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Project: **Highways Agency Spatial Planning Arrangement** Job No: **60295882 SH038.001**  
Subject: **St Albans Draft Strategic Local Plan - Review**  
Prepared by: **Jane Salmon** Date: **7<sup>th</sup> November 2014**  
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Approved by:

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## 1. Introduction

- 1.1 AECOM have been commissioned, by the HA, to undertake a review of the St Albans City and District Council (SACDC) Draft Strategic Local Plan (SLP). The Strategic Local Plan sets out the long term planning strategy for the District and is currently open for consultation. This will eventually replace the current Local Plan which was adopted in 1994 and aspects of which are still in use today in making planning decisions.
- 1.2 Further Development Plan Documents still to be produced by the council are a Detailed Local Plan (DLP) which will include more detailed site allocations and development control policies, and an East Hemel Hempstead Area Action Plan which will be prepared jointly with Dacorum Borough Council. Together with the SLP, these will form SACDC's new Local Plan.
- 1.3 The district is well located with regard to the Strategic Road Network, including the M1, the A1(M) and the M25. The M1 runs north-south through the western part of the district and the A1 (M) runs north-south to the east of the district. The M25 runs broadly east-west across the southern part of the district. The district is also well connected by rail, with London Midland services running between St Albans Abbey and Watford Junction and Thameslink services running via St Albans and Harpenden. A map is contained in **Appendix A** which shows the district's location in relation to the strategic transport networks.
- 1.4 As part of the consultation exercise, the draft SLP includes ten questions which it invites members of the public, and other bodies, to answer. These can be found in **Appendix B**. These questions seek respondents opinion on whether they 'strongly agree', 'agree', 'disagree', 'strongly disagree' or 'don't know' on the following planning themes:
  - Economic Development;
  - Housing Need;
  - Affordable Housing and Housing Mix/Type;
  - Housing Development Options;
  - "Exceptional Circumstances" for Change to Green Belt Boundaries;
  - Green Belt Review and Development Strategy;
  - Development Sites;
  - Housing Density;
  - Infrastructure; and
  - Other Policies

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- 1.5 AECOM consider that it is not appropriate or necessary for the HA to respond to the majority of these questions. However, the questions deemed to require a response from the HA are considered in the conclusion.
- 1.6 This technical note considers the draft SLP's policies and proposals, with **section 2** devoted to the quantum and location of planned housing and employment development, **section 3** devoted to transport infrastructure proposals and **section 4** setting out AECOM's own high-level assessment of potential traffic impact. **Section 5** provides a conclusion incorporating a suggested response to the more relevant consultation questions.
- 1.7 Throughout the note, a number of key recommendations are made which are underlined for ease of reference.

## 2. Proposed Development

- 2.1 SACDC have highlighted the planning constraints faced by the district due to over 80% of the land being Green Belt. The SLP response to these pressures is to:
  - *Maximise development opportunities in existing urban areas, where consistent with good design and employment/economic development needs;*
  - *Contain the spread of urban development by continued application of Green Belt policy to keep green field land permanently open;*
  - *Prioritise development opportunities that give greatest economic, social and environmental benefits overall; and*
  - *Minimising the changes to Green Belt boundaries necessary to achieve an appropriate balance between seeking to meet development need and consistency with achieving overall sustainable development.*
- 2.2 Proposed development is predominantly housing and mixed use development.

### **Housing**

- 2.3 SACDC have commissioned an independent study to identify the future level of housing that is required. The outcome of this is that 436 to 747 additional dwellings are required per year over the plan period. The draft SLP is based on a projection of 436 houses per year therefore at the bottom end of the range (Policy SLP8). This equates to a minimum total of 8,720 dwellings over the 20 year planning period. SACDC argue that this is considered to be an appropriate target because it takes account of longer term estimates of migration. What is uncertain is whether contingency planning has been considered by the council if it was at a later point in time required to deliver more houses, and this could require the council to identify more sites than those put forward in the draft SLP.
- 2.4 In accordance with the first constraint objective listed above, SACDC consider that development will be accommodated as far as possible within existing urban areas where residents will benefit from existing transport networks and access to facilities. This means that urban areas of St Albans, Harpenden and London Colney are the main foci for new development. Development will be constrained in smaller villages and the Green Belt settlements as they are less well connected, and therefore less sustainable. However due to development constraints, some large developments are proposed in the Green Belt.

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- 2.5 The table below sets out proposals for approximately 4,625 dwellings in urban areas, including windfall allocation and those which have already been completed since April 2011. An additional 4,500 are proposed at larger sites within the Green Belt.

**Table 1: How Residential development targets will be met over the plan period**

Source	Number of Dwellings	Percentage of Overall Delivery
Completions from 1 April 2011 to 1 April 2014	1,075	11.8%
Urban/Non-Green Belt Capacity (identified)	Minimum of 1,750 (estimated)	19.2%
Urban/Non-Green Belt Capacity (windfall)	Minimum of 1,800 (estimated)	19.7%
Large scale Green Belt Broad Locations Includes potential for flexibility in scale and timing of development at these locations	Up to 4,000 (estimated)	43.8%
Small scale greenfield Green Belt supported by local communities through DLP, or Neighbourhood Plan process, including exceptions policies for affordable housing	500 (estimated)	5.5%
<b>Total</b>	<b>Up to 9,125</b>	<b>100%</b> <b>(on 9,125 base)</b>

- 2.6 The draft SLP identifies a notable proportion of dwellings as windfall. This comprises of development which has not yet been identified, and may include redevelopment of inner-urban areas, conversion of a house into multiple apartments and so-called ‘garden grabbing’ type developments. NPPF paragraph 48 indicates that local authorities can make allowance for windfall sites in their five-year supply of housing if there is compelling evidence that such sites have consistently become available. It would also presumably need to be demonstrated that historic trends can be maintained in the future.
- 2.7 This may not be an immediate concern for the HA (and others may be better placed to interrogate the housing assumptions in their responses to the plan) however if at a later point in time it was determined that such a level of windfall allocation was not appropriate, the council may instead have to allocate a proportion of housing to other sites, and these sites may be in fewer and hence large locations, possibly close to the SRN. The HA should be mindful of this possible risk and AECOM suggests that through further discussions regarding the preparation of a transport evidence base (see later discussion) the HA may wish to enquire the assumption and/or potentially request a sensitivity test which assumes a reduced windfall and additional sites / higher allocations to other sites, if the proposed windfall allocation is later determined as being too high.
- 2.8 The draft SLP proposes that 4,000 dwellings are located across four ‘broad locations’ identified by an independent study. The study, commissioned by SACDC, had identified eight broad areas which were considered to be most suitable for development but within the Metropolitan Green Belt

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because they contributed the least to the five Green Belt purposes defined by the NPPF (paragraph 80):

- *To check the unrestricted sprawl of large built-up areas;*
- *To prevent neighbouring towns from merging into one another;*
- *To assist in safeguarding the countryside from encroachment;*
- *To preserve the setting and special character of historic towns; and*
- *To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

2.9 These eight areas were reviewed against economic, social and environmental factors to determine their overall suitability for development, and were ranked accordingly by the SACDC. For example, sites which benefited from existing infrastructure, and were least detrimental to the environment and landscape ranked the highest. Consequently, the top four ranking sites have been included in the SLP, while the bottom four have not. Two of these are mixed use developments, and two are housing led. The four Broad Locations are detailed under Policy SLP1 and are summarised in the table below.

**Table 2: Proposed Broad Locations of Development**

Site	Dwellings	Proposals	Infrastructure	Timing	Nearest SRN junctions
East of Hemel Hempstead (North) – Mixed use	1,500	Housing, Two primary schools, Secondary school, Employment, Community facilities, Transport network upgrades and improvements	East Hemel Hempstead Area Action Plan will guide development in this area including details of infrastructure required	From 2021	M1 J7/8, A414
East of Hemel Hempstead (South) – Mixed use	1,000				
East of St Albans – Principally Housing	1,000	Housing, Primary school, potential expansion of existing schools, improved facilities at Oaklands College, improved footpaths and cycle ways, Community facilities, Transport network upgrades and improvements	Improvements to accesses to Hatfield Road and Sandpit Lane. Planning Brief will be detailed in the Detailed Local Plan (DLP)	From 2019	A1(M) J3 and J4
North West of Harpenden – Principally Housing	500	Housing, Community facilities, Transport network upgrades and improvements	Possible requirement for a related primary school site. Planning Brief will be detailed in DLP	From 2019	M1 J9, J10 and J10a

2.10 Development at East of Hemel Hempstead is expected to come forward post 2021. Policy SLP13b suggests that the earliest release on the southern site will be 2026, and that both sites will include provision of reserve land for longer term housing development post 2031.

2.11 The rejected sites were to the North of St Albans (900 dwellings), North East of Harpenden (750 dwellings), London Colney (300 dwellings) and Chiswell Green (400 dwellings).

2.12 AECOM cannot locate the transport evidence base associated with the draft SLP. Given the stage that SACDC appear to be at in preparing the plan, it is possible that the evidence base is still in development and the council is awaiting views on their currently proposed quantum and spatial allocation of development. There is a risk however that sites have been chosen without a robust

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evidence base to identify the transport effects. It may be the case that there has not been the opportunity for transport evidence to be used to support the choices being made with regard to where development is located.

- 2.13 In the Development Site and Strategy Options Evaluation Technical Report (SACDC, October 2014) it is noted that the highway implications of growth at East Hemel Hempstead on the A414 and M1 will need to be considered. The HA should welcome this however it is unclear if any recent assessment work has been undertaken. Review work undertaken by AECOM for the HA in relation to a previous developer-led proposal to build a large-scale development to the East of Hemel Hempstead, and this work had determined that there could be a significant traffic impact at M1 Junctions 7 and 8, and at the A414 Green Lane roundabout immediately west of the M1.
- 2.14 In the absence of a transport evidence base, AECOM have undertaken a high level traffic assessment to provide the HA with an indication of where traffic issues may arise on the SRN which can be used to assist the HA in discussions with SACDC as to what requires in terms of an evidence base. AECOM's assessment is contained in Section 4 of this note.

**Employment**

- 2.15 The SLP states that the district has *'a primary spatial relationship with London, a city which strongly influences local patterns of employment, travel, retail and leisure. It also has strong spatial relationships with neighbouring towns, particularly Hemel Hempstead, Welwyn Garden City, Hatfield, Watford and Luton. These towns offer alternative and sometimes competing employment, retail and leisure opportunities.'*
- 2.16 Policy SLP15 in the SLP states that existing employment land within the district will be retained where appropriate, and redeveloped in some cases for the provision of more intensive or flexible employment land. It is stated that *'In all settlements across the District the Council will seek provision of sufficient land and floor space to cater for full employment and to provide for different kinds of employment use.'* AECOM consider this an appropriate approach and encourage the provision of employment land within and close to new developments, in order to maximise more sustainable, shorter journeys to work.
- 2.17 The draft SLP does not specify an overall jobs growth target. It is possible that the employment needs may not be met within the district, and an existing trend of out-commuting may be expected to continue, particularly to Central London (by train), to Hatfield and to Hemel Hempstead (by car).
- 2.18 Some development is expected to take place in the two major research and development centres in the district; the Building Research establishment (BRE) in Bricket Wood, and the Rothamsted agricultural research centre in Harpenden. Details on these potential developments are expected to be provided in the DLP.
- 2.19 Some employment land will also be brought forward through the two mixed use broad locations to the east of Hemel Hempstead. The HA should welcome the provision of mixed use developments which complies with NPPF policy on promoting mixed use developments and encouraging *'multiple benefits from the use of land in urban and rural areas'*.
- 2.20 The choice of East Hemel Hempstead as a broad location of development could be considered appropriate as it would be co-located within significant employment development at Maylands (within the neighbouring borough of Dacorum) and it may be of a scale which could offer some

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opportunity for internalisation of trips with the provision of other key land uses including education, retail and further employment. Conversely, the location could have significant traffic implications which would need to be considered in more detail.

- 2.21 Specific sizes and locations of employment developments are not provided in the SLP. Therefore, AECOM have not been able to review their potential impact on the SRN. It is recommended that the impact on the SRN of any large employment site being brought forward is reviewed independently, particularly those detailed in the East Hemel Hempstead Area Action Plan, and any other major developments in the DLP.

### **Retail**

- 2.22 Policy SLP18 of the draft SLP sets out the retail hierarchy of centres in the district:

- St Albans – Major town centre: should serve the district as a whole, be the major comparison shopping destination and the main focus for leisure, cultural and civic activities.
- Harpenden – Town centre: Should serve the northern part of the district, with good provision of shops, restaurants, leisure, cultural and other uses.
- London Colney, Fleetville, Marshalswick, Southdown – District centres: should provide food and grocery shopping facilities, a limited range of other shops and non-retail facilities serving their local communities.
- Local centres: should provide a basic range of small shops and services and serve their local catchment within walking distance of the centre

- 2.23 The above does not suggest a major change to the current retail hierarchy. There are however long term plans to strengthen St Albans city centre’s position within the hierarchy by increasing the diversity of retail. There is a potential for bulky goods retail warehouses, which cannot be accommodated within the centre, to be developed at Griffiths Way, to the south of the centre. This could lead to increased trips on the SRN as it is relatively close to M25 Junction 21a although it is uncertain to what extent it would attract trips from south of the M25 especially given potentially competing retail offer in Watford and London Colney.

- 2.24 A small amount of retail development is proposed in London Colney, as an extension of Colney Fields Retail Park which has recently been granted planning permission. This site can be expected to impact upon M25 J22.

### **Strategic Rail Freight Interchange**

- 2.25 There is the potential for a major development of a Strategic Rail Freight Interchange (SRFI) in the Green Belt at the former Radlett Airfield Site. This has been opposed by the Council, but permitted by the Secretary of State in July 2014 on the basis of national need. The SRFI’s potential highway impact was reviewed by the HA as part of the 2009 planning application. Following possible completion of the development, the draft SLP reports that SACDC will consider undertaking a partial review of the SLP (and DLP) to investigate appropriate Green Belt boundaries and to set out policies for any other development opportunities and mitigation that may arise. AECOM are concerned that, if completed, it may also have a significant impact on the SRN as there is a likelihood of increased numbers of HGVs travelling to the site. Therefore, they support a review of the SLP, and investigation of the traffic impacts, if the development goes ahead.

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**3. Transport and Connectivity**

- 3.1 New development locations have been chosen with regard to their accessibility and access to existing services and facilities. The HA should welcome this approach to make use of existing networks.
- 3.2 A need has been identified for improving bus links from the rural areas to the towns and City. Existing bus services are stated to be expensive, unreliable and infrequent. Additional routes and services are proposed, to ensure connectivity with the broad location developments. This will also involve the introduction of hybrid and low emission buses. This approach should be welcomed by the HA.
- 3.3 Key actions in the Council's existing Walking Strategy include encouraging walking to school and work, promoting walking as leisure, improving rights of way and addressing the needs of disabled people. The Council's Cycling Strategy includes new cycle routes, secure parking and shared use of some paths. Additional links in the National Cycleway Network are planned between Harpenden and Wheathampstead and between Routes 6 and 57, which both run through Harpenden, in the next 5 to 10 years. A 'Green Ring' will be installed around St Albans by 2016 which provides an orbital route around the city, connected by spokes to the centre. The HA should welcome this focus on pedestrian and cyclist provision, particularly at the strategic level, which will help encourage people away from private car trips.
- 3.4 The SACDC will expect travel plans to be submitted with all major residential and non-residential developments and other non-major developments where appropriate. The HA should welcome this approach as it will allow the sustainability of developments in terms of access, to be reviewed on a site by site basis.
- 3.5 The SLP states that there are no 'show stopper' items of infrastructure essential to the delivery of any one specific element of the SLP Strategy and it is the cumulative and interconnected impacts of the strategy that will require maintained, enhanced and new infrastructure. However, no major infrastructure schemes will be required as a result of the strategies in this SLP. It is unclear what evidence there is to support this assumption and it is recommended that the HA's requests more information on how this has been concluded and whether the SRN has been included in any traffic assessments carried out.
- 3.6 The only two significant infrastructure proposals made reference to in the draft SLP is a north eastern relief road at Hemel Hempstead and a transport hub adjacent to M1 Junction 10. The former has been in the pipeline for some time and is being proposed by Dacorum Borough Council. It is not known what the latter proposal is envisaged to comprise, for example a bus/coach interchange, park and ride etc? It is unclear to what extent this is likely to benefit St Albans district or its timescales for delivery. It is recommended that the HA requests clarification on this proposal.
- 3.7 The status of the transport evidence base is uncertain. SACDC provide some documents on their website in support of the plan – the Hertfordshire Infrastructure and Investment Strategy and the Inter Urban Route Strategy which were developed by Hertfordshire County Council to consider more strategic infrastructure priorities across the county. It is unclear whether or not, and to what extent these documents would have considered the growth which is now proposed in the draft SLP. It is uncertain therefore whether these documents can be relied upon to form the sole transport evidence base in support of the SLP.

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- 3.8 Based on experience in other districts, AECOM would have expected some form of traffic modelling assessment, for example a strategic model covering the whole of St Albans district, or smaller scale models covering specific areas.
- 3.9 It is recommended that the HA seeks clarification from SACDC of their position and forthcoming plans with regard to the transport evidence base and to request the council considers preparing evidence of sufficient detail to assess the traffic implications of planned growth. The geographic scope of the evidence should cover the SRN. AECOM’s high level traffic assessment (see section 4 below) identifies the junctions where the most traffic could be generated.
- 3.10 If this evidence is not forthcoming, the HA may alternatively wish to consider liaising with Hertfordshire County Council to determine if they hold any evidence of their own which could be used by the HA, or commission its own more detailed assessment to inform responses to future consultations on the SLP, DLP and East Hemel Hempstead AAP.

**4. Traffic Forecasting**

- 4.1 AECOM have carried out a high level trip distribution assessment of the four proposed broad locations for residential developments to provide an indication of the traffic generation effects of the largest developments could have on the HA’s network. As noted above, the draft SLP does not detail the quantum and location of employment development in detail, and therefore these have not been assessed.
- 4.2 As the exact locations and sizes of developments within urban areas are not provided, AECOM have not been able to carry out trip distributions for these sites. It is assumed that most urban developments will be small scale, as it will be necessary to make use of available space. Therefore they are unlikely to have significant individual impacts on the SRN. The collective impact, however, could be significant, and the impact of these developments must therefore be considered through future modelling. AECOM recommend that if any major developments are planned within urban areas, details of their location and size be included in the SLP.
- 4.3 Small scale green belt developments, which will bring forward 500 dwellings, and windfall development, have not been assessed because they have not been detailed in the SLP.

***Trip Rates***

- 4.4 Trip generation rates for this assessment have been calculated using the TRICS database (version 7.1.2). The broad locations are all on the edge of existing towns, therefore trip rates based on edge of town sites have been used. As the mix of houses and flats is not yet known, a private housing assumption has been applied for robustness. Because one trip rate has been applied to all sites, there is a risk that these trip rates will not accurately represent all sites in all locations, and therefore trip generation may in some instances be under or over estimated. However, this is deemed broadly acceptable for this assessment, particularly as sites are in broadly similar locations in relation to nearby towns. The trip rates are summarised below.

**Table 3: Residential trip rates for Broad Location development sites**

Time Period	Arrivals	Departures	Total
08:00-09:00	0.137	0.431	0.568
17:00-18:00	0.416	0.262	0.678

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**Trip Distribution**

4.5 The trip distribution has been calculated using 2011 Census Journey to Work census data, based upon the output areas where the development sites are located. This has been calculated for each broad development (East of Hemel Hempstead North and South has been considered as one site of 2,500 dwellings.). As the highest trip generation is for AM departures, this is what has been used as a basis for the trip distribution.

Broad Location: East of Hemel Hempstead North and South (2,500 dwellings)

4.6 The sites to the east of Hemel Hempstead will accommodate a major urban extension of Hemel Hempstead. The sites are located immediately adjacent to the M1, and north and south Junction 8, and is therefore of concern to the HA. SACDC state that the development would integrate well with the proposed developments at Spencer’s Park, Maylands Business Park and Woodhall Farm in Dacorum Borough. It may therefore benefit from existing services, although additional services will also be provided due to the size of the development. The development at this site will be guided by the East Hemel Hempstead Area Action Plan which will include details of infrastructure required. This will be jointly prepared by Dacorum Borough Council, Hertfordshire County Council and the Local Enterprise Partnership.

**Table 4: Residential trip generation for development site East of Hemel Hempstead**

Time Period	Arrivals	Departures	Total
08:00-09:00	343	1,078	1,420
17:00-18:00	1,040	655	1,695

**Table 5: Residential trip distribution by junction for development site East of Hemel Hempstead**

Route	Percentage of trips	Trips (AM departures only)
M1 J7/8 South into central London	9	97
M1 J7/8 South onto M25 west	7	80
M1 J7/8 South onto M25 east	3	35
M1 J7/8 South to J6	1	13
M1 J7/8 South to J5	7	76
M1 J7/8 North	6	64
M1 J7/8 East via A414	7	69
Not via SRN	60	644
<b>Total</b>	<b>100</b>	<b>1,078</b>

4.7 The anticipated trip numbers indicate that the developments will have a significant impact on the M1 Junctions 7 and 8. Considering residential AM departures above only, a potential 434 additional trips will use the junction. The close proximity of the two sites to the M1 is expected to encourage use of M1 Junctions 7 and 8. There is also a strong potential for impact on the M1 Junction 6A as many of the M1 south trips could use this junction to access the M25. Several trips could travel via A414 and some of these could travel on towards A1 (M) Junction 3.

Broad Location: East of St Albans (1,000 dwellings)

4.8 This development is expected to be housing led and will include improvements to Oaklands College, which is the major provider of Further Education in the District. SACDC state that the site is well

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located for access to existing services within St Albans. It is approximately 5km from the A1(M) Junctions 3 and 4, the closest of the SRN junctions.

**Table 6: Residential trip generation for development site East of St Albans**

Time Period	Arrivals	Departures	Total
08:00-09:00	137	431	568
17:00-18:00	416	262	678

**Table 7: Residential trip distribution by junction for development site East of St Albans**

Junction	Percentage of trips	Trips (AM departures only)
M25 J21a	14	60
A1(M) South via J3	9	38
A1(M) North via J4	5	21
M25 J22	4	19
East via A1(M) J4	3	11
M1 J9	2	9
Not via SRN	63	273
<b>Total</b>	<b>100</b>	<b>431</b>

4.9 This development is likely to have a more dispersed impact on the SRN because it is fairly centrally situated between the M1, A1(M) and M25. Its most significant impact is on the M25 Junction 21a, followed by the A1 (M) Junctions 3 and 4. Its impact on the M1 and the M25 Junction 22 is smaller, and may not be significant.

Broad Location: East of Harpenden (500 dwellings)

4.10 This development is also housing led, and is smaller than the other sites and therefore relies more on residents accessing existing services and facilities. For example no new school is proposed with this development. However, the SACDC states that it is well located in relation to Harpenden, and existing facilities. It is approximately 5km from the M1 Junction 9 (via Annables Lane and Watery Lane) and around 5km to Junctions 10/10a (via the A1081).

**Table 8: Residential trip generation for development site East of Harpenden**

Time Period	Arrivals	Departures	Total
08:00-09:00	69	216	284
17:00-18:00	208	131	339

**Table 9: Residential trip distribution by junction for development site East of Harpenden**

Junction	Percentage of trips	Trips (AM departures only)
M1 South via J9	15	33
M25 J22	6	12
M1 North via J10/10a	5	11
A1(M) via J5 (and J4)	4	8
East via A1 (M) J4	2	4
Not via SRN	69	148
<b>Total</b>	<b>100</b>	<b>216</b>

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- 4.11 The smaller size of this development compared to the other sites means its impact on the SRN could be lower. There is some potential for a dispersal of trips to a number of SRN junctions. The site's location on the edge of a medium sized town could mean that future residents need to travel further afield for work, and this may necessitate trips by car, possibly via the SRN. The site's proximity to M1 Junction 9 suggests it is likely to generate traffic at this junction.
- 4.12 It has been shown through the trip distribution that all of these developments are likely to generate significant increases in traffic on various parts of the SRN, and the larger developments are likely to have a more significant impact. Collectively, when combined with other development proposed in the district, this impact could be even more significant. The most impacted part of the network is likely to be the M1 Junctions 7 and 8 which is largely attributable to the East Hemel Hempstead locations. A1M Junctions 3 and 4, M1 Junction 9 and M25 J21a could also experience notable increases in trips.
- 4.13 Further developments are being brought forward in Dacorum around Hemel Hempstead, which is close to M1 Junctions 7 and 8. A transport evidence base should consider the combined impacts of both planning authority's development proposals at M1 Junctions 7 and 8.

### Rejected Sites

- 4.14 The locations and sizes of the alternative sites which have been rejected are outlined in the draft SLP. There is some possibility of these sites being brought forward if the proposed sites do not provide sufficient housing for the district. AECOM have therefore taken the opportunity to assess these rejected sites to determine their traffic effects. The rejected sites are:
- North of St Albans: around 900 homes
  - North East of Harpenden: around 750 homes
  - Land at London Colney: around 300 homes
  - Land at Chiswell Green: around 400 homes
- 4.15 It is considered that the sites to the north of St Albans and to the north east of Harpenden would have a similar distribution to the preferred developments to the east of St Albans and to the north of Harpenden. Therefore, a further trip distribution has not been completed for these sites. It is thought that the sites at London Colney and Chiswell Green would have a different distribution, and may have a significant impact on the SRN due to their proximity to it. A broad touch distribution has been calculated for these sites utilising 2011 Census Journey to Work data.
- 4.16 The trip distribution showed that the London Colney site could generate a potential 27 additional trips at M25 J22. An impact here is expected due to the sites close proximity to the junction. There is also likely to be some impact on the A1 (M) Junction 3, the M25 Junction 21, and the M1 Junctions 8 and 6. However, these are relatively small increases in traffic.
- 4.17 With regard to Chiswell Green, the distribution showed that a development at this site could cause an additional 58 trips on the M25 Junction 21A, as well as an additional 49 trips on the M1 at Junction 6. It should be noted that these junctions are currently very congested. It could also impact the M1 at Junctions 7 and 8 and the A1(M) at Junction 3. However, these are relatively small increases in traffic.

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- 4.18 This distribution has shown that the rejected sites may have a significant impact on the SRN, and if they are brought forward due to a shortfall in dwellings, this impact should be investigated in more detail.

**5. Conclusion**

- 5.1 AECOM have been commissioned, by the HA, to undertake a review of the St Albans City and District Council (SACDC) Draft Strategic Local Plan (SLP). The Strategic Local Plan sets out the long term planning strategy for the District and is currently open for consultation. This will eventually replace the current Local Plan which was adopted in 1994 and aspects of which are still in use today in making planning decisions.
- 5.2 Further Development Plan Documents still to be produced by the council are a Detailed Local Plan (DLP) which will include more detailed site allocations and development control policies, and an East Hemel Hempstead Area Action Plan which will be prepared jointly with Dacorum Borough Council. Together with the SLP, these will form SACDC’s new Local Plan.
- 5.3 AECOM have made a number of key recommendations throughout the note which are underlined. These largely concern the status of the transport evidence base and it is considered important that the HA seeks clarification of the evidence supporting the SLP’s plans and policies.
- 5.4 As part of the consultation exercise, the draft SLP includes ten questions which it invites members of the public, and other bodies, to answer. AECOM consider that it is not appropriate or necessary for the HA to respond to the majority of these questions. However, the questions deemed to require a response from the HA are considered below.

***Question 1: Economic Development – do you agree with the approach to economic development?***

- 5.5 AECOM broadly agree with the proposed economic strategy. The approach of providing local employment throughout the district, in proportion to the size and type of settlements will help reduce external journey to work trips and will contribute to the diversity of land uses. However, as the SLP acknowledges, London and other neighbouring towns play a large part in employment patterns in the region. Therefore is expected that a large number of residents will travel longer distances for work. It will be important therefore that evidence is prepared to assess the possible impacts of in/out-commuting on the wider road network including the SRN.

***Question 7: Development Sites – do you agree with the method of choosing development sites?***

- 5.6 SACDC have presented a prioritisation of sites which demonstrates some consideration of how sites compare with regard to their impacts including transport. The SLP states that approximately 3,550 dwellings will be accommodated in existing urban areas through sites which are not yet identified, and a large allocation is made to windfall. Another 4,000 will be accommodated through four broad locations in the Green Belt, which have been selected, out of a potential eight sites, on the basis of being least damaging to the Green Belt objectives.
- 5.7 High-level assessment has determined that significant increases in traffic could occur at different points on the SRN, most notably M1 Junctions 7 and 8, and to a lesser extent M1 Junctions 9, 10 and 10a, A1(M) Junctions 3 and 4 and M25 Junction 21a. There does not appear to be a transport evidence base which has assessed the impact of the broad locations. It will be important therefore

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that evidence is prepared in order to justify policies and proposals taken forward and to help identify what mitigating infrastructure may be required.

**Question 9: Do you agree with the level of infrastructure proposed?**

- 5.8 AECOM are encouraged by the intention to improve bus services in the district, in particular to provide for the proposed developments. The proposed developments are also likely to benefit from investment in the Thameslink route.
- 5.9 Although some mention is made of junction improvements in and around St Albans, there is no little indication of the possible need for improvements at SRN junctions, with the exception of M1 Junctions 7 and 8 in relation to the East Hemel Hempstead allocation. It is, however, stated that no major infrastructure projects are expected to be necessary as a result of the SLP strategies. Given the lack of transport evidence presented, clarification is required of how this assumption has been made.
- 5.10 The plan makes the suggestion for a transport hub at M1 Junction 10/10a. The intended purpose of this hub is unclear and therefore clarification from SACDC is required.
- 5.11 SACDC have chosen preferred broad locations of growth and have defined policies. Whilst there should be further opportunity for the HA to be involved in future discussions and major changes made to the SLP, it would be expected that a transport evidence base which assesses the district's planned growth, in particular the broad locations, should already be in preparation in order to help justify the plan and demonstrate that it is effective and sound.
- 5.12 There may be an increasing risk, as the SLP progresses towards eventual adoption, that development proposals will be taken forward without evidence to demonstrate their impact and to identify any potential infrastructure measures that may be required of which. Given the scale and cost of transport infrastructure, it is more appropriate and effective to identify and bring forward through the plan-making process the need for transport infrastructure improvements in advance of future planning applications.

This document has been prepared by AECOM Limited for the sole use of our client (the "Highways Agency") and in accordance with generally accepted consultancy principles, the budget for fees and the terms of reference agreed between AECOM Limited and the Client.

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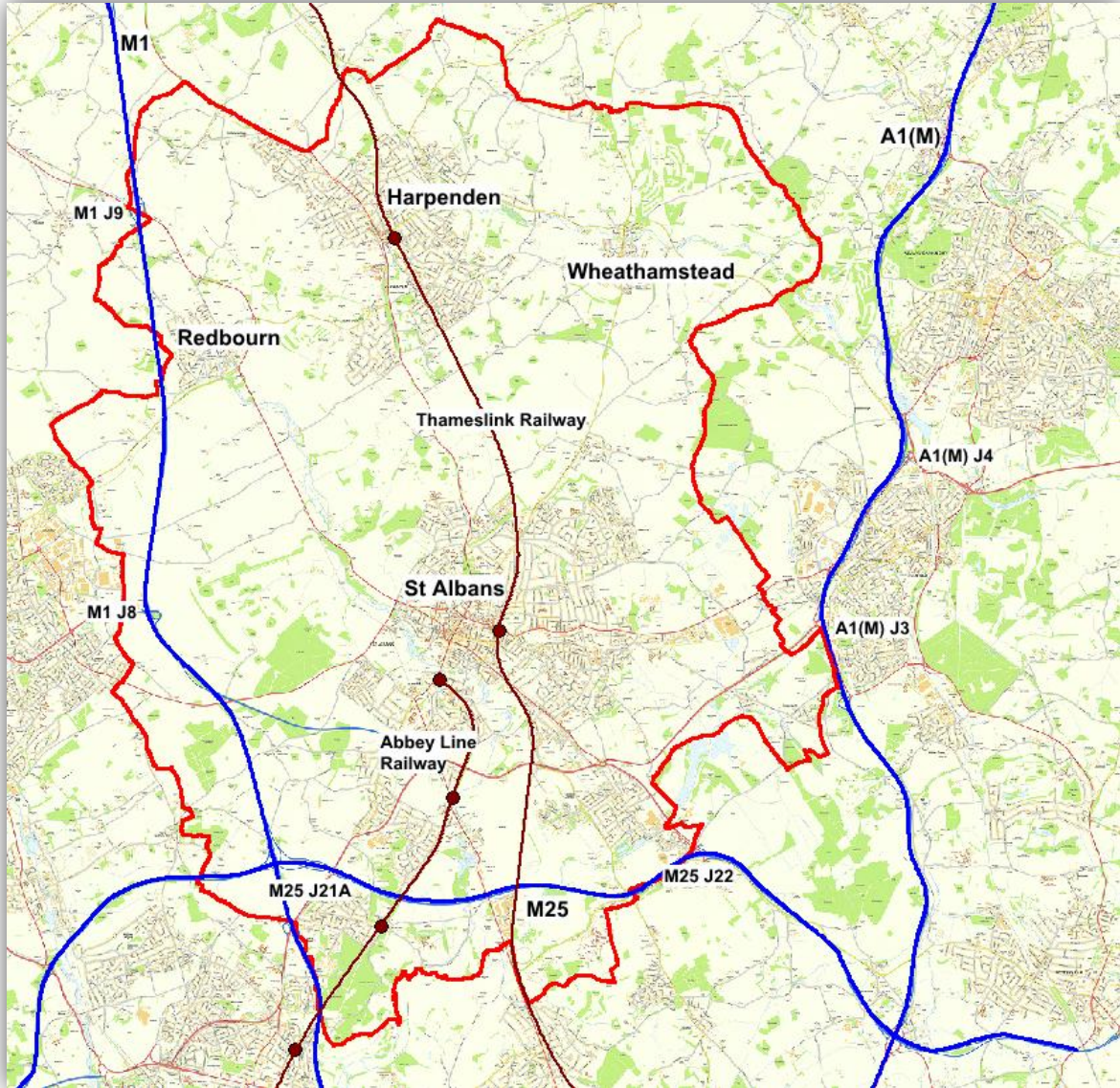
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**APPENDIX A**

**Location of St Albans City and District in relation to the strategic transport network**



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**APPENDIX B**

For each of the following consultation questions, respondents are asked to respond with the following

*Do you agree or disagree with this approach?*

*Strongly Agree*

*Agree*

*Disagree*

*Strongly Disagree*

*Don't Know*

*Do you have any alternative approach to suggest? Comments?*

**Question 1**

**1. Economic Development**

We need to consider Government and Local Enterprise Partnership (LEP) aspirations for growth. The draft Local Plan gives the economy high priority and says:

*There are two main economic aims:*

- To foster a healthy, diverse and strong local economy, with a focus on knowledge industries, financial and business services, the rural economy, the green technology sector, creative industries and visitor economy*
- To offer employers a highly skilled and flexible workforce and individuals the very best opportunities to learn, train, start businesses, develop entrepreneurial opportunities and improve their employability*

The draft Local Plan suggests that economic development needs will be met locally and in the wider area, with many people working in London and nearby towns. The draft Local Plan supports key innovation centres in the District (Rothamsted Research for agriculture - and the Building Research Establishment for the built environment). New employment land will be available at east Hemel Hempstead to meet the priority of the LEP for development in the M1/M25 corridor and regeneration of Hemel Hempstead. New housing in the district supports economic growth.

**Question 2**

**2. Housing Need**

An important part of planning for the future of the District is identifying the number of homes that will be required to house a growing population. St Albans District is different to many areas in that, as well as 'natural' growth through family formation and people wanting to live close to where they work, it is seen as a highly desirable area to move to from elsewhere.

We commissioned an independent study to help us decide the future level of housing that should be considered in the Plan. The consultants gave a range of options from 436 to 747 dwellings each year. We felt that 436 was an appropriate projection on which to base the draft Local Plan. This uses data from a ten year period to estimate the number of people who might move into and out of the area. We believe it gives a better base to estimate future local net migration than the five year period used by the Office of National Statistics in their national projections. Over the twenty year period for which we are planning (2011 – 2031) this comes to 8,720 dwellings. The draft Local Plan says:

*Housing needs research suggests that, using a demographic projection of future household growth and taking account of longer term estimates of migration (ten year projection period), an annual average provision of 436 new dwellings would meet full need.*

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### Question 3

#### 3. Affordable Housing and Housing Mix/Type

The demographic trends reported in our housing study indicate a particular need for smaller housing for young families. Our study also highlighted the continuing importance of making affordable housing available, particularly to cater for new family formation and people wanting to live close to where they work. Some of this needs to be socially rented and some needs to be purchasable through schemes such as shared ownership.

Experience elsewhere in the country suggests that developments with very high levels of affordable housing do not help to create rounded, cohesive communities. Bearing this and funding issues in mind, we think 40% affordable housing is a realistic target. The draft Local Plan says:

*The Council will seek affordable housing contributions from all new residential development... 40% affordable homes as a proportion of the overall development unless it is clearly demonstrated that this is not economically viable.....*

*All new housing development will contribute to a mix of different housing types in residential areas, taking into account the existing pattern of housing in the area, evidence of local need and site specific factors. It will in particular require the inclusion of more small and small to medium-sized housing, including one and two bedroom flats and two and three bedroom houses, in new development schemes in suitable locations, to increase the proportion of such sized units in the district housing stock, to widen choice and to provide more relatively low cost market housing available to buy.*

### Question 4

#### 4. Housing Development Options

We have prepared the draft Local Plan on the basis that sites within the existing urban areas of St Albans and the other towns and villages in the District should be developed – or redeveloped - in preference to anywhere else. Around 1,075 homes have already been built since the start of the planning period on 1 April 2011. We already know of sites that would take about 1,750 homes and, if past patterns continue, we would expect to see about 1,800 homes built on ‘windfall’ sites that we don’t know about yet. We also expect about 500 homes being built as a result of neighbourhood plans and communities supporting some minor changes to Green Belt through the Detailed Local Plan process. Together these would see about 5,000 new homes being built in the area by 2031.

If we plan to meet the level of housing growth projected in our independent study, we will have to find somewhere for an additional 4,000 new homes. Options include:

1. Keep our Green Belt boundaries where they are, but this would mean that we cannot house everybody who needs or wishes to live in the District.
2. Prepare a Local Plan that removes some land from the Green Belt, but does not provide for the full level of housing growth that our independent study identified. We could, instead, attempt to focus housing provision on those elements that we believe are most pressing.
3. Prepare a Local Plan on the basis of removing land from the Green Belt to accommodate the projected need for additional homes in full (4,000 homes). We have prepared the draft Local Plan on this basis to illustrate what the effect of doing this would be.

If we do not provide for all 4,000 new homes, we will need to explore opportunities to divert development to other areas. Whilst there is a legal requirement, known as the ‘duty to co operate’, for other councils to discuss this with us, neighbouring areas face much the same pressures as we do and may well ask us to accommodate some of their needs.

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## Question 5

### 5. "Exceptional Circumstances" for Change to Green Belt Boundaries

One issue of particular significance for the District is national policy on Green Belt. The Metropolitan Green Belt around London sets out to limit urban sprawl. There is clearly a high demand for housing in our area. The Green Belt that surrounds St Albans is however highly prized by many of its residents and is one of the factors that contribute to the high demand for housing.

We have to decide if factors such as growing housing and the economic regeneration of Hemel Hempstead now justify change to the Green Belt boundaries.

Green Belt should only be changed in 'exceptional circumstances'. This is a controversial issue currently subject to national political debate and legal dispute. The Council has taken specific legal advice about the question of 'exceptional circumstances'.

Some people in the District think that the need for housing is so important that 'exceptional circumstances' exist justifying a change to Green Belt boundaries. Other people think that it is not surprising or unusual for our District that we cannot house everybody who needs or wants to live here and so the circumstances are not exceptional. The Council has not yet made up its mind whether or not 'exceptional circumstances' exist and will do so only after it has considered the responses to this consultation. However it has taken the view that the draft Local Plan should be prepared on the basis that there *may* be 'exceptional circumstances' that justify Green Belt release. The draft plan therefore shows the effect of accepting that they do exist.

**We need to know your views. As explained above, our choices range from removing no land from Green Belt and meeting only part of the projected housing need, through to removing sufficient land from the Green Belt to meet the need in full.**

**What do you believe we should do and why? Comments?**

## Question 6

### 6. Green Belt Review and Development Strategy

We need to know, if we are to remove land from the Green Belt, which land should be removed. Green Belt land makes varied levels of contribution to the NPPF's five Green Belt purposes. The five purposes are:

- To check the unrestricted sprawl of large built-up areas
- To prevent neighbouring towns from merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Because of the importance of Green Belt, the Council asked consultants to conduct a comprehensive review with the aim of finding the areas where development could take place with least damage to the purposes of the Green Belt. The consultants identified eight areas that they felt contributed less than others. These are shown on the diagram in this booklet. However the consultants advised that all of those areas contributed to at least one of the Green Belt purposes.

## Question 7

### 7. Development Sites

The Council then reviewed each of these areas against economic, social and environmental factors to see if, in addition to their Green Belt status, there were any other factors that ruled out development there. This also enabled us to assess and rank their suitability for potential release.

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As a result of evaluation, some sites are included and some have been excluded from the draft Local Plan. The draft Local Plan says:

The Strategy will meet development needs with minimum impact on the Green Belt and best prospects for delivery of appropriate social, economic and environmental objectives and specific community benefits. The areas in the draft Local Plan, shown in yellow in the diagram (with estimated capacity for homes), are:

- East of Hemel Hempstead, North (around 1,500 homes)*
- East of Hemel Hempstead, South (around 1,000 homes)*
- East of St Albans (around 1,000 homes)*
- North West of Harpenden (around 500 homes)*

The areas not in the draft Local Plan, shown in purple in the diagram (with estimated capacity for homes), are:

- North of St Albans (around 900 homes)*
- North East of Harpenden (around 750 homes)*
- Land at London Colney (around 300 homes)*
- Land at Chiswell Green (around 400 homes)*

## Question 8

### 8. Housing Density

To decide the amount of land needed for housing development it is necessary to make assumptions about the density of development. This is a simple measure of how many houses are, or will be, built on each hectare of land. The draft Local Plan assumes 40 homes per hectare (dph) within the specific housing areas, but with a general assumption of 40% of the overall site area set aside for infrastructure and open space.

We have based this approach on the Homes & Communities Agency Research which suggests a net density range of 30-50 dph in suburban locations.

If lower levels of density are adopted, more land will be needed. At 30 dph, the North of St Albans and North East of Harpenden areas would also be required. At 25 dph all of the eight large areas identified in the Green Belt review would be required.

## Question 9

### 9. Infrastructure

The level of new development needed requires appropriate infrastructure including benefits for the wider community.

The NPPF says that Councils should work with other bodies to assess the quality and capacity of infrastructure for transport, water supply, waste water and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education and flood risk. Consideration should be given to meeting forecast demands. It also says that the Local Plan must set out the strategic priorities of the Council for delivering this infrastructure.

The draft Local Plan says that development will only take place on the basis of:

- Carefully master planned development led by the Council in collaboration with communities, landowners and other stakeholders
- Affordable housing and self build opportunities, integral with private schemes
- Housing densities and size mixes that make best use of the land available and fulfil the evidence of need for smaller homes
- Social and community facilities, particularly to deal with pressures on local schools, including the need to make land available for new school sites
- Excellence in design, energy efficiency and water management.

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The Council's evaluation work identified that larger sites can deliver better infrastructure improvements and community benefits.

## Question 10

### 10. Other Policies

The draft Local Plan should be considered as a whole. The policies cover a wide range of important topics such as design and built environment, conservation, green spaces, retail development and transport.

While we have picked out some key issues for specific comment, we welcome your views and evidence on any aspect of the draft Local Plan.

**Let us know what you think of the other parts of the draft Plan. Have we missed anything? Comments? For comments on individual parts of the draft Local Plan please comment on the each of the SLP policies in the relevant section of the draft Local Plan.**

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