

**Chief Executive and
Director of Environment: John Wood
Hertfordshire County Council**

28 November 2014

Dear Sir/Madam,

**ST ALBANS CITY AND DISTRICT DRAFT STRATEGIC LOCAL PLAN
CONSULTATION 2014**

Thank you for consulting the County Council in relation to the above. The following represents officer comments from services within the Environment Department only.

Highways

1.0 SLP 13 a) East Hemel Hempstead (North) Broad Location – Mixed Use & SLB 13 b) East Hemel Hempstead (South) Broad Location - Mixed Use

The Infrastructure Delivery Schedule (IDP) included as Appendix 5 to the SLP indicates the importance of infrastructure planning to support new development. It is acknowledged that the current list is not intended to be exhaustive and that the process of implementation will constantly be responding to local circumstances, utilising new avenues and drivers to prioritise spending over the life of the SLP. However, the current list, drawn from responses and negotiations with service providers, requires further detail which will only be possible with the preparation of a specific transport master planning.

The IDP includes references to the Hemel Hempstead North East Relief Road (NERR) stating that completion of the existing relief road is required to relieve

congestion and support new development in this area. A growth related capacity study led by Dacorum Borough Council with support from HCC and LEP is programmed to commence 2015/16. The work aims to cover current and future growth related pressures east of Hemel Hempstead.

Dacorum Borough Council has also identified growth across the east of Hemel Hempstead which will place additional pressure on the surrounding local road network. The impact of DBC growth in traffic has been modelled and without the SLP proposal leads to considerable pressure at several locations in the area. Further growth in this area without planned mitigation will add greater pressure.

The site is on the outskirts of Hemel Hempstead and although the town offers a wide range of employment and local facilities, the distance between town, neighbourhood centres and the development will require significant measures to support the principles of sustainable development.

Therefore in summary, both major developments of this scale, circa 1,000 & 1500 dwellings, 2FE primary schools, and possibility of secondary schools will lead to significant impact on the road network. It is assumed the East Hemel Hempstead Area Action Plan will identify and include the appropriate infrastructure and delivery mechanism to support this level of growth. The appropriate infrastructure will be supported with evidence from traffic modelling which includes other planned growth identified across Hemel Hempstead and neighbouring districts. The plan must also include essential sustainable transport planning to fully integrate the development into the existing area and provide links to wider infrastructure.

2.0 Policy SLP 13 c) North West Harpenden Broad Location – Principally Housing

The site is located adjacent to A1081 Luton Road which forms part of the county's primary distributor network. Due to the classification of the road it is important to minimise the impact of an additional access on the function of the route. However, without any obvious points of access from Bloomfield Road (as it is residential without an access point to the site) and the predominately rural nature of both Cooters End Lane and Ambrose Lane there may be a case for introducing an additional arm to the existing junction with Roundwood Lane, thereby changing the existing three arm signal controlled junction into a four arm cross road junction.

A main vehicle access to a development of this scale from either Cooters End Lane or Ambrose Lane is likely to change the character of the roads.

Although there are several bus routes that run along Luton Road, with regular services Mon-Fri including evenings, although less frequent at weekends, for a proposal of this scale it will require the preparation of a sustainable transport strategy.

The local road network currently suffers with congestion, particularly in the town centre. The impact from a development of this scale must be fully assessed. It would be appropriate to develop a traffic model which can combine the development traffic with other growth from across the district (as listed in Part A of the spatial strategy) and neighbouring areas to establish appropriate mitigation and additional infrastructure. An access strategy should also consider measures to discourage additional traffic using alternative inappropriate routes.

The local highway authority is not aware of any detailed proposals to develop this area and we have not been involved in any dialogue with representatives from the site.

3.0 SLP 13 d) East St Albans (Oaklands) Broad Location - Principally Housing

The site is located between Sandpit Lane and A1057 Hatfield Road. The A1057 forms part of the County's primary distributor network. Due to the classification of the road it is important to minimise the impact of an additional access on the function of the route.

There are regular bus services along Hatfield Road with evening and Sunday provision. Good pedestrian/cycle links will need to be provided through the site to Hatfield Road in order to access these services. It is important that further development of this site does not worsen the existing congestion on Hatfield Road as this is an important bus route. Other measures to improve and encourage sustainable transport should be an integral part of a future development.

Previous proposals on this site have included a link road which would run through the site to provide an access spine road and connect Hatfield Road to Sandpit Lane.

It is not clear from the information provided how/where the site will connect to the existing network or whether all or part of the link road is to be provided as part of this proposal. Clearly, a development of this scale (up to 1000 homes) will require major road and junction improvements. There are significant traffic implications associated with the proposal and the introduction of a link road between Hatfield Road and Sandpit Lane. To date the local highway authority are not aware of any feasibility work that has been carried out to predict how the proposal will impact and link onto the existing road network (including network capacity).

A thorough sustainable transport strategy will be required. Sandpit Lane is not well served in relation to bus services and the proposal will need to be designed to accommodate passenger transport.

Bearing in mind the scale of the proposal and the lack of any information associated with sustainability and access arrangement it is difficult for the local highway authority to comment in any more detail.

A full assessment of the accessibility of the site will be required to establish the necessary sustainable transport measures that can be introduced to ensure the facilities in both St Albans and Hatfield and beyond are available to those who cannot or choose not to use a car.

The local road network currently suffers with congestion, particularly in the approaches to the town centres of St Albans and Hatfield. The impact the development will have on the capacity and operation of the road network must be fully assessed. It would be appropriate to develop a traffic model which can combine the development traffic with other growth from across the district (as listed in Part A of the spatial strategy) and neighbouring areas. This process will enable appropriate assessment, mitigation design and inform the IDP.

Summary

Due to the scale and location of the broad locations listed in the Spatial Strategy (Part b) there is a requirement for traffic modelling to be carried out to allow the highway authority to fully assess the impact of the proposals on the local road network. There is also a requirement to prepare sustainable transport studies which will also lead to specific mitigation. The modelling and sustainable transport planning will help identify and design specific infrastructure which can inform the supporting IDP. At this stage the highway authority are not aware of this level of detail being prepared for any of the sites.

Historic Environment

Policy SLP 3

The Policy commitment that "*The unique character of the District's historic environment, which greatly contributes to a distinctive local 'sense of place' and a high quality of life for residents, businesses and stakeholders, will be conserved, enhanced and enjoyed. This includes both designated and undesignated heritage assets which all contribute to this unique character*" is welcomed.

Recommend that this part is changed to "*....will be conserved and enhanced*". Suggest that "*and enjoyed*" is placed in the explanatory text.

Currently unknown Heritage Assets are likely to be found as part of archaeological investigations both as part of the planning process and through other activities. Some of these may have a high significance and be worthy of designation. The NPPF paragraph 169 says "*Local planning authorities should have up-to-date evidence about the historic environment in their area and use it to assess the significance of heritage assets and the contribution they make to their environment. They should also use it to predict the*

likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.... "

The Policy should therefore provide for as yet unidentified heritage assets.

The Policy notes that as well as designated assets, "*Heritage assets also include the District's high level of above and below ground archaeology, locally listed buildings; and locally listed historic parks and gardens*".

The St Albans Urban Archaeological Database (UAD) and the Herts Historic Environment Record (HER) record the known heritage assets in the county (NPPF paragraph 169 "...*Local planning authorities should either maintain or have access to a historic environment record*"). These consist of designated and undesignated heritage assets. The latter includes archaeological remains and historic buildings and historic landscapes which are not Listed or Locally Listed. As such these are a sub-set of heritage assets and the current wording may therefore imply those which are not currently Listed or Locally Listed are not significant. This is important for heritage assets with archaeological interest because NPPF paragraph 139 says "*Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets*".

Recommend that the sentence "*Heritage assets will be conserved in a manner appropriate to their significance. Great weight will be given to the conservation of the District's designated heritage assets, which include Scheduled Monuments, Listed Buildings, Registered Parks and Gardens and Conservation Areas*" is changed to "***Heritage assets will be conserved in a manner appropriate to their significance. Great weight will be given to the conservation of the District's designated heritage assets, which include Scheduled Monuments, Listed Buildings, Registered Parks and Gardens and Conservation Areas, also non-designated heritage assets with archaeological interest demonstrably equivalent to Scheduled Monuments***".

Recommend that the Policy should also include reference to heritage assets recorded on the UAD and HER as well as designated and Locally Listed ones.

The meaning of the phrase "*Intelligently managed change*" in relation to heritage assets should be made clear.

Policy SLP 21

The Policy intention to include increased museum facilities for the District is welcomed.

The NPPF paragraph 141 says: Local planning authorities should make information about the significance of the historic environment gathered as part of plan-making or development management publicly accessible. They should also require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner

proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible.*30

* NPPG Footnote 30 defines this as: Copies of evidence should be deposited with the relevant Historic Environment Record, and any archives with a local museum or other public depository.'

The latter requirement is particularly important in the context of the draft Strategic Local Plan, given that the archaeological investigations carried out as part of the NPPF are likely to produce significant amounts of archaeological finds and site records that will require archiving '*in the appropriate local museum or other public depository*'.

Strongly recommend the addition of a further requirement within this section which reflects the NPPF guidance, and ensures that funding is secured for the deposition, storage, care and accessibility of archaeological archives, via Section 106 Agreements or Planning Conditions.

Policy SLP 22

The Policy intention to emphasise the unique character of the Abbey and its setting is welcomed.

Policy SLP 23

The Policy intention to consider the impact of the Visitor Economy on the historic environment.

Building Futures

General comment

On the whole, the draft SLP would promote the delivery of high quality sustainable design and place making in an integrated and well-thought out manner. The emphasis upon high quality and sustainable design via draft policies SLP4 and SLP29 is particularly welcomed. The following comments are made to help strengthen these policies and further the aims of creating sustainable and well-designed schemes.

SLP4 – Urban Design

The policy text and preamble to draft policy SLP4 strongly present a lucid and coherent set of aims and requirements to guide new development. However, it is suggested that the policy text be amended to make further reference to:

- Balancing the need for safe and secure design with creating welcoming and attractive buildings and spaces.
- Inclusive design, catering for all members of society, of both buildings and the public realm

- Layouts that encourage greater levels of walking and cycling and enjoyment of public open space for informal recreation and leisure.
- Ensuring that buildings and internal and external spaces within new development are resilient to current and future environmental risks (e.g. overheating and extreme weather events associated with climate change; detrimental impacts to health and amenity from air/noise pollution)

SLP 29 – Sustainable Design and Construction

Under this draft policy, applications for development of 50 or more dwellings or 1000 sq m of non-residential floorspace would be required to provide a 'sustainability checklist based statement'. It is strongly recommended that the *Building Futures Sustainable Design Toolkit* is specifically referred to here as the mechanism by which SACDC and applicants can create such a statement in order to understand, demonstrate and assess how the principles of sustainable design and construction have been implemented.

To be consistent with the approach taken in draft policy SLP29, it may be advisable to briefly outline the key principles of sustainable design and construction the policy refers to. The principles enshrined within the questions set out in the *Building Futures Sustainable Design Toolkit* would provide a comprehensive and coherent framework, and should SACDC choose to utilise the *Building Futures Sustainable Design Toolkit* as recommended above, would help create clarity and consistency of approach throughout planning and design discussions.

Broad location policies (SLP13 a-d and SLP14)

Given the significance of these sites and locations, and in line with NPPF paragraph 62, it is recommended that the Hertfordshire Design Review Panel (HDRP) is utilised at the earliest possible stage to inform AAPs, master plans and planning briefs for the broad locations (and sites), should they be taken forward following consultation and future examination of the SLP. The support offered by the HDRP can be tailored to SACDC's needs and those of other stakeholders. For instance, it could take the form of traditional design review (i.e. a panel review) or more collaborative and enabling exercises (e.g. workshops) that explore in greater detail the possibilities and opportunities those locations and sites offer.

Landscape

1 Introduction

Have we missed anything?

Collaborative Planning

With regards joint work and evidence bases, there is no reference to Hertfordshire Landscape Character Assessment carried out between 2000 and 2005. (NPPF paragraphs 158 and 165 establish a requirement for up to date and relevant evidence about environmental characteristics.)

Comments

Sustainable Community Strategy for St Albans City and District

The natural environment (landscape, historic environment and biodiversity) can help deliver each of the four key priorities for the District.

2 SADC Context

Have we missed anything?

Introduction

At the local level there is the Hertfordshire Landscape Character Assessment carried out between 2000 and 2005. (NPPF paragraphs 158 and 165 establish a requirement for up to date and relevant evidence about environmental characteristics.)

The Sub Regional Context

Paragraph 2.11 refers to countryside areas. These areas have recently been updated by Natural England and are called National Character Areas (NCAs). Each area profile includes “*a description of the natural and cultural features that shape our landscapes, how the landscape has changed over time, the current key drivers for ongoing change, and a broad analysis of each areas characteristics and ecosystem services. Statements of Environmental Opportunity (SEOs) are suggested, which draw on this integrated information. The SEOs offer guidance on the critical issues, which could help to achieve sustainable growth and a more secure environmental future.*” (NE website)

Comments

Introduction

Paragraph 2.1 identifies the special character of the district and refers to the “*City, towns, villages and Green Belt countryside.*” This is reflective of the holistic definition of landscape as promoted within the European Landscape Convention (ELC) (ratified by the UK Government in 2000). The ELC recognises landscape as “*our living natural and cultural heritage, be it ordinary or outstanding, urban or rural, on land or in water*”

With regards the ‘Environmental Capacity of the District,’ the emphasis on the importance of the non-urban area , for example in terms of the ecosystems services they provide and their contribution to the local economy, are important drivers for the conservation and enhancement of landscape

character and biodiversity. This is reflected in paragraph 6.8.6 of the capacity study that references the Hertfordshire Landscape Character Assessment and states that “Close attention should be paid to existing landscape character and the underlying ecosystems that support those landscapes when working towards a more sustainable approach to land use planning and management.”

Point of clarification: Do the non-urban areas include the Green Belt, or are they areas *outside* urban areas and Green Belt?

3 LP Vision & Objectives

Have we missed anything?

The feeling of remoteness and tranquillity is a perceptual aspect of the landscape that should be protected wherever possible. Tranquillity provides relief from urban areas and benefits health and well-being, protecting any pockets of tranquillity is especially important in such a highly developed area.

Comments

The Vision & Objectives are fully supported, in particular where they acknowledge the role of landscape in the delivery of local character and ‘sense of place’, Green Infrastructure, high quality design, public health, a thriving economy, climate change mitigation and adaptation and the provision of ecosystem services. The production of local food, renewing the relationship between people and the landscape, has the potential to have a significant positive impact upon landscape character and quality, and the management of habitats.

There is some concern for the use of terms such as ‘retain’ and ‘preserve’ that suggest keeping something *as it is in perpetuity*. With regards landscapes, they have and will continue to change as a result of planning and management activities. Landscapes are therefore referred to in terms of their ‘conservation’ and ‘enhancement’ that implies *action for positive change*.

4 Strategy

Policy SLP1 – Spatial Strategy and Development Strategy

Comments

The General Distribution of Development

With ref to paragraph 4.3, there is strong concern that the evidence base should include landscape and visual impact assessment and the potential for effective mitigation, ensuring that development has minimal impact upon landscape character and visual amenity.

5 Our Special Character

Policy SLP2 – Metropolitan Green Belt

Comments

Introduction

There is concern that the content of this chapter is slightly confused. It is difficult to know how best to address issues of landscape and townscape character, historic environment and biodiversity as they are interrelated. The Draft SLP appears to split these issues between Chapter 5 'Our Special Character' and Chapter 10 'A Healthy & Strong Environment', with the addition of Green Belt and urban design. It is suggested there may be scope for a separate landscape and townscape character focused chapter.

With regards paragraph 5.3, it is suggested that, it is not the Green Belt (GB) that has helped shaped the character of the District, it is the variety of landscapes within the GB, each with its own distinct character, that has helped shaped the District.

Proactive Management of the Green Belt

It is agreed that the Green Belt is (GB) of great importance in safeguarding the countryside. In addition to this, a landscape character based approach to managing change ensures that wherever development is necessary (within or beyond the GB) it does not cause unacceptable harm to landscape character and quality. This is in line with Natural England's mantra that "*All Landscapes Matter.*"

Policy SLP3 – Historic Environment and Townscape Character

Fully support inclusion of landscape as an historic asset.

Policy SLP4 – Urban Design

Design for the 21st Century

With regards paragraph 5.20 Building Futures also looks at landscape and biodiversity. It is appreciated that these aspects are addressed in Chapter 10 'A Healthy & Strong Environment', however it is suggested that in identifying opportunities and constraints there should be reference to the protection of existing landscape features, such as trees, that can help maintain a reference to the past as well as provide instant benefits for amenity and biodiversity.

Where trees and hedgerows are present on a site, developers should submit details in line with 'BS 5837:2012 Trees in relation to design demolition and construction.' 'The Hedgerow Regulations' should also be adhered to.

Development schemes should include comprehensive landscape schemes with hard and soft landscape details, specifications and maintenance schedules.

Landscape and Visual Impact Assessments and mitigation strategies are required in line with best practice guidance 'Guidelines for Landscape and Visual Impact assessment' (Third Edition).

Policy SLP4 – Urban Design

Networks of Green Infrastructure throughout the urban environment are fundamental in creating sustainable places. GI contributes to climate change mitigation and adaptation, including renewable energy and sustainable drainage, and the provision of ecosystem services.

With regards public art, it should not only be considered as an installation of art in an appropriate location it should be considered as an “approach.” Wherever possible, artists should be employed from the inception of a project or development scheme, they can bring a fresh and innovative perspective to place shaping and problem solving, and can be highly skilled in engaging with local communities.

6 Mixed & Balanced Communities

SLP 12 – Gypsies, Travellers and Travelling Showpeople

Support reference to policies for the protection, conservation and enhancement of the natural environment. Potential Sites should be subject landscape and visual impact assessment.

SLP 13 (a) and (b) - East Hemel Hempstead (north and south)

It is appreciated that development at these locations will be guided through an East Hemel Hempstead Area Action Plan, and a series of detailed planning brief and Masterplans. At this stage it is encouraged to consider the following landscape proposals:

- Green Infrastructure approach, integration of movement corridors, sustainable drainage, and open space and habitat networks
- Open space and parking courtyards generous enough to accommodate mature large-scale native trees soften views of the urban area
- Trees and structure planting in open space and semi-private areas such as parking courtyards to regulate micro climate
- Open space networks that recognise areas that may not suitable for public access but provide valuable wildlife habitats and habitat links
- The provision of a tree within each private garden
- Shared surfaces that utilise colour, texture and strategic tree planting to provide passive traffic calming
- Provide opportunities for homeowners to harvest rainwater for non-potable uses e.g. water butts, rain gardens, and green roofs.
- Utilise permeable paving in low traffic areas (secondary and tertiary routes, car parking areas)

- Utilise landscape to improve quality of life and public health, complementing and supporting activities within public/commercial buildings

SLP 13 (c) – North West Harpenden

It is encouraged to consider the following landscape proposals:

- Green Infrastructure approach, integration of movement corridors, sustainable drainage, and open space and habitat networks
- Open space and parking courtyards generous enough to accommodate mature large-scale native trees soften views of the urban area
- Trees and structure planting in open space and semi-private areas such as parking courtyards to regulate micro climate
- Open space networks that recognise areas that may not suitable for public access but provide valuable wildlife habitats and habitat links
- The provision of a tree within each private garden
- Shared surfaces that utilise colour, texture and strategic tree planting to provide passive traffic calming
- Provide opportunities for homeowners to harvest rainwater for non-potable uses e.g. water butts, rain gardens, and green roofs.
- Utilise permeable paving in low traffic areas (secondary and tertiary routes, car parking areas)
- Utilise landscape to improve quality of life and public health, complementing and supporting activities within public/commercial buildings

With regards landscape screening, shelterbelts can provide effective visual mitigation however can be poorly managed and unproductive, therefore if this approach is favoured, it is important to ensure that mechanisms for their long term management and vitality are put in place early on, for example could they provide a useful community and/or wildlife resource.

SLP 13 (d) – East St Albans

The location appears to occupy a broad elevated ridgeline, with relatively steep slopes, running parallel to Sandpit Lane. Landscape and visual mitigation measures may include keeping the top of the elevated area free from development, or siting large-scale native tree planting along the ridge line to reduce the impact of the development.

It is encouraged to consider the following landscape proposals:

- Green Infrastructure approach, integration of movement corridors, sustainable drainage, and open space and habitat networks
- Open space and parking courtyards generous enough to accommodate mature large-scale native trees soften views of the urban area
- Trees and structure planting in open space and semi-private areas such as parking courtyards to regulate micro climate
- Open space networks that recognise areas that may not suitable for public access but provide valuable wildlife habitats and habitat links

- The provision of a tree within each private garden
- Shared surfaces that utilise colour, texture and strategic tree planting to provide passive traffic calming
- Provide opportunities for homeowners to harvest rainwater for non-potable uses e.g. water butts, rain gardens, and green roofs.
- Utilise permeable paving in low traffic areas (secondary and tertiary routes, car parking areas)
- Utilise landscape to improve quality of life and public health, complementing and supporting activities within public/commercial buildings

7 A Thriving Economy

Policy SLP 15 - Economic Prosperity and Employment

Economic Prosperity and Employment

Fully support acknowledgement of natural environment as a significant driver for the local economy.

In line with intentions of 'Vision and Objectives,' measures that encourage local food production and contribute to the rural economy, renewing the relationship between people and the landscape, are fully supported.

Policy SLP 16 - BRE, Bricket Wood

The provision of comprehensive landscape and visual mitigation measures, such as a comprehensive landscape scheme, could help reduce the impact upon the Green Belt.

8 Celebration of Our Culture

Policy SLP 20 – Creating Attractive and Vibrant Centres

Fully support reference to landscape enhancements.

With regards lighting, light pollution is a significant public health issue and should be reduced wherever possible. Where lighting is necessary strict controls should ensure that they are designed to avoid light spill and are operated only where and when absolutely necessary.

10 A Healthy & Strong Environment

Policy SLP 26 – Natural Environment

Natural Environment

There is no reference to Hertfordshire's Local Nature Partnership (LNP) whose priorities reflect the strategic objectives of the SLP and are summarised as:

- Healthy and resilient ecological networks
- Health and well-being through the natural environment
- Sustainable economic growth through the natural environment and water for people and wildlife.

The LNP has produced ecological network mapping for the county, furthermore there is strong potential for close working between the LNP and the Local Enterprise Partnership, especially in the delivery of Green Infrastructure.

Is there scope for any locally designated landscape areas that are valued by local communities?

The cumulative negative impact on landscape, visual amenity, and wildlife, as a result of the incremental loss of gardens to development is a strong concern, especially in the context of creating compact urban areas. Furthermore the loss of front gardens to driveways raises similar concerns.

Policy SLP 27 – Green Infrastructure

The landscape profession is a leading authority on green infrastructure and this is reflected in the Landscape Institutes position statement “*Green Infrastructure An integrated approach to land use.*” Green Infrastructure is described as the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect villages, towns and cities. Individually these elements are GI assets (e.g. country parks, lakes, woodlands, green roofs, street trees etc.), and the roles that these assets play are GI functions (e.g. ecosystem services).

GI is not only specific areas (or assets) but it is an approach to delivering a wide range of benefits from sustainable transport links, sustainable drainage systems (SuDS), and climate change mitigation and adaptation.

In addition to the assets listed within the policy, elements such as community facilities, allotments, small holdings and orchards have a vital role to play in the delivery of GI.

Policy SLP 28 – Renewable and Low Carbon Energy

There is concern that there should be greater emphasis on ensuring that renewable energy proposals do not result in unacceptable landscape *and visual* impacts. Identifying opportunity areas should be based on an understanding of the landscapes ability to accommodate the type of proposed change without causing unacceptable harm to landscape character or visual amenity (utilising the local Landscape Character Assessment as an evidence base).

Policy SLP 29 – Sustainable Design and Construction

Support reference to Building Futures.

Minerals and Waste

Minerals

The Minerals Planning Authority aims to protect mineral resources from sterilisation, and regard should be given to the issue of minerals sterilisation and the need to recover the mineral prior to any development. Minerals Policy 5 (Mineral Sterilisation) of the adopted Minerals Local Plan (2007) encourages prior extraction to avoid mineral sterilisation from other built development. This should be a consideration on sites where any significant mineral resource would be sterilised.

Given that this is the first part of the plan which only identifies the broad location for housing and mixed use development, the following comments are provided in relation to the broad locations. Should other sites come forward in addition to the broad locations identified St Albans District Council should take into account mineral sterilisation issues when identifying further sites and detailed site boundaries for the Detailed Local Plan DPD (DLP).

- East of St. Albans (Oaklands) is located within the sand and gravel belt. The county council has provided comments previously in relation to previous applications in this area. However, previous comments related to a smaller area and previously developed land, if the wider broad location were to be built upon the county council would wish to be consulted further to ensure that the issue of mineral sterilisation is fully considered and this acknowledged within the plan.
- North West Harpenden is not located within the sand and gravel belt and the BGS geological maps indicate that this area is 'generally barren'.
- East of Hemel Hempstead (south) and East of Hemel Hempstead (north) are also not located in sand and gravel belt and BGS geological maps indicate that this area is 'generally barren'.

It should also be noted that the adopted Minerals Local Plan (2007) identifies Preferred Area 1 (Land at BAe) which falls partly within St. Albans District, this area has yet to be worked and therefore any non-mineral development on this area would raise sterilisation issues.

In order to avoid an objection by the county council at the planning application stage regarding development on potentially mineral bearing land, it should be demonstrated by the applicant that the land in question does not contain potentially workable mineral deposits, or the mineral cannot be extracted in advance and there is an overriding need for the development.

In addition the Mineral Consultation Areas (MCA) SPD, adopted in January 2008 sets out the process for any planning application for non-mineral

development within the set MCA area which would be subject to the consultation procedures with the county council (other than applications for 'excluded development' as set out in the SPD).

Waste

The National Planning Policy for Waste (published October 2014), encourages waste planning authorities and district/boroughs to work collaboratively to provide a suitable network of facilities to deliver sustainable waste management. This should be achieved through the Duty to Cooperate. In addition, other key aspects of the policy are: the proximity principle; which encourages local responsibility for the waste to be treated or disposed of as near to the place of origin, the design and layout of new development complement sustainable waste management and the need for all authorities to drive waste up the hierarchy.

The anticipated amount of growth within the plan period will produce an increased amount of waste. The County Council as Waste Planning and Disposal Authority, encourages districts and boroughs to promote the sustainable management of waste generated by new development by having regard to this and by also encouraging the re-use of unavoidable waste where possible and the use of recycled materials where appropriate to the construction.

The National Planning Practice Guidance (NPPG) is updated regularly and most recently has been amended to include waste issues. The NPPG sets out how "non-waste" planning authorities can help to drive waste up the hierarchy. This re-iterates Article 4 (Waste Hierarchy) of the European Union Waste Framework Directive (2008/98/EC) and reflects the policy in the National Planning Policy for Waste (October 2014). The NPPG states that *'movement of waste up the Waste Hierarchy is not just the responsibility of waste planning authorities. All local planning authorities, to the extent appropriate to their responsibilities, should look to drive waste management up the hierarchy'*.

The NPPG also states that *'while such authorities may not have the planning functions in respect of the preparation of Local Plans covering waste, or dealing directly with waste planning applications, they must have regard to national planning policy for waste and are expected to help deliver the Waste Hierarchy. This might include:*

- *Working constructively with waste planning authorities to identify and protect those sites needed for waste management facilities. Local planning authorities should consider the need for waste management alongside other spatial planning objectives*
- *Integrating local waste management opportunities in proposed new development*

- *Considering, where relevant, the likely impact of proposed, non-waste related development on existing waste management sites and on sites and areas allocated for waste management*
- *Promoting sound management of waste from any proposed development, such as encouraging on-site management of waste where this is appropriate, or including a planning condition to encourage or require the developer to set out how waste arising from the development is to be dealt with*
- *Including a planning condition promoting sustainable design of any proposed development through the use of recycled products, recovery of on-site material and the provision of facilities for the storage and regular collection of waste*
- *Ensuring that their collections of household and similar waste are organised so as to help towards achieving the higher levels of the waste hierarchy’.*

The Waste Local Plan, Policy 12 (Sustainable Design, Construction and Demolition) of the Waste Core Strategy and Development Management Policies requires similar elements with particular regard for all relevant construction projects to be supported by a Site Waste Management Plan.

The County Council notes that the broad locations identified at East Hemel Hempstead (south and north) will be adjacent to identified Employment Land Area of Search (ELAS 168, ELAS 006) within the Waste Site Allocations document (July 2014) and falls within Area of Search A for LAC Organic Waste Recovery Facility. The County Council encourages the joint approach for the Area Action Plan but notes that the following will need to be considered as part of the overall approach.

- It should be noted that the nearest Household Waste Recycling Centre (HWRC) is located in Dacorum (Cupid Green). Any new development located in St. Albans broad location of East of Hemel Hempstead would be using Cupid Green as the nearest Household Waste Recycling Centre (HWRC) in line with the proximity principle.
- The County Council will seek to ensure that the existing employment land areas would continue to provide a potential contribution for waste sites.

It should also be noted that East of St. Albans is located near to ELAS122 and falls within Area of Search C for Local Authority Collected (LAC) waste within the Waste Site Allocations document and future development in this area will need to take account of the Waste Local Plan.

In terms of employment land, the county council supports Policy SLP15 of the Local Plan stating that existing employment sites should be retained. The Waste Site Allocation identifies several ELAS sites of B2, B8 uses in St. Albans which are suitable for waste, the Council would wish to see these

areas protected and notes that employment sites will be allocated in the DLP. The NPPG also clearly states that Local Planning Authorities should be integrating the need for waste management with other spatial planning aspects in plan preparation, including opportunities and re-use of previously-developed land, including industrial land, for new waste facilities and when reviewing employment land to consider the needs of waste management before releasing land for other development.

It is noted that amendments to the Green Belt boundary and detailed boundaries for the broad locations will be defined within subsequent documents; however the county council would still seek the removal of the site allocations Roehyde (AS036) from the Green Belt following the adoption of the Waste Site Allocations document.

Ecology

I understand you have received comments direct from Hertfordshire Ecology.

Yours sincerely,

Paul Donovan
Environment Department
Hertfordshire County Council