

Enclosure 1

HARPENDEN GREEN BELT ASSOCIATION's
RESPONSE TO St ALBANS DISTRICT COUNCIL'S
CONSULTATION ON A DRAFT
STRATEGIC LOCAL PLAN 2014

Question 1: Economic Development

Disagree.

We do not agree that removing land from Green Belt will assist with economic development of the local area or the country as a whole.

In particular, we disagree with the statement that “*new housing in the district supports economic growth*”. This statement is not justified by evidence: indeed the Sustainability Appraisal Working Note assessing the draft plan (at Appendix B) says specifically of the NW Harpenden site that “*the potential contribution to economic growth through the development of this site is limited*”. The same comment is made in relation to the NE Harpenden site, as well as North St Albans, West of London Colney and West of Chiswell Green.

New housing without adequate supporting infrastructure does not contribute to long-term sustainable economic growth or regeneration, rather it detracts from it. For example, the District suffers from existing high levels of traffic congestion, which the St Albans Sustainable Communities Strategy recognises is a key challenge facing the District, with reducing it said to be an aspect of the four key priorities for the District to 2021. Building new homes without taking any measures to alleviate traffic congestion, as the Strategic Local Plan (SLP) proposes for Harpenden, is likely to inhibit economic growth rather than promote it. We also have significant issues of parking in Harpenden town centre, which the proposals in the SLP will exacerbate, to the detriment of local businesses.

Across the County, there is an infrastructure deficit of £2.4bn. The District Council has made no proper assessment of the quality and capacity of existing infrastructure and its need to meet forecast demands, as it is obliged to do by paragraph 162 of the National Planning Policy Framework (NPPF). For example, in relation to traffic congestion, as mentioned above, it made no calculations itself of the impact on traffic congestion down the A1081 Luton Road when evaluating the NW Harpenden site (Site S5) nor down the B653 Lower Luton Road when evaluating the NE Harpenden site (Site S6) nor did it take Hertfordshire County Council's advice on such issues before carrying out those evaluations.

Equally, the District Council has not complied with its duty under NPPF paragraphs 156 and 157 to set out its strategic priorities for infrastructure and to plan positively for it: in relation to NW Harpenden, the “Infrastructure Delivery Schedule” at Appendix 5 to the SLP says that the bodies to provide appropriate infrastructure, the time by which it will be provided and how

it will be funded are all "*unknown at this stage*". Residents can therefore have no confidence that new housing will be properly supported by sufficient infrastructure, which is a necessary minimum for economic growth. Jobs and profits from construction projects are necessarily short term, and the District does not need to attract new people in order to allow local businesses to thrive: indeed, as we have said above, excessive population growth may damage rather than enhance local businesses.

We consider that a strategy of meeting demand for housing, particularly from London, on the Green Belt around London, including in St Albans District, will lead to an imbalanced approach to economic growth, with the South East of the country suffering from over-development and inadequate infrastructure and the remainder of the country receiving insufficient economic support. A joined-up strategy is necessary, which the draft SLP does not provide.

Furthermore, economic development is not an "exceptional circumstance" justifying a change in Green Belt boundaries. A desire for growth is not new or unusual and Green Belt boundaries have historically been fixed where they are in the knowledge that this would impede development for all purposes, including for economic purposes, on the grounds that the 5 recognised purposes of the Green Belt are more important in these locations.

Question 2: Housing Need

Agree.

We do not think that SADC has done a sufficiently good job of making people aware that there are two quite distinct stages: first, an ascertainment of the “objectively assessed need” for housing as defined by national policy and secondly, a decision as to how much of that need it is appropriate to meet, given Green Belt or other constraints. National planning policy and guidance is quite clear that, although Green Belt authorities like St Albans are obliged to measure their “objectively assessed need”, they are not required to meet it by release of land from Green Belt and indeed, should not be releasing land from Green Belt to meet that need unless the circumstances are “exceptional”. Planning Practice Guidance paragraph 45 makes clear that the first stage is the assessment of “full housing needs”, but that should be followed by a second stage, namely the preparation of a Strategic Housing Land Availability Assessment which recognises that Green Belt restrains the ability of the authority to meet that need.

As to the first stage question, we accept that the Government requires SADC to measure something it calls “need” but which does not in fact equate to “need” for housing in the popular sense, but also caters for *“the housing demand of the area”*. We agree that 436 homes per annum is a reasonable measure of this “need” and that, in so far as this “need” is projected into the future by looking at what has occurred in the past, it makes sense to take a 10 year period, rather than the 5 years recommended by the independent consultant.

However, we strongly disagree that the figure of 436 homes per annum, once ascertained, provides any useful tool for determination of planning policy in the local circumstances of St Albans District and in particular for determination as to whether it is appropriate to release land from Green Belt. The number is meaningless. It does not measure housing need in the way that phrase is popularly understood, because it includes those who merely wish or desire to live in the District as well as those who really need to. However, it does not truly measure demand either, because, as the independent consultant recognised at ES 32, the patterns and trends of movement to and through St Albans *“constitute an ‘unstoppable force’, an example of a housing market in which the exercise of demand will always exceed supply and will arise from well beyond St Albans’ boundaries”*. If the study were truly to identify all those people who would buy homes in St Albans District if homes were available

for them, the number would massively exceed even the largest of the options considered by the consultant.

Because the Independent Housing Needs Assessment and SHMA does not attempt to define “need” in the sense in which this word is generally understood, it is impossible to tell from the report what proportion of the 436 homes every year are required by people who are in genuine need of being housed in the District. It should be noted that the distinction between need and demand is not the same as the distinction between local/outsider – there are people in the District now (for example the children of relatively well-off families newly moved to the District) who cannot be said to “need” to live here in future. Equally, there will be people who currently live outside the District who might be said to “need” to live here – for example if they work locally and have strong local ties but are unable to afford local house prices.

Whatever proportion of the 436 homes per annum are genuinely “needed” as opposed to “wanted” – and we simply do not know what that proportion is – there must be very real doubt as to whether those needs will be met by the proposed plan. SADC has no control over the allocation of market housing and its control over allocation of social housing over the long term is limited by Right to Buy and Right to Acquire. The housing market in the District, and in particular in Harpenden, is driven by London, with locals unable to compete in the market with those who have realised substantial equity by sale of London property. Harpenden estate agents tell us that 50% of the houses they have sold in the last year have gone to Londoners. This is consistent with the evidence in the Housing Needs Assessment which, having conducted an analysis of Council tax receipts, found that new-build properties were being acquired by those from outside the District by a ratio of 10:1. The consultant advised that *“these patterns...strongly suggest that new build schemes are driving in-migration to the area rather than meeting the needs of local residents”*: see paras. 2.26-2.27 and ES 31.

It is not fair to existing residents, who place considerable value on the Green Belt, to release Green Belt to meet a figure of 436 homes per annum when this figure is entirely meaningless, measuring neither real need nor real demand and in a situation where the Council cannot in any event ensure that the housing goes to, and stays with, those who genuinely need it.

Question 3: Affordable Housing and Housing Mix/Type

Agree.

We agree that more affordable housing is needed, but it must be recognised that social housing originally constructed as affordable housing may eventually become market housing through the Right to Buy (in respect of Council properties) and the Right to Acquire (in respect of Housing Association properties). Moreover, we note that the Independent Assessment of Housing Need and SHMA at paragraph 2.48 recorded a surge in Right to Buy and Right to Acquire sales since April 2012. Before the Council decides to give up Green Belt permanently for housing, it should conduct a study to predict what proportion of the 40% proposed affordable housing is likely to end up on the market.

We also believe that location is as important, if not more important, than quantity of housing. Green Belt sites on the fringes of our towns are not good places for a concentration of affordable housing, which should as far as possible be provided close to facilities and services.

There are much better locations in Harpenden for affordable housing than the NW and NE Harpenden sites. For example, we have three large surface car parks within a few minutes' walk of the railway station, a new primary school and all the facilities of the town centre, at Bowers Way and either side of Harpenden Railway Station. It may be possible to build a multi-storey car park on one of these, in which case the other two would make excellent locations for affordable housing, in the heart of the town. Equally it may be possible to relocate the Harpenden Telephone Exchange, which would again free up a large site which would be ideally located for affordable housing. Station House, which is currently offices, but appears to be substantially unused, would provide an excellent location for conversion to affordable housing, right next to the Railway Station. As far as we are aware, the District Council has not properly explored any of these options, or similar options in St Albans and other centres in the District. Before concluding that it should release large areas of land from Green Belt, it should commission an independent study to see if there are ways of using brownfield land more imaginatively, in a sustainable way, to provide housing, including affordable housing.

Question 4: Housing Development Options

Option 1.

We strongly agree with Option 1 - to keep Green Belt boundaries where they are.

This is quite obviously the only truly sustainable option, given the findings and recommendations of "Environmental Capacity of St Albans City and District: Defining a Sustainable Level of Development".

The Green Belt exists for very important reasons and national policy recognises that maintaining Green Belt protection in accordance with section 9 of the NPPF is an important part of achieving sustainable development in practice: see NPPF para. 6.

The Green Belt Review found that the District's Green Belt continues to perform well. Each of the Broad Locations makes a significant contribution to 2 Green Belt purposes (for we must not overlook the fact that the reason why the consultants did not measure the contribution each site makes to the 5th national purpose, to assist in urban regeneration, is because all sites contributed equally well to that purpose) and partially fulfils at least one other purpose. If they do not fulfil all 5 purposes, that is because no Green Belt land of the size of the Broad Locations could be expected to fulfil all 5 purposes - we would suggest that any parcel of land, anywhere in the Green Belt, which was subdivided and subdivided again as the Green Belt Review did to reach the Broad Locations, would find it impossible to pass that test.

Recent Planning Guidance (PPG 44 and 45) emphasises the importance of maintaining Green Belt protection; that Green Belt boundaries should only be altered in truly exceptional circumstances, and that constraints such as Green Belt may restrain the ability of the authority to meet that need. In the accompanying press release Eric Pickles has said that *"protecting our Green Belt must be paramount. Local people don't want to lose their countryside to urban sprawl, or see the vital green lungs around their towns and cities to unnecessary development"*.

We are very concerned that Cllr Daly and planning officers have been promulgating an obviously erroneous interpretation of PPG 44 and telling Planning Policy Committee and residents at local consultation meetings (including with slides to which underlining has been added) that those who wish to protect the Green Belt must provide evidence that *"adverse*

impacts" of meeting objectively assessed need *"would significantly and demonstrably outweigh the benefits"* of doing so. This is wrong for two reasons.

- First, the purpose of a statutory consultation is not to require residents to provide evidence: it is to allow them to participate in the authority's decision-making process by expressing their views on the proposals. It is clear to us that many residents are inhibited from responding to this consultation because they believe that they are not entitled to unless they provide "evidence".
- Secondly, Cllr Daly and his officers have clearly overlooked the word "or" in PPG 44. It is quite clear from this paragraph of the Guidance, in particular when read against NPPF paragraph 14, which it replicates, that Green Belt is to be protected just because it is Green Belt. The test of "adverse impact" applies only where there are no specific policies indicating that development should be restricted. The promulgation of this erroneous view of policy is also inhibiting residents from responding to the consultation, because they believe that it is more difficult to protect Green Belt than it in fact is.

We do not believe that a policy of meeting demand for housing, just because there is demand, by building on the Green Belt around our towns and cities, is a sensible or coherent policy, either nationally or locally. The Metropolitan Green Belt was created to place severe limits on development in the area around London, for the good reason that if market forces were permitted to dictate the location of housing and other development, the result would be urban sprawl, the merging of towns, encroachment into the countryside, destruction of the setting of historic towns and a failure of urban regeneration. To give way to the pressures for development because the market demands it is to subvert the whole purpose of the Green Belt.

The country needs sufficient housing, but it needs it in the right places and supported by the right infrastructure. There is much imaginative thinking currently going on about the creation of new Garden Cities, including by the winner of this year's Wolfson Prize and all the main political parties. That is the future which we believe residents want for their children and grandchildren: properly sustainable communities, well-designed homes within walking distance of facilities and amenities, good transport links etc. In contrast St Albans appears to be taking the easy but unsatisfactory option of acceding to the pressure constantly to erode the Green Belt around our towns and cities, giving way to the primacy of the motor vehicle as it lengthens journey times and putting further strain on already over-stretched infrastructure.

There will always be pressure for development on the Green Belt – because Green Belts are only created in places where there is pressure for development which must be resisted. The Council should be seeking more imaginative ways of building homes. As we have said in section 3 above, we think that there are opportunities for imaginative development of urban areas which have been missed, such as the use of town centre surface car park sites. The Council should be commissioning a study to see if it can make better use, in a sustainable way, of its brownfield sites. It should also be working together with other authorities to create new Garden Cities, rather than looking to Green Belt.

Question 5: “Exceptional Circumstances” for Change to Green Belt Boundaries

We strongly disagree that there are exceptional circumstances justifying change to Green Belt boundaries. The Courts have made clear that this test is “*a very stringent one*”; that it is “*not arguable*” that the mere fact that an authority is drawing up its local plan is itself an exceptional circumstance justifying boundary change and that general planning merits cannot, in law, constitute “exceptional circumstances”: *Gallagher Homes Ltd v Solihull Metropolitan BC* [2014] EWHC 1283.

There is nothing exceptional in the fact that more people would wish to live in the District than we can accommodate: the Housing Needs Assessment and SHMA says expressly that demand for housing in the District is an “*unstoppable force, an example of a housing market in which the exercise of demand will always exceed supply and will arise from well beyond St Albans’ boundaries*” (ES 32).

The argument that there are “exceptional circumstances” appears to rest solely on the fact that the Council cannot provide 436 homes per year unless it builds on Green Belt. But, as we have said above, national policy makes clear that the mere fact that there is a difference between assessed “need” and assessed supply does not justify Green Belt release. That there is an unmet “need” cannot automatically constitute exceptional circumstances, otherwise Green Belt restraint would not be a reason given in paragraphs 14 and 17 of the NPPF for not meeting that need in full. Those who wish to argue that there are exceptional circumstances must show, on the evidence, something particular in St Albans’ local circumstances which is “exceptional” and which necessitates a change to Green Belt boundaries. We do not think that they get anywhere near doing so.

The figure of 436 homes per annum is a measure of some of the demand for housing but, for the reasons given in section 1 above, it is meaningless as a tool for policy in the particular circumstances of St Albans District. As it measures something which has not been measured before, how can it be said that it represents something “exceptional”? We simply do not know what the result would have been of taking a similar measurement at any particular point in the past.

Furthermore, the evidence from the Housing Needs Assessment and SHMA is that new-build homes fuel in-migration into the District rather than meeting local needs (see paras. 2.26-2.27 and ES 31). Green Belt release cannot be justified where the evidence shows that, whatever the level of housing “need” and however that is measured, new market housing on former Green Belt sites will not address that need.

Question 6: Green Belt Review and Development Strategy

Strongly disagree.

The methodology of the Green Belt Review is unsound.

The large parcels of land assessed in Part 1 were subdivided into smaller parts at the end of Part 1 with the identification of 8 "strategic areas" and 8 "sub-scale" areas. Only the 8 "strategic" areas were taken forward for assessment in Part 2. There, they were each subdivided into 2 or more parts, with a choice of one part from each area made according to landscape strength. The 8 areas shown on the Key Diagram, including the 4 Broad Locations, are the sub areas reached by way of this process of division and comparison.

We strongly disagree that this approach provided a robust method of identifying the areas of Green Belt which perform least well against the 5 national and 1 local purpose:

First, the sub-division of the "strategic" areas in Part 2 has resulted in areas which are no longer of a size to be considered truly strategic. At page 4 of the summary booklet it is claimed that the areas of land identified by the Part 2 Review *"are of a strategic scale with the potential for hundreds or thousands of homes and significant public infrastructure"*. This is inaccurate: a number of the sites, including NW Harpenden and NE Harpenden, have been acknowledged in the evaluation matrix to be too small to be able to provide any strategic infrastructure.

Some of the 8 areas identified by this process are not substantially larger than some of the "sub-scale" areas identified in Part 1. However, there has been no evaluation of the sub-scale areas against the sustainability criteria. The two kinds of site have been treated as conceptually different, when they are not.

A further consequence of this repeated sub-division is to result in areas of land of a size unlikely to be able to demonstrate that they fulfil all 5 national and 1 local Green Belt purpose to the fullest extent. That is because no area of Green Belt land, when cut down to a sufficiently small size and assessed in isolation from the land around it, is likely to be able to do so.

Secondly, in Part 2, the 8 "strategic" areas were not compared with each other. Rather one part of each area was compared with the other part or parts of that same area. For example, the West part of S1 was compared with the East/North part of S1, but neither the whole nor

any part was compared with S2, S3, S4 etc. It was wrongly assumed that part of every site must be released from Green Belt, but that the whole of any site could not be. As a consequence not all of the options were properly explored.

Thirdly, the comparison between parts of strategic areas conducted in Part 2 was made on the basis of landscape/visual sensitivity characteristics, not Green Belt purposes. This is to confuse quite different things.

One of the consequences of selecting sites by reference to landscape/visual characteristics rather than Green Belt purposes is that the boundaries of the areas identified are not sufficiently robust Green Belt boundaries. In NW Harpenden, for example, the effect of selecting the site identified in the Part 2 review would be to substitute a very strong Green Belt boundary (the A1081 Luton Road) in part for a line which exists only on a map and does not reflect any feature on the ground. NPPF paragraph 85 requires Green Belt boundaries to be defined clearly "*using physical features that are readily recognisable and likely to be permanent.*"

There are other, unexplained, discrepancies between Parts 1 and 2 of the Green Belt Review. For example, an additional area of land between Milford Hill and Common Lane was added to the NE Harpenden site in Part 2, whereas in Part 1 this area was described as extending only to Whittings Close. It is our understanding that this was added because of a perceived requirement to obtain access down Common Lane and not for any reasons associated with Green Belt purposes.

Question 7: Development Sites

Strongly disagree.

The process by which sites have been selected for release from the Green Belt is patently unsound: illogical, inconsistent and unsupported by, or flatly contrary to, evidence and previous assessments, including those carried out under statute. Some examples are given below with supporting evidence, including documents, provided to SADC in June 2014.

Failure to Give Weight to Green Belt Purposes: It is claimed that "*the strategy will meet development needs with minimum impact on the Green Belt*". In fact the 4 sites were chosen from 8 without reference to the impact on the Green Belt. Paragraph 5.35 of the methodology agreed at the PPC meeting of 4 March 2014 makes clear that the "evaluation matrix" was not intended to be free-standing, but was to be read together with the Green Belt Review. In the event, however, the sites were chosen only by reference to the scores produced by the matrix and no weight was given to the extent to which they fulfil Green Belt purposes. As a consequence, the 4 sites selected for release from GB are 4 of the 5 sites scoring best for GB purposes. By failing to take into account in the evaluation the extent to which the sites fulfil GB purposes, SADC has failed to reflect paragraph 6 of the NPPF, which makes clear the Government considers that Green Belt policy is an important aspect of "sustainable development" in practice.

Failure to Follow Agreed Methodology: The methodology for the evaluation of sites agreed on 4 March 2014 was not followed in significant respects.

- Contrary to paragraph 5.18 of the methodology, SADC officers did not have "*detailed discussions with Hertfordshire County Council*" before scoring the sites on traffic and access grounds, making the assessments unreliable. We believe that the conclusions drawn on traffic and access for NW Harpenden and NE Harpenden are wildly overoptimistic and would not have been reached had these discussions taken place.
- Contrary to paragraphs 5.8 and 5.21 of the methodology, SADC officers used "as the crow flies" distances rather than measuring walking routes on the ground. This led them wrongly to conclude that NW Harpenden and NE Harpenden were within walking distance – given in the methodology as 800m at paragraph 5.8 and 800m-1000m at paragraph 5.21 - of many services and facilities, whereas in fact people are

likely to drive to reach them, especially as the area topography militates against walking. The judgments about sustainability of development in these locations are therefore based on manifest error.

Internal Inconsistency: If sites are to be properly evaluated, it is vital that the same area of land is scored consistently throughout the evaluation. However, for the purposes of some scores NW Harpenden was treated as including the field north of Cooters End Lane, whereas for the purposes of others it was not. Furthermore, the consequences of assertions made in relation to one criterion were not carried through to the scoring of other criteria. For example, in relation to NW Harpenden, the score for "sustainable location" depended upon education capacity issues being "*capable of resolution*" (see also draft SLP para. 6.69), including by a new on-site primary school. However, for the purposes of the traffic/access score, no consideration was given to the need to provide a separate access for a school or to the impact of school-related traffic.

Inconsistency with Sustainability Appraisal Working Note: The scoring in the evaluation matrix does not tally with the 2014 Sustainability Appraisal Working Note, even in respect of criteria which are supposedly measuring the same thing. For example, Appendix B of the Sustainability Working Note rates East Hemel Hempstead (north) and East Hemel Hempstead (south) as "very sustainable" under "sustainable location", but NW and NE Harpenden as only "sustainable". Consequently the view of the sustainability appraisal consultants is that NW and NE Harpenden are less sustainable locations for development than the Hemel Hempstead sites. The evaluation matrix however, gives NW Harpenden a higher score than East Hemel Hempstead (north) for "sustainable location", and NE Harpenden the same score. The scoring should have been adjusted after receipt of the Working Note to reflect the conclusions in it.

Inconsistency with Statutory Sustainability Appraisals: Some of the scores given in the evaluation matrix are inconsistent with, or even the opposite of, conclusions reached in statutory Sustainability Appraisals of the 2012 draft plan prepared under s.19(5) of the Planning and Compulsory Purchase Act 2004. The justifications given by officers for these discrepancies in answer to public questions are unconvincing. First, it is claimed that the differences arise because of a different national policy context. This cannot be correct: the content of a Sustainability Appraisal is determined by the Environmental Assessment of Plans and Programmes Regulations 2004, which the NPPF does not amend, and the particular SA objectives for St Albans District remain unchanged since 2005. Secondly, it is claimed that the differences arise because the scoring in the evaluation matrix is relative between sites, rather than against an absolute standard. If this is the case (and it does not

appear from the agreed methodology), it is not reflected in the scores given to sites. For example, on "heritage/archaeology" grounds, the only factor which differentiates different sites is the presence or absence of listed buildings. If the scoring were truly relative, that would mean that a site with a listed building would attract a score of 0 or 1 out of 5, a site without listed buildings a score of 5 out of 5. Instead the evaluation matrix gives all sites with a listed building on site a score of 4 out of 5. The evaluation appears not to recognise listed curtilage.

Inconsistency with Previous Evaluations: The scoring in the evaluation matrix is sometimes the exact opposite of other evaluations of the same site. For example, the Strategic Housing Land Availability Assessment (2009) treats vehicular traffic and access issues as a disadvantage of development of "Area of Search 8 (SE part)" – now the southern field in NW Harpenden – and "Area of Search 8 (NW part)" – now the northern field. In the evaluation matrix, in contrast, NW Harpenden has been given 9/10, the highest score of all the sites, against traffic and access: what was a negative has irrationally become a positive.

Previous evaluations of NE Harpenden include recommendations to protect, preserve and improve the important low density farmland that forms the landscape.

Failure to have regard to Sustainable Community Strategies: Contrary to s.19 of the Planning and Compulsory Purchase Act 2004, SADC has not had regard to either the Hertfordshire Sustainable Communities Strategy or the St Albans Sustainable Communities Strategy in determining the number of homes which should be built or the best locations to build them.

Misunderstanding/misapplication of Green Belt Policy: Both in the evaluation matrix, and in answers to public questions, it has been contended that a primary school to accommodate the occupants of new housing in NW Harpenden may be built on land retained in the Green Belt. It has been determined by an inspector (see Three Rivers District Council Site Allocations Report, PINS/P1940.429/7, para. 33) that it is unsound to plan for school buildings (rather than playing fields) on land to be retained in the Green Belt.

Irrational conclusions drawn from evidence/Disregard of cogent evidence: When drawing up the final matrix in July 2009, SADC had two sources of evidence available to it in relation to the traffic/access score for NW Harpenden: a consultation response from HCC Highways from 2009, when the Council was consulting on a proposal to build c.300 homes on Area of Search 8 (SE part), now the southern field for NW Harpenden, and a highways consultant report prepared on the instructions of Herts CC as education authority in 2011, which assessed the whole of the NW Harpenden site as a potential location for a secondary

school, which had been provided by Harpenden Green Belt Association in its submissions. Both raised significant issues concerning traffic and access. SADC

- completely ignored the report provided by HGBA, even though it was more recent than the 2009 consultation response and addressed the whole of the site, and not just part of it;
- failed to consider that the 2009 HCC consultation response was not concerned with the same site as that supposedly being scored, being only the field south of Cooters End Lane. This was obvious, as HCC suggested the potential for access via another arm to the junction of the A1081 and Roundwood Lane – a location from which it is impossible to access the northern part of the NW Harpenden site. Furthermore, the proposal then under consideration involved 200 fewer homes than now contemplated.
- summarised the 2009 HCC consultation response in a misleading way, failing to record that HCC's advice included that *"the A1081 Luton Road forms part of the county's primary distributor network and the average week day traffic flow is in the region of 18,000 vehicles...the County Council as the highway authority will maintain the current policy which states that new junctions on the primary road network will be opposed...[unless] very special circumstances exist"* and *"this area of search represents a large site that will have a significant impact on the road network in the area. Issues surrounding network capacity, access and sustainability must be fully investigated at the earliest opportunity"* and thereby making HCC's advice appear more positive than it in fact was.
- reached conclusions wholly at odds with both the 2009 HCC consultation response and the 2011 traffic consultants' report, both of which emphasised the difficulties associated with traffic and access. No reasonable local authority acting objectively could have drawn the conclusions that *"traffic impact is likely to be acceptable"* or that there is a *"relatively straightforward access position"* from either the 2009 consultation response or the traffic consultants' report.

Regarding NE Harpenden, traffic data appears incomplete and fails to take account, for example, of published Luton Airport projections and data collated and presented for recent developments along the Lower Luton Road.

A similar misuse of evidence from HCC is apparent in the scoring of the NW Harpenden site in relation to school capacity. It is a key part of the evaluation that, whilst "*education capacity issues exist, they are capable of resolution*", including via an on-site new primary school. However, HCC's advice is that a primary school needs 2.5ha of flat land – the NW Harpenden site is not flat so clearly not suitable for a primary school. Moreover, no indication has been given as to how or where nursery or secondary school places are to be provided to resolve the education capacity issues that exist.

Equally, HGBA and others provided evidence to SADC that Ambrose Wood, adjacent to the NW Harpenden site, is ancient woodland and a local wildlife site and that the "*small remnant woodland area*" identified on-site is likely to be ancient woodland. Contrary to that evidence, NW Harpenden has been evaluated in the matrix on the basis that there are no local wildlife sites or ancient woodland on site or immediately adjacent.

Mismatch between comments and scoring: There are sometimes discrepancies between the comments in the evaluation and the scores awarded. For example, in respect of "Landscape quality/surrounding area characteristics" for NW Harpenden, the overall conclusion is that a "*mid level evaluation score is appropriate*". However, in fact a high level has been given, 7/10, in respect of this criterion.

New Sustainability Appraisal Working Note: The new Sustainability Appraisal Working Note Appendix B is inaccurate in several respects.

- In assessing against the SA objectives "greenhouse gas emissions", "air quality", it uses the erroneous "as the crow flies" measurements of distance given by officers to justify its conclusions about NW Harpenden and NE Harpenden: the true walking distances are significantly longer.
- In addition, in relation to NW Harpenden the Working Note is inconsistent with the 2012 statutory Sustainability Appraisal for Area of Search 8 as regards the SA objectives "historic and cultural assets", "health" and "equality and social exclusion", without good reason.

"Revised" Evaluation Matrix, October 2014: We note that officers prepared a revision to the evaluation matrix in October 2014. As far as we are aware this has not received approval by Planning Policy Committee, nor did it form the basis of the decisions taken in July 2014 as to which sites to release from Green Belt. Moreover, it appears to be relied upon as part of the evidence base only for the online aspect of the consultation and is not available to those

reading the summary booklet in hard copy or Word. However, as it is available on the Council's website we take the opportunity in this consultation to make our views on it known.

The report re-measures some, but not many, of the distances which featured in the original evaluation matrix on which Councillors made their decisions. It demonstrates that the original evaluation was indeed, as Harpenden Green Belt Association and Harpenden Town Council had pointed out in submissions on the draft matrix, based on wholly inaccurate measurements of distance. However,

- The October report continues with errors in its measurement of distances and likely routes taken. For example, the routes measured from the NW and NE Harpenden sites to the Harpenden Railway Station patently fall short of the actual station itself. There are errors in calculations (e.g. NE Harpenden edge of site to nearest town $2.2 + 0.5 = 2.7$, not 2.27) and at one point access is identified via a route that appears only possible if an existing dwelling is demolished.
- The October report does not use the methodology agreed in March 2014. Paragraphs 5.7 and 5.21 of the agreed methodology gave distances that people are likely to walk as 800m or 800m-1km. Paragraph 5.21 indicated that 400m represented a 5 minute walk, 800-1,000m a 10-15 minute walk and that the recommended walking distance reduces by 10m for every 1m rise or fall. Instead of using its own sophisticated interactive mapping system to measure distances accurately, to which the agreed methodology could be applied, officers have instead chosen to use "Google Maps" which has much more optimistic walking times and which does not take account of topography.

In the October report officers seek to argue that the corrected measurements do not change the evaluation scoring or overall conclusions. We strongly disagree. It was a key element of the scoring of the NW and NE Harpenden sites in July 2014 that *"a wide range of facilities including those in the town centre are accessible within walking and cycling distance"*: now it is clear beyond doubt that many of the facilities identified as being within walking distance are not within walking distance, the original scoring manifestly cannot be maintained.

Question 8: Housing Density

Disagree.

HGBA recognises that if we are to minimise greenfield development, we need to build more densely in urban areas than has sometimes been the case in the past. We also recognise that, with good design, densely-built housing can be a pleasant place to live.

However, the net density of 40 or more dph is too high for the Broad Locations because these sites are right at the edges of our towns. The housing estates proposed will be wholly out of keeping with the housing on adjacent streets: they will represent ugly "carbuncles" attached to the edges of towns.

It is suggested that if a lower density figure is chosen, it will be necessary to take more land out of Green Belt. This is not the case. It is entirely open to the Council to reduce the overall number of homes and build at an appropriate density without sacrificing other Green Belt land.

Question 9: Infrastructure

Strongly Disagree.

The preamble to this question makes little sense, because the 5 bulletpoints identified from the draft plan have almost nothing to do with infrastructure, which is what the question is apparently aimed at. The appropriate parts of the draft plan to refer to would be paras. 11.3 and 11.4, and the "Infrastructure Delivery Schedule" at Appendix 5.

See our answer to Q1, where we discuss the woeful inadequacy of SADC's infrastructure planning. The Infrastructure Delivery Schedule at Appendix 5 is so sparse as to be almost bare. There is almost no content and certainly no strategic planning in evidence.

The Appendix downplays some infrastructure needs, for example the need to upgrade the Maple Lodge Wastewater treatment works and sewer network to accommodate the proposed new homes in East Hemel Hempstead (north and south). Others it omits

altogether: for example, the Water Cycle Study – Scoping Report in SADC's evidence base states that, at the proposed rate of home building, upgrades to Harpenden's waste water treatment works will be required, that the sewerage network is currently at capacity at a number of locations and would require extensive network upgrades through the town; also that localised issues may need to be resolved to ensure the risk of sewer flooding does not increase, with significant upgrades being required through the existing town. No plans have been made for these works to be carried out, which do not feature in Appendix 5 at all.

Appendix 5 falls badly short of SADC's obligations to set out "*strategic priorities for the provision of infrastructure*" (NPPF para 156) and to "*plan positively*" for the infrastructure required in the area (NPPF para. 157). It is wholly unacceptable to foist an additional 9,000 homes on the District with no clear strategy about how infrastructure will be provided for them or to support existing residents.

As paragraph 11.3 of the draft plan acknowledges, a large part of Hertfordshire's existing £2.4bn infrastructure deficit relates to highways and schools, and Harpenden and its surrounding villages suffer with current local infrastructure deficiency on both counts. Far from properly assessing the existing capacity, as required by NPPF para 162, SADC has been content to assert in respect of both NW and NE Harpenden that the "*education capacity issues are capable of resolution*", without in fact making any concrete plans for their resolution.

It seems likely that land will have to be taken out of Green Belt for schools in Harpenden to accommodate the occupants of new housing, but nowhere in the draft plan are these changes to Green Belt boundaries identified. It is wrong to consult with residents about Green Belt changes for housing without identifying the consequential changes to the Green Belt which will be required to accommodate schools and other infrastructure for that housing: residents should appreciate, and be able to comment upon in a single consultation, the full ramifications for the Green Belt of the Council's voluntary choice to provide 9,000 additional homes.

In so far as the plan (at para. 6.10 and Policy SLP6) proposes new schools on land retained in the Green Belt, this is unsound, as determined by the Inspector in the Three Rivers District Council Site Allocations Report, PINS/P1940.429/7, para. 33. School buildings (as opposed to playing fields) are clearly inappropriate development on the Green Belt and "exceptional circumstances" will have to be shown to justify Green Belt boundary change.

Equally, far from properly assessing highways infrastructure and factoring that in to decisions about whether and where to release land from Green Belt, SADC has been content to assert that "*traffic impact is likely to be acceptable*" in NW Harpenden, despite

having carried out no traffic modelling itself, having not discussed the issue with HCC Highways and flatly contrary to the evidence it had available to it.

Question 10: Other Policies

See below for our comments on Policy SLP 13c.

Specific Comment on Broad Locations for Development – NW Harpenden

As regards paragraph 6.69 of the draft plan:

- the conclusion that "*a wide range of facilities including those in the town centre are accessible within walking distance*" is manifestly erroneous, based on "as the crow flies" measurements of distance: see answer to Q7.
- the conclusion that "*topography is favourable for walking and cycling*" is the opposite of the conclusion reached in the statutory Sustainability Appraisal in respect of the 2012 pre- submission draft plan for the southern part of the site. It ignores the fact that the site is on one side of a steep-sided valley, with the A1081 Luton Road running along the valley floor.
- The conclusion that "*education capacity issues exist*" is a gross understatement of the problem, and the assertion that they are "*capable of resolution*" is entirely unsupported: see answer to Q9.
- The conclusions that "*satisfactory vehicular access can be provided*" and "*traffic impact is likely to be acceptable*" are not conclusions which any reasonable local authority would reach on the evidence available: see answer to Q7.

As regards Policy SLP 13c:

This policy assumes that it is possible to fit 500 homes on this site at a net density of 40 dph whilst retaining the listed building at Cooters End Farm and the "small remnant woodland"

and making provision for recreation/public open space as well as, possibly, a primary school. It is not - the site is too small. It is 18 ha gross, 17.1 ha once the listed building and its curtilage is taken into account. Even on the assumption that the part of Cooters End Lane which runs through the site, the public open space, the small remnant woodland and the possible school are all accounted for in the 40% of the site set aside for infrastructure, that leaves only 10.26 ha available for housing. At 40 dph that will accommodate only 410 homes.

In answer to public questions at Planning Policy Committee in September 2014, officers produced a series of slides purporting to demonstrate how this site, or the southern part of it, could accommodate 500 homes. None of these proposals withstand scrutiny.

- The first proposal purported to show how 537 homes could be fitted onto the southern part of the site, with all the infrastructure, including a school, located on additional land owned by the same developer to the East. Apart from the dubious planning merits of having all the housing on one site and all the infrastructure on another, this proposal
 - involves using land which does not form part of the Broad Location on which consultation is taking place and has not been evaluated through the site evaluation matrix. For example, no consideration has been given to the impact on the landscape of these proposals (the land is in a landscape conservation area) nor how the additional land would be accessed.
 - involves building at a density significantly higher than 40 dph and therefore does not reflect Policy SLP 13c.
- The second proposal purported to show 460 homes being fitted onto the southern part of the site, but grossly overstated the areas involved. It showed the southern part of the site as having a total area of 18 ha: in fact this is the gross area of the whole of the Broad Location.
- The third proposal purported to show 440 homes being fitted onto the whole of the Broad Location, as per the calculations in Part 2 of the Green Belt Review. However, the Green Belt Review made no allowance for retention of the listed building and therefore does not reflect Policy SLP 13c.
- The fourth proposal purported to show 720 homes, using the whole of the Broad Location and the additional land owned by the same developer. This is a combination of proposals 1 and 3 and suffers from all the shortcomings of both.

Enclosure 2

Harpenden Town Council



St Albans Strategic Local Plan 2011-2031

Representations by Harpenden Town Council

24 November 2014

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1 INTRODUCTION

- 1.1 These representations are made by Harpenden Town Council (HTC), with the assistance of Navigus Planning in respect of the St Albans Strategic Local Plan (SLP) 2011-2031 consultation.
- 1.2 HTC has sought to respond to each of the questions posed by St Albans City and District Council (SADC). The nature of such a reply is that in several circumstances there is the need to duplicate particular parts of the response; where possible, and for the sake of brevity, it has sought to cross-refer such points as clearly as possible, rather than simply repeating them.
- 1.3 HTC wishes to make it categorically clear at this stage that it deplores the loss of Green Belt land. These representations seek to be clear on this matter whilst also recognising the importance of providing for the needs of the community of Harpenden within the strategic context that is taken forward.
- 1.4 HTC recognises that there is high demand for housing in Harpenden. This is partly driven by inward migration and is a consequence of being an attractive place to live, with good transport links and excellent local schools. We do not seek to meet this demand through the SLP. There is however an unmet need for older residents downsizing to smaller houses/flats; affordable start-up homes for local key workers (e.g teachers) and small affordable family homes. Harpenden's demographic profile suggests that over the next 20 years the need for smaller homes is likely to grow.

2 Q1: ECONOMIC DEVELOPMENT

- 2.1 The aims of the SLP to foster a strong local economy with a focus on certain sectors and to create a highly skilled, flexible workforce are supported by HTC. The local economy would not benefit from the significant additional low skill jobs that could accrue in sectors such as logistics which would also contribute to greater congestion from the activity per se and from increased numbers of employees commuting in as a consequence of high local house prices.
- 2.2 Complementing the local economy, it is important to recognise that for many residents of the district their location of work is Greater London as well as important centres of employment to the east, west and north. This is one of the attractions of St Albans district, with its fast links into Central London and good road access via the A414, M25, M1 and A1(M) in particular. It is also one of the reasons why the demand for housing in the district is as high as it is. People want to come to live in the district but when they do so, they continue to work elsewhere but most notably in London.
- 2.3 Whilst supportive of the overall aims, HTC is not clear as to how the economic development objectives of the SLP will be achieved within the context of the spatial strategy presented. We recognise the potential for new housing to contribute to the economic development of Hemel Hempstead by virtue of the scale of the proposed urban extension west of Redbourn. However, the SLP is considered to give insufficient recognition to St Albans City, as the largest settlement, being the economic driver of the district, and thus having the critical mass to realise significant change in economic performance. HTC considers that the spatial strategy fails to consider adequately the potential of further strategic growth around the St Albans urban area, given its capacity to provide employment. For example, further consideration should be given to a strategy of economic growth aligned with housing growth to the south of St Albans in order to drive transformation and regeneration. This would provide the potential for strategic infrastructure improvements to, for example, the A414 which is one of the key routes through the district and a particular issue that needs to be addressed.
- 2.4 Harpenden is the second largest settlement in the district, but is a dormitory town with limited employment opportunities. A significant proportion of residents commute out of Town to high income jobs. New housing, based on extremely high historic property values, is likely to continue to serve this market sector. A significant number of people commute into the Town to work in local service sector roles in the economy, including education, retail, food and drink services and the building trades (builders, decorators, plumbers, etc). For example, the majority of Council workers and highly skilled employees of Rothamsted Research commute into Town. They come from other locations having been priced out of the Harpenden housing market.
- 2.5 Within the context of the economic strategy of the SLP, it is clear that trying to change this pattern of local service sector workers living outside settlements such as Harpenden is unrealistic. At any point in time these employees are settled elsewhere. More housing can be provided but is likely to attract new incomers

employed elsewhere. HTC is of the opinion that more housing is needed, but considers this must serve the needs of those with a local connection to Harpenden. This does not mean that an unrealistic strategy of focusing economic growth within Harpenden should be promoted. Within this context HTC endorses the approach proposed in the SLP which does not identify Harpenden as a strategic location for economic growth.

- 2.6 Nevertheless, Harpenden is the second largest centre in the District, and the SLP should be clearer about its role in the economic strategy for the District. Specifically it should recognise that this lies in the Knowledge Economy (for example Rothamstead). Existing industrial sites will not contribute towards the delivery of the economic strategy in the SLP. Within this context, HTC is of the opinion that the SLP has not considered the potential for industrial sites in Harpenden to be redeveloped in order to provide for local housing need over the period of the plan. These sites could also provide mixed use development that incorporates employment growth of the type that will fit with the economic profile of Harpenden and the strategy in the SLP. The significant loss of green belt land proposed cannot be justified when the opportunities from existing industrial sites to provide for mixed use development, and therefore provide for housing and employment needs in the district, have not been explored.

2.7 HTC particularly welcomes the following wording in Policy SLP15:

"The Council will support and encourage the redevelopment of existing employment generating sites for evolving employment uses, including for more intensive employment uses or for the provision of flexible business space and incubator units..."

- 2.8 However, HTC considers that the policy should be more explicit in encouraging, where appropriate, mixed use development on industrial sites including commercial and residential development. In Harpenden it is considered that industrial sites such as those at Coldharbour Lane and Batford Mill offer the potential for housing-led, mixed use development incorporating small-scale commercial premises. However, the SLP has not considered the potential for such development, including in particular the potential of these sites to contribute significantly towards addressing housing need on brownfield sites, close to the town centre. This could obviate/reduce the need for strategic green belt release in Harpenden. However, HTC recognises the need to provide new infrastructure such as schools and understands that strategic sites provide more opportunity to fund these.

3 Q2: HOUSING NEED

- 3.1 HTC recognises that the assessment of objectively assessed need, led by the Strategic Housing Market Assessment (SHMA), has been undertaken in accordance with Government guidance and supports the use of the more objective 10-year base. As such, it does not object to the process of establishing objectively assessed need or to the recognition of the obligation, where possible, to address this fully in the SLP.
- 3.2 However, what it has not been possible for the SLP to reflect is the new Government guidance on objectively assessed need within the context of releasing land from the Green Belt. The update to Planning Practice Guidance by the Department of Communities and Local Government (DCLG) was published on 6th October 2014, during the consultation period. We would welcome a statement by SADC on the impact of any changes on the SLP.
- 3.3 The guidance largely reinforced the National Planning Policy Framework (NPPF), but says that 'need' is not the only factor which should be taken into consideration when preparing a local plan. A DCLG press release entitled 'Councils must protect our precious green belt land' says it is not justifiable to simply release land from the green belt in order to address objectively assessed need. St Albans District adjoins Greater London, which has huge population pressure and housing need. Over 80% of SADC land is green belt. The wider issues need to be weighed up and balanced carefully.
- 3.4 The guidance states that a key consideration is whether full objectively assessed needs can be met without any adverse impacts outweighing the benefits of fulfilling them. Given that paragraph 83 of the NPPF also states that green belt boundaries should only be changed in "exceptional circumstances" it is evident that the bar is set high if objectively assessed need is used to justify the loss of green belt land.
- 3.5 Prior to the DCLG press release, the guidance was that green belt should be released to meet housing need. The press release has confused the situation. The debate is now around 'exceptional circumstance'. Does demonstrated housing need alone constitute an 'exceptional circumstance' to release green belt land? This is in fact a matter for central government clarification or (probably expensive) legal interpretation.
- 3.6 The dilemma faced by SADC and HTC is that if the SLP decides that need does not constitute an 'exceptional circumstance' and does not release strategic areas of green belt, we are at risk from unconstrained development. This is because the District has a very high housing demand (much higher than the housing need as shown in the SLP). Developers will almost certainly produce major housing development plans in Harpenden, which will not reflect the true local need, but the external demand for high value executive homes. If the SLP is not accepted, Planning Inspectors could approve these plans. The consequences are unconstrained development, with an inappropriate housing mix, more pressure on local infrastructure and no development contribution to improve infrastructure (for example schools and roads).

- 3.7 HTC considers that there is a housing need in Harpenden, which has not been quantified in the SLP, which only looked at the District as a whole. This consists of:
- 3.7.1 2/3 bedroom flats and houses for downsizers.
 - 3.7.2 Smaller affordable homes for key workers and local Harpenden first time buyers
 - 3.7.3 Three bedroom affordable and social housing for local families to relieve existing housing pressure in Harpenden
- 3.8 HTC considers that only this need should be considered as part of the SLP.

4 Q3: AFFORDABLE HOUSING AND HOUSING MIX TYPE

- 4.1 HTC welcomes the provisions of Policy SLP9. The pattern of development in Harpenden over the last ten years has resulted in virtually no new affordable homes being built. Developer contributions and new affordable units on smaller scale sites (or alternative provision) are considered important principles.
- 4.2 HTC also welcomes the recognition in Policy SLP10 and the supporting text of the need to provide for a mix of properties. The predominance of larger housing has created shortages of other types of housing, so pricing more households out of the market in the district.
- 4.3 In particular, HTC welcomes in paragraph 6.57 of the SLP the recognition of the need for a range of smaller properties. These properties are not just for first-time buyers who are typically looking for one and two bedroom flats. It is also for 'downsizers' – older people whose children have grown up and left home. Experience in Harpenden is that many of these people are looking to sell large four bedroom properties and are looking for reasonably sized two or three bedroom houses or apartments. They are not seeking the smaller flats first-time buyers are. Good examples of this in Harpenden are the 3-bed mews houses at The Foresters, Sir Joseph's Walk and Gorselands, all of which are within walking distance of the town centre. Many downsizers would be unable to afford the existing expensive properties. There is a need for affordable properties close to the Centre as well as flexi care properties (such as the new Lea Springs development).
- 4.4 It is important to recognise there is a need for a very wide range of dwelling types.
- 4.5 Whilst welcoming the overall thrust of Policy SLP10, HTC has concerns over the wording. It states that:

"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..." (our emphasis).

- 4.6 It is unclear as to whether the policy is suggesting the existing pattern should be perpetuated or whether development needs to reflect an existing over/under-supply of any particular type of property. It is suggested this is reworded:

All new housing development will contribute to a mix of different housing types in residential areas, taking into account any over- or under-supply of particular property types ~~the existing pattern of housing in the area...~~"

- 4.7 On this point, the policy should explicitly acknowledge the potential for neighbourhood plans – working in areas where there may be a slightly different pattern of need to the district-wide picture – to create their own policies on housing mix in order to address needs. The danger with a policy such as SLP10 is that it is too broad and only ever addresses district-wide mismatches in provision rather than addressing specific local need in a particular area. It could be envisaged that, in a place such as Harpenden which is different to many other parts of the district, this policy could exacerbate any mismatch in supply rather than the opposite.

5 Q4: HOUSING DEVELOPMENT OPTIONS AND Q5: "EXCEPTIONAL CIRCUMSTANCES" FOR CHANGE TO GREEN BELT BOUNDARIES;

- 5.1 HTC considers that Questions 4 and 5 are intrinsically linked, therefore has considered them together.
- 5.2 HTC wishes to reiterate its objection to the removal of land from the green belt. It is recognised that objectively assessed need for housing is a key matter that has to be addressed but that green belt should only be released if there are proven 'exceptional circumstances'. The SLP has established an objectively assessed need. Having taken the capacity of non-green belt sites into account, it is using green belt to accommodate the balance of the need. HTC's objection is that there is limited evidence of exceptional circumstances. Is it possible not to meet this need? We understand that this is a legal consideration and would urge SADC to work with other local authorities in taking specialist legal advice.
- 5.3 The evidence put forward by SADC is a legal opinion dated 25th June 2014. This was written prior to the issuing by DCLG of Planning Practice Guidance on the matter of green belts and what constitutes exceptional circumstances. This legal advice relies heavily on the case of *Gallagher v Solihull MBC* [2014] EWHC 1283 and sums up in paragraph 9 that:

"...housing need would be capable of justifying a change in the Green Belt. In my view, that must be right."

- 5.4 Yet the Government guidance issued on 6th October makes clear that this, of itself, is not enough justification. It states that:

"The Framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted."

(Paragraph: 044 Reference ID: 3-044-20141006)

- 5.5 We believe that this new guidance means the 25/06/14 legal opinion is insufficient on its own to justify green belt release. If the NPPF intended for objectively assessed housing need to outweigh green belt boundaries in all cases, then it would have said so. Instead, the decision to release green belt land must be accompanied by a clear assessment of how the benefits of doing so on the areas of land proposed for release will 'demonstrably outweigh the dis-benefits when assessed against the policies in the Framework taken as a whole.' HTC would welcome this assessment.
- 5.6 Within this context, it is the view of HTC that insufficient consideration has been given to the recommendations of the SKM Green Belt Review ('the SKM Study'). The NPPF states that the green belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns 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.

5.7 The first principle of establishing whether land should be removed from the green belt is to understand the extent to which it now serves those five purposes. This does not mean that if any area of land only serves four purposes it can be removed; the policy is intended to reflect the range of ways that land can serve these functions.

5.8 Therefore HTC suggests that the recommendations of the SKM Study are used first of all to rank areas of land depending on the extent to which they address these purposes. The sustainability evaluation by SADC officers, which was presented to the Planning Policy Committee on 3rd July 2014 did not fully recognise the findings of the SKM Study on how sites support green belt purposes. In many cases a site assessed by the SKM Study as making a significant contribution to the purpose of the green belt, was considered in the sustainability evaluation to be a sustainable site which should be identified in the SLP.

5.9 The shortcomings of the methodology employed are illustrated by the evaluation of S7. The SKM Study ranked it 3rd in terms of the sites contributing least to the purposes of the Green Belt and concluded that:

"...this area of land does not significantly contribute towards any of the five purposes of the Green Belt...."

Yet in terms of SADC's overall assessment (Strategy and Site Options Evaluation document), the site is only evaluated 8th out of eight sites. The SLP has an objective to ensure that development needs are met in a way that is least damaging to Green Belt objectives. It is evident in the case of S7 that insufficient weight has been given to the assessment that it will have less impact on the Green Belt than other sites proposed. A 2009 masterplan for this site (then known as Area of Search 3) concluded that the development of some 440 dwellings was viable, developable and deliverable.

5.10 HTC would also like to comment that over 80% of the district is designated as green belt land to:

- Provide opportunities for access to the open countryside for the urban population.
- Provide opportunities for outdoor sport and outdoor recreation near urban areas.
- Retain attractive landscapes and the enhance landscapes, near to where people live.

- Improve damaged and derelict land around towns.
- Secure nature conservation interests.
- Retain land in agricultural, forestry and related uses.

5.11 It is the view of HTC that, in order to demonstrate that exceptional circumstances exist to justify the release of green belt land, then alternative options need to be considered more carefully. In particular, it is considered that the option of focusing more growth around St Albans would potentially have more weight within an 'exceptional circumstances' argument because of the ability of growth to address issues of deprivation.

5.12 The absence of an Infrastructure Delivery Plan (IDP) to inform the decision-making process is of concern. Strategic infrastructure provision is a key issue for Harpenden. The IDP that will help to ascertain the relative benefits of development in each location in terms of ability to provide for strategic infrastructure needs. HTC are concerned about the impact of development on infrastructure, particularly schools and road infrastructure. Harpenden schools are a known issue in terms of capacity. Plans for a 4th secondary school are underway. A new primary school is currently being built in the Town Centre. Any development will exacerbate an already difficult situation. No figures have been produced about the impact of development on traffic. Local experience is that traffic and parking issues are becoming increasingly difficult in the Town.

6 Q6: GREEN BELT REVIEW AND DEVELOPMENT STRATEGY AND Q7: DEVELOPMENT SITES

- 6.1 HTC considers that Questions 6 and 7 are linked, therefore has considered them together.
- 6.2 The only area in Harpenden identified for development of green belt land is in NW Harpenden. This land is restricted in the amount of land that can come forward because of the lack of defensible boundaries to the north of Cooters End Lane
- 6.3 Taking a strategic infrastructure approach it is clear to HTC that building 500 dwellings at Site S5 is not an efficient way of delivering strategic growth with effective infrastructure to support it. In simple terms, it will realise insufficient developer funding to lead onto the delivery of the required infrastructure. As Policy SLP13c identifies, there is a “possible” need for a 2FE primary school. HTC would wish to make clear that, given the issue with school capacity in Harpenden, the additional 500 dwellings must require a more definitive statement of need for such a school. In addition, it requires
- 6.3.1 Other community facilities or contributions to existing community facilities
 - 6.3.2 Transport network and public transport services upgrades/improvements
 - 6.3.3 Recreation space and public open space
- 6.4 The primary mechanism that this list of infrastructure requirements will be funded through is the Community Infrastructure Levy (CIL). The draft CIL for SADC that was consulted on in early 2014 proposed a rate of £170/m² for residential development. Assuming an average dwelling size of 90m² to reflect the push for smaller properties and the provision of 40% affordable housing (which is exempt from CIL), the CIL receipts from development at Site S5 would be £4.6m. A 2 FE primary school alone would cost about £6.9m (excluding the cost of the land) with the need for community facilities, transport improvements and recreation/public open space increasing this bill substantially further. Whilst CIL funding from other development can contribute towards addressing this funding gap, it is likely that most of this will get drawn towards the larger strategic developments in Hemel Hempstead and St Albans as these will have priority in order to ensure that the spatial strategy is delivered. Harpenden would be facing an even larger infrastructure deficit than presently exists.
- 6.5 Thus it is questioned whether the strategic infrastructure needed to support the delivery of Site S5 can be achieved. In fact, the evidence base prepared by the planning officers at SADC agrees. Page 19 of the ‘Development Site and Strategy Options Evaluation’ Report of July 2014 states that:
- “The limited scale of development and the lack of any special factors or opportunities with this site mean it is not likely to deliver strategic infrastructure.”*
- 6.6 HTC wishes to express concern with this position and would ask SADC to demonstrate how the strategic infrastructure to support Site S5 will be delivered in Harpenden.

- 6.7 HTC does not believe that 500 dwellings would be deliverable along with a 2.5-hectare school. There is inconsistency and ambiguity throughout the SLP and its evidence base as to whether Site S5 includes the land to the north of Cooters End Lane or not. The SLP states clearly at paragraph 6.75 that:

"The extent of this site will be determined with reference to the potential of Cooters End Lane to serve as a clear and defensible Green Belt boundary."

- 6.8 The 'Development Site and Strategy Options Evaluation' Report is even clearer when it states at p.19 that:

"However development of the part of the site beyond Cooters End Lane is more intrusive into countryside. It may be appropriate to consider a reduced area for development, so as to further limit impact."

- 6.9 To the north of Cooters End Lane there is no obvious alternative defensible green belt boundary and it is of concern to HTC that if development were to spread north of Cooters End Lane then it would be liable to sprawl significantly which would be contrary to one of the purposes of the green belt. HTC also agrees that it would represent an unacceptable intrusion into the countryside. The language in paragraph 6.75 is vague and HTC is of the opinion that it should be made clearer that Cooters End Lane is the *only* possible defensible green belt boundary and the implications of development beyond that will need to be specifically justified against the test of exceptional circumstances.
- 6.10 Further important context is added to this matter by the fact that the site is at the district and county boundary with the resulting uncertainty regarding the plans of Central Bedfordshire Council as the adjacent local planning authority.
- 6.11 Even if a school was not provided (and HTC has been clear that it considers a school to be essential to support growth), it is not clear if it is possible to accommodate 500 dwellings on the 11 hectares of land to the south of Cooters Lane at a density of 40 dwellings per hectare. HTC therefore considers that the SLP is not providing clear guidance on the extent of green belt that would need to be removed. Whilst the detail would be addressed as part of the Detailed Local Plan, the inconsistency and the lack of an IDP to properly evidence infrastructure needs is of considerable concern to HTC.

7 Q8: HOUSING DENSITY

- 7.1 HTC is of the opinion that the approach to density as reflected in Policy SLP11 is overly simplistic. This is because a density of 40 dwellings per hectare (dph) may not be appropriate in all locations across the district. This appears to be a way of minimising the loss of green belt land which may be laudable but could result in poorly designed developments which are out of keeping with their surroundings.
- 7.2 Whilst, for a location such as Harpenden, a density of 40dph may not be unreasonable, not least because of the need for smaller residential units, it is the view of HTC that this should not be so explicitly stated in the policy as a target. In response to Question 7, HTC reiterates its concern over the potential to deliver development at a density of 40dph on Site S5 whilst retaining the defensible green belt boundary of Cooters End Lane. Clearly it is the case that higher densities than 40dph would not be appropriate on land on the edge of a settlement leading into open countryside.
- 7.3 HTC considers that Policy SLP11 should make clear that the density of development should reflect the importance of using land as efficiently as possible but should not provide a target figure. Additionally, more specific guidance should be given in respect of the broad locations, accompanied by a clearer statement for each broad location as to the extent of the area that would be brought forward.
- 7.4 It is of considerable concern that there is a clear inconsistency in the SLP between the recognition of Cooters End Lane as the possible defensible boundary (in the opinion of HTC, the *only* defensible boundary) and the policy approach in Policy SLP11.

8 Q9: INFRASTRUCTURE

8.1 Many of the matters that HTC wishes to raise in response to this question have already been addressed in these representations. In particular concerns on the absence of an IDP to inform the spatial strategy and guidance on the fundamental matter of the delivery of strategic infrastructure.

8.2 HTC is particularly concerned about the matter of education provision. The SLP says that development will only take place on the basis of:

"Social and community facilities, particularly to deal with pressures on local schools, including the need to make land available for new school sites."

8.3 It is considered that this is insufficient. Whilst the developer can reasonably be expected to provide the land (although they cannot be compelled to provide it for free), development should only take place on the basis of a reasonable prospect of the *delivery* of that infrastructure, and in particular the schools required to alleviate existing pressures and address the additional needs.

8.4 The assessment of site S5 makes no mention of the requirement for an additional secondary school in Harpenden or that the site itself is currently the subject of evaluation by Hertfordshire County Council for such use ('Site A' in the assessment of secondary education sites to serve the Harpenden area). It is premature to identify site S5 for housing until such time as the secondary education needs are addressed

8.5 Again, this returns to the concern that HTC has about the potential of 500 dwellings at Site S5 to secure the strategic infrastructure needed, and we will not repeat these arguments here.

8.6 It is the opinion of HTC that Policy SLP30 on infrastructure delivery and the related policies on the strategic locations need to be much stronger in requiring the key strategic infrastructure items to be secured before a significant quantum of development comes forward. It cannot be the case that development comes and then the expected infrastructure does not come with it, as happened historically with development in Batford. In Harpenden this would be disastrous for the effective functioning of the town.

8.7 HTC is concerned about the issue of water supply in Harpenden. The existing infrastructure is ageing, and there have been issues with water supply/disposal around the Town. Adding this density of properties to a system that already has issues will exacerbate the situation. At the same time, water supply in the District is subject to drought and lack of supply. Adding substantially to the population will make this situation worst.

8.8 If Site S5 remains in subsequent versions of the SLP, then collaboration with the community on its master planning will be vital, so this bullet point Policy SLP13c is strongly supported.

9 Q10: OTHER POLICIES

- 9.1 Policy SLP21 on the provision and retention of cultural facilities specifically identifies the redevelopment of Harpenden Public Halls as a supported item. This part of Policy SLP21 is strongly supported by HTC.
- 9.2 On a similar theme, HTC considers that Policy SLP7 on community, sport and recreation facilities should, if taking the approach of identifying particular needs by location, make specific reference of the need in Harpenden for a new leisure centre/swimming pool during the period of this plan and, in the shorter term, a full-sized, 3G floodlit football pitch. This links back to Policy SLP13c which identifies the need for 'recreation space' and 'other community facilities'. Explicit acknowledgement of priority items will help to give the developers of any strategic site in Harpenden a clear steer on the needs arising from development.
- 9.3 Equally, Policy SLP25 should make specific reference to improved town centre and railway station (multi-storey) parking in Harpenden.
- 9.4 In terms of identifying the overall key features of Harpenden that need to be considered in shaping the spatial strategy, there are some omissions and errors:
- At Policy SLP7, Harpenden Library has already been relocated.
 - There is no mention of Harpenden Common's value as a County Wildlife Site.
 - No mention is made of the Batford Springs Local Nature Reserve and the chalk stream, one of only 180 in the world.
 - At paragraph 3.13 reference is made to Harpenden having a museum yet it does not have such a facility.
 - At paragraph 3.5 reference is made to Harpenden having benefitted from expanded central supermarkets. HTC is confused as to what this means and considers that this needs to be clarified in the text.
 - At paragraph 8.10 reference is made to the Wheathampstead Farmers market but this ceased to operate over 12 months ago.
 - Policy SLP 21 as worded is ambiguous. Potentially it could be read as meaning that the ambition to redevelop the public halls and other initiatives is the responsibility of HTC. Whilst this may be the case in time, at this stage it is not appropriate to give any suggestion that HTC is the only body which should take such initiatives forward. Indeed, the SLP is explicit about the fact that SADC will be sharing the cost of initiatives in St Albans city centre. It should be acknowledged that the District owns and runs the Public Halls.
 - At paragraph 11.6 it should be noted that St Albans is a three tier authority area, not two, with local councils now providing much of the leisure facilities and green space.

Enclosure 3

which will review and define detailed Green Belt boundaries. Also, where there is an established local need, some land adjoining or within villages may be developed to provide affordable housing where it is supported by the local community. Such small-scale 'rural exception' sites will help address the needs of lower-income households with a close family or employment connection to that settlement. These small scale Green Belt boundary changes and intentions for negotiation of rural exception sites may be identified through the Neighbourhood Planning process, if Town and Parish councils chose to progress such Plans.

Local Housing Target / Requirement

- 6.33 Taking the approach set out above and looking at recent trends, the most up to date information on housing land supply has been analysed to give confidence of housing delivery. The table below indicates land supply sources & approximate proportion of planned supply:

| <u>Source (whole Plan period)</u> | <u>Dwelling Numbers</u> | <u>Percentage of Overall Delivery (rounded)</u> |
|---|------------------------------|---|
| Completions from 1 April 2011 (base date for Plan period) to 1 April 2014 | 1,075 (actual) | 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 greenfield Green Belt Broad Locations (residual development requirement affecting land currently designated as Green Belt) Includes potential for flexibility in scale and timing of development at these locations – especially East Hemel Hempstead. | 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% |

| | | |
|------------------------|-------------|-------------------------|
| Total projected supply | Up to 9,125 | 100% (on 9,125 base) |
|------------------------|-------------|-------------------------|

- 6.34 National planning policy requires the SLP and DLP to ensure that the housing target can be delivered with confidence and to provide for contingency. An up-to-date Housing Trajectory outlining the current housing land supply position against the locally derived housing target / requirement is set out annually in the Authority's Monitoring Report³. A notional trajectory based on the draft SLP and the current land supply position (April 2014 base date) is set out at Appendix 2. This trajectory and the table above illustrates that it is reasonable to assume that the Plan proposals can deliver approximately 9,000 dwellings in the period to 2031. This is a cautious assumption and builds in a considerable degree of contingency/flexibility, as required by the NPPF.
- 6.35 The trajectory illustrates the realistic potential to achieve a relatively even level of housing delivery over the Plan period. However it is important to acknowledge that delivery issues are complicated and will be dependent on general and site specific market conditions through the Plan period
- 6.36 Taking account of all relevant aspects, including market factors and allowing for contingency, the approach supports the following approach to a local housing target / requirement:

Policy SLP8 – Local Housing Requirement /Target and Provision

Additional Homes 2011 - 2031 = 8,720 = average 436 per annum across the plan period.

Sites currently permitted or available for development together with the Development Strategy (set out in Policy SLP1) will deliver the land required to meet this Local Housing Requirement / Target in general accordance with the Spatial Strategy (again as set out in policy SLP1).

Further policies and detailed site allocations to support delivery of the Housing Target will be set out in the DLP. These will include making provision for older persons housing of all forms. Where such provision is made the supply of new homes will be taken as contributing to meeting the local housing requirement / target.

- 6.37 The Council's Local Housing Requirement / Target is set at 436 dwellings per annum on the basis of the best evidence available on the need for new housing development in the District and a Plan that sets out to meet reasonable long term estimations of need in full. 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. This estimate of need has been used directly as the Plan housing requirement/target. It is acknowledged that other calculations of need currently exist and new calculations of need will be made over time. Unless there is a highly significant change in future long term estimations of

³ Authority Monitoring Reports are published annually in December.

Enclosure 4

Our Ref: EIR 224861
Please ask for: Customer Services/FOI Team
Direct Line: (01727) 819209
E-mail: foi@stalbands.gov.uk
Date: 20 November 2014

Joanne Whitehead

Emails: [REDACTED]

Dear Ms Whitehead.

Environmental Information Regulations Request –Reference: 224861

I write with regard to your request for information sent by email to St Albans City & District Council, received on 23 October 2014.

Your request falls under the Environmental Information Regulations. Under the Environmental Information Regulations, we are required to make environmental information available in so far as it is not exempt under any of the exceptions in Regulation 12.

Your request:

"I would be grateful if you could provide the following documents under the Freedom of Information Act:

All communications (including emails and minutes or notes of meetings) between St Albans District Council as local planning authority and Hertfordshire County Council as highways authority in the period 4 March 2014 to the date of this request relating to the highways and traffic aspects of St Albans District Council's draft Strategic Local Plan; and

All internal records (including notes of meetings and internal emails) within St Albans District Council recording advice given by Hertfordshire County Council as highways authority in the period 4 March 2014 to the date of this request relating to the highways and traffic aspects of St Albans District Council's draft Strategic Local Plan.

To help guide your search, I am particularly interested in the following (although without narrowing the scope of the above requests):

(1) the date on which St Albans District Council first approached Hertfordshire County Council for its advice on the highways and traffic aspects of the draft Strategic Local Plan and the date on which that advice was first given; and

(2) the content of the advice given by Hertfordshire County Council in relation to the highways and traffic aspects of the draft Strategic Local Plan at a meeting on or



about 8 October 2014 between Chris Briggs of St Albans District Council and members of the Hertfordshire County Council highways team.”

Our response:

Attached is the information you require. Due to the restrictions on our email attachment sizes, this information will be sent in two separate emails.

On your specific questions:

- 1) I am advised that SADC did not specifically approach HCC for advice on the highways and traffic aspects of the draft Strategic Local Plan but they will be responding to the current consultation in the normal way.
- 2) As above. The notes of the meeting on 8 October 2014 are attached and may be of some help to you.

If you are dissatisfied with this response the Commissioner's Office recommends that you first refer the matter to the Council. You can do this by writing to foi@atalbans.gov.uk asking for an internal review of my decision. If you wish the Council to undertake an internal review, then you must write to the Council within 40 working days of the date of this letter. The Council will not consider any requests received after this date unless there are exceptional circumstances for the delay.

You have a right to appeal to the Information Commissioner's Office at the following address: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. You must do this no later than two months after the Local Authority's last response to you.

Yours sincerely,

Linda Batham
FOI Coordinator
Planning & Building Control

This is the only relevant enclosure

Notes from meeting with SADC regarding Strategic Local Plan on 8/10/14

SADC- Chris Briggs, John Hoad and Manpreet Singh Kanda

HCC- Richard Jones, Lindsey Lucas

Apologies James Dale

Issues discussed. - HCC actions in bold

Strategic Local Plan public consultation will run from 10 October 2014- 23 November 2014

Highways Local Plan Protocol – JH stated they are waiting to see the redrafted version following the last meeting of the HPG where Sanjay agreed that redraft would take place.

Action:- RJ to check status with SP

SADC position is that it is for the land owner/developer to fund any required traffic modelling work as they wouldn't have budget to pay for that, nor indeed would they expect HCC to. Information on transport issues etc has been drawn from existing work.

Broad Locations

Hemel Hempstead sites. Need to keep highway needs/ assessment of potential Broad Locations in SADC separate from those of other issues – primarily the Maylands transport/infrastructure work currently being scoped. Dealing with Crown Estates. SADC would expect them to pay for any modelling work required. Would be able to use HH model as base.

Oaklands site – current application for over 300 dwellings on part of site. Due to be determined in next couple of weeks. Recommended for refusal – understood no highway reasons. Site covered by existing SADC model

Harpenden. Have had some discussions with Central Beds but not specific to this site or highway aspects. If required - suggest that developer would pay for modelling. Need to determine whether or not or what type of modelling might be required- whole area model or site specific as for a TA. Recommended that SADC speak to Central Beds to see if their model covers the area . CB thought that Herts property had been looking at the site for potential school site assessments and may have some transport data. Also previous discussions on the site have identified access points.

Actions:-

MSK to liaise with Central Beds to see if they have any relevant traffic information or modelling that could be made available.

LL to check with JD and Matt Wood

MSK/RJ to investigate and establish list of existing transport assessment/modeling work already undertaken with regards to broad locations

Other allocations including sites already identified and windfall sites could provide another 4000-5000 dwellings of which approx. 50% could be within St Albans city. eg Ziggurat offices near station converting to residential. Impact of these would be covered by CIL.

General

Appendix 5 of report sets out the Infrastructure Delivery Schedule and includes highways. Manpreet to forward details of transport assumptions used in developing the infrastructure plan for HCC to check that the relevant data has been used.

Actions:-

MSK to provide site evaluation report to HCC and SADC initial views on transport infrastructure requirements for each broad location.

MSK to forward details of IDP which relate to transport to HCC. JD to assess prior to November meeting

LL explained UTP review that is currently going on. Might be beneficial to share outcomes of work currently being carried out by Aecom as a base line of what we know in terms of current situation

MSK to provide 5 yr land supply and SHLAA data for background information to the UTP refresh process

Next meeting to be set week beginning 10 November at SADC offices and to include Sue Jackson

Enclosure 5

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

Spatial Planning & Design
St Albans City and District Council
Civic Centre
St Peters Street
St Albans
Hertfordshire
AL1 3JE

Spatial and Land Use Planning
Environment Department
Hertfordshire County Council
County Hall
Hertford
Hertfordshire
SG13 8DN

Paul Donovan
01992 556289
paul.donovan@hertfordshire.gov.uk

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 be 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 be 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 e 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

Enclosure 6

Project: **Highways Agency Spatial Planning Arrangement** Job No: **60295882 SH038.001**

Subject: **St Albans Draft Strategic Local Plan - Review**

Prepared by: **Jane Salmon** Date: **7th November 2014**

Checked by: **Simon Willison** Date: **12th November 2014**

Verified and **John Alderman** Date: **12th November 2014**

Approved by:

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% |
| Total | Up to 9,125 | 100% (on 9,125 base) |

- 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 |
| Total | 100 | 1,078 |

- 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 |
| Total | 100 | 431 |

- 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 |
| Total | 100 | 216 |

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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.

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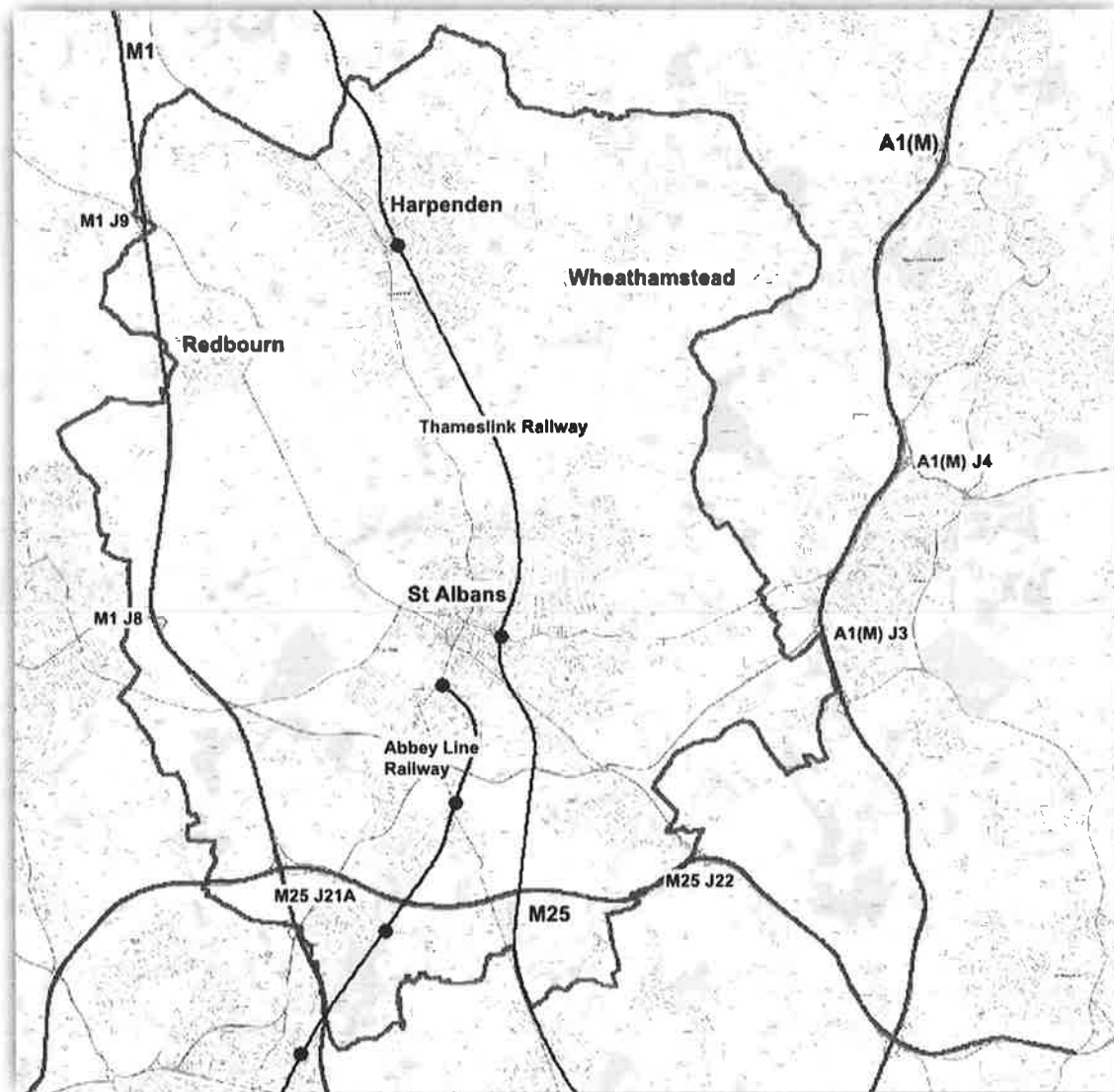
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APPENDIX A

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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Enclosure 7

Joanne Wicks QC

From: David Rankin <[REDACTED]>
Sent: 04 February 2016 17:11
To: Joanne Wicks QC
Subject: James Dale reply

Importance: High

From: [David Rankin](#)

Sent: Monday, January 25, 2016 11:49 AM

To: <mailto:James.Dale@Hertfordshire.gov.uk>

Subject: Traffic modelling, Harpenden and St Albans District Council's current draft Strategic Plan

Dear James

I need a short update on one or two matters and I hope you can help.

I do know you are very busy.

1) Can you kindly confirm that testing of the preferred locations using COMET is still to start in February 2016?

How long do you think will it take to complete the cumulative testing of key 'interurban road networks'?

It is anticipated that the first run of the future year (2031) version of the COMET model will be completed by the end of February. This will include residential and employment growth in St Albans district as provided by SADC in December 2015 (which is consistent with the development sites outlined in the current consultation) in addition to proposed growth in other districts within Hertfordshire (based on information agreed with the LPAs).

2) When will you be testing the A1081?

The A1081 will be 'tested' as part of the COMET model run.

3) I understand from you that the testing will take into account traffic from the A1081 resulting from the rapid expansion of Luton airport and the housing development plans of adjoining authorities like Central Beds and Luton Borough Council.

The COMET model includes current and predicted traffic growth from outside the county.

I think that it is also essential for you to have some idea of the impact on Harpenden of at least 1,500 new houses in Redbourn. Unless you can model that impact, you may find that all you have done on the A1081

is effectively undermined. At peak hours, the Redbourn Lane onto the A1081 now has long tailbacks and is very busy throughout the working day.

Noted

4) There are **1,300** new homes to be built in Harpenden not just the 500 to be built on green built to the north of Harpenden. The 800 are to be built within the Town is to be found in SADC's draft SLP 'Housing Trajectory' for 'urban capacity'.

Can you confirm that the consequences of building many new houses 'on urban capacity' (ie within the green belt) will be covered in your modelling?

Confirmed, all growth specified in St Albans Local Plan consultation is included in the COMET run.

All the focus in the press and elsewhere is on green belt usage for new homes not on 'urban capacity'. However, 'urban capacity' has to provide **4,500** homes in the District of St Albans and unless you take full account of it, your modelling will be completely insufficient for the task at hand.

Noted

5) Is it current HCC policy not to allow new accesses onto A roads?

Hertfordshire County Council has a policy that sits behind the Local Transport Plan which states that,

New access to primary and main distributor routes will only be considered where special circumstances can be demonstrated in favour of the proposals. This will include consideration of why alternative proposals are not viable.

Regards

David

From: [James Dale](#)

Sent: Monday, November 9, 2015 8:55 AM

To: [David Rankin](#)

Cc: [David Williams](#)

Subject: RE: Traffic modelling and Harpenden

David

Further to my message last week my responses to your questions are listed below.

1) With your transport modelling in mind, could you tell me if it is your intention to use the 'Saturn' traffic model (or a similar model) for Harpenden?

Harpenden is not currently included in the existing St Albans Saturn model. However we are currently developing a Saturn based countywide transport model (COMET) which will cover the whole area. The intention is to undertake an initial test of preferred local plan development locations (provided by the district councils) in February 2016. This will be a cumulative test looking at the impact of development across the county, in particular on the key interurban road network.

Following this the intention is to encourage developers to commission tests of individual developments using the model, recognising that there may need to be some localised model enhancement work to assist this.

2) Would a model analyse not only the traffic flows on the Luton Road and the Lower Luton Road but the traffic flows on Redbourn Lane?

The new countywide model network coverage covers these three links so should be able to assess the impact of development on these routes.

3) Would the model analyse traffic flows on roads like Station Road ie those **within** the (rather congested) centre of Harpenden?

Station Road is also included in the model as well as other key links within the urban area (such as Southdown Road and Crabtree Lane). It should however be noted that initially the calibration efforts have concentrated on the key interurban links and therefore it is likely that further enhancement work would be needed to give confidence of the impact within urban areas.

4) Would the model predict the likely requirements from the residents of the **1,300** new homes which may be built in Harpenden in the Plan period for parking in the centre of Harpenden.

The Countywide model does take into account different trip purposes but these are largely limited to home based work and home based other and do not specifically differentiate between shopping and say leisure trips.

The model will include an estimate trip generation from the development and where the traffic goes based on the underlying distribution pattern in the model. This will include allowance for commuting trips by car to the station and other trips to the town centre from the development but would not specifically identify the exact parking requirements.

Normally I would expect that this level of detail is something that would be worked up by the developers in support of a planning application.

The NPPF's view on town centre parking is,

40. Local authorities should seek to improve the quality of parking in town centres so that it is convenient, safe and secure, including appropriate provision for motorcycles. They should set appropriate parking charges that do not undermine the vitality of town centres. Parking enforcement should be proportionate.

5) Would the model take into account the need for parking from residents of the 2,500 new homes which may be built east of Redbourn? Some of those residents will use the train service in Harpenden and will need to shop in Harpenden.

Similar to my response to question 4, I expect modelling and other techniques to accurately predict the level of traffic and person movements generated by proposed residential development but I believe it will be difficult to accurately predict how many of the new occupants will drive from Redbourn to Harpenden to shop.

6) On SADC's website, it says that 'Highways England' no longer gives **direction** to local planning authorities, only **advice**. Does that mean that local authorities are now free to ignore the advice of 'Highways England'? I assume that Herts County Council, once it has completed its traffic modelling exercise, will only be providing 'advice' to local authorities in the County and has no power to 'direct' them. Is that correct?

Hertfordshire County Council as local highway authority are a consultee in the process and all authorities involved in the process have a duty to cooperate. The local plan is promoted by St Albans City and District Council. However, part of the process is a formal examination in public where views from all parties will be considered.

From: David Rankin [[mailto:\[REDACTED\]](mailto:[REDACTED])]
Sent: 05 November 2015 11:27
To: James Dale
Subject: Traffic modelling and Harpenden

Dear James

From the end of today, I will assume that you are never going to reply to either David Williams or myself.

Do let me know if a reply is about to be sent.

Regards

David

From: [David Rankin](#)
Sent: Monday, June 22, 2015 4:00 PM
To: <mailto:James.Dale@Hertfordshire.gov.uk>
Subject: Traffic modelling and Harpenden

Dear James

You may recall from our brief telephone exchanges some months ago that I am interested in St Albans District Council's draft 'Strategic Local Plan'. I try to follow its development in as much detail as I can.

I understand from SADC that you are currently working on a high level County-wide transport model which will test the so-called 'broad locations' in SADC's draft SLP. As you know, new homes might be built on those 'broad locations'.

1) With your transport modelling in mind, could you tell me if it is your intention to use the 'Saturn' traffic model (or a similar model) for Harpenden?

2) Would a model analyse not only the traffic flows on the Luton Road and the Lower Luton Road but the traffic flows on Redbourn Lane?

3) Would the model analyse traffic flows on roads like Station Road ie those **within** the (rather congested) centre of Harpenden?

4) Would the model predict the likely requirements from the residents of the **1,300** new homes which may be built in Harpenden in the Plan period for parking in the centre of Harpenden.

5) Would the model take into account the need for parking from residents of the 2,500 new homes which may be built east of Redbourn? Some of those residents will use the train service in Harpenden and will need to shop in Harpenden.

6) On SADC's website, it says that 'Highways England' no longer gives **direction** to local planning authorities, only **advice**. Does that mean that local authorities are now free to ignore the advice of 'Highways England'? I assume that Herts County Council, once it has completed its traffic modelling exercise, will only be providing 'advice' to local authorities in the County and has no power to 'direct' them. Is that correct?

My thanks.

Regards

David

01582 766859

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Enclosure 8

GENERAL

Measurements in the draft evaluation

The distances given in the draft evaluation are inaccurate and highly misleading.

The methodology proposed by planning officers and agreed by the PPC at their 4 March 2014 meeting was that *"distance assessments will measure approximate routes on the ground rather than "as the crow flies": see paragraph 5.8 of the Report "SLP Green Belt Strategic Sub Area Development Options – Evaluation Methodology"*.

In fact it appears that distances have, for the most part, simply been lifted wholesale from the Green Belt Review Part II, which does not use "approximate routes on the ground" and is often badly inaccurate even when expressing "as the crow flies" distances.

Moreover, it appears that distances have not been measured consistently from a single point, but from the outermost edge of the relevant site closest to the relevant facility. Thus the goal posts have been moved each time a measurement has been taken so as to shorten the distance being measured, which is not consistent with a proper assessment of sustainability.

In each case, the effect of departure from the approved methodology has been significantly to understate the distance – which has obvious consequences for the soundness of the judgments made in the draft evaluation.

Measurements in this submission are taken from the Magic website, www.magic.gov.uk, measured in each case from a defined single point. They are only approximate.

Letter from Harpenden Town Council dated 18 June 2014

We agree with the points made in the letter from Harpenden Town Council dated 18 June 2014 and hope by this submission to provide further detail and evidence to support that position.

SITE S5

Distances are taken by using the measuring tool on the Magic website taken from Cooters End Farm (AL5 3NR), using the most likely route

1. SUSTAINABLE LOCATION

- 1.1 The overall scoring of “High” for this criterion is inconsistent with formal Sustainability Appraisals previously carried out for this site by C4S, on behalf of the Council, pursuant to s.19 of the Planning and Compulsory Purchase Act 2004 and the European Directive 2001/42/EC. It is irrational for the current assessment to differ from previous statutory appraisals unless there is evidence of change since those appraisals were carried out.
- 1.2 In particular, the southern field in Site S5 was previously identified as “Area of Search 8: Land North of Harpenden (South East part) (**AoS8(SE)**)”, and was the subject of the SA Report 2012 in respect of the draft pre-submission publication SLP 2012. At **Appendix 1** is a copy of the assessment of AoS8(SE) (together with the key).
- 1.3 In the formal Sustainability Appraisal, against the SA objective “sustainable location”, AoS8(SE) was not given the highest score “very sustainable”, which would be commensurate with “High” in this evaluation, but only “sustainable”, it being recognised (see “greenhouse gas emissions” and “air quality”) that the site is located some distance from the town centre, which is likely to generate additional car trips. Development of Site S5 was considered “unsustainable” against the SA objectives of biodiversity, soils, use of brownfield sites, historic and cultural assets, landscape and townscape and health. Overall, it scored as “unsustainable” against 9 SA objectives, and “sustainable” against only 7.
- 1.4 Against this background we consider each of the factors addressed in the draft initial evaluation.
- 1.5 Relation to existing settlements

The methodology adopted by the Green Belt Review has been designed to select sites which immediately abut existing settlements: consequently, all of the sites under consideration relate to an existing settlement, and there is very little to differentiate any of them on this ground.

1.6 Proximity to employment

- 1.6.1 As indicated above, the draft evaluation significantly understates the distances to the employment sites mentioned. For example, Site S5 is approximately 2km from EMP1 Coldharbour Lane and approximately 1.8km from Harpenden town centre (taken as the War Memorial).
- 1.6.2 The employment opportunities at Coldharbour Lane, Batford Mill Industrial Estate and Southdown Industrial Estate are very limited.
- 1.6.3. The identification of all the employment sites fails to give due consideration to the likely inhabitants of new housing on Site S5. Market housing in Harpenden is amongst the most expensive in the country; the market is driven in particular by the desire of families from London to access its good schools, open green spaces and good transport links to London, coupled with their ability to out-bid local people for housing by reason of selling expensive properties in London. Furthermore, the Assessment of Housing Needs and Strategic Housing Market Assessment (paragraphs 2.26-2.27) demonstrates that new-build housing in the District drives that in-migration. Consequently it is obvious that the most likely inhabitants of new-build market housing on Site S5 will be professional families, many with at least one adult working in London. Since, whatever the provision of affordable housing on Site S5, the majority is clearly going to be market housing, it is fantasy to suggest that any more than a small minority of those living on Site S5 will work locally. Data recorded in the Harpenden Urban Transport Plan (2011), taken from the 2001 census, indicates that 65% of those in employment commute out of the town to work, with the largest single employment draw being London. We anticipate that that trend will have become even more pronounced in the 13 years since that census was taken.

1.7 Proximity to schools

- 1.7.1 As indicated above, the draft evaluation significantly understates the distances to the schools mentioned. Wood End School is approx.1.4km away; the Roundwood Schools are approx..1.6km away; St George's school is 1.3km away and Sir John Lawes approx. 1.8km away.

1.7.2 Of the local schools mentioned in the draft evaluation, St Hilda's School is an independent girls' school and The King's School is an independent evangelical Christian school with a very strong faith ethos. Neither would be open to all children living on Site S5 and therefore neither should be considered when evaluating this site. In any event, both only pre-school to 11 and are very small: St Hilda's has about 165 pupils in total, The King's School about 180 pupils in total.

1.7.3 All three Harpenden secondary schools are academies with control over their own admissions policies and St George's School is a faith school with restrictive admissions criteria.

1.7.4 The draft evaluation wholly understates the crisis of school capacity which currently exists in the Harpenden area and misstates Hertfordshire County Council's current position. At **Appendix 2** is a report to the Policy, Resources and Transformation Cabinet Panel of Hertfordshire County Council's meeting of 13 September 2013. It shows that:

- the most recent forecast indicates a 4 forms of entry ("f.e.") shortfall in secondary school places in the Harpenden school planning area (which includes neighbouring villages) by 2017/18, increasing to 7.6 f.e. by 2019/20, then reducing to 5 f.e. on a permanent basis, with no surplus across the area (para. 2.2 and table at page 4);
- the need to provide additional secondary places in the Harpenden area is "*acute*" (paras. 2.3, 4.2, 4.21);
- the expansion of existing schools in Harpenden will not address the predicted shortfall of secondary school places (para. 4.7); and
- these figures do not include any additional places required as a consequence of new housing in Harpenden (para. 4.8).

1.7.5 Demand for primary school places is also extremely high. We understand that residents of Bloomfield Road are currently unable to secure a place at Roundwood Primary School, which is substantially

their closest school. Places at Roundwood Primary would simply not be available to residents of Site S5.

1.7.6 HCC's infrastructure requirements paper regarding schools which was provided to SADC in 2012 at the time of the previous draft SLP indicated that allowance should be made for 42 primary school places and 38 secondary school places for each 100 new dwellings. Consequently new housing on Site S5 will generate a need for up to 223 additional primary school places and 202 secondary school places (depending on density and mix of housing). Neither existing schools, nor the planned fourth secondary school, have anything like the capacity to absorb these numbers of children and Site S5 is not large enough to accommodate a new school as well as new housing. Consequently, development on Site S5 will inevitably place further pressure on Harpenden's Green Belt, in order to accommodate new schools for which there is no urban land available.

1.7.7 Recognising the negative impact of the lack of school places in local schools on the SA objective "equality and social inclusion", the 2012 SA scored AoS8(SE) as "unsustainable" for this reason.

1.8 Proximity to open space

As indicated above, the distances given are inaccurate.

1.9 Proximity to existing neighbourhood centres

1.9.1 As indicated above, the distances given in the draft evaluation are inaccurate. In particular, it should be noted that Harpenden town centre (measured from Cooters End Farm to the War Memorial via Luton Road) is approximately 1.8km from Site S5.

1.9.2 The "local centre" at 95-105 Luton Road (i.e. Tesco's Express) has very limited parking.

1.9.3 The "local centre" at Westfield Road is unlikely to be much used by the inhabitants of Site S5, given its very limited offer and distance from the site (approx. 1.8km and therefore no closer than Harpenden town centre).

1.10 Proximity to supermarkets

1.10.1 As indicated above, the distances given in the draft evaluation are inaccurate. The supermarkets in Harpenden town centre are all at least 1.8km away.

1.10.2 The existing supermarkets are relatively small, often overcrowded and suffer from very limited parking with no room for expansion.

1.11 Proximity to medical facilities

1.11.1 As indicated above, the distances given in the draft evaluation are inaccurate.

1.11.2 The BUPA Harpenden Spire Hospital is a private hospital; it should not be used in the evaluation of Site S5.

1.12 Proximity to leisure facilities

As indicated above, the distances given in the draft evaluation are inaccurate.

1.13 Links to footpath and cycle network

1.13.1 As indicated above, the distances given in the draft evaluation are inaccurate. The Nickey Line entrance off Ambrose Lane is approximately 700m away.

1.13.2 The draft evaluation fails to mention the Chiltern Way long distance walking route, which runs down Cooters End Lane and which may be lost if Site S5 were to be developed.

1.13.3 Whilst we recognise that there are cycle routes around Harpenden and that the Nickey Line is a particularly important leisure route close to Site S5, it cannot be ignored that there are no safe cycle routes along the A1081 Luton Road towards, or away from, Harpenden town centre. This road is very busy and congested and it is not safe for anybody other than the most confident cyclist to navigate.

1.13.4 Furthermore, as the 2012 SA of AoS(SE) recognised, by scoring this land as “unsustainable” on health grounds, the topography of this area of Harpenden discourages cycling and walking, since the A1081 lies at the bottom of a steep-sided dry valley. This means that there are steep uphill climbs towards, for example, the Roundwood schools from Site S5, and back to Site S5 from those schools. In addition, the Harpenden Urban Transport Plan (<http://www.hertsdirect.org/docs/pdf/h/harputpfin.pdf>.) identifies both the

narrow pavement under the Nickey Line bridge on the A1081 and the narrow pavement on Ambrose Lane on bridge over the Nickey Line as disincentives to walking (para. 4.18).

1.14 Potential to promote equity and added social inclusion

We agree that Site S5 provides no opportunities to promote equity and added social inclusion. On the contrary, as the 2012 SA recognises, the site is unsustainable in relation to this ground due to the lack of available places in local schools.

1.15 Contribution to economic growth potential

We agree that Site S5 provides no opportunities to develop the economic growth potential of the area.

1.16 Ability of development to draw on economic value of built or natural environment

We agree that development on Site S5 would not draw on the economic value of built or natural environment features. Indeed it would compromise those features, as we discuss further below.

1.17 Overall conclusions

1.17.1 The conclusions drawn in relation to this criterion appear to be based on inaccurately-recorded distances to local facilities, out of date information about school places and unrealistic assumptions about the people likely to live in any development on Site S5.

1.17.2 Site S5 is 1.8km to Harpenden town centre and 2.3km to Harpenden railway station, which will be the key connector to employment for many of the people who would live there. These distances are too far to walk comfortably, particularly with small children or carrying heavy shopping and given that the site itself slopes sharply (so that most inhabitants will have an uphill climb at the end of their journey). The walking times given in the brochure for the Developer of the southern part of Site S5 (Commercial Estates Group – “CEG”) are wildly optimistic and clearly written by people who do not actually walk these routes. Cycling down the A1081 is only for the most confident. Coupled with the high levels of car ownership which can be anticipated from those who will live in the new housing, it is clear that development of Site S5 will add significantly to the levels of congestion on the A1081.

1.17.3 Given the distance from the town centre and railway and the existing acute shortage of school places, we consider that the current “High” rating for Site S5 cannot be justified. At most this should attract a “Low/Medium” rating, consistently with the previous statutory Sustainability Appraisal.

2. SETTLEMENT HIERARCHY

2.1 The use of the “settlement hierarchy” criterion is based on the assumption that the main urban settlements are the most sustainable locations because they enable the widest range of facilities to be accessed. This assumption is not true of Harpenden, where existing facilities are already over capacity and will inevitably be accessed predominantly by car from Site S5.

2.2 Given the factors addressed above, we consider that the current “high” rating for settlement hierarchy cannot be justified. At most this should attract a “Medium” rating.

3. MIXED-USE DEVELOPMENT

3.1 We agree that mixed-use development would not be appropriate on this site and that it therefore attracts a “Low” score.

3.2 We note that CEG is seeking to argue that the southern part of Site S5 is suitable for mixed use by virtue of a “hub” of care retirement apartments, extra care assisted living apartments and assisted living bungalows. However, it would appear that these would all comprise *“not more than six residents living together as a single household where care is provided for residents”* and therefore be classed as “dwellinghouses” within Planning Use Class C3, as much as the other housing on the site. This proposal is not for genuinely mixed use.

4. OTHER MATTERS

4.1 We do not agree that there is no economic value to environmental and heritage features. The green spaces around Harpenden, together with heritage features such as Cooters End Farm and the Highfield Oval, and local wildlife and beauty spots such as Ambrose Wood and Westfield Wood, play an important role in attracting people to the town. There is an economic dimension to this attraction, bringing money into the District and the town to support its local economy.

4.2 The economic value of the Green Belt and other green infrastructure was expressly recognised in the study commissioned by SADC in 2012: "Environmental Capacity of St Albans City & District: Defining a Sustainable Level of Development" ("the Environmental Capacity Report"). Due to its length we have not appended this report. In the Executive Summary, it is said that the Environmental Capacity Report *"will form an important part of the Council's evidence base to shape and support local policy"*. In fact it appears to have been ignored. Section 2 addresses the economic values of ecosystems services, including Green Belt. The conclusion of this study was that *"there is overwhelming quantitative evidence that the current level of urban development in St Albans is unsustainable"* (Executive Summary) and *"it would be unwise to permit further urban development in the District on undeveloped land"* (para. 9.8).

4.3 We are also concerned about the loss of agricultural land: Site S5 is actively farmed. The proposals of CEG for the southern part of Site S5 anticipate the loss of significant areas of farmland going well beyond Site S5. Paragraph 10.7 of the pre-submission draft SLP, withdrawn in November 2012, stated that *"Agricultural land in the district is of great importance in ensuring a sustainable place to live for current and future generations"*.

4.3 For those reasons we consider a "Low" score is appropriate.

5. STRATEGIC INFRASTRUCTURE PROVISION

We agree that development of Site S5 provides no opportunity to improve strategic infrastructure provision. On the contrary, it will place an even greater burden on strategic infrastructure which is already at, or beyond, capacity. The "Low" score is appropriate.

6. VEHICULAR ACCESS AND TRAFFIC IMPACT

6.1 We are astounded to see Site S5 given a "High" score on the grounds of vehicular access and traffic impact. This not only flies in the face of the reality experienced by Harpenden residents, it is opposite of every previous evaluation of this site, by SADC and others, throughout the core strategy/SLP process. For example, the Strategic Housing Land Availability Assessment (2009) gives congestion on the A1081 Luton Road as a negative factor against building on AOS8 (SE) and AoS8(NW), not as a positive factor in favour of it.

6.2 Moreover, the assertions made in respect of this criterion appear to be made without reference to any evidence whatsoever, in particular the Harpenden Urban Transport Plan 2011. Given the length of this document we have not attached it as an appendix but it may be found at <http://www.hertsdirect.org/docs/pdf/h/harputpfin.pdf>. In addition, at **Appendix 3** is an extract from a traffic evaluation study carried out by Stormor Civil Engineering Consultants for Hertfordshire County Council in 2011 as part of an appraisal of Site S5 as a possible site for a school.

6.3 Congestion on A1081 Luton Road

6.3.1 The Harpenden UTP recognises that Harpenden is a “congestion town”, with very high traffic flows on the A1081 due to the strategic highway function and land use types attracting both short distance local trips and medium distance trips (paragraph 4.9).

6.3.2 The stretch of the A1081 adjacent to Site S5 is particularly affected by congestion, due to the “pinch point” created by the Nickey Line bridge at Park Hill and the traffic generated by the Roundwood schools. It has been identified as part of a “congestion hotspot” since 2007 and this remains a key traffic issue due to the impact of congestion on accessibility, cycling, quality of life and public transport patronage (Harpenden UTP paragraph 4.10).

6.3.3 The position has not improved since 2011 and is destined to get significantly worse given additional future traffic flows down the A1081 as a consequence of major housing development planned for Luton and the expansion of Luton airport. There are no plans to alleviate this congestion and development of Site S5 will not fund any infrastructure improvements in this regard.

6.3.4 The level of car ownership in Harpenden is very high, with only 12% of its residents not having access to a car (against the national average of 27%) and nearly 50% of residents having access to two or more cars (Harpenden UTP para. 2.3). Furthermore, the 2001 census showed 65% of Harpenden residents out-commuting by car (Harpenden UTP para. 2.5); and 87% of those in-commuting also travelling by car (para. 2.7). As we have said above, any realistic assessment of Site S5 requires recognition that a majority of likely

residents will be affluent professional families, with most having two cars. Site S5 is at a sufficient distance from Harpenden town centre to make it likely that they will access it, as well as places further afield, by car.

6.3.5 The Hertfordshire County Sustainable Communities Strategy says that traffic flows in Hertfordshire are 35% higher than the national average and that congestion is seen by local people as one of the biggest issues facing Hertfordshire and something that is worsening. It recognises that the volume of traffic on our roads is predicted to increase even further between now and 2021.

6.3.6 The St Albans District Sustainable Communities Strategy also recognises traffic congestion as one of the key problems facing the District and says that reducing congestion is one of the four key priorities for the District in the period to 2021. The Sustainable Communities Strategies are documents to which SADC is obliged to have regard when drawing up its plan pursuant to s.19 of the Planning and Compulsory Purchase Act 2004.

6.3.7 High volumes of traffic in Harpenden have a knock-on effect on parking in the town, which is a considerable concern to residents and identified as a key issue in the Harpenden UTP (paras. 4.26 and 4.27).

6.4 Access from A1081 Luton Road

6.4.1 The draft evaluation blithely suggests that "*with appropriate improvement work access can readily be achieved*". This ignores the fact that HCC highway policy restricts the provision of new accesses off A roads within the county. As the Stormor report at **Appendix 3** recognises, it is unlikely to be acceptable to HCC to create a new access from the A1081.

6.4.2 It follows that the masterplan drawn up by CEG of the southern part of Site S5 is unlikely to be acceptable to HCC, not least because it would follow that a second access would be needed onto the A1081 for the northern part of Site S5. Access as shown on the masterplan would also require the making of substantial breaches in the very mature

hedgerow along the A1081, which contains a number of standard trees. Please see photographs at **Appendix 5**.

6.4.3 The Stormor report considers, in a detail which is manifestly lacking from the draft evaluation, the difficulties associated with providing an access off the south western end of Cooters End Lane which, whilst technically possible, would be likely to have significant adverse effects in terms of traffic backing up onto the A1081 and cause an increase in traffic along Cooters End Lane and Ambrose Lane, which are not suitable for such an increase.

6.4.4 In addition to the problems discussed in the Stormor report, we note the absence of any footpath along the side of the A1081 immediately adjacent to Site S5, until just before the junction with Roundwood Lane, where there is a bus stop. Pedestrians exiting Site S5 from Cooters End Lane (including from the “principal pedestrian route” on CEG’s masterplan for the southern part, or from any access point on the northern part) would need to cross the road to access the footpath, and cross back again to get to the bus stop. The road is extremely busy and dangerous and this would not be safe without the erection of one or more pedestrian crossings, which may be unacceptable to HCC given the extent of the traffic and that they may encourage increased use of Cooters End Lane. The provision of a new footpath on the eastern side of the A1081 would involve the destruction of very well-established hedgerows.

6.5 Use of Single Track Country Lanes

6.5.1 The draft evaluation appears to give no consideration at all to the impact on Cooters End Lane, Ambrose Lane or Bloomfield Road and indeed worryingly suggests that there is potential for secondary access “*via nearby residential areas*”, though the draft does not say onto which road the proposed secondary access would be created.

6.5.2 Cooters End Lane can only accommodate two-way traffic for a distance of approximately 20m from its junction with the A1081. After that, it is a single track, narrow (and in places, sunken), country lane which winds its way to join Thrales End Lane just before a railway bridge close to the River Lea. It has no footpaths despite being an

attractive walking route out of Harpenden towards the Lea Valley and the route of the Chiltern Way. As the Stormor report records, there is already a significant flow of traffic along the road at present: as local residents we see an element of rat-running as motorists try to avoid congestion on the A1081.

6.5.3 Ambrose Lane is also a narrow single track country lane leading from Cooters End Farm past the Kings School and on towards residential areas of north Harpenden. Importantly, at its junction with Bloomfield Road it runs between two parcels of ancient woodland, Ambrose Wood and a copse at the eastern corner of Site S5. Widening at this point would clearly be inappropriate as it would involve the loss of ancient woodland as well as significantly affecting the nature of the road, contrary to HCC policy.

6.5.4 The Stormor report makes quite clear that HCC highway policy does not generally allow improvements to be carried out on country lanes if they would affect the nature of the road and that the consultants could not recommend any access arrangements which would encourage vehicular use of Cooters End Lane or Ambrose Lane as neither road is suitable for a significant increase in traffic.

6.5.5 The Stormor report considered the possibility of access being provided off Ambrose Lane in the eastern corner of Site S5, but discounted that possibility due to the heavy impact on residents of Bloomfield Road, Hillside Road and Ambrose Lane. It also drew attention to the hazardous junction between Bloomfield Road and the A1081. Moreover, such an access would involve the unacceptable destruction of ancient woodland.

6.6. Safety

6.6.1 The junction of Bloomfield Road and A1081 Luton Road is identified as a "hazardous site", suffering 6 or more accidents over the previous 3 years, in Harpenden UTP (Figure 4.1). The dangers at this junction will be exacerbated with even heavier traffic flows down the A1081 Luton Road and traffic backing up down the A1081 to turn into a new development on Site S5.

6.6.2 There are also significant safety concerns associated with the sharp bend taken by Ambrose Lane over the Nickey Line bridge just past Highfield Oval. The road narrows to a single track over the bridge and it is difficult for drivers to see oncoming traffic from either direction. Please see photographs at **Appendix 5**. Any increase in traffic along Ambrose Lane – which would be inevitable if Site S5 is developed – would substantially increase the prospects of a serious accident at this point.

6.7 Overall conclusion

6.7.1 The conclusion in the draft evaluation that there is a “*relatively straightforward access position*” flies in the face of the evidence, and we consider it utterly complacent for the draft evaluation of Site S5 to suggest that “*traffic impact is likely to be acceptable*”. The people of Harpenden consider it entirely unacceptable, as they have repeatedly made clear in previous consultations on the Core Strategy/SLP. Moreover, their concerns have been recognised in documents like the Hertfordshire Sustainable Communities Strategy, the St Albans District Sustainable Communities Strategy and the Harpenden UTP.

6.7.2 The only scoring for this criterion which is consistent with hard evidence, rather than being based merely on assertion, is a “Low” score.

7 PUBLIC TRANSPORT

7.1 Harpenden rail station is approximately 2.3km away from Site S5 (whether taking the A1081 Luton Road to the front of the station or Ambrose Lane – Hollybush Lane – Sun Lane to the back). The suggestion in CEG’s brochure for the southern part of Site S5 that the train station is a 20-minute walk from the site is laughable: it is a good 25-minute brisk walk for a healthy adult from Bloomfield Road, and the northern part of Site S5 is considerably further away.

7.2. Trains from Harpenden are already overcrowded, with it often being impossible to find a seat in peak hours. The additional capacity deriving from the planned longer Thameslink trains will be fairly swiftly used up by the

residents of new housing north of the District, particularly in Luton and Bedford, and by any expansion of Luton airport.

- 7.3 As regards bus services, as stated above, realistic assumptions need to be made about the likely transport habits of those who will live on Site S5. The bus services are not frequent and it is inevitable that high-income residents with one or more cars will find their cars significantly more convenient than the bus, particularly if transporting small children or heavy shopping etc., and given that there will be a steep uphill walk to the houses on Site S5 from the A1081 at the end.
- 7.4 The only bus service which stops on the A1081 within a reasonable distance of Site S5 and goes to the rail station is route 636, which is extremely infrequent – in the evenings for example there are no services between 17.40 and 19.06, making it completely impractical for commuters and unattractive for other users. At 2.3km Site S5 is too far from the station to walk, making car use inevitable and increasing pressure on already inadequate and expensive car parking at the station.
- 7.5 We consider that only a site where most residents were likely to complete their journeys entirely on public transport could justify a “High” rating. Very few journeys from Site S5 will not involve a car for at least part of the journey: on that basis, we consider a realistic assessment demands a “Low” score.

8. URBAN DESIGN

- 8.1 No evidence has been provided for the assertions made in respect of this criterion in the draft evaluation.
- 8.2. Neither the indicative layout given in the Green Belt Review Part II, nor the masterplan of CEG for the southern part of Site S5, indicates any integration of the proposed development with any existing neighbourhood at all.
- 8.3 As regards social cohesion, as we have indicated above, the draft evaluation appears to have been produced without any consideration given at all to the likely residents of a development on Site S5: on that basis it is very difficult to see why the authors feel confident that development will promote social cohesion.

- 8.4 Overall, this criterion is sufficiently uncertain to justify a “High” scoring: we suggest at most this should be a “Medium” score.

9 ENVIRONMENTAL CONSTRAINTS

9.1 Flood zones

9.1.1 We agree that Site S5 is within a low flood risk zone. However, we are concerned about the additional surface water run-off which will be created by development of Site S5. During heavy rain in the winter of 2013-2014 the A1081 Luton Road, which of course lies in a dry valley, was prone to flooding, and this tendency is likely to be exacerbated by loss of the water-absorbing qualities of a greenfield site. AoS8(SE) was scored as “unsustainable” against the “soils” SA objective in the 2012 statutory Sustainability Appraisal for this reason.

9.1.2 On the subject of water, we are concerned to see that no attempt is being made to consider water consumption as an aspect of sustainable development. At the Hertfordshire Water Summit in March 2013 it was recognised that water risks becoming a constraint on growth as it is likely that the current supply cannot sustain greater demand, and that water resource pressures have significant environmental impacts. These are also discussed in the Environmental Capacity report. We understand that Affinity Water plans to rely upon metering to cut consumption of water in the Harpenden area, but the Water Summit concluded that in Hertfordshire generally, meters have not generally succeeded in cutting consumption.

9.2 Sites of Special Scientific Interest

We agree that there is no SSSI on Site S5 or immediately adjacent to it.

9.3 Proximity to Local Nature Reserve or Local Wildlife Site

Site S5 is immediately adjacent to Ambrose Wood, which is a Local Wildlife Site and ancient woodland. It is also close to Westfield Wood, which is also a Local Wildlife Site and ancient woodland. Further we believe that the “small remnant woodland area” within the site which is referred to in the draft evaluation is likely to be ancient woodland. Further details on each of these

areas are given below. Ambrose and Westfield Woods are also shown as Nature Conservation Sites in Figure 7.1 of the Environmental Capacity report.

9.4 Proximity to Ancient Woodland

9.4.1 We disagree that there is no ancient semi-natural woodland on the site or immediately adjacent to it. There is ancient woodland both on the site and immediately opposite it, across Ambrose Lane, in Ambrose Wood.

9.4.2 For the ancient woodland status of Ambrose Lane, please see **Appendix 4** which is a copy of a Hertfordshire CC Rights of Way report (December 2013). At page 19 is a report of a wildlife survey of Ambrose Wood carried out by the Herts and Middlesex Wildlife Trust. The owner of Ambrose Wood – which also owns Site S5 – permitted the survey findings to be recorded in the Rights of Way report. It will be seen that Ambrose Wood is considered ancient woodland and noted that it features in Bryant's map of 1822 (shown on page 7 of the report).

9.4.3 It can be seen from the same report that the "small remnant woodland area" within Site S5 also features on Bryant's map of 1822 and on every subsequent map shown in the report. It is clearly associated with Ambrose Wood. Since the use of the term "End", as in "Cooters End Farm" is a Saxon term indicating a clearing in a wood, it is likely that Ambrose Lane once ran through the middle of a wood to Cooters End Farm, and that Ambrose Wood, Westfield Wood and the "small remnant woodland area" are what is left of that ancient woodland.

9.4.4 We do not know of any ecological study carried out of the "small remnant woodland area" but can confirm that it is thickly carpeted with bluebells, which are an ancient woodland indicator species.

9.4.5 Natural England's Standing Advice on protected species says that "*Ancient woodland is of prime ecological and landscape importance, providing a vital part of a rich and diverse countryside*" (para. 4.8.1). At paragraph 5.2 it notes the harmful effects of development of land adjacent to ancient woodland.

9.5 Tree Preservation Orders

9.5.1 Both the trees in the “small remnant woodland area” and in Ambrose Wood are the subject of tree preservation orders.

9.5.2 Included at **Appendix 5** are photographs of the Bloomfield Road/Ambrose Lane junction, looking north. It can be seen that the trees in Ambrose Wood and those on the opposite side of the road, particularly the large mature horse chestnut, provide an important visual gateway. This is the point at which the town becomes the country. Loss of these trees by widening of Ambrose Lane or the creation of an access point here would destroy, not only the important habitats provided by ancient woodland, but also the natural beauty of this area.

9.6 Habitats and Species

9.6.1 We disagree that there are no protected habitats or species known on site or immediately adjacent. We know that there exists a wildlife survey of Ambrose Wood, referred to in the Rights of Way report at **Appendix 4**, which apparently contains a “*very extensive list*” of all the plant species on site. We do not have access to this survey but it can presumably be obtained from the owner of Site S5.

9.6.2 We wish you to note the presence of bats, which fly at dusk along the field margins of Site S5 and in the gardens of the houses along Bloomfield Road. All species of bat are protected under Schedule 5 of the Wildlife and Countryside Act 1981 and Schedule 2 of the Conservation of Habitats and Species Regulations 2010. We refer to Natural England’s Standing Advice on the protection of species in this regard.

9.6.3 Given the length of time that Site S5 has been farmed (it is a pre-18th century enclosure, as recognised by the 2012 Sustainability Appraisal) and the proximity of ancient woodland with its rich ecology, it is highly likely that the hedgerows around Site S5 will be “important” hedgerows for the purposes of the Hedgerow Regulations 1997. The hedgerow along the A1081 Luton Road is particularly well-established and contains a number of standard trees. The draft evaluation

suggests that hedgerows will be retained “where possible”, suggesting that it is envisaged that some hedgerows will be breached or lost. Photographs of the hedgerow which would be breached by the plans put forward by CEG in respect of the southern part of Site S5 are at **Appendix 5**.

9.7 Overall conclusion

The conclusion that “a mid to high level score is justified due to lack of significant environmental constraints” appears to have been reached without reference to the ancient woodland of Ambrose Wood immediately adjacent to the site and the “small remnant woodland area” on it. We disagree with the draft evaluation: a “Low” score is appropriate.

10. LANDSCAPE

- 10.1 We agree that Site S5 lies within a Landscape Conservation Area; we understand that it also immediately abuts, at its northern end, an Area of Great Landscape Value within Central Bedfordshire. We fail to see how part of an area believed to require special protection from SADC in landscape terms in 1994, and unchanged since then, and continuing to enjoy special protection just over the border in Central Bedfordshire, is considered fit now to be downgraded to having only “medium” landscape value. The 2012 statutory Sustainability Appraisal considered development of AoS8(SE) to be “unsustainable” against the landscape and townscape objective.
- 10.2 Built development would undoubtedly affect the openness of the landscape in this area and will be visible from local roads and the neighbouring plateau to the east, despite the hedgerow along Ambrose Lane.
- 10.3 We do not agree with the assessment of the Green Belt Review Part II, copied into the draft evaluation, that agricultural intensification has resulted in the loss of field boundaries, in relation to Site S5. The 2012 SA of AoS8(SE) recognises the southern field in Site S5 as pre-18th century enclosure.
- 10.4 Important public and private views will be lost by development of Site S5: public views of those walking along the Chiltern Way and approaching on roads from the east; from the Roundwood area across the other side of the A1081 valley. The private views lost include not only those of residents identified in the draft evaluation but most obviously those of the residents of

Bloomfield Road, who have long-distance views across Site S5 towards Luton Hoo, with the listed building at Cooters End Farm providing a focal point. See **Appendix 5** for photographs of those views.

- 10.5 We also wish to express our concern that CEG appears to envisage significant areas around Site S5 being taken out of agricultural use, which will inevitably have an impact on the landscape across a large part of this Landscape Conservation Area.
- 10.6 Further, we cannot see that any consideration has been given, either in the Green Belt Review or by the authors of this evaluation, to the impact of development of Site S5 on the Central Bedfordshire Area of Great Landscape Value. The landscape is treated as though it simply stops at the administrative boundary, even though at this point the administrative boundary is an entirely fictional line, not represented by any feature on the ground.
- 10.7 As reflected in its inclusion within a Landscape Conservation Area and abutting an Area of Great Landscape Value, the quality of the landscape in this area is high – no less than the landscape quality of Sites S3 and S8 - and should be recognised with a “Low” score. This would be consistent with the 2012 Sustainability Appraisal of AoS8(SE).

11. HERITAGE/ARCHAEOLOGY POTENTIAL

11.1 Conservation Area

We agree that Site S5 is not within a Conservation area, but Highfield Oval conservation area is very close, and the King's School which is immediately adjacent to Site S5 was once the sanatorium associated with the children's home there.

11.2 Listed Buildings

11.2.1 Cooters End Farm lies in the middle of Site S5 and the remainder of the site comprises the pre-18th century fields associated with it, as recognised in the 2012 Sustainability Assessment.

11.2.2 At the moment the Farm appears, when viewed from any direction, in its historical setting, surrounded by agricultural fields: please see photographs at **Appendix 5**. We do not believe that it is possible to

develop Site S5 without impacting, indeed destroying, the setting for this grade II listed building: viewed from every direction, the Farm will appear surrounded by modern houses.

11.2.3 We agree that any development would also need to respect the Old Bell PH which is another listed building.

11.3 Scheduled Ancient Monuments/Historic Parks & Gardens

We agree that there are no scheduled ancient monuments or historic parks & gardens on site or immediately adjacent.

11.4 Archaeological sites

We are not aware of any archaeological sites, but given the close proximity of two listed buildings it is not possible to say that there cannot be anything of archaeological interest in Site S5.

11.5 Overall conclusion

The 2012 Sustainability Appraisal scored AoS8(SE) as “unsustainable” against the SA objective of “historic and cultural assets”, because of the impact of development of it on the setting of Cooters End Farm and adverse effects on the historic landscape. Against that statutory appraisal, a scoring of Site S5 as “High” against this criterion is perverse. For the reasons given in the 2012 SA, a “Low” score is appropriate.

12. OPPORTUNITIES FOR SUSTAINABLE ENERGY PRODUCTION

We agree that there are no special opportunities provided by Site S5 in this respect and that a “Low” score is appropriate.

APPENDICES

- 1 2012 Sustainability Appraisal for southern part of Site S5 (then known as
“Area of Search 8 (South East Part)**
 - 2 Report to Policy, Resources and Transformational Cabinet Panel,
Hertfordshire County Council, 13 September 2013**
 - 3 Extract from Traffic Evaluation Study, Stormor Engineering Consultants
(2011)**
 - 4 Hertfordshire County Council Rights of Way report on Ambrose Wood
(2013)**
 - 5 Photographs**
-

GENERAL

Measurements in the draft evaluation

The distances given in the draft evaluation are inaccurate and highly misleading.

The methodology proposed by planning officers and agreed by the PPC at their 4 March 2014 meeting was that *"distance assessments will measure approximate routes on the ground rather than "as the crow flies": see paragraph 5.8 of the Report "SLP Green Belt Strategic Sub Area Development Options – Evaluation Methodology"*.

In fact it appears that distances have, for the most part, simply been lifted wholesale from the Green Belt Review Part II, which does not use "approximate routes on the ground" and is often badly inaccurate even when expressing "as the crow flies" distances.

Moreover, it appears that distances have not been measured consistently from a single point, but from the outermost edge of the relevant site closest to the relevant facility. Thus the goal posts have been moved each time a measurement has been taken so as to shorten the distance being measured, which is not consistent with a proper assessment of sustainability.

In each case, the effect of departure from the approved methodology has been significantly to understate the distance – which has obvious consequences for the soundness of the judgments made in the draft evaluation.

Measurements in this submission are taken from the Magic website, www.magic.gov.uk, measured in each case from a defined single point. They are only approximate.

Errors in the Green Belt Review

This document does not address the wide range of errors and incomplete information in the Green Belt Review that laid the foundation for this Evaluation. Some of these errors and omissions have been highlighted to PPC and SADC in emails June 2014 (and are awaiting replies), however further work remains to be done. Additionally, SADC fact-checking (apparently relying on residents to identify problems) appears to be an incomplete process.

Letter from Harpenden Town Council dated 18 June 2014

We agree with the points made in the letter from Harpenden Town Council dated 18 June 2014 and hope by this submission to provide further detail and evidence to support that position.

SITE S6

Distances are taken by using the measuring tool on the Magic website taken from the Mast located in to the centre of the proposed paddocks, using the most likely route. Even this, however is likely to underestimate distances for much of the site, given the difficulty of access and the lack of potential access points to the North of S6. Note that for Batford, any measurements to locations on the town side of the River Lea are complex and far longer than 'crow flies' because of the limited river crossings.

1. SUSTAINABLE LOCATION

- 1.1 The overall scoring of "Medium" for this criterion is inconsistent with the physical isolation between Batford (and North East Harpenden) communities and Harpenden, as well as the lack of local amenities, or infrastructure provision. This separation was historically caused by river crossings, habitation separation because of the river Lea and reinforced by subsequent housing developments.
- 1.2 In a formal Sustainability Appraisal, against the SA objective "sustainable location", S6 cannot be given a favourable assessment, it being recognised (see "greenhouse gas emissions" and "air quality") that the site is located some distance from the town centre, road links are poor and topography also makes it extremely likely to generate additional relatively long car trips. Development of Site S6 can be considered "unsustainable" against the SA objectives of biodiversity, soils, use of brownfield sites, historic and cultural assets, landscape and townscape and health.
- 1.3 In addition to the individual items discussed, this document also makes reference to a summary documents (which lists further references) separately submitted to SADC by email. Appendix 6 includes these documents and attachments.
- 1.4 Against this background we consider each of the factors addressed in the draft initial evaluation.
- 1.5 Relation to existing settlements

The methodology adopted by the Green Belt Review has been designed to select sites which immediately abut existing settlements: consequently, all of the sites under consideration relate to an existing settlement, and there is very little to differentiate any of them on this ground. S6 could however be considered more isolated, given the lack of river crossings and difficult road access.

1.6 Proximity to employment

- 1.6.1 As indicated above, the draft evaluation significantly understates the distances to the employment sites mentioned. For example, because of road structures, limited river crossings and limited potential access to the Lower Luton Road from S6 (topography) Site S6 is over 1.2km (not 250m) from EMP1 Coldharbour Lane, over 1.5km (not 1.02km) from EMP2 Batford Mill, 4km from EMP3 Southdown Industrial Estate, over 3km from EMP3a Rothamsted and over 3km from Harpenden town centre (taken as the War Memorial).
- 1.6.2 The employment opportunities at Coldharbour Lane, Batford Mill Industrial Estate and Southdown Industrial Estate are very limited.
- 1.6.3. The identification of all the employment sites fails to give due consideration to the likely inhabitants of new housing on Site S6. Market housing in Harpenden is amongst the most expensive in the country; the market is driven in particular by the desire of families from London to access its good schools, open green spaces and good transport links to London, coupled with their ability to out-bid local people for housing by reason of selling expensive properties in London. Furthermore, the Assessment of Housing Needs and Strategic Housing Market Assessment (paragraphs 2.26-2.27) demonstrates that new-build housing in the District drives that in-migration. Concerns were expressed very early in the process by PPC members and Officers, that developing new-build to accommodate in-migration can only fuel that in-migration. Consequently it is obvious that the most likely inhabitants of new-build market housing on Site S6 will be professional families, many with at least one adult working in London. Since, whatever the provision of affordable housing on Site S6, the majority is clearly going to be market housing, it is fantasy to suggest that any more than a small minority of those living on Site S6 will work locally. Data recorded in the Harpenden Urban Transport Plan (2011), taken from the 2001 census, indicates that 65% of those in employment commute out of the town to work, with the largest single employment draw being London. We anticipate that that trend will have become even more pronounced in the 13 years since that census was taken.

1.7 Proximity to schools

- 1.7.1 As indicated above, the draft evaluation significantly understates the distances to the schools mentioned. Sauncey Wood School is approximately 500m from the Mast/Centre of S6, although access is likely to mean a longer route because of the location of existing houses. The road journey to Manland School is approximately 2km, the Lea over 1.2km. Crabtree Schools are over 2.5km. away; St George's school 2km away and Sir John Lawes approx. 1.5km by foot and 2km by car. Roundwood Park Secondary is approximately 3.5km.
- 1.7.2 Of the local schools mentioned in the draft evaluation, The King's School is an independent evangelical Christian school with a very strong faith ethos. It would not be open to all children living on Site S6 and therefore should not be considered when evaluating this site. In any event, it is small - about 180 pupils in total.
- 1.7.3 All three Harpenden secondary schools are academies with control over their own admissions policies and St George's School is a faith school with restrictive admissions criteria.
- 1.7.4 The draft evaluation wholly understates the crisis of school capacity which currently exists in the Harpenden area and misstates Hertfordshire County Council's current position. At **Appendix 2** is a report to the Policy, Resources and Transformation Cabinet Panel of Hertfordshire County Council's meeting of 13 September 2013. It shows that:
- the most recent forecast indicates a 4 form-entry ("f.e.") shortfall in secondary school places in the Harpenden school planning area (which includes neighbouring villages that take 40% of secondary places) by 2017/18, increasing to 7.6 f.e. by 2019/20, then reducing to 5 f.e. on a permanent basis, with no surplus across the area (para. 2.2 and table at page 4);
 - the need to provide additional secondary places in the Harpenden area is "*acute*" (paras. 2.3, 4.2, 4.21);

- the expansion of existing schools in Harpenden will not address the predicted shortfall of secondary school places (para. 4.7); and
- these figures do not include any additional places required as a consequence of new housing in Harpenden (para. 4.8).

1.7.5 Demand for primary school places is also extremely high with many Harpenden parents failing to get places in schools within a short walking distance from their homes. We understand that residents of Batford currently go to a wide range of schools across Harpenden, including Sauncey Wood, Manland, Crabtree, High Beeches and further afield, most of which involve crossing the Lower Luton Road, or even car journeys. While there are perhaps one or 2 places available at Sauncey Wood Primary, the overall primary place shortage in Harpenden means Sauncey Wood is expected to be at or over capacity within a year.

1.7.6 HCC's infrastructure requirements paper regarding schools which was provided to SADC in 2012 at the time of the previous draft SLP indicated that allowance should be made for 42 primary school places and 38 secondary school places for each 100 new dwellings. Consequently new housing on Site S6 will generate a need for up to 223 additional primary school places and 202 secondary school places (depending on density and mix of housing). Neither existing schools, nor the planned fourth secondary school, have anything like the capacity to absorb these numbers of children and Site S6 is not large enough to accommodate a new school as well as new housing. Consequently, development on Site S6 will inevitably place further pressure on Harpenden's Green Belt, in order to accommodate new schools where no urban land is available.

1.7.7 Recognising the negative impact of the lack of school places in local schools on the SA objective "equality and social inclusion", S6 is "unsustainable" for this reason. In particular, since Batford is already classified as the most deprived area within the district, building further housing here will simply increase the imbalance and put residents in the position of longer/more costly school journeys, further increasing the risk of social exclusion and reducing fair access to resources.

1.8 Proximity to open space

As indicated above, the distances given are inaccurate. Distance to Tallents Crescent open space is at best 1km. Batford Springs Nature Reserve (not Marshalls Heath) is approximately 1.2km, Rothamsted Park over 3 km.

1.9 Proximity to existing neighbourhood centres

1.9.1 As indicated above, the distances given in the draft evaluation are inaccurate. In particular, it should be noted that Harpenden town centre (measured from the Mast via main roads to the War Memorial) is over 3km from Site S6.

1.9.2 The "local centres LC17" at the Lower Luton Road (i.e. Tescos Garage) at over 1km has very limited parking and frequently causes currently causes tailbacks and traffic problems. The Coop/takeaway at just under 1km similarly also has limited parking. With the closure of the Station Road North Post Office, there remain 2 shops on Station Road North LC18, one of which is an electrical supplier/electrician. These shops are approx. 1.5km from S6.

1.9.3 Neither of these local centres are likely to offer much to local residents, given their limited offers. They are more likely to generate traffic as they are currently often used for last minute emergencies. Recent and approved new build at Lea Springs, Pinneys and Lea Valley Industrial estate has added hundreds of dwellings to a small community that has poor infrastructure and difficult and distant access to Doctors, pharmacy and Post Office. These all increase the need for cars and more car journeys for even basic necessities.

1.10 Proximity to supermarkets

1.10.1 As indicated above, the distances given in the draft evaluation are inaccurate. The supermarkets in Harpenden town centre are all 3km or more away.

1.10.2 The existing supermarkets are relatively small, often overcrowded and suffer from very limited parking with no room for expansion.

1.11 Proximity to medical facilities

1.11.1 As indicated above, the distances given in the draft evaluation are inaccurate. Harpenden Memorial Hospital is over 3 km, The Elms (full, with no patient spaces) approximately 2.7km and Spire 2.5km, well outside reasonable

walking distance. The closest pharmacies are at the town centre and Southdown.

1.11.2 The BUPA Harpenden Spire Hospital is a private hospital; it should not be used in the evaluation of Site S6.

1.12 Proximity to leisure facilities

As indicated above, the distances given in the draft evaluation are inaccurate. Harpenden sports centre is over 3km, not 1.7km

1.13 Links to footpath and cycle network

1.13.1 As indicated above, the distances given in the draft evaluation are inaccurate. Access to the Lea (not Lee as stated) involves crossing the lower Luton Road and also a river crossing route and is at least 800m away

1.13.2 The draft evaluation fails to mention the walking routes and public footpaths, and country lane walks that run across and beside the site and which may be lost if Site S6 were to be developed.

1.13.3 Whilst we recognise that there are cycle routes around Harpenden, the 50 mile walking and cycling route is incomplete near Batford. It also cannot be ignored that there are no safe cycle routes along the Lower Luton Road. This road is very busy, winding, narrow in places, with much hedgerow, often poor visibility and congested. It is not safe for anybody other than the most confident cyclist to navigate. Access to the leisure routes entails crossing this very busy road to gain access and access points are some distance from S6, meaning more traffic (driving to park) is likely to be generated for 'new' residents to access them. There is a lorry ban on the Lower Luton Road that appears not to be enforced, making it even more dangerous especially at points where farm traffic, buses or lorries are going in opposite directions. There are numerous accidents, often daily, in the vicinity of S6.

1.13.4 Furthermore, this site is 'unsustainable' on health grounds, given the topography of this area of Harpenden discourages cycling and walking. The Lower Luton Road follows the edge of a flood plain on one side and is at the bottom of a steep-sided dry valley. This means that there are steep uphill climbs towards (Appendix 6 includes some topography references), for example, into S6 and also from the Lower Luton Road to other parts of

Harpenden. The Harpenden Urban Transport Plan (<http://www.hertsdirect.org/docs/pdf/h/harputpfin.pdf>.) identifies missing sections in the national cycleways and poor access to the Nickey Line route. Although this document appears to focus on the town centre rather than specific issues in the Batford Area, just crossing the Lower Luton Road safely is problematical. The topography is a disincentive and makes walking access difficult for existing Batford residents and it will be even more so for S6, which is potentially more isolated than existing communities.

1.14 Potential to promote equity and added social inclusion

We agree that Site S6 provides no opportunities to promote equity and added social inclusion. The topography and geographic location, with close proximity to existing social housing (SADC assessment most deprived in district) means that this area is at risk if further exacerbating or increasing the inequality that already exists between this area of Harpenden and the rest of the town, or between new build at S6 and existing Batford communities. In addition, the site is further unsustainable in relation to this ground due to the lack of available places in local schools, further increasing the risk of reducing social inclusion/access to services.

1.15 Contribution to economic growth potential

We agree that Site S6 provides no opportunities to develop the economic growth potential of the area.

1.16 Ability of development to draw on economic value of built or natural environment

We agree that development on Site S6 would not draw on the economic value of built or natural environment features. Indeed it would severely compromise those features, as we discuss further below.

1.17 Overall conclusions

1.17.1 The conclusions drawn in relation to this criterion appear to be based on inaccurately-recorded distances to local facilities, out of date information about school places and unrealistic assumptions about the people likely to live in any development on Site S6.

1.17.2 Site S6 is more than 3km to Harpenden town centre and 2.8km to Harpenden railway station, which will be the key connector to employment for many of the people who would live there. These distances are too far to walk comfortably,

particularly with small children or carrying heavy shopping and given that the site itself slopes sharply (so that most inhabitants will have an uphill climb at the end of their journey). Cycling on the Lower Luton Road, to town, to the railway station or other local destinations is only for the most confident. Coupled with the high levels of car ownership which can be anticipated from those who will live in the new housing, it is clear that development of Site S6 will add significantly to the levels of congestion on the Lower Luton Road, into Harpenden itself and also potentially the A1081. Very many families need two cars to function in the existing Batford settlements, and cars will be even more important for S6 as it is further from existing infrastructure and routes.

1.17.3 Given the distance from the town centre and railway and the existing acute shortage of school places, we consider that the current "Medium" rating for Site S6 cannot be justified. At most this should attract a "Low" rating.

2. SETTLEMENT HIERARCHY

2.1 The use of the "settlement hierarchy" criterion is based on the assumption that the main urban settlements are the most sustainable locations because they enable the widest range of facilities to be accessed. This assumption is not true of Harpenden, where existing facilities are already over capacity and will inevitably be accessed predominantly by car from Site S6. In particular, Batford and the vicinity of S6 is already the least well served and most deprived area in the district.

2.2 Given the factors addressed above, we consider that the current "high" rating for settlement hierarchy cannot be justified. At most this should attract a "Low/Medium" rating.

3. MIXED-USE DEVELOPMENT

3.1 We agree that mixed-use development would not be appropriate on this site and that it therefore attracts a "Low" score.

4. OTHER MATTERS

4.1 It is inconsistent to claim no economic contribution in the development at S5 while claiming a strong contribution at S6. Any economic value in any build phase is unlikely to significantly benefit the local Harpenden community. As seen with other large scale build in the area, labour and other construction

resources are transported or bussed in from some distance outside the area, including the Midlands and further afield. The inhabitants demographic in Harpenden simply does not include large scale and available building resource. Historically, CIL or other payments have been distributed to suit district or county-wide needs rather than the specific local area. Historically, developer-led builds simply have not included sufficient infrastructure or lower cost housing support, that infrastructure is always assumed to be provided by 'someone else'.

- 4.2 The economic value of the Green Belt and other green infrastructure was expressly recognised in the study commissioned by SADC in 2012: "Environmental Capacity of St Albans City & District: Defining a Sustainable Level of Development" ("the Environmental Capacity Report"). Due to its length we have not appended this report. In the Executive Summary, it is said that the Environmental Capacity Report "*will form an important part of the Council's evidence base to shape and support local policy*". In fact it appears to have been ignored. Section 2 addresses the economic values of ecosystems services, including Green Belt. The conclusion of this study was that "*there is overwhelming quantitative evidence that the current level of urban development in St Albans is unsustainable*" (Executive Summary) and "*it would be unwise to permit further urban development in the District on undeveloped land*" (para. 9.8). Locally green spaces around Harpenden, together with heritage features such as Common Lane, Batford Springs, Lea Valley, The Hyde, Bower Heath, Sauncey Wood, plus the curtilage of listed or heritage buildings such as Mackerye End or Windmill Cottage, ancient drovers ways and the deep country lanes are all local wildlife and beauty spots which play an important role in attracting people to the town. There is an economic dimension to this attraction, bringing money into the District and the town to support its local economy.
- 4.3 In particular, County designations state that development in this area must be resisted given the landscape importance of these valley sides. Appendix 7: Area 033 Assessment. In addition to Area 033, there are neighbouring assessments for, for example, the Kimpton basin.
- 4.4 We are also concerned about the loss of agricultural land: Site S6 is actively and historically farmed. In particular it is low intensity mixed farming that is specifically mentioned as protect, conserve and improve. The fields are also

a valuable contribution to over-wintering birds in the flood plain and vicinity of the River Lea and bring leisure visitors for wildlife and bird identification.

4.5 Some of the proposed S6 paddocks are narrow, constrained and steeply sloping. There are power cables over a significant length of the site.

4.3 For those reasons we consider a "Low" score is appropriate.

5. STRATEGIC INFRASTRUCTURE PROVISION

We agree that development of Site S6 provides no opportunity to improve strategic infrastructure provision. On the contrary, it will place an even greater burden on strategic infrastructure which is already at, or beyond, capacity. The "Low" score is appropriate.

6. VEHICULAR ACCESS AND TRAFFIC IMPACT

6.1 We are surprised to see Site S6 given a "Medium" score on the grounds of vehicular access and traffic impact. In particular, there are existing severe parking and traffic problems caused by recent and new and proposed developments in the area – developments built with fewer parking spaces than dwellings leading to severe parking overspill onto already crowded roads. Reference Pinneys development (Station Road) Lea Springs nearing completion on Common Lane (14 spaces for over 60 flats) and proposed at Lea Valley with parking shared between industrial and residential units. This not only flies in the face of the reality experienced by Harpenden residents, it is opposite of previous evaluations of this site, by SADC and others for planning or other purposes. Congestion on the Lower Luton Road is extreme, with frequent closures for floods, weather or accidents. Traffic is expected to increase significantly with the expansion of Luton Airport. Traffic is negative factor against building on S6 not as a positive factor in favour of it.

6.2 Moreover, the assertions made in respect of this criterion appear to be made without reference to any evidence whatsoever, in particular the Harpenden Urban Transport Plan 2011. Given the length of this document we have not attached it as an appendix but it may be found at <http://www.hertsdirect.org/docs/pdf/h/harputpfin.pdf>. In addition, at **Appendix 3** is an extract from a traffic evaluation study carried out by Stormor Civil Engineering Consultants for Hertfordshire County Council in 2011 as part of an appraisal of Site S6 as a possible site for a school.

6.3 Congestion on the Lower Luton Road

- 6.3.1 The Harpenden UTP recognises that Harpenden is a “congestion town”, with very high traffic flows on the A1081 due to the strategic highway function and land use types attracting both short distance local trips and medium distance trips (paragraph 4.9). The Lower Luton Road is similarly busy and congested. It is a narrower, winding road which suffers pinch points around the limited number of river crossings into Harpenden.
- 6.3.2 The stretch of the Lower Luton Road adjacent to Site S6 is particularly affected by congestion, due to the “pinch point” created by the two river crossings at Station Road and towards Westfield. Either of these also become rat runs at times of stress on the motorways and the A1081 through Harpenden. The narrow road with hedgerows, poor road visibility and lack of exit and turning points make it particularly vulnerable. It remains a key traffic issue due to the impact of congestion on accessibility, cycling, quality of life and lack of bus transport, access to Harpenden Railway Station, schools, the town centre, and more.
- 6.3.3 The position has not improved since 2011 and is destined to get significantly worse given additional future traffic flows forecast as a consequence of major housing development planned for Luton and the expansion of Luton airport. There are no plans to alleviate this congestion and development of Site S6 will not fund any infrastructure improvements in this regard.
- 6.3.4 The level of car ownership in Harpenden is very high, with only 12% of its residents not having access to a car (against the national average of 27%) and nearly 50% of residents having access to two or more cars (Harpenden UTP para. 2.3). Furthermore, the 2001 census showed 65% of Harpenden residents out-commuting by car (Harpenden UTP para. 2.5); and 87% of those in-commuting also travelling by car (para. 2.7). As we have said above, any realistic assessment of Site S6 requires recognition that a majority of likely residents will be affluent professional families, with most having two cars. Site S6 is so far from Harpenden town centre to make it

essential that they will access it, as well as places further afield, by car.

6.3.5 The Hertfordshire County Sustainable Communities Strategy says that traffic flows in Hertfordshire are 35% higher than the national average and that congestion is seen by local people as one of the biggest issues facing Hertfordshire and something that is worsening. It recognises that the volume of traffic on our roads is predicted to increase even further between now and 2021.

6.3.6 The St Albans District Sustainable Communities Strategy also recognises traffic congestion as one of the key problems facing the District and says that reducing congestion is one of the four key priorities for the District in the period to 2021. The Sustainable Communities Strategies are documents to which SADC is obliged to have regard when drawing up its plan pursuant to s.19 of the Planning and Compulsory Purchase Act 2005.

6.3.7 High volumes of traffic in Harpenden, combined with lack of parking spaces at existing Batford dwellings have a knock-on effect on parking in the town, which is a considerable concern to residents and identified as a key issue in the Harpenden UTP (paras. 4.26 and 4.27).

6.4 Access from Lower Luton Road

6.4.1 The draft evaluation states that new access will be required and there will be some impact on the road network. Access to S6 is likely to be entirely via the Lower Luton Road, because access through or into exiting areas of Batford is contra-indicated (unless existing housing stock is demolished for access). Similarly, access via Common Lane will not be feasible without destroying historic drover's ways, deep cut historic single track routes and risking the mediaeval woodlands that border Common Lane. (Lane photograph attached App6) Access to the Lower Luton Road from Common is already difficult and virtually impossible at peak times, necessitating travel past Sauncey Wood school to be able to join the lower Luton Road. Adding further traffic to this country lane would add further danger to Pickford and Milford

Hill roads which are essentially single track roads because of the necessity for on-street parking.

- 6.4.2 Additional traffic and parking concerns are already overloading the vicinity of S6, with several approved building projects that have far fewer parking places than estimated car ownership. These schemes are adding congestion to streets near S6 on a daily basis.
- 6.4.3 There are significant traffic difficulties on the Lower Luton Road in the vicinity of S6. Careful junction design, as indicated in the draft report cannot remove traffic from the roads. Traffic is often at a standstill with one or 2 mile tailback towards Luton or Wheathampstead. It also seems to imply significant potential damage to the conservation landscapes along the river, in order to be able to manage traffic on, off, through or past S6.
- 6.4.4 In addition we note the absence of suitable crossing and access points that would enable S6 residents to be able to safely cross the Lower Luton Road. Since S6 is so far from suitable shop, school or transport infrastructure, perhaps this lack of safe pedestrian access will have limited consequence, given that residents will need cars for most any journey. While there are buses along to the Lower Luton Road, there are limited stops and indeed limited services in the area, significantly reducing their utility. Any 'improvement' in roads or access will lead to significant the destruction of very well-established hedgerows, trees or wetland resources. This is against the Herts and Middlesex Trust 5 year plan to improve the River Lea to Luton .

6.5 Use of Single Track Country Lanes

- 6.5.1 The draft evaluation appears to give no consideration at all to the impact on Common Lane and the deep single track narrow lanes adjoining it leading to Mackerye End, Sauncey Wood Lane and Bower Heath. The potential destruction of these landscape features, woodland, mature hedgerows and trees is very worrying indeed..
- 6.5.2 Common Lane can only accommodate two-way traffic for a distance of approximately 350m from its junction with the Lower Luton Road. After that, it is a single track, narrow (and in places, very sunken), country

lane which winds its way to Kimpton and other hamlets. It has no footpaths despite being an attractive walking route out of Harpenden. There is some traffic along the road at present from Kimpton and other villages and hamlets.

6.5.3 Similarly, Bowers Heath lane to the North end of S6 is narrow, deep and winding towards Kimpton and Whitwell. There are parcels of ancient woodland and historic hedges. Widening either lane would clearly be inappropriate as it would involve the loss of ancient woodland as well as significantly affecting the nature of the road, contrary to HCC policy.

6.5.4 The Stormor report referenced elsewhere makes quite clear that HCC highway policy does not generally allow improvements to be carried out on country lanes if they would affect the nature of the road. In assessing a nearby sites for a potential school sites, Stormor consultants could not recommend any access arrangements which would encourage vehicular use of the single track lanes as they are unsuitable for a significant increase in traffic.

6.6. Safety

6.6.1 The junction of Common Lane and the Lower Luton Road is locally recognised as a hazardous site, suffering several accidents over the previous 4 years and sometimes daily shunts or near misses. There are similarly accidents along the Lower Luton Road to S6, in particular near the hotspots of local shops and pinch point river crossing junctions. The dangers at these junctions will be exacerbated with even heavier traffic flows down the Lower Luton Road. Traffic regularly is backed up for up to 2 miles coming in to Batford. Additional traffic from development on Site S6 is going to exacerbate the situation.

6.6.2 While the traffic focus in the evaluation centres around the Lower Luton Road towards existing Batford settlements and S6, it is essential to consider the other side of the river, namely the daily congestion that is Station Road approaching the Lower Luton Road. This is made worse by the lack of parking at recent developments on Station Road and Coldharbour Lane industrial, with cars parking on

the street and reducing traffic flows. Development at S6 will also significantly increase traffic at the Westfield Road Lower Luton Road Junction. Poor visibility and high traffic flows already make it difficult to access the Lower Luton Road at this point. Development at S6 can only make this junction even more congested.

6.7 Overall conclusion

6.7.1 While the assessment admits that access is poor and that careful planning will be needed alongside new road infrastructure, this simply understates the problem. There is no viable way to access S6 except from a new Lower Luton Road access point that will add problems to an over capacity road. There is no access through existing settlement without demolishing some existing housing stock, there is no access through the lanes without significant damage to local natural resources (deemed protect and conserve).

6.7.2 The only scoring for this criterion which is consistent with hard evidence, rather than being based merely on assertion, is a “Low” score.

7 PUBLIC TRANSPORT

7.1 Harpenden rail station is approximately 3km away from the centre of Site S6 (whichever route is taken from the Lower Luton Road). It is marginally walkable by some existing Batford residents, involving 2 uphill and one downhill component on the way home. It is unlikely to be walkable for S6 at all.

7.2. Trains from Harpenden are already overcrowded, with it often being impossible to find a seat in peak hours. The additional capacity deriving from the planned longer Thameslink trains will be fairly swiftly used up by the residents of new housing north of the District, particularly in Luton and Bedford, and by any expansion of Luton airport.

7.3 As regards bus services, as stated above, realistic assumptions need to be made about the likely transport habits of those who will live on Site S6. The bus services are not frequent (hourly) and it is inevitable that high-income

residents with one or more cars will find their cars significantly more convenient than the bus, particularly if transporting small children or heavy shopping etc., and given that there will be a steep uphill walk to the houses on Site S6 from the Lower Luton Road at the end.

- 7.4 The evaluation does list a number of buses but these are often infrequent, late and require changes to arrive anywhere 'useful' or to be able to get back at all. The bus service which stops on the Lower Luton Road within a reasonable distance of Site S6 and goes to the rail station is extremely infrequent making it completely impractical for commuters and unattractive for other users. At 3km Site S6 is too far from the station to walk, making car use inevitable and increasing pressure on already inadequate and expensive car parking at the station.
- 7.5 We consider that only a site where most residents were likely to complete their journeys almost entirely on public transport could justify a "Medium" rating. Very few journeys from Site S6 will not involve a car for at least part of the journey: on that basis, we consider a realistic assessment demands a "Low" score.

8. URBAN DESIGN

- 8.1 No evidence has been provided for the assertions made in respect of this criterion in the draft evaluation.
- 8.2. The indicative layout given in the Green Belt Review Part II, does not indicate any integration of the proposed development with any existing neighbourhood at all.
- 8.3 As regards social cohesion, as we have indicated above, the draft evaluation appears to have been produced without any consideration given at all to the likely residents of a development on Site S6: on that basis it is very difficult to see why the authors feel confident that development will promote social cohesion. Indeed, because of the proximity to the most deprived area in the district, there is a very high risk that development at S6 will effectively isolate

potential and/or existing residents and cause further mobility and cohesion problems.

- 8.4 Even the “Low” rating seems to be an overestimate, given the caution in the summary statement which highlights a number of design challenges and the need for careful planning.

9 ENVIRONMENTAL CONSTRAINTS

9.1 Flood zones

9.1.1 The majority of the site forms valley sides adjacent to the River Lea Flood Plain. However, water course and flood analysis show flood events and risks that run across the site precisely because it is the drainage route for upland water to the River Lea. We are also concerned about the additional surface water run-off which will be created by development of Site S6 in the proximity to the flood plain. . During heavy rain the Lower Luton Road regularly floods and closes, a situation that is likely to worsen with valley-side development at the flood points. Road closures also will seriously affect S6 site access.

9.1.2 On the subject of water, we are concerned to see that no attempt is being made to consider water consumption as an aspect of sustainable development. At the Hertfordshire Water Summit in March 2013 it was recognised that water risks becoming a constraint on growth as it is likely that the current supply cannot sustain greater demand, and that water resource pressures have significant environmental impacts. These are also discussed in the Environmental Capacity report. We understand that Affinity Water plans to rely upon metering to cut consumption of water in the Harpenden area, but the Water Summit concluded that in Hertfordshire generally, meters have not generally succeeded in cutting consumption. Water supplies rely on local ground water, which will suffer both additional demand due to new housing, alongside depleting reserves because of the new demand. Water infrastructure problems are forecast for Harpenden in the future, even without the additional pressure of new builds.

9.2 Sites of Special Scientific Interest

Batford Springs Nature Reserve is in the vicinity of Site S6. It has one of only 180 chalk streams in the world. It is significant and protected and although not an SSSI at this time further work is in progress to upgrade its status.

9.3 Proximity to Local Nature Reserve or Local Wildlife Site

Site S6 is in the vicinity of Batford Springs Nature Reserve, and it is immediately adjacent to Sauncey Wood which is an ancient protected woodland. It is also adjacent to the River Lea, which is a significant wildlife site. The river borders, adjacent fields and S6 itself form part of the designated important over winter ground for migrating birds. Along the lane borders there are also significant pockets, copses and ancient woodland at the Hyde.

9.4 Proximity to Ancient Woodland

9.4.1 We disagree that there is no ancient semi-natural woodland on the site or immediately adjacent to it. There is ancient woodland both on the site and immediately opposite it, Sauncey Wood and the Hyde.

9.4.2 In the interests of time, formal assessment and documentation of the woodlands is not included with this summary, however, it will be sought and provided at a later date as required.

9.4.4 We do not know of any ecological study carried out of the already identified adjacent woodlands, but they were historically coppiced and are popular destination for bluebell viewing, bluebells being an ancient woodland indicator species.

9.4.5 Natural England's Standing Advice on protected species says that "*Ancient woodland is of prime ecological and landscape importance, providing a vital part of a rich and diverse countryside*" (para. 4.8.1). At paragraph 5.2 it notes the harmful effects of development of land adjacent to ancient woodland.

9.5 Tree Preservation Orders

9.5.1 TPO status at this time is unknown but it is likely that the woodlands are the subject of tree preservation orders.

9.5.2 Photographs at the Common Lane end of S6 indicate the narrow lane, farmland and woodland features identified. They provide an important visual gateway. This is the point at which the town becomes the country. Loss of these trees by widening of Common Lane, or the lanes in the vicinity of Bower Heath/The Hyde would destroy, not only the important habitats provided by ancient woodland, but also the natural beauty of this area and the gateway to the smaller villages and hamlets beyond Harpenden.

9.6 Habitats and Species

9.6.1 We disagree that there are no protected habitats or species known on site or immediately adjacent. We know that there are extensive records of birds, other wildlife and plants compiled over 30 or more years.

9.6.2 We wish you to note the presence of bats, which fly at dusk along the field margins of Site S6 and in the gardens of the houses in Batford. Bat management is typically a planning constraint in the area. All species of bat are protected under Schedule 5 of the Wildlife and Countryside Act 1981 and Schedule 2 of the Conservation of Habitats and Species Regulations 2010. We refer to Natural England's Standing Advice on the protection of species in this regard

9.6.3 Given the length of time that Site S6 has been farmed, its proximity to an ancient ford and with the mill and other evidence from the Domesday Book, and the proximity of ancient woodland with its rich ecology, it is highly likely that the hedgerows around Site S6 will be "important" hedgerows for the purposes of the Hedgerow Regulations 1997. The hedgerows along the fields and the Lower Luton Road is well-established and contains a number of standard trees. The draft evaluation suggests that hedgerows will be retained "where possible", suggesting that it is envisaged that hedgerows will be breached or lost, indicating 'acceptable' losses. It is hard to see evidence for what might be deemed acceptable.

9.7 Overall conclusion

The conclusion that “*a mid level evaluation is appropriate*” given “*acceptable impact on existing features*” appears to have been reached without reference to the ancient woodlands, the landscape and interlinked importance of the fields and adjacent environmental features. We disagree with the draft evaluation: a “Low” score is appropriate.

10. LANDSCAPE

- 10.1 We agree that Site S6 lies within a Landscape Conservation Area. The report freely admits the landscape conservation issues and currently identifies that development at S6 will have a visual affect. This implies acceptance of the conservation guidance that development must be resisted, and appears to ignore basic statements within the conservation statement documents that states the high importance attached to this particular low density farming about. We fail to see how part of an area believed to require special protection is considered fit now to be downgraded to having only “medium” landscape value.
- 10.2 Built development would undoubtedly affect the openness of the landscape in this area and will be visible from local roads and the neighbouring plateau to the east, despite proposed hedgerow and screening ‘improvements’. It is the open sloping landscape, widely visible from around Harpenden and surrounding areas, that is important. .
- 10.3 S6 includes many small field historic field boundaries that can be seen in historic maps and information.
- 10.3 Important public and private views will be lost by development of Site S6: These include the curtilage of Mackerye End – whose document lists the views as an important component of the listing. Public views of those in Harpenden and (walking) the countryside near S6 will be significantly affected. Houses whose back gardens already form (the SADC preferred) soft Green Belt Edge backing on to farmland form part of the landscape from local walks and views, near and far. The private views lost include most

obviously those backing onto the farm fields who have long distant distance views across Site S6 towards the listed building at Mackerye End, Windmill cottage and the open countryside in, across and around S6.

- 10.4 By incorporating the entire S6 into development, significant farm lands will be lost that will split businesses and potentially render those businesses no longer viable.
- 10.5 Further, we cannot see that any consideration has been given, either in the Green Belt Review or by the authors of this evaluation, to the impact of development of Site S6 on the gap between Harpenden and Kimpton Vale or surrounding village or hamlets. The landscape is treated as though it simply stops at the site boundary, even though at this point the boundary is an entirely fictional line, crosses into Wheathampstead and potentially other parishes and the Kimpton Landscape Area.
- 10.6 Given that this landscape is historic, open and of the form that is designated protect, conserve and improve, it should be recognised with a “Low” score.

11. HERITAGE/ARCHAEOLOGY POTENTIAL

11.1 Conservation Area

We agree that Site S6 is not within a Conservation area.

11.2 Listed Buildings

11.2.1 Batford Mill, The Marquis of Granby Public House, the Thatch Cottage in Batford are all listed buildings in close proximity to S6.

11.2.2 Mackerye End is also a listed building in close proximity, and the views over S6 form part of the protected curtilage of Mackerye End i.e. they are an important component of the listed status. There is also Windmill Cottage adjacent to S6 which has specific heritage status. .

11.3 Scheduled Ancient Monuments/Historic Parks & Gardens

We agree that there are no scheduled ancient monuments or historic parks & gardens on site or immediately adjacent.

11.4 Archaeological sites

We are not aware of any archaeological sites, but given the close proximity of listed buildings and the very long history of settlement at Batford and nearby hamlets, and the importance of the ancient River Lea ford crossings and bridges, it is not possible to say that there cannot be anything of archaeological interest in Site S6.

11.5 Overall conclusion

The objective of "historic and cultural assets" clarifies the impact of development on the setting of Mackerye End and adverse effects on the historic landscape. Against that statutory appraisal, a scoring of Site S6 as "High" against this criterion is perverse. For the reasons given in the 2012 SA, a "Low" score is appropriate.

12. **OPPORTUNITIES FOR SUSTAINABLE ENERGY PRODUCTION**

We agree that there are no special opportunities provided by Site S6 in this respect and that a "Low" score is appropriate.

APPENDICES

- 6 Previous submissions to SADC relating to Site 6 and errors in the Green Belt Review, Initially prepared from September 2013, emailed June 2014, including photographs.**
- 7 Area 033 Landscape Assessment**

Enclosure 9

HARPENDEN TOWN COUNCIL

CLOSER TO THE COMMUNITY

Ms Tracy Harvey
Head of Planning and Building Control
St Albans City and District Council
Civic Centre
St Peters Street
St Albans AL1 3JE



NL/jb/E4a/33554

18 June 2014

Dear Ms Harvey

Green Belt Review Sites and Boundaries Study SKM – S5 and S6

Please find attached Harpenden Town Council's response to the Initial Evaluation of Green Sub Belt Areas S5 and S6.

Despite Harpenden's designation as the second town in the SADC Local Plan Review 1994, we do not consider Harpenden to be a sustainable settlement for further growth for the following reasons:

- Harpenden is essentially a dormitory town where the majority of economically active residents (65%) commute out either by rail (22.4%) or car (65.3%) to London or surrounding towns. (source 2001 census)
- Only 12% of its 30,000 plus residents do not have access to a car (the national average is 27%) with nearly half of all residents having access to two or more cars (source: Harpenden UTP 2011)
- 50% of the 9000 employed in the town commute in. 87% by car and only 4% by train (source: Harpenden UTP 2011)
- Our primary and secondary schools are over-subscribed with no further possibility of expansion.
- The planned fourth secondary school will be full on building completion as its intake will come from Harpenden **and** surrounding areas.
- GP surgeries have 55,000 on their books. The surgeries are constrained in terms of further physical expansion, and have a high proportion of very young and elderly.
- We have two main roads the A1081 and B653, both of which have been subject to a dramatic increase in traffic movements over the past ten years.
- More traffic will cause gridlock in our Victorian pattern of streets.
- The level of car ownership is amongst the highest in the country.
- We have three mid-size supermarkets, access to each is restricted and there is no room for further expansion of their parking facilities.

JOHN BAGSHAW – TOWN CLERK

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We believe much of the report has been based on out of date information and is factually incorrect, which has skewed the evaluation scores. We note that distances have been recorded confusing kilometres with miles. It is thus suggesting amenities and facilities are closer than is the actual case. It is suggested this may have affected the conclusions drawn. We therefore submit our response below in the expectation that corrections will be made prior to any further evaluations.

I hope that the comments and observations presented by Harpenden Town Council assist you in the review process and crystallise concerns.

Yours sincerely



Councillor Mrs Nicola Linacre
Chair Strategic Planning Committee Harpenden Town Council

cc Harpenden Town Councillors
Harpenden District Councillors
Harpenden County Councillors
Rt Hon Peter Lilley MP

S5: NW HARPENDEN

(1) Sustainable location

Main factors to consider include;

Related to existing settlement

The site is located in the green belt area that has previously been discounted as an option for development in the Shaping Our Community 2010 Core Strategy. Nothing has changed. Any development in this area will have an adverse effect upon the locality, will not serve to enhance the area and as a consequence will diminish the environmental relationship between the existing development and the area around it.

In 2009 the District Council withdrew the Areas of Search for housing. The Coalition Government's intended abolition of the East of England Plan had allowed the Council to review growth needs locally, from the bottom up, rather than having numbers imposed. The new approach identified more locations within existing towns and villages and smaller locations of under 400 homes. New development would need to contribute positively to the wider community through benefits such as enhanced school facilities, transport improvements and green space. These ideas were tested through workshops with different local groups, including schools, residents and District and Parish Councillors.

Proximity to employment opportunities.

Coldharbour Lane has very few employment opportunities apart from being the headquarters for Jarvis who are the second largest employer in Harpenden.

Batford Mill only has one current tenant.

Southdown Industrial Estate has limited employment opportunities.

Rothamsted is Harpenden's largest employer, attracting staff and students from across the world. It is building its own accommodation for people on research projects etc. Permanent staff are from around the larger SADC area, and many are highly educated, to PhD level.

Town Centre staff mainly commute in from surrounding towns and villages.

Proximity to existing schools, consideration of capacity and potential to meet increased demand and consideration of capacity

The schools cited in the report are full. *Capacity issues exist at some local schools* is an understatement of the current position. In recent years there has been major expansion of primary school capacity and the launch of the Harpenden Free School to meet rising demand. Most of the relatively straightforward expansion opportunities have already been exploited. All three secondary schools are academies and able to obstruct any aspiration on the part of the County Council to expand admissions.

The King's School is an independent Christian day school.

St Hilda's is an independent school which recently gained planning consent on the understanding that it did not increase its numbers.

Such is the demand for places and the impact of siblings admissions on Roundwood Primary that local applicants from Park Mount, less than **300m** away, cannot secure a place at their local school.

Proximity to existing large supermarkets or superstores or potential to provide.

None of the supermarkets are large. They all have significant parking problems, with no possibility to expand their car parks. M&S Food is a small outlet, as is the Tesco recently built on Luton Road, which has no parking attached.

The Shaping Our Community 2010 consultation on the Core Strategy includes provision for an extension to supermarket provision, which it is suggested with the additional Tesco Express in North Harpenden, has been met.

Proximity to existing medical facilities or potential to provide

The GP practices in Harpenden have 55,000 people on their combined lists; these include patients from outlying villages (or Greater Harpenden as some refer to the area). Each surgery is constrained by lack of opportunity to expand physically and their capacity to accept more patients is questioned.

Harpenden Memorial Hospital, known locally as the Red House, runs very few clinics and caters for the wider area, not just Harpenden.

The Spire Hospital is a private hospital without A&E or minor injuries facilities.

Issues around the health of older people will become increasingly significant. It is forecast that the number of 65 year olds and over living in the District will increase by 22% over the next 10 years. (Source: West Herts PCT Public Health Reports). This will significantly impact on health provision in Harpenden and an already creaking infrastructure.

Proximity to existing leisure facilities or potential to provide

There are no plans to expand the Sports Centre.

Comments/Overall Conclusions:

We agree that this site is near existing footpaths and cycle routes, but disagree that a high evaluation score should result as culturally most residents will drive, thereby adding to the congestion of the A1081. The A1081 is a busy road and not conducive to cyclists.

Good potential accessibility to the site re footpath and cycleway access overstates the reality. Proximity to the Nickey Line, which is not lit and has limited value as a commuter route, is a recreational asset but it doesn't make for a sustainable location per se.

Harpenden town centre is at the base of a valley. Access to points in the town outside of the centre is uphill and not easily negotiated by foot or cycle.

(2) Settlement Hierarchy

We disagree that Harpenden is a suitable location for sustainable development. We understand the logic of placing new development in main urban settlements assuming that the widest range of services and facilities are more readily accessible, but as the above shows, our schools, medical facilities and basic social infrastructure are unlikely to cope with increased numbers.

Detailed and up to date knowledge of Harpenden would certainly reduce the high evaluation score.

(6) Vehicular access and traffic impact

We do not have the road infrastructure to cope with increased traffic. Traffic congestion in Harpenden Town Centre is already acute and we regularly experience considerable delays on the main route into and out of Harpenden (the A1081), which would be exacerbated by any development on this site. Harpenden has been identified within the Harpenden UTP as a "congestion town".

The A1081 southbound in AM peak from town boundary into town centre is a congestion 'hotspot' identified through anecdotal reports in *Tackling Congestion in Hertfordshire* (Hertfordshire County Council, 2007) and subsequently confirmed through consultation responses and site visits. This situation has not been addressed since 2007 and therefore continues to grow.

We would also be badly affected by the proposed expansion of Luton Airport given there are only two roads through Harpenden to the airport.

Harpenden has one of the highest levels of car ownership in the country and it is unrealistic to expect residents to change their driving habits. Most roads are unsuitable for cyclists, particularly the very busy A1081.

The report suggests *there is potential for secondary access via nearby residential areas*. These roads are narrow, Ambrose Lane, Hollybush Lane and Sun Lane are all constrained by railways bridges and in places are little more than narrow lanes and already used as dangerous rat-runs. We disagree that the traffic impact is likely to be acceptable.

There has been no mention of the Harpenden Urban Transport Plan 2011 or the overarching Hertfordshire Transport Plan. There is no mention of the County Sustainable Communities Strategy. Both documents should be referenced and recognised if comment in the review is to be accepted as meaningful, not just speculation and guesswork.

(7) Public Transport

The report gives no indication of the frequency of bus services, or their usage.

It is worth noting that Harpenden Station deals with 5,500 passengers on average per day, 3,890 of which are commuters. Harpenden Station does not have the

capacity to deal with the large number of commuters who drive into Harpenden to catch the train and parking provision at the Station is poor. The recent failure by the local rail service provider to create additional parking at the station exacerbates the problem. There are also very limited storage facilities for cycles and bikes.

There are two entrances into the Station, both of which are narrow and cause congestion in both directions along Station Road.

The train service itself is subject to much overcrowding, which again, will be made worse by any expansion of Luton Airport.

Accessibility to the Station by public transport does not mitigate against the poor frequency of bus services or the experience of driving to Harpenden Station and parking a car, bike or cycle.

(8) Urban Design

Social Cohesion between new and existing neighbourhoods is extremely important. There is no evidence that a social study have been made of the impact any development would have in this area. It is purely based upon the numbers game and an assumption. It is suggested this is not an appropriate basis for a considered approach to the development of the Town.

(9) Environmental Constraints

Protecting our environment for the future is considered a key consideration. A recent report produced by the Hertfordshire Environmental Forum calculated that St Albans District has the largest per capita carbon footprint compared to the ten district areas in Hertfordshire. Surely this should be a factor in considering development sites and their suitability.

S6: NE HARPENDEN

(1) Sustainable Location

Main factors to consider include;

Proximity to employment opportunities.

Coldharbour Lane has very few employment opportunities, apart from being the headquarters for Jarvis who are the second largest employer in Harpenden

Batford Mill only has one current tenant

Southdown Industrial Estate, again has limited opportunities

Rothamsted is Harpenden's largest employer, attracting staff and students from across the world. It is building its own accommodation for people on research projects etc. Permanent staff are from around the larger SADC area and many are highly educated to PhD level.

Town Centre staff mainly commute in from surrounding villages.

Your report says *the development would make a positive economic contribution in terms of jobs during construction phases*. This would be a short term benefit to residents of Harpenden and in no way argues a sustainable benefit. *Economic benefits would also arise from additional population ie new residents working and spending in the local economy*. This is unlikely given the limited local employment opportunities and the nature of the new residents who are likely to be in top level, highly paid work outside Harpenden. Spending in the local economy would be dependent on ease of access to shops and ability to park.

Proximity to existing schools, consideration of capacity and potential to meet increased demand and consideration of capacity

The schools cited in the report are full. *Capacity issues exist at some local schools* is an understatement of the current position. In recent years there has been major expansion of primary school capacity and the launch of the Harpenden Free School to meet rising demand. Most of the relatively straightforward expansion opportunities have already been exploited. All three secondary schools are academies and able to obstruct any aspiration on the part of the County Council to expand admissions.

Crabtree Infants and Junior Schools recently became an academy trust so is able, as are the three senior schools, to obstruct any aspiration on the part of the County Council to expand admissions.

Proximity to existing public open space and allotments

There is no mention of Batford Springs Local Nature Reserve. There is reference to the 'new Batford Open Space' in the Local plan, which dates back to 1994. The Springs was accredited as a Reserve by Natural England in 1995. Its principal features are the fresh springs that serve a small network of chalk lined streams and ponds. Chalk streams are currently being considered for status as a Site of Special Scientific Interest.

You refer to Marshalls Heath Local Nature Reserve, which is in Wheathampstead, and should not form part of the public open space for Harpenden.

Proximity to existing large supermarkets or superstores or potential to provide.

None of the supermarkets are large. They all have significant parking problems, with no possibility to expand their car parks. M&S Food is a small outlet, as is the Tesco Express recently built on Luton Road, which has no parking attached.

Proximity to existing medical facilities or potential to provide

The GP practices in Harpenden have 55,000 people on their combined lists; these include patients from outlying villages (or Greater Harpenden as some refer to the area). Each surgery is constrained by lack of opportunity to expand physically and their capacity to accept more patients is questioned.

Harpenden Memorial Hospital, known locally as the Red House, runs very few clinics and caters for the wider area, not just Harpenden. It is in an extremely dilapidated condition which has meant most services have been withdrawn from this location.

The Spire Hospital is a private hospital without A&E or minor injuries facilities.

Proximity to existing leisure facilities or potential to provide

There are no plans to expand the Sports Centre which is more than 2 miles away from Batford.

Comments/Overall Conclusions

You state *A wide range of facilities including those in the town centre are accessible within walking and cycling distance.* We would dispute this. Very few people walk from Batford into Harpenden Town Centre. The Lea Valley and the Harpenden dry valley result in up down topographical features that inhibit east-west access on foot or bike, particularly to the main retail, leisure and employment areas and the station.

There are only two crossings of the Lea, which are via Station Road and Westfield Road. Given the town's commute in and out characteristics, the location of the secondary schools and car journeys to overcome the topography, these routes are already subject to congestion.

The existing local centre facilities are considered very poor, on the periphery of Batford and at the bottom of the valley. We would contend that any development of S6 would require a new centre for retail and community facilities to serve both 'old and new Batford', especially given the number of new residents which the report estimates at 2200.

The Lea Valley walk is a recreational asset, it is not lit and has limited value as a commuter route. It doesn't make for a sustainable location per se.

(5) Strategic Infrastructure Provision

Given the strain on existing infrastructure, such as schools and town centre and commuter parking, *no identified scope for strategic infrastructure provision due to small scale of development* is exactly why the proposed development is not sustainable.

(6) Vehicular access and traffic impact

Traffic levels on the B653 already results in congestion that is likely to be exacerbated by the expansion of Luton Airport. No note has been made of the potential fourth secondary school site, or proposed housing development at the corner of Westfield/Lower Luton Road. Neither is mention made of the new facility, Lea Springs or the proposed mixed commercial and residential development in the Lower Lea Valley Estate, all of which will impact the B653.

Immediate access to the site would be via the Lower Luton Road, which is in a flood zone. The report suggests new access would be required and this would impact on the existing road network. We would emphasise that the only way to connect Batford and Harpenden is via Station Road and Westfield Road. Neither has the capacity to take twice the number of cars presently driven from Batford into Harpenden. New access would only be to the 'new' Batford, and would have to empty onto the B653. Given the area is ringed with woods, there is little scope to build a new road network to take cars away from the B653.

Access may be possible from Common Lane, but this will be complicated by Lea Springs and the potential new secondary school. Roads would need to be connected to the north of the site, but bear in mind that Porter's Hill Park cannot be built on or through, and it is marked as adjacent to the central part of the proposed site.

We consider these factors should all contribute to a low evaluation score.

(7) Public Transport

Buses have not provided an acceptable option for regular rail commuters who generally require car, taxi, motorcycle or cycle parking, drop-off/pick up or storage near the station. An existing shortage of such facilities and congested access to the station should reduce the evaluation score. As should the factor that many commuters leave home early and return late, thus making use of public transport, even if available, unrealistic.

(8) Urban Design

Batford has its own identity. Introducing possibly 2,200 new residents into the existing community, thereby doubling the area, without providing any extra community facilities or focal points, may prevent social cohesion.

(9) Environmental constraints

The report highlights an area of Flood Zone 2.

Given the report refers to Marshalls Heath Local Nature Reserve, and not Batford Springs Nature Reserve, we would ask the officers responsible to check the status of this part of the report.

Protecting our environment for the future is considered a key consideration. A recent report produced by the Hertfordshire Environmental Forum calculated that St Albans District has the largest per capita carbon footprint compared to the ten district areas in Hertfordshire. Surely this should be a factor in considering development sites and their suitability.

(11) Heritage/archaeology potential

The Council understands that this site may have been a medieval settlement and that archaeologists have expressed an interest in assessing the site.

The case against further expansion – applies to S5 and S6

We disagree strongly that Harpenden is a suitable location for sustainable development. We understand the logic of placing new development in main urban settlements, assuming that the widest range of services and facilities are more accessible there, but as the above shows, our schools, roads, food stores and medical facilities are unlikely to cope with increased numbers.

Harpenden is the only other designated town in the District (second to St Albans) but for all the reasons set out above, its dormitory town characteristics mitigate against it being a sustainable settlement for growth.

The contrast with the identification from Regional Spatial Strategies of, between, for example, the expansion of the area to the west of Northampton (Upton) or the south of Cambridge (Trumpington), and Harpenden could not be greater. These developments provide clear opportunities for population growth and local employment growth, enjoy sustainable transport links and are being progressed at a scale to provide infrastructure such as primary schools, medical centres etc. None of this would apply to Harpenden.

Harpenden's attractiveness has already resulted in a significant number of new dwellings being provided in recent years. In 1991 there were 10781 dwellings, and we believe the number is now approximately 11695. We understand the number of new dwellings for 2013/14 is likely to be at least 30.

The long standing consent to develop beyond Yeoman's Avenue, garden grabbing, backland development, demolishing and replacing large family homes with semi-detached houses, has all resulted in unprecedented activity. Add to this the brownfield developments such as Stephen's Court (Pinney's), the Forresters site, the Post Office sorting office, the Glen Eagles Hotel, Bennett's Lodge, Lea Industrial Estate, Lea Springs, Pinewood, and looking forward, the Harpenden House Hotel and James Marshall House, Harpenden is making an enormous contribution to the District's housing growth (including enabling residents to downsize and provide more homes for family occupation).

We have also seen developers apply for Permitted Development Rights to change the use of office accommodation in Harpenden Town Centre, for example Station Approach and offices in Thompson Close, adding to our stock of housing.

Beyond the fact that this pattern of development has resulted in a significant growth in the Town's homes and population, it must be recognised that at the same time there has essentially been no contribution to the stock of affordable homes. Developers are unlikely to address this.

Enclosure 10

Appendix 14 – Summary of approach to assessing capacity on the Eight Areas Of Search

The Council is working closely with relevant landowners and developers in relation to the eight Areas Of Search. In some cases, landowners and developers have produced or are preparing detailed studies, to show what scale and nature of development could be achieved.

In the assessment below, it is important to consider the relative importance of each factor, as well as the number of factors, when weighing up the merits of each site. A higher number of positives does not automatically mean that a particular site is better overall, and vice versa.

It is acknowledged that large-scale housing developments will have an impact on nearby housing areas. These include short-term impacts during construction and longer-term changes, particularly for those living next to land that was previously open countryside.

All distances quoted in the assessment are approximate and measured from the likely nearest site boundary to the nearest example, as the crow flies. Travel distances, including walking and cycling distances, are often longer, due to roads and other constraints. The information on schools relates only to state sector establishments.

Areas Of Search – Potentially Suitable, Available and Achievable

Area of Search 1 – South West Of St Albans

| <p>This area is located north of the A 414 (former M10) and south of the A4147 Hemel Hempstead Road. The potential development area is partly east of Bedmond Lane (south of the Verulam Estate) and partly to the west. The land is mainly farmed.</p> <p>A development scheme could accommodate 1,000-1,200 homes, and associated uses such as a two-form entry primary school and a local shopping centre. There is also scope for significant countryside enhancement and increased public access.</p> | |
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| Positives | Negatives |
| Development in this area could pay for an improved western orbital route around St Albans. This would include a new road through the Area of Search from the A414 to the Hemel Hempstead Road. It appears that the western orbital route could result in major transport benefits for the City. | Development would result in outward expansion of the City towards Chiswell Green and Hemel Hempstead, but would not result in coalescence of settlements. Development would not extend south of the A414 towards Chiswell Green and a substantial gap between St Albans and Hemel Hempstead would remain. |
| Accessibility to existing local facilities is not very good. However, a new primary school and local shopping centre could be included in the development and there is scope for improved bus services. | The land immediately south of the A4147 and west of Bedmond Lane is an area of high archaeological importance. It is unlikely that any built development will be acceptable on this land. |
| Opportunity exists for large new areas of public open space, woodland planting and better access to the countryside to the north and west of the potential | Due to the archaeological constraints, any development west of Bedmond Lane would have to be well south of the A4147, so would not be well located in relation to the existing built up area. |

Appendix 14 – Summary of approach to assessing capacity on the Eight Areas Of Search

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| development – to help meet Watling Chase Community Forest objectives. | |
| Likelihood of housing being built is high, given that there is one principal landowner, who is working on possible development options for the land. | Park Wood and Birch Wood are designated as County Wildlife Sites and should be protected. |
| Proposals for this area of search could include a hotel and a mini park and ride car park, close to the junction of the A414 and the possible western orbital road. | The site includes Windridge Farm which has a Grade II Listed farmhouse and several Grade II Listed barns, whose setting will need to be preserved. |
| | It is uncertain whether the Highways Agency will agree to a new junction on the A414 (nb the Highways Agency is responsible for this section of the A414, which is a trunk road, but it may be detrunked and passed over to Hertfordshire County Council). |
| Distance to local facilities | |
| Approximate distance to primary school | Prae Wood – 600m |
| Approximate distance to secondary school | Marlborough – 600m |
| Approximate distance to bus routes | Verulam Estate – multiple stops 100-200m |
| Approximate distance to publicly accessible amenity space | Verulamium Park – 800m |
| Approximate distance to convenience retail | Abbey Avenue – 400m |
| Conclusions: There are some clear disadvantages with this location, including the impact on pleasant Green Belt countryside and the archaeological constraints. However, development would enable the provision of the western orbital route. Initial work suggests that this route would result in major transport benefits for the City, which outweigh the disadvantages of developing this land. Other advantages of this area include the potential for a new school, a local shopping centre And substantial woodland planting, public open space and better access to the countryside. | |

Area of Search 2 (south west part) – South East of St Albans

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| <p>This area consists of land between London Road, the A414 and Napsbury Lane. The main components of this area are:</p> <ul style="list-style-type: none"> • Overgrown land east of Napsbury Lane, called Napsbury Fields (the largest part of this area). • Ayletts Garden Centre, which fronts the A414. • The commercial site immediately east of Ayletts, containing pet supplies and tropical fish shops and other retail elements. |
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Appendix 14 – Summary of approach to assessing capacity on the Eight Areas Of Search

| <ul style="list-style-type: none"> • Birklands Meadow (open land, used on a temporary basis as public open space). <p>Depending on how much of the commercial sites is made available, this area could accommodate up to around 400 homes.</p> | |
|---|--|
| Positives | Negatives |
| The area is largely surrounded by development and is well related to the existing built up area. In 1983, the Local Plan Inspector recommended that the Napsbury Fields site be released from the Green Belt. | The gap between St Albans and London Colney is narrow - development on this land would increase the degree of coalescence. |
| The A414 separates the site from open countryside and would form a new defensible long term Green Belt boundary. | <p>Birklands Meadow is available for housing development, but there is uncertainty over the availability of:</p> <ul style="list-style-type: none"> • Napsbury Fields – it has been used informally as an open space for many years and local residents have submitted an application seeking 'village green' status. This is opposed by the landowners. If the land is declared a village green, it will prevent development. • Ayletts Garden Centre and the adjoining commercial site – it is uncertain how much (if any) of these sites would be available for housing - the main retail elements would probably remain. |
| The area contains elements of previously developed land along the A414. | |
| Opportunity exists for new areas of public open space and landscaping improvements, contributing to Watling Chase Community Forest objectives. | Napsbury Fields is a designated County Wildlife Site – there is a clear presumption in favour of retaining wildlife sites. This presumption should not be over-ridden unless there is a very strong case for development. |
| This site is in a fairly sustainable location, within walking distance of a local shopping centre, bus routes on London Road and the North Orbital Commercial Park. | Space should be allowed to retain existing trees, orchard (on Birklands Meadow) and hedgerows. |
| Could accommodate an extension to the North Orbital Commercial Park employment area – this is one of the District's few realistic opportunities for new employment sites. | There is uncertainty regarding road access to this site, but solutions can probably be found. Hertfordshire County Council is undertaking a study to decide the best approach. |
| Birklands Meadow is owned by Hertfordshire County Council and could be made available for a primary school, if | |

Appendix 14 – Summary of approach to assessing capacity on the Eight Areas Of Search

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| needed. | |
| Distance to local facilities | |
| Approximate distance to primary school | Cunningham Hill – 1200m |
| Approximate distance to secondary school | Francis Bacon – 200m |
| Approximate distance to bus routes | London Road - 50m |
| Approximate distance to publicly accessible amenity space | Birklands – 100m |
| Approximate distance to convenience retail | Newhouse Park – 250m |
| Conclusions: There are some points in favour of housing development – the area is well related to the existing built up area, is not open countryside and contains some previously developed land. However, there are major disadvantages with developing this land. The main drawbacks are the increased degree of coalescence with London Colney and Napsbury Field's status as a County Wildlife Site. Also, there is considerable doubt over whether much of the land would be available for housing – a village green application has been submitted. | |

Area of Search 2 (north east part) – South East of St Albans

| <p>This part of Area of Search 2 consists of two agricultural fields north east of London Road close to the London Colney Roundabout. The two fields adjoin the cemetery, with the field on the north west side (closest to the city centre) being the larger one.</p> <p>These fields could accommodate about 500-600 homes.</p> | |
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| Positives | Negatives |
| Both fields are flat and are not of high landscape value, but contain mature trees and hedgerows that should be retained. | The gap between St Albans and London Colney is narrow - development on this land would increase the degree of coalescence. |
| The location is sustainable – frequent bus services run along London Road, Francis Bacon Secondary School is close and the larger field is within walking distance of the Whitecroft local shopping centre. | To mitigate the impact on the Green Belt, space should be allowed for substantial boundary planting to the east and south and landscaping along London Road. |
| Housing development on the larger field would be fairly well related to the existing built up area. | The pleasant rural character of Nightingale Lane should be retained. |
| The likelihood of housing being built is high, given that there is one landowner (Leach Homes), who would like to | Housing development on the smaller field would not be very well related to the existing built up area. |

Appendix 14 – Summary of approach to assessing capacity on the Eight Areas Of Search

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| develop the land for housing or a business park. | |
| | The site is one of the District's very few opportunities to build a high quality business park, but this would be prevented by housing development. |
| Distance to local facilities | |
| Approximate distance to primary school | Cunningham Hill – 1200m |
| Approximate distance to secondary school | Francis Bacon – 200m |
| Approximate distance to bus routes | London Road - 50m |
| Approximate distance to publicly accessible amenity space | Birklands – 100m |
| Approximate distance to convenience retail | Newhouse Park – 250m |
| Conclusions: These fields are not of high landscape value and the location is sustainable. An important drawback is that development would increase the degree of coalescence between St Albans and London Colney. Another key issue is whether the land should be used for a high quality business park, rather than for housing. | |

Area of Search 3 – West of London Colney

| <p>This area of search consists mainly of farmland south of the new Napsbury Park housing development. It also includes farmland north of Napsbury Park and unused land to the west (close to the railway, south of North Cottages).</p> <p>Hertfordshire County Council (owners of the land north and south of Napsbury Park) is carrying out a technical study into possible development options on its land. Subject to the results of this study, Area of Search 3 could accommodate up to about 900 homes.</p> | |
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| Positives | Negatives |
| At present, Napsbury Park does not have many social and community facilities. Further housing development could increase the population to a level that would support better facilities, such as a local shopping centre and probably a primary school and improved bus services. | Residential development north of Napsbury Park would reduce the already narrow Green Belt gap between London Colney and St Albans. A landscaping screen would be required to mitigate the harm from any development here. |
| The land to the south of Napsbury is relatively flat and has limited landscape character. | Extensive views southwards from Napsbury Park and views into the area from Shenley Ridge would be harmed by housing development. |
| Housing development south of Napsbury would not unacceptably reduce the Green Belt gap between London Colney and other settlements. | It seems unlikely that large scale additional housing development can be accommodated, unless significant improvements are made to the local road network (the position will be clearer once the |

Appendix 14 – Summary of approach to assessing capacity on the Eight Areas Of Search

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| . | County Council's technical study is completed). |
| Opportunity exists for new woodland planting, public open space and better access to the countryside to the south and north of Napsbury Park – to help meet Watling Chase Community Forest objectives. | Development would affect the setting of Napsbury Park, which is designated as a conservation area and a Registered Historic Park and Garden. |
| The likelihood of housing being built is high, given that the main landowner (Hertfordshire County Council) is working on possible development options for its land. Also, the land west of Napsbury has been marketed as having development potential. | |
| Distance to local facilities | |
| Approximate distance to primary school | Bowmans Green - 250m (St Bernadette RC – 50m) |
| Approximate distance to secondary school | Francis Bacon – 2km |
| Approximate distance to bus routes | Shenley Lane – 50m |
| Approximate distance to publicly accessible amenity space | Broad Colney Nature Reserve – 200m |
| Approximate distance to convenience retail | Haseldine Road – 500m |
| Conclusions: There are clear disadvantages of housing development in this Area of Search, including the impact on the conservation area and the historic park and garden. Also, significant development to the north would erode the Green Belt gap with St Albans. However, there are advantages, particularly the opportunity to provide improved local facilities and substantial woodland planting, public open space and improved access to the countryside. The outcome of the County Council's technical study is needed before conclusions can be reached about this Area of Search, particularly in relation to traffic issues. | |

Area of Search No. 5 – East Of St Albans

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| <p>There are two separate potential strategic development sites in this Area of Search:</p> <ul style="list-style-type: none"> • <u>Beaumont School</u> Playing Fields/Winches Farm Drive – The potential housing development area consists of the existing school playing fields off Hatfield Road and an agricultural field north of Winches Farm Drive. The development would also provide new, improved school playing fields north of the new housing, a new school access road off Hatfield Road and some new school buildings. Housing capacity would be about 150 homes. • <u>Oaklands College Smallford Campus, land south of Sandpit Lane</u> – The land in question is farmland located south of Sandpit Lane, west of North Drive, north of the Oaklands |
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Appendix 14 – Summary of approach to assessing capacity on the Eight Areas Of Search

| <p><u>College buildings and east of Verulam School Playing Fields.</u> There is potential for 800-1,000 homes. The development could also provide local shopping facilities, an expanded Oakwood Primary School, together with significant countryside enhancement and increased public access in adjoining land owned by the College.</p> | |
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| <p><u>Beaumont School Playing Fields/ Winches Farm Drive</u></p> | |
| Positives | Negatives |
| New and much improved educational facilities at Beaumont School and an improved road access. | Localised traffic impacts upon Hatfield Road. |
| This is a very accessible, sustainable location, on land well related to the urban area which contributes relatively little to the Green Belt. | Hedgerows and adjoining woodland will need to be protected. |
| The area is close to local facilities such as shops and schools and there are regular bus services to St Albans city centre and Hatfield via Hatfield Road. | |
| Likelihood of housing being built is high, given that there are two landowners, who are working on proposals for school improvements and housing. | |
| <p>Distance to local facilities</p> | |
| Approximate distance to primary school | Oakwood – 400m |
| Approximate distance to secondary school | Beaumont – 50m |
| Approximate distance to bus stops | Hatfield Road – 50m |
| Approximate distance to publicly accessible amenity space | Longacres recreation ground – 100m |
| Approximate distance to convenience retail | Hatfield Road – 100m |
| <p>Conclusion: This is an accessible, sustainable location for housing. The land is well related to the built-up area and contributes little to the Green Belt. Significant key benefits are the new and improved educational facilities at Beaumont School and improved road access to it.</p> | |
| <p><u>South of Sandpit Lane/North of Oaklands College buildings</u></p> | |
| Positives | Negatives |
| The site is well related to the built up area and development would not reduce the gap between St Albans, Smallford and Hatfield. | Access to some facilities, such as shops is not very good – but local shops could be provided in the new development. |
| The landscape quality of the land is not | Traffic implications on Sandpit Lane – junction |

Appendix 14 – Summary of approach to assessing capacity on the Eight Areas Of Search

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| particularly high, but benefits from established trees and hedgerows, with ancient woodland nearby. | improvements likely to be required. Also, further consideration should be given to a possible eastern distributor road, linking Sandpit Lane to Hatfield Road and London Road. The possible transport benefits of a distributor road need to be weighed against the environmental impact. |
| The development would fund the expansion of Oakwood Primary School. This may require a small part of the adjoining Verulam School Playing Fields. If so, Verulam School may need some land to replace its lost playing field area. | Space should be allowed within the site to retain existing trees and hedgerows and for new planting along Sandpit lane and the new Green belt boundary. |
| There are regular bus services along Sandpit Lane. It may be also be possible to introduce a new St Albans-Hatfield route via Sandpit Lane. | |
| Opportunity exists for large new areas of public open space and woodland planting to the east and south of the potential development – to help meet Watling Chase Community Forest objectives. | |
| Likelihood of housing being built is high, as there is one landowner (Oaklands College), who is working on possible development options for the land. | |
| Distance to local facilities | |
| Approximate distance to primary school | Oakwood – 100m |
| Approximate distance to secondary school | Beaumont – 50m |
| Approximate distance to bus stops | Sandpit Lane – 100m |
| Approximate distance to publicly accessible amenity space | Longacres recreation ground – 600m |
| Approximate distance to convenience retail | Hatfield Road – 500m |
| Conclusions: There do not appear to be any major drawbacks to developing this land. This area is well related to the existing built up area, the landscape quality is not high and the gap between St Albans and nearby settlements would be maintained. Housing development could offer some advantages, including expansion of Oakwood Primary School, a local shopping centre and substantial woodland planting and public open space; possibly also a new St Albans-Hatfield bus route. | |

Appendix 14 – Summary of approach to assessing capacity on the Eight Areas Of Search

Area of Search 6 – Smallford

| <p>This area of search comprises a number of sites in Smallford, including three horticultural sites containing large glasshouses (i.e. Glinwell, Radio and Chester nurseries), Notcutts Garden Centre, a concrete formwork depot and large residential gardens. Together, these sites have the potential to significantly enlarge the village.</p> <p>If all the sites came forward for development, total housing capacity of the area would be about 750 homes.</p> | |
|--|--|
| Positives | Negatives |
| <p>Area of Search 6 is Green Belt, but not open countryside. The glasshouses are large, intrusive structures, which detract from the openness of the Green Belt. The area contains elements of previously developed land, including the garden centre and the concrete depot.</p> | <p>Project 23 and its preamble in the 1994 Local Plan stated that the Council's main aim was to secure a major enhancement of the whole area, consistent with its Green Belt status. Landscaping improvements and increased public access were sought, to help meet the Watling Chase Community Forest objectives. The 1994 Plan recognised that some enabling development was necessary to bring this about.</p> <p>It now appears that, due to the high existing use values, the landowners will not make their land available for housing unless the Council accepts development on most if not all of their land. Therefore, it seems that the major enhancement envisaged in the 1994 Plan is not achievable.</p> |
| <p>There are frequent bus services to St Albans and Hatfield and jobs nearby at Oaklands College and the employment area off Hatfield Road.</p> | <p>The Green Belt gaps between St Albans and Smallford and between Smallford and Hatfield are narrow and fragile. If the Council accepts the large scale of development necessary to encourage landowners to make their land available for housing, it would urbanise Smallford and reduce the perception of a countryside gap between the settlements.</p> |
| <p>Housing development would enable more facilities to be provided, probably including a larger convenience store and a community centre. This would make Smallford more of a self-contained village.</p> | <p>Housing development would result in a considerable loss of existing jobs, particularly at Glinwell Nurseries. As a result, the case for new employment development in the Green Belt would be increased.</p> |
| <p>Project 23 in the 1994 Local Plan envisaged some development, to replace the glasshouses and concrete depot south of Hatfield Road.</p> | <p>Even if around 750 new homes were built, it would not be sufficient to provide a wide range of local facilities. For example, it is unlikely that a primary school or a full local shopping centre would be built.</p> |
| <p>The likelihood of housing being built is high if the Core Strategy proposes</p> | <p>Hatfield Road is congested at peak hours – improvement of the Hatfield Road/Station</p> |

Appendix 14 – Summary of approach to assessing capacity on the Eight Areas Of Search

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| around 750 homes at Smallford. Most of the key landowners are acting as a consortium and are working on possible development options for their land. | Road/Oaklands Lane junction would be required and possibly other measures. |
| Distance to local facilities | |
| Approximate distance to primary school | Colney Heath – 1.2km |
| Approximate distance to secondary school | Beaumont – 1.7km (Nicholas Breakspear RC – 1.2k) |
| Approximate distance to bus routes | Hatfield Road – 50m |
| Approximate distance to publicly accessible amenity space | Oaklands Lane – 100m |
| Approximate distance to convenience retail | Station Road – 50m |
| Conclusion: There are some clear advantages to developing here. In particular, the land is not open countryside and there are large intrusive structures and elements of previously developed land. However, it is very important to protect the narrow Green Belt gap that separates St Albans and Hatfield and avoid coalescence. It seems that most of the potential land will not be brought forward for housing development, unless the Council accepts large scale development, which would urbanise Smallford and reduce the perception of countryside between the settlements. | |

Area of Search 7 – North of St Albans

| <p>This area of search covers farmland to the east of Harpenden Road (rear of Texaco filling station), west of the railway line and north of the Porters Wood employment area. Most of the area is owned by St Albans School.</p> <p>The site could accommodate 600-1,000 homes. It could also provide local shopping facilities and possibly a food superstore , a primary school and an extension to the Porters Wood employment area.</p> | |
|--|---|
| Positives | Negatives |
| Depending on the precise extent of new development, the Green Belt gap between St Albans and Harpenden would either be maintained or reduced by only a small amount. | Development would involve the loss of attractive unspoilt countryside, with some long distance views. Screen planting would be required to mitigate this harm. |
| Currently, road access to Porters Wood employment area is poor, but the development would provide a new, improved access from Harpenden Road. | Might add to traffic congestion at the Ancient Briton and King William IV junctions – but it appears that the development would fund improvements to these junctions. |
| Could accommodate an extension to the Porters Wood employment area – this is one of the District's few realistic opportunities for new employment sites. | Space should be allowed to retain Porter's Wood. |
| Located close to frequent bus services | |

Appendix 14 – Summary of approach to assessing capacity on the Eight Areas Of Search

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| on Harpenden Road and there may be scope for a new local bus route into the city centre. | |
| Could accommodate a new food superstore, if the Council decides that this would be appropriate. | |
| Would provide new local shopping facilities and some landscaped public open space. | |
| Could meet the identified need for a new secondary school to serve the north of St Albans. Could also accommodate a new primary school. | |
| The likelihood of housing being built is high, as both the landowners are working on possible development options for their land. | |
| Distance to local facilities | |
| Approximate distance to primary school | Margaret Wix – 500m |
| Approximate distance to secondary school | Townsend – 500m |
| Approximate distance to bus routes | Harpenden Road - 50m |
| Approximate distance to publicly accessible amenity space | Beech Road - 800m |
| Approximate distance to convenience retail | Beech Road – 800m |
| Conclusions: There would be an adverse impact on attractive Green Belt countryside. However, this area has significant potential for residential or mixed use development. Potential benefits of development include local shopping facilities, public open space, a new access to the Porters Wood employment area and possibly new primary and secondary schools, an extension to the employment area and a food superstore. | |

Area of Search 8 (south east part) – North of Harpenden, Luton Road/Ambrose Lane

| This site consists of an agricultural field, bounded by Luton Road, Cooters End lane, Ambrose Lane and the rear of the properties in Bloomfield Road. About 300 homes could be accommodated. | |
|--|--|
| Positives | Negatives |
| The site is well related to the existing built up area and the landscape quality is not high. | Traffic impact – the A1081 Luton Road is congested. Further consultation needed with Hertfordshire County Council and Hertfordshire Highways, but the principle of housing development is unlikely to be ruled out on traffic grounds. |

Appendix 14 – Summary of approach to assessing capacity on the Eight Areas Of Search

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| Cooters End Lane and Ambrose Lane would form a new defensible long term Green Belt boundary and housing development would not reduce the Green Belt gap between Harpenden and Luton. | Local schools are full – further discussions needed with Hertfordshire County Council on possible ways of increasing capacity. |
| The site is in a sustainable location, close to bus routes and a local centre and within walking distance of schools and Harpenden town centre. | The site adjoins the Grade II Listed Cooters End Farm - the setting of this listed building will need to be protected. |
| Housing development would help to support local shops on Luton Road. | Space should be allowed for screen planting along Cooters End Lane. |
| This Area of Search is one of only two potential strategic housing sites in the north of the District and provides a rare opportunity to secure a significant amount of affordable housing in this part of the District. | |
| The likelihood of housing being built is high, given that there is one landowner who is working on possible development options for the land. | |
| Distance to local facilities | |
| Approximate distance to primary school | Roundwood – 600m |
| Approximate distance to secondary school | Roundwood Park – 600m |
| Approximate distance to bus routes | Luton Road – 50m |
| Approximate distance to publicly accessible amenity space | Rothamsted Park – 1.2km |
| Approximate distance to convenience retail | Luton Road – 100m |
| Conclusions: There are concerns about traffic and education issues, which need further investigation. However, this is a sustainable location for housing and the site is well related to the existing built up area. The landscape quality is not high and the gap between Harpenden and Luton would be retained. This site gives a rare opportunity for a large housing development (including affordable housing) in the north of the District. | |

Area of Search 8 (north west part) – North of Harpenden, north west of Cooters End Lane

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| This site consists mainly of farmland, north east of Luton Road and north west of Cooters End Lane. The land extends up to the boundary with Bedfordshire. |
| About 400 homes could be accommodated. |

Appendix 14 – Summary of approach to assessing capacity on the Eight Areas Of Search

| Positives | Negatives |
|--|---|
| Housing development would not reduce the Green Belt gap between Harpenden and Luton. | The site is attractive open countryside and is not very well related to the existing built up area. It is mainly rural in character , rather than urban fringe, with large fields and some trees and hedgerows along boundaries. |
| The site is in a fairly sustainable location, close to bus routes and within walking distance of schools and a local shopping centre. | The land is very open and there are long distance views which would be affected by development. The County boundary is not defined on the ground by any physical features and would not form a defensible new Green Belt boundary. Extensive landscaping would be needed to mitigate the harm and establish a strong new Green Belt boundary that would endure. |
| This Area of Search is one of only two potential strategic housing sites in the north of the District and provides a rare opportunity to secure a significant amount of affordable housing in this part of the District. | Traffic impact – the A1081 Luton Road is congested. Further consultation needed with Hertfordshire County Council and Hertfordshire Highways. |
| | Local schools are full – further discussions needed with Hertfordshire County Council on possible ways of increasing capacity. |
| | The site includes the Grade II Listed Cooters End Farm - the setting of this listed building will need to be protected. |
| | The likelihood of housing being built is uncertain – landowners and developers have not contacted the Council about possible housing development. |
| Distance to local facilities | |
| Approximate distance to primary school | Roundwood – 600m |
| Approximate distance to secondary school | Roundwood Park – 700m |
| Approximate distance to bus routes | Luton Road – 50m |
| Approximate distance to publicly accessible amenity space | Rothamsted Park – 1.6km |
| Approximate distance to convenience retail | Luton Road – 500m |
| Conclusions: The case for housing development in this part of Area of Search 8 is much weaker than with the land south east of Cooters End Lane. The site is not very well related to the existing built up area and development would cause the loss of attractive, rural countryside. Other concerns include traffic and education issues and the lack of a natural new defensible Green Belt boundary. | |

Appendix 14 – Summary of approach to assessing capacity on the Eight Areas Of Search

Areas Of Search – NOT Suitable, Available and Achievable

Area of Search 4 – South Of London Colney

| <p>This 44 hectare site is bounded by the River Colne to the north, Colney Fields Retail Park to the east, the M25 to the south and Shenley Lane to the west. Most of the land is a restored sand and gravel site and is used for low intensity grazing. There is a small element of previously developed land (containing storage uses) adjacent to Shenley Lane.</p> <p>The various constraints (see below) would restrict the housing capacity, probably to about 500 homes.</p> | |
|---|--|
| Positives | Negatives |
| The eastern part of this Area of Search is fairly well related to the existing built up area. | The River Colne and Broad Colney Nature Reserve mean that the western part of this Area of Search would be poorly related to the existing built up area. |
| Housing development on the eastern part of the area would be sustainable, with good accessibility to the Colney Fields shops, buses in Barnet Road and jobs on the Riverside employment area. | Housing development on the western part of the area would be a considerable distance from most local services and facilities, so would not be very sustainable. |
| Housing development south of Napsbury would not unacceptably reduce the Green Belt gap between London Colney and other settlements. | Close proximity to the M25 and its associated noise and pollution issues. |
| Opportunity exists to use part of this area for public open space and major landscaping improvements, particularly close to the M25 – to help meet Watling Chase Community Forest and TAP (Trees against Pollution) objectives. | Road access would probably have to be via Shenley Lane, which means an indirect route to facilities in the Barnet Road area. Also, the Bell Lane/Shenley Lane/Harper Lane roundabout would probably have to be improved. |
| | The northern part of the site is in an area with a high risk of flooding. If the Council decides to pursue the possibility of development, it would be necessary to carry out a level 2 strategic flood risk assessment. |
| | Development close to the River Colne would harm the amenity of Broad Colney Nature Reserve and the setting of London Colney Conservation Area. Landscaping would be needed to mitigate the impact. |
| | It is understood that further tipping on the former |

Appendix 14 – Summary of approach to assessing capacity on the Eight Areas Of Search

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| | sand and gravel land would be required before any building could take place. The tipping would have an adverse environmental impact and would delay the start of building works. |
| | Space should be allowed to retain existing trees and hedgerows and the planting in the south of the site. |
| | The current planning application for a strategic rail freight interchange on the Radlett Aerodrome site proposes a country park, including part of Area of Search 4 (i.e. the former sand and gravel land), to mitigate the impact of the freight depot. As a result, this land is not currently available for built development. Furthermore, there has been no interest shown by the landowners (Lafarge) in residential development here. |
| Distance to local facilities | |
| Approximate distance to primary school | Bowmansgreen – 700m (St Bernadette RC – 500m) |
| Approximate distance to secondary school | Francis Bacon – 2.5 km |
| Approximate distance to bus routes | Barnet Road – 200m |
| Approximate distance to publicly accessible amenity space | Broad Colney Nature Reserve – 50m |
| Approximate distance to convenience retail | London Colney Retail Park – 50m |
| Conclusion: There are few points in favour of housing in this Area of Search. In contrast there are several disadvantages. These include the poor relationship between the western part of the area to the existing built up area, M25 noise, the potential harm to the nature reserve and conservation area and the need for further tipping prior to built development. Also, the main part of the site may not be made available for housing development. | |

Appendix 14 – Summary of approach to assessing capacity on the Eight Areas Of Search

Capacity Summary For the Eight Areas Of Search

| Areas Of Search | Dwelling capacity (Mid-estimate figures) |
|--|--|
| No. 1 (South West of St Albans) | 1,100 |
| No. 2 (South East of St Albans) | 950 |
| No. 3 (West of London Colney & south of Napsbury site) | 900 |
| No. 4 (South of London Colney) | 0 |
| No. 5 (East of St Albans) | 1,050 |
| No. 6 (Smallford) | 750 |
| No. 7 (North of St Albans) | 800 |
| No. 8 (North of Harpenden) | 700 |

Other Options for Strategic Housing Sites in the Green Belt

Apart from the Areas Of Search assessed above, the Council has considered whether there are any other locations where existing settlements might be expanded significantly. The Council's conclusion is that there are no other acceptable locations for major development. The table below sets out the main reasons for this conclusion, on a settlement-by-settlement basis.

| Towns and potential direction of growth | Why development should not be proposed |
|---|---|
| St Albans | |
| North | Covered partly by Area of Search 7 (assessed earlier in this appendix). Elsewhere, the landscape quality is generally high and contains Childwickbury Conservation Area. Major northwards expansion would erode the Green Belt gap between St Albans and Harpenden. |
| North east | There is a need to maintain separation between St Albans and Sandridge. Development beyond House Lane would be visually intrusive in the countryside and distant from the city centre. |
| East | Covered by Areas Of Search 5 and 6 (assessed earlier). |

Appendix 14 – Summary of approach to assessing capacity on the Eight Areas Of Search

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| South east | Covered partly by Area of Search 2 (assessed earlier). Further to the east, major development would raise issues of possible coalescence of St Albans with Colney Heath and Tyttenhanger. Also, Highfield Park forms a clear-cut barrier to outward expansion of the urban area. |
| South | The environmental quality of the Ver Valley, Verulam Golf Course and Sopwell Conservation Area is a strong constraint to development. Further to the west, the main concern is to avoid coalescence between St Albans, Park Street and Chiswell Green. |
| South west | Covered by Area of Search 1 (assessed earlier). |
| West | This is not a feasible area for development, due mainly to the major constraints caused by scheduled ancient monuments and Verulamium Park. |
| North west | Batchwood Golf Course, Batch Wood and Townsend School are major constraints and the landscape quality is high. Also, the southern part of Batchwood Drive forms a strong physical edge to the built up area and there are important views of the City's historic skyline. |
| Harpenden | |
| North | Partly covered by Area of Search 8 (assessed earlier). East of the railway, development would adversely affect an area of high landscape quality including the Lea valley. Development would be distant from the town centre and have poor access to services. |
| North east | The land south of Bower Heath Lane is an area of high landscape quality, forming part of the Lea valley slopes. |
| East | Development eastwards in the Lea Valley would adversely affect a high quality landscape and raise issues of coalescence between Harpenden, Mackerye End and the Lea Valley Estate. |
| South east | This is an area of high landscape quality. Other constraints are the presence of Aldwickbury Golf Course and the need to avoid coalescence between Harpenden, Wheathampstead and Amwell. |
| South | Major development is ruled out, as Harpenden Common and Harpenden and Childwickbury Conservation Areas are major constraints. Other important factors include the high quality landscape and the need to maintain a substantial Green Belt gap between Harpenden and St Albans. |
| South west | South of Redbourn Lane, important constraints include Harpenden Golf Club, the need to retain a substantial gap between Harpenden and Redbourn and the distance from the town centre and local services. |
| West | Partly covered by the potential Rothamsted Research expansion. Elsewhere, Rothamsted Park is Harpenden's principal public park and |

Appendix 14 – Summary of approach to assessing capacity on the Eight Areas Of Search

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| North west | <p>Rothamsted Research needs to retain an extensive area for its important long term agricultural experiments. Retention of a substantial Green Belt gap between Harpenden and Redbourn is also an issue, whilst the setting of the Grade 1 listed Rothamsted Manor House must be protected.</p> <p>To the north of the Nickey Line footpath/cycleway, major development would be unsustainable as it would be distant from shops, services and employment. Also, road access to this area is poor. Further north, Kinsbourne Green Common is a major constraint to development.</p> |
| London Colney | |
| North | The land between High Street and Shenley Lane is important in maintaining a degree of separation between London Colney and St Albans, and providing for recreational activities. However, an indoor leisure centre is proposed on a small part of this area. |
| East | The bypass represents a clear physical boundary and some of the land beyond the bypass is in Hertsmere Borough. |
| South | Covered by Area of Search 4 (assessed earlier). |
| West | Covered by Area of Search 3 (assessed earlier). |
| Bricket Wood | The village is tightly constrained by the Abbey railway line and Bricket Wood Common (woodland and Site of Special Scientific Interest) to the east and south east. To the south is the Building Research Establishment (assessed earlier). The A405 forms a strong boundary to the west and development beyond this road would erode part of the important Green Belt gap between Watford, Bricket Wood and Chiswell Green. The M25 forms a very strong boundary to the north. |
| Chiswell Green | The land north of Ragged Hall lane and Greenwood Park (east and north east of the village) plays an important role in preventing coalescence between Chiswell Green and St Albans. The A405 forms a clear edge to the village on the south and south east side. Land west of Chiswell Green to the south of Chiswell Green Lane have been assessed as individual SHLAA sites. Major development north of Chiswell Green Lane would encroach into pleasant countryside and be distant from services and facilities. |
| How Wood | The danger of coalescence with Park Street is a major issue to the north. Along the east side of How Wood, the Abbey railway line forms a clear settlement edge. The M25 and Black Green Wood (ancient woodland) are important constraints to the south. Woodland (including Birch Wood) provides a clear settlement edge on part of the west side and any development would be distant from services and facilities. |
| Park Street and Frogmore | To the north, the A414 is a strong barrier and prevents coalescence with St Albans. The Abbey railway line and the River Ver check outward expansion to the east and north east. To the south east is the former |

Appendix 14 – Summary of approach to assessing capacity on the Eight Areas Of Search

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| | Radlett Aerodrome site, where the Council is resisting proposals for a strategic rail freight interchange on Green Belt and other grounds. To the south west, the River Ver and Moor Mill lakes are major constraints. Development to the west would cause Park Street and How Wood to coalesce. North easterly development would erode the fragile Green Belt gap between Park Street, Chiswell Green and St Albans. |
| Redbourn | Development to the north would be an unacceptable encroachment into open countryside and would be distant from services and facilities. There is scope for several hundred homes on land north east of the village up to the bypass, but this scale of growth would be too large for the village to absorb. It would change Redbourn's character, but would probably be too small to justify provision of a new primary school and more shops. Land east of Redbourn to the south of Harpenden Lane has been assessed earlier. To the south, the bypass forms a strong village boundary. The land west of the village is not a sustainable location for major development, being some distance from the village centre. Noise from the M1 is also a problem. |
| Wheathampstead | Wheathampstead is surrounded by land of high quality landscape quality, so major growth would not be acceptable. Other important factors include the River Lea and its floodplain in the north and north east of the village, Devil's Dyke ancient monument to the east, the need to avoid development extending further over the skyline to the south east and the danger of coalescence with Amwell to the south west. |

Enclosure 11

Mr John Young
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Date: 16th September 2009

Dear Mr Young,

**Shaping Our Community: Planning Consultation – Emerging Core Strategy
Local Development Framework**

Thank you for consulting the County Council in relation to the above. This response relates to the County Council's functions and services provided by the Environment Department as coordinated by the Forward Planning Unit and includes a preliminary response of the Transportation Planning and Policy Unit. It is an officer response only and as yet has no political clearance.

The Council's Corporate Services Department will be making separate responses on behalf of other County Councils service providers such as Children Schools and Families and Adult Care Services where appropriate.

1. Environmental Sustainability Policies

The emerging strategy recognises the need to address climate change through both mitigation and adaptation as identified in SO12. The local planning authority has been proactive in its approach to addressing environmental sustainability and it is encouraging to see an ambitious target for new development to meet higher levels of sustainability than those required under statutory regulations.

The emerging policies refer to the Government's ambition for zero carbon homes by 2016 and identify how the Code for Sustainable Homes programme will contribute towards this target being met. However, no reference is made to Government aspirations for all non-residential development to be zero carbon by 2019, local government buildings to be zero carbon by 2018 and schools and colleges by 2016.

The emerging environmental and sustainability policies do not refer to the generation of stand alone renewable technologies. Both the PPS1: addendum and PPS22 require local development documents to provide guidance on the location of stand alone

renewable energy generation. PPS1: addendum states that during the plan preparation, planning authorities should consider identifying suitable areas for renewable and low carbon technology sources whilst PPS22 requires planning policy at the local level to provide guidance in relation to stand alone renewable energy schemes and the accompanying practice guidance states that it is likely there will be "two different policy areas in a local plan to cover these".

2. Longer term growth requirements/Green Belt Reviews

The existing RSS runs to 2021, but has policy guidance for local authorities in providing for housing beyond that timeframe in order to meet 15-year land supply requirements of PPS3. This essentially requires the LDF process in St Albans to look to 2026 (on the assumption the approval of this core strategy document is the correct LDD from which to calculate the 15 years, not the site allocations LDD). There is therefore a national and regional policy requirement for the LDF to look to 2026 in terms of planning for housing provision and the Green Belt implications of that provision.

The East of England Plan requires strategic Green Belt Reviews (Policy SS7) in the Region to look to 2031. There is no such requirement for non-strategic non-regionally significant Green Belt Reviews, which is the position in the City and District of St Albans. The consultation document states that GOEast has advised that Policy SS7 also applies to more local reviews of the Green Belt. If this is the advice that has been received it cannot be correct. There is no wording within Policy SS7 or its supporting text applying the principles of that policy to Green Belt Reviews other than those referred to in Policy SS7. Those Reviews have no application in the City and District.

Government guidance in PPG2 does require local authorities to ensure that Green Belt Reviews will not be required again at the end of the relevant plan period – in this case 2026. Unless housing provision in the City and District were to come to a complete or near complete halt at 2026, there is every expectation that a further Green Belt Review would be required at that stage. Under these circumstances there is therefore an expectation that the LDF process should explore longer term Green Belt boundaries beyond 2026, to 2031 and potentially beyond. However, PPG2 states that regional/strategic guidance should provide a strategic framework for considering this issue. Whilst the current RSS does not the RSS Review underway is exploring longer term growth requirements for the Region which will, of course, include appropriate levels of growth for the City and District (currently ranging between 7,000 and 16,000 dwellings). The strategic guidance expected in PPG2 is therefore in preparation. Under these circumstances the view could be taken that the LDF process should be contained to the 2026 timeframe until the strategic guidance is forthcoming.

The prematurity of Green Belt releases may be an issue picked up in the sustainability appraisal/strategic environmental assessment processes running alongside the core strategy process as it progresses. The SA/SEA might, for example, come to the view that:

- the RSS Review process should be awaited to inform decisions on the scale of additional greenfield/Green Belt releases that may be required beyond 2026.
- Until that scale of development is known robust decisions on the best location(s) for post-2026 releases cannot be made. It is plausible, for example, for

sustainability conclusions based on one scale of growth requirement to be different from those at another – and this is a distinct possibility at the range of growth levels currently being considered for the City and District in the current RSS Review consultation exercise.

Were the 2026 timeframe to be taken forward through the remainder of the LDF process, this would remove the requirement for a range of proposed post-2026 Green Belt releases, including west of London Colney, North of Harpenden, East of Redbourn, Nicholas Breakspear School.

3. Assessment of Potential Strategic Housing and Employment Sites

The emerging core strategy sets out the preferred strategic housing and employment sites to be taken forward over the plan period to 2026 and beyond. It would be helpful if the technical appraisal of all areas of search considered and a clear picture of how decisions have been arrived out could be brought together as a single appraisal – perhaps formally within the sustainability appraisal/strategic environmental assessment process.

4. Affordable Housing

The relationship between 100 dwellings per annum and minimum 35% target for affordable housing is not clear.

5. Minerals and waste issues

Site Specific Considerations

The County Council supports the possibility of identifying Roehyde as an employment area, in order to complement and serve the needs of the District to 2026. Although the site is not identified as a current waste site or suitable area to accommodate future waste facilities within the adopted Waste Local Plan, the County Council's emerging Waste Development Framework has identified the site as a suitable location for future waste uses, and is listed as a Preferred Waste Area (HPO 036) in the Site Allocations Preferred Options document, published in January 2008. It is the County Council's intention to carry this site forward through to the next stage of the emerging Waste Development Framework.

Waste facilities are generally considered to be compatible alongside B2 and B8 uses, and whilst the District Council is considering promoting the site as a high quality, well landscaped business park, any proposals should be considered in context with the site's promotion as a preferred waste area through the County Council's Waste Development Framework. Although the site lies within the sand and gravel belt, whereby sites of this nature may provide for opportunistic extraction, the site previously formed part of Roehyde quarry, and appears to provide no further opportunity to extract primary aggregate. Extraction on this site was originally approved in June 1957, was subsequently in filled, and closed in 1980.

Minerals Sterilisation

The Core Strategy Key Diagram shows a number of sites and areas of search for housing development that maybe needed to meet the future needs of the District. Of these locations, Areas of Housing Search 1, 3, and 5 appear to be within the sand and gravel belt, along with employment development areas 1 and 3, and specific housing sites 5 and 6. These locations, along with possible Mini Park and Ride locations 1-4, appear large and not clearly defined in any detail.

The County Council as mineral planning authority aims to protect minerals resources from sterilisation, and at this stage it is hard to determine if, or to what extent minerals would be sterilised, especially if these broad locations fall upon greenfield (undeveloped) sites. Regard should be given therefore to the issue of minerals sterilisation and the need to recover the mineral prior to any development when considering these broad locations for further development, either within future versions of the Core Strategy or in specific Development Briefs. Proposals that prejudice the coming forward of the Preferred Area for mineral extraction at the former British Aerospace site would be the subject of an objection by the County Council.

General Core Strategy Considerations

The County Council broadly welcomes the promotion of waste minimisation within Core Strategic Objective 12. However, this needs to be clearer as to what measures will be used to promote the minimisation of waste and to encourage re-use and recycling within the District. It is suggested that this could be strengthened by a new policy on design and sustainability that incorporates the promotion of sustainable construction methods that minimises waste generation, and the re-use, and recycling of materials as far as practicable on site. This should then be taken into consideration if any of the sites or areas or search identified within this consultation come forward for future development. Proposals for new development should also ensure that they make provision for waste arising from occupation of the development, including appropriate access for refuse collection vehicles, storage of collection bins and locality based transfer and processing facilities.

Methods of waste minimisation should be in keeping with the County Council's aims and objectives for the reduction of waste and its environmental impact, as stated in section three of the Waste Local Plan 1995-2005. The key objectives that are of particular relevance to individual Local Planning Authorities are:

- To facilitate the provision of sufficient waste management facilities in Hertfordshire to accommodate the equivalent of the County's own arisings.
- To locate waste recycling, handling and reduction facilities as close as practicable to the origin of waste.
- To promote the development of waste management facilities, which increase the proportion of waste managed further up the waste hierarchy.
- To minimise the impact of waste management development on the natural and built environment.

It is the County Council's intention to maintain this approach, when formulating the key objectives within the emerging Waste Core Strategy. These will also emphasise the need for all local planning authorities in Hertfordshire to facilitate sustainable waste management principles within their emerging LDF documents. The publication of the East of England Plan in May 2008 outlines a significant need to minimise construction and demolition waste, as this represents the largest waste stream within the region.

It should also be noted that as from 6 April 2008, a site waste management plan (SWMP) is required by law for all construction projects that are worth more than £300,000. This aims to reduce the amount of waste produced on site and should contain information including types of waste removed from the site and where that waste is being taken to. Projects over £500,000 may require further information.

6. Transport

Green Belt

A1) *To help us take our vision forward we have a number of objectives. How much to you agree or disagree with each of them?*

a) *Ensuring the District is a great place to be, by:*

Providing sufficient land for development in sustainable locations

Maximising development in areas which are already served by passenger transport is beneficial as this potentially increases its use, improves commercial viability of bus routes and provides opportunities to make improvements to existing pedestrian/cycle/bus networks. Development in less well served areas requires significant developer contributions in order to make development sustainable which may not be achievable in small scale developments.

b) *Supporting sustainable travel and reducing car usage*

This is essential in order to minimise the potential negative impact of proposed development and so current issues of congestion, air pollution, and accessibility are addressed.

A number of initiatives are suggested for further consideration in the UTPs for St Albans and Southern St Albans including cycling measures such as: signalised junction improvements in the City Centre in Victoria Street or the need to look at ways to reduce severance and improve links for cyclists along the A414.

Housing

Housing Density

B1) *Building houses at higher density in towns can reduce the amount of green field land needed for development. Higher density can also mean reduced*

recreational space and diversity of plant and animal life, fewer trees, more street congestion, higher building and smaller properties. On the other hand, green field development can lead to urban sprawl and less space between settlements.

- a) Which of the following options do you prefer?**
i) High density in built up areas and less development on green field sites
ii) Lower density in built up areas and some development on green field sites

Existing built up areas are likely to already have some passenger transport provision and therefore maximising densities in such areas rather than on Greenfield sites increases the potential for the use of such services. Greenfield sites are likely to be less well served in relation to bus routes, pedestrian or cycle links and measures to improve accessibility by sustainable modes of transport may need to be greater than in existing built up areas. High densities can also reduce the need to travel if the distance between destinations is reduced. Having said this, specific site characteristics need to be examined in all situations as some built up areas may be much better served than others and the need to travel can be influenced by effective land use planning (eg mixed use developments) and quality pedestrian/cycle and passenger transport links.

Housing Sites

B2a) The emerging strategy proposes the following main sites for housing for the period to 2021. Please say whether you support or oppose the Council allocating these sites for housing.

- i) AOS 1: south west of St Albans, Bedmond Lane**

Following the completion of the M1 widening works the M10 (between the Park Street roundabout and the M1) has been reclassified as the A414(T). The provision of an access and link road through the site requires a junction with this section of road. The assessment of the site in Appendix 8 recognises that the A414(T) remains the responsibility of the Highway Agency and therefore it will be necessary to seek their approval.

There has been a general assumption that in the future the responsibility of the A414(T) will be transferred to HCC as the local highway authority. It is understood that at this stage the Highways Agency have no intention to transfer the road to HCC. However, *should* the road be transferred the road will form part of the county's primary strategic network. This being the case the County Council will maintain the current policy which states that the County Council as Local Highway Authority opposes new junctions on the primary road network. The County Council will only accept a deviation from this policy where very special circumstances exist.

An initial study into the overall impact of the site and link road has been carried out by representatives of AOS1. The results indicate that a significant amount of traffic is likely to divert to the new route relieving some of the congestion the southern approaches to the city, in particular, at the King Harry Lane junction with St Stephens Hill. The diverted traffic will lead to a significant increase in traffic on the A4147 Bluehouse Hill and Batchwood Drive. The study goes on to investigate localised junction improvements necessary at several junctions along the route to accommodate the additional demand.

The results of the study also show that there is only a relatively small impact on the amount of traffic in the centre of St Albans. This outcome is obviously in conflict the aspiration of the Emerging Core Strategy to reduce the amount traffic in the town centre leading to the possibility of traffic restrictions.

However, the traffic modelling work uses updated versions of an old model. Unfortunately, the new modelling has not been fully validated and concentrates attention to a localised area. Although the modelling has provided an indication about the affect of the link road the results cannot be considered as a robust evidence base. The impact of the link road with direct access to the A414(T) is likely to have wider reaching implications and further investigations will need to be carried out before the local highway authority is in a position to agree with the conclusions reached by the current report that states that the route would result in major transport benefits for the city.

The introduction of a development of this scale in this location would require an extensive sustainable transport strategy. The initial work that has been carried out to date has identified several bus services in the area and suggests that it will be possible to divert them into the site. There does not appear to be any evidence in the initial transport report that takes this theory any further. The cycling strategy appears to rely on a network of cycling routes that would link to a formal off carriageway core facility that would run parallel to Bedmond Lane. At this stage it would be useful to carry out further work to establish the feasibility of linking the new cycle route to the existing road network to the east and the town centre.

Appendix 8 makes reference to the opportunity of the inclusion of mini park and ride close to the junction with the A414. The subject of Park and Ride in St Albans is covered in section E1a iii.

ii) AOS 5 (south west part): east of St Albans at Beaumont School playing fields/Winches Farm Drive

It is assumed that the access to this site will be taken from a new signalised junction from the A1057 Hatfield Road to the east of Oakwood Drive. The junction has been previously assessed and approved in principle when submitted with a recent application to develop the smaller area of land within the same area of search.

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 the 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 Rd as this is an important bus route. Other measures to improve and encourage sustainable transport should be an integral part of a future development.

iii) AOS 5 (north part): east of St Albans at Oaklands Campus south of Sandpit Lane.

Paragraph 13.19 refers to an eastern distributor route that would run from London Road (via Highfield Park Drive) to Hatfield Road and through the Oaklands Smallford Campus site 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 eastern distributor route 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 any sections of a link road between London Road, 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 or the links will impact on the existing road network.

For a proposal of this size a thorough sustainable transport strategy is required. This area (Sandpit Lane) is not well served in relation to bus services. Most of the site falls outside the 400 metre catchment for existing services but a development of this size should 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.

Possible Long Term Housing Needs

B3a) The emerging strategy identifies the following sites for possible long-term housing needs (mostly post 2026) for safeguarded land (land reserved for future development). Please say whether you support or oppose the Council allocating these sites for housing.

i) AOS 3: west of London Colney

A proposal of this scale is likely to lead to improvement works to Shenley Lane to accommodate the additional traffic. There is also likely to be a requirement to upgrade the roundabout junction at Bell Lane/Harper Lane. However, limited available highway land may restrict improvements. To the north the Shenley Road junction with the A414 will also need to be tested in terms of capacity and the safety/accident history.

The area is currently served by one bus route, the 602, with operation hourly Monday to Saturday with no evening or Sunday provision. Bus service provision would need to be improved should this still be the case when the site comes forward. Further bus services are available from London Colney High St but this is over 400m from the site. Enhanced facilities as suggested within Appendix 8 such as shops/school would be beneficial in order to reduce the need to travel.

Only limited discussions have taken place with representatives of AOS3, without any additional information available regarding the proposed access arrangement, mitigation measures and sustainable transport strategy it is difficult for the highway authority to provide any further detailed comments.

ii) AOS 8: (south west part): north of Harpenden, Luton Rd/Ambrose Lane

Appendix 8 states that the A1081 Luton Road is a congested road. This observation is reinforced in the County Council's 'Tackling Congestion in Hertfordshire' document that

identifies this section of the A1081 as a congestion hotspot. Without any additional measures to ease the existing congestion any additional traffic is likely to make the situation worse. Careful consideration of measures to deter the use residential streets as alternatives to Luton Road will be required should this proposal be progressed.

It should also be noted that the A1081 Luton Road forms part of the county's primary distributor network and the average week day traffic flow is in the region of 18,000 vehicles. This being the case the County Council as the highway authority will maintain the current policy which states that new junctions on the primary road network will be opposed and that a deviation from this policy will only be possible where very special circumstances exist. 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 another arm to the existing junction with Roundwood Lane and thereby turning the existing three arm signal controlled junction into a four arm cross road junction (also controlled with traffic signals).

An access to a development of this scale from either Cooters End Lane or Ambrose Lane is likely to change the character of the roads if sections are upgraded in terms of road width and the provision of footways

It should be noted that as a general design principle, a development of approximately 300 dwellings will require at least one more access for emergency use.

For a proposal of this size a significant sustainable transport strategy is required. Currently there are several bus routes that run along Luton Rd, with regular services Mon-Fri including evenings, although less frequent at weekends. Good pedestrian/cycle links will need to be provided through the site to the Luton Road in order to access these services. Developer contributions from this site could be used towards improving evening and weekend service provision and other sustainable transport links to the town centre.

This area of search represents a large site that will have a significant impact on the road network in the area. Issues surrounding network capacity, access and sustainability must be fully investigated at the earliest opportunity. To date the highway authority are not aware of any work that has taken place to support this proposal.

iii) AOS 7: north of St Albans at Harpenden Rd/Sandridgebury

The County Council's 'Tackling Congestion in Hertfordshire' document identifies this section of the A1081 as a congestion hotspot. The introduction of a development consisting of 1,000 dwellings will generate in the region of 500 additional vehicle movements in the morning peak period. Without any additional measures to ease the existing congestion any additional traffic is likely to make the situation worse.

It should also be noted that the A1081 Luton Road forms part of the county's primary distributor network and the average week day traffic flow is in the region of 18,000 vehicles. This being the case the County Council as the highway authority will maintain the current policy which states that new junctions on the primary road network will be opposed and that a deviation from this policy will only be possible where very special circumstances exist.

The introduction of a development of this scale in this location would require an extensive sustainable transport strategy and designed to accommodate a public transport. There appears to be evidence of a shared use cycle path on the A1081 Harpenden Road. A sustainable transport strategy for the site is likely to include upgrading this facility. At this stage it would be useful to carry out further work to establish the feasibility of linking the new cycle route to the existing road network and the town centre and expand it to other facilities in the area. The site is somewhat remote from shops/services, therefore improved bus service provision to the site is required in order to encourage sustainability.

This AOS represents a large site that will have a significant impact on the road network in the area. Issues surrounding network capacity, access and sustainability must be fully investigated at the earliest opportunity. To date the highway authority are not aware of any work that has taken place to support this proposal.

Strategic Housing sites no longer proposed

B4a) The emerging strategy no longer proposes the following as main housing sites. Please say whether you agree or disagree with the Council's decision to reject these sites for housing.

i) AOS 4: South of London Colney

This site is remote from existing bus services. There are bus stops within the local retail park but these would be over 400m from the site. Significant developer contributions would be required to improve bus services in order to enhance accessibility.

ii) AOS 6: Smallford

Smallford has relatively limited services and residents would likely need to travel to either Hatfield or St Albans for daily needs. Whilst this is possible by bus due to the bus services which run along Hatfield Rd, the lack of local facilities increases the need to travel and so this would not make this site very sustainable. Extra vehicle trips generated by the development may also have a significant negative impact on Hatfield Rd which is already congested.

iii) AOS 2: South east of St Albans (south west part)

Bus services are available from London Rd but stops would be outside the 400m distance criteria for most of the site. Significant developer contributions would need to be sought in order to improve pedestrian/cycle/bus accessibility. The south western part of this site is remote from local services, and the major roads that surround the site may create barriers to movement.

iv) AOS 8: North of Harpenden (north west part)

Several bus routes are available from Luton Rd but this part of the site is less well located for development than its south-western part due to the increased distance from the town centre and other local services.

Employment

Strategic Employment Sites

C1a) The emerging strategy proposes the following main employment sites. Please say whether you support or oppose the Council allocating these sites for employment.

- i) E1 & Area of Search 2 (north east part): London Rd (adjacent to cemetery), St Albans for professional jobs.**

A proposed access arrangement to the site has not been included with the consultation information. Following a brief discussion with AOS2 representatives it is assumed that the access for the southern site will be taken directly from the London Road and the northern section of the site will be served from Highfield Park Drive.

It should also be noted that the A1081 London Road forms part of the county's primary distributor network. This being the case the County Council as the highway authority will maintain the current policy which states that new junctions on the primary road network will be opposed and that a deviation from this policy will only be possible where very special circumstances exist.

The site is close to the London Colney roundabout junction on the A414 and it is generally accepted that the junction can become congested at peak times. Therefore, there are concerns that an additional junction serving the southern site will delay traffic exiting the London Colney roundabout and interfere with the safe operation of the junction. There are also concerns that the any additional traffic generated by this proposal will have a direct impact on junctions operation in terms of capacity and safety.

Several bus routes are available from London Rd and frequencies are good. Pedestrian/cycle access onto London Rd is important in order to facilitate access to bus stops. The site appears somewhat remote from local services, facilities and residential areas, however, it is understood that there is opportunity to provide links to existing rights of way routes and upgrade where required.

The introduction of a development of this scale in this location will require an extensive sustainable transport strategy. At this stage it would be useful to carry out further work to establish the feasibility of linking the site to the existing road network and the town centre and expand on other facilities in the area. The site is somewhat remote from shops/services, therefore improved bus service provision to the site is required in order to encourage sustainability.

This AOS represents a large site that will have a significant impact on the road network in the area. Issues surrounding network capacity, access and sustainability must be fully investigated at the earliest opportunity. To date the highway authority are not aware of any work that has taken place to support proposal.

- ii) E2: Rothamsted Research, West Common, Harpenden – extension for Rothamsted and related firms for professional jobs.**

Appendix 9 makes reference to frequent bus services along the A1081 but there are no bus stops on this road in the vicinity of the site. As the crow flies, stops in Southdown Rd are geographically the closest, but this would not be an obvious route to go and the busy A1081 presents a barrier to their access. Other bus stops on Redbourn Rd and within the town centre are not within the recommended 400m distance criteria. The site is however within walking distance of the town centre.

iii) E3: Building Research Establishment (part) at Garston – redevelopment for BRE and related activities for professional jobs.

This site is not well served in relation to bus services, with no bus stops within 400m. The site is also close to major roads which may create barriers to movement into Watford and the surrounding area. As stated in appendix 9, the site is remote from local services/facilities and therefore this site scores particularly poorly in terms of sustainability. A significant sustainable transport strategy for the site will be required and is likely to require equally significant developer contributions in order to improve and support accessibility.

iv) E4 Roehyde: south west of A1(M) junction 3, Colney Heath (west of Hatfield) – possible alternative to London Rd, St Albans for a high quality business park or in addition to it.

This site is well situated in relation to access to major roads but is not in a location that would encourage the use of sustainable modes of travel. The co-location of hotel with a business park may be effective if there is a need for accommodation for business travellers. Access to the site or travel further afield by sustainable modes would currently be problematic for this site as the nearest bus stops are the other side of major roads and a roundabout. Such major roads also do not present an environment that is pedestrian and cycle friendly. Should this site be developed, developer contributions would need to be sought towards improving accessibility of the site by sustainable modes.

The site requires an access on to the A414. The principle of the access serving a development of the scale described has not been agreed (not as stated in appendix 9). Previous planning applications on this site have been refused. The reasons included the long term policy that restricts the introduction of new accesses on to the county's principle road network. In recent years the use of the site has become more established. Following the last planning application a proportion of the site continues to be used for temporary construction plant storage another part of the site is being used for the storage of bus/coaches. As a result of the continuing use of the existing access in recent years, albeit predominately temporary, the site has become more established. However, the amount of vehicles using the access remains relatively small.

It should be noted that another reason for refusal was the design and safety of an access in this location. The vehicle speeds on the A414 in this location are increased as drivers accelerate away from the roundabout, lane changing is also taking place as three lanes exiting the roundabout reduces to two on the A414.

Due to the close proximity of Junction 3 of the A1(M) any proposals for this site should also include consultation with the highways agency.

- v) ***E5 & Area of Search 7: Employment area extension EMP8 (Porters Wood) St Albans – for long term needs probably post 2026.***

The nearest bus stops are on Valley Rd but are not within the recommended 400m distance criteria and are served by local routes only. Access through to Harpenden Rd, from where the 321 Rickmansworth/Watford-Luton bus route is available, is poor due to the narrowness of Valley Rd as it runs behind St Albans Girls School. The site is remote from local facilities – the shops in Marshalswick are not within easy walking distance. Currently this site does not score highly in terms of accessibility by bus/pedestrians/cyclists.

Shopping

Harpenden Town Centre and St Albans City Centre

D1a) How much do you agree or disagree with the following statements?

- i) ***Proposals for shopping, culture and related facilities should be concentrated in St Albans city centre.***
- ii) ***Improvements in shopping in Harpenden should be concentrated in the town centre.***

Town centres are sustainable locations for such developments as they add to existing facilities, maintain vitality of existing town centres, and are where there are most options in relation to sustainable modes of transport. Development needs to be designed in conjunction with passenger transport, pedestrian/cycle network improvements and an effective parking strategy in order that sustainable modes of travel are encouraged and new development doesn't simply attract new car trips, adding to congestion. If town centres are to be further developed it is important that this is not to the detriment of local centres which may be more commercially marginal and play an important role in reducing the need to travel, particularly for residential areas further from town centres. For instance the supermarket and associated shops in Southdown in Harpenden play an important role for the residents of the Southdown/Batford area and reduces the need for these residents to travel to the town centre.

Shopping Developments in St Albans City Centre

- D2) ***A development which might include a food supermarket, large shops units and a department store is proposed for St Albans city centre.***

- a) ***Where would you prefer to see this kind of development?***

SH1: West of St Peter's St (Drovers Way)

SH2: East of St Peter's Street (Civic Centre area)

Both/neither

Either option is acceptable provided that the development is well connected to St Peter's Street, does not compromise the existing passenger transport network, reduce the capacity of the road network, fully considers sustainable transport (including car parking) and is safe.

Griffiths Way and Colney Fields (Former Savacentre)

D3a) Please say whether you support or oppose the following possible sites for retailing?

- i) SH3: Griffiths Way, St Albans (former gas holders site) possible retail warehousing.***

There are two bus stops on Griffiths Way within 400m of the gas holders site and two further stops on Holywell Hill by the Abbey Rail Station. There are a variety of routes available, both local and inter-urban. The site is therefore relatively well served in relation to buses despite being separate from the town centre. The proximity of the Abbey Station also provides the opportunity for visitors to come by rail. In terms of pedestrian and cycle access, this may be somewhat limited due to local topography, although there are residential areas within walking/cycling distance. The impact of any further development in this location may have an adverse effect on congestion along St Stephens Hill on the approach to the King Harry Lane junction.

- ii) SH4: Colney Fields, London Colney: possible expansion of retail park.***

Colney Fields is an important retail facility for residents of London Colney, but also attracts visitors from further afield due to the size of stores. There are several bus routes that call at the stops for the retail park. In order to encourage the use of sustainable modes of transport, any further development of this site should include measures to promote bus use and improve information provision and signage. Recent alterations to the car park have improved pedestrian routes within the site. Future development would give the opportunity to examine whether improvements could be made to pedestrian and cycle access from a wider area.

Transport

E1a) To what extent do you support or oppose the following transport measures:

- i) St Albans City Centre – reduce traffic and improve the facilities for bus, cycling and walking.***

As overall aims these are very positive but it is the means by which they are achieved that is important. At the moment central St Albans is a traffic dominated environment and traffic is not free-flowing, which impacts upon bus services and is not pedestrian and cycle friendly, although pedestrian/cycle improvements have recently been made to St Peter's St. If consideration is to be given to making St Peter's St for the use of sustainable modes of transport only, improvements need to be balanced with improved bus services, bus priority measures, information provision/ticketing initiatives/marketing. Cycle route improvements should link into the wider cycle network to enable people to come from further afield. Pedestrian routes should be of a high quality and enable

effective access to key destinations. In order to make sustainable modes of transport attractive, measures to improve facilities need to be combined with an effective parking strategy which discourages the use of the private car combined with enforcement. Improved accessibility is key to achieving social inclusion and enabling access to health, education, jobs, shopping, leisure and other community facilities.

It should be noted that initiatives proposed in the consultation do not provide evidence of their feasibility. The city vision work did not include modelling to justify its aspirations.

Whilst HCC are hoping to undertake modelling for central St Albans in the near future this may not be in time to inform the final LDF submission.

ii) *Increase the bus use, cycling and walking in the whole District.*

This is essential in order to enable anticipated development within the District to take place in a sustainable way. Effective land use planning, in which development is designed in conjunction with passenger transport, helps to make sustainable modes of transport more attractive. Factors to consider include the design of new development so as to be conducive for bus access, location of bus stops within reasonable walking distance, high quality pedestrian and cycle routes to key destinations, appropriate levels of parking and measures to discourage rat running. Mixed use developments can assist in reducing the need to travel and consideration should be given to the location of any new development in relation to local services and accessibility by passenger transport, on foot/bicycle.

Bus services operate within a commercial environment and therefore available routes and their frequencies are determined by commercial viability. Whilst developer contributions can be used to improve services this is usually for a limited time only and so measures to increase patronage, which may lead to service improvements long term, are important. Bus services within St Albans are currently adversely affected by levels of congestion and whilst this may be improved short term by diverting traffic onto orbital routes, measures need to be in place to lock in the benefits of extra capacity such as bus priority measures, quality interchanges, pedestrian/cycle routes, coupled with an effective parking strategy. The proposed park and ride using local bus services will, if successful, encourage bus use. Other measures that should be considered are improvements to bus stop infrastructure and passenger waiting facilities, information provision/marketing/ticketing initiatives.

Tackling congestion is important in order to provide an environment that is more attractive for cyclists, along with priority measures, the provision of a network of high quality routes, and cycle parking at key destinations. Accessibility of services on foot is also important for short distances and therefore also essential is an effective pedestrian network which promotes safe, direct access to key destinations, crossing points and access to passenger transport (bus stops/rail stations).

Improvements to rail services into London as part of the Thameslink programme and those to the Abbey Line will also play an important role in improving the attractiveness of sustainable modes of transport.

The suggestions of the City Vision are referred to within Chapter 13 (13.25, 13.30). There are already several bus routes that operate between the station and town centre. Careful consideration should be given as to the viability of another route and demand for bus access to the cathedral/Verulamium Park. Bus services operate within a commercial environment. If developer or other sources of funding are used to support bus services, these are often of a limited time span and so assessment of the likely long term viability of a route is important. In relation to east-west links, a number of routes already run between the town centre and Hatfield along Hatfield Rd. Paragraph 13.11 makes reference to the Rural Vision, which identifies a need for improved bus links between rural areas and towns. Such routes may be commercially marginal and therefore not attractive to bus operators. Increased numbers of bus routes/service frequencies in themselves may lead to some increased patronage, but given the commercial nature of bus operation and in order to maximise the usage of sustainable modes of travel on a long term basis, other measures need to be developed in tandem to make their use more attractive – eg infrastructure/information/bus priority provision and quality pedestrian and cycle links. In rural areas, more innovative solutions may be required such as demand responsive or community based transport schemes.

iii) Mini park and ride (PR 1-4)

In principle, park and ride can be an effective means of encouraging people to access town centres by bus. In order to be effective, there needs to be frequent, reliable, low cost buses available coupled with further measures to encourage its use such as a parking strategy which manages parking within the town centre, improvements to bus infrastructure including passenger waiting facilities, bus priority measures, as well as improvements to pedestrian and cycle access around the town.

Whilst the proposal to use local bus services is positive in that this may lead to enhanced patronage and therefore commercial viability, such services may be more subject to delays if they have come from further afield and would also presumably lack the branding and marketability of a dedicated park and ride bus service. The size of car parks provided also determines the numbers of people able to use the park and ride, and a small car park may therefore limit commercial viability. Careful consideration should also be given to the location of the park and ride sites. The proposal for a site on London Rd may be effective as there are already bus routes using this route into the town centre. The other proposed sites are not so well served by existing services and so thought would need to be given as to how to fund improvements. It is important that park and ride is placed where there will be highest demand and potential use, if existing bus services are used, where these are with highest frequencies, and land available for the facility. A robust business case will need to be made, combined with high quality facilities, and so potential users are offered a saving in time and cost over the car.

Reference is made to the potential for 'park and walk' (paragraph 13.30) car parks. If these are proposed along with park and ride, one might compete with the other, and the provision of car parks in themselves may give further encouragement to cars, although it would displace them from the central area.

Comments as above, the need for the Parking Strategy and the outcomes of the city vision work is paramount for the case of park and ride to be tested.

Paras 13.27 and 13.28 cannot be proven - evidence is needed.

iv) Western orbital route (a new link road from the A414 [former M10] to the A4147 Hemel Hempstead Road plus junction improvements.

Whilst the orbital route is likely to divert vehicles, particularly through traffic, the provision of extra road capacity may simply attract extra vehicle trips and not tackle issues of congestion and increasing car use long term. It is important that there is a balance between road/junction improvements and sufficient and effective measures to encourage the use of alternatives to the car to ensure the long term sustainability of development. An effective routing strategy is needed to ensure vehicles use roads appropriate to their journey purpose and which will act with other measures to discourage the use of cars in the area. If the new route is developed it should be designed so as to be conducive for bus use, and consideration should be given to bus priority measures and pedestrian and cycle routes. The need for such a route and the impact on traffic flows should be assessed through modelling (see previous comments B2a)i).

Para 13.7 of the core strategy should not make reference to the St Albans UTP supporting the construction of an orbital route. This was a proposal in the earlier SADC 2007 core strategy document that the UTP considered as part of its development and recommended that the feasibility be considered prior to any further commitment.

Community

Education facilities

F1a) How much do you agree or disagree with the following educational proposals?

i) New secondary school on the north side of St Albans

This site would be very close to St Albans Girls School and presumably access may also be along Sandridgebury Lane. If this is the case, this would add to current congestion in the area around school start/finish times. The site is also close to other schools such as Townsend and Margaret Wix Schools. It would be beneficial if schools within St Albans are located where pupils can walk/cycle to them and are also accessible by local bus services. There are regular bus services along the A1081 although this may be outside the recommended distance criteria for a school (200m).

ii) New primary school west of St Albans city centre

As above, the location of a school needs to take into account where pupils are going to be coming from so that the majority can be within walking/cycling distance. Large areas of housing development may justify a new school as well as other community facilities. Should a new school be within AOS1, this area currently has limited bus services which would need to be improved. The provision of quality pedestrian and cycle routes are important to encourage the use of sustainable modes of transport.

Recreation

Hotels

G2a) The emerging strategy proposes possible new hotel accommodation in sites located along the A414 corridor. Please say whether you support or oppose the Council allocating these sites for hotels

i) HT1: The City Centre and other built up areas for budget and boutique hotels

The city centre is well served in relation to bus services and so would be a sustainable location for a hotel. If other built up areas are proposed, accessibility of the site by bus, rail, pedestrian and cycle networks needs to be assessed in order that sustainable modes of transport are encouraged and deficiencies addressed through the planning process and developer contributions.

ii) HT2: London Rd, St Albans (adjacent to the cemetery) for a 4 star hotel with conference facilities.

In relation to bus services, a number of routes are available from London Rd and stops would likely be within 400m of most of the site. Good pedestrian/cycle access onto London Rd is important as this is the main route for buses and into the town centre. The co-location with employment uses may be effective if there is a need for business traveller accommodation (also see comments c1ai).

iii) HT3: Roehyde (A414/A1[M]) linked to business park.

This site is well situated in relation to access to major roads but is not in a location that would encourage the use of sustainable modes of travel. The co-location of hotel with a business park may be effective if there is a need for accommodation for business travellers. Access to the site or travel further afield by sustainable modes would currently be problematic for this site as the nearest bus stops are the other side of major roads and a roundabout. Such major roads also do not present an environment that is pedestrian and cycle friendly (also see comments C1aiv).

7. Green Infrastructure, Natural Environment and Countryside Policies

The emerging policies on green infrastructure, the natural environment and countryside do not fully address Landscape objectives set out in the East of England Plan and emerging national guidance. It is suggested that in the revised document, SADC signpost within the document towards a fuller set of objectives for landscape policy than currently suggested.

SADC and their partners should recognise and aim to protect and enhance the diversity and local distinctiveness of the countryside character areas identified in the emerging document by:

- developing area-wide strategies, based on landscape character assessments, setting long-term goals for landscape change, targeting planning and land

management tools and resources to influence that change, and giving priority to those areas subject to most growth and change;

- developing criteria-based policies, informed by the area-wide strategies and landscape character assessments, to ensure all development respects and enhances local landscape character; and
- securing mitigation measures where, in exceptional circumstances, damage to local landscape character is unavoidable.

In addition Natural England is in the process of promoting a number of landscape policies (e.g. all landscapes Matter) which would merit a mention

Yours Sincerely



Forward Planning Unit
Hertfordshire County Council

Enclosure 12



HIGHWAYS AND ACCESS APPRAISALS

for

**St Albans City and District, Delivering
Secondary School Expansion**

Prepared on behalf of
**Hertfordshire County Council
Hertfordshire Property**

February 2011

Reference: ST2151/HAA-1102

Revision 0

SECTION 2 – POTENTIAL SCHOOL SITES

It is unlikely that the Highway Authority will accept the principle of parents dropping off pupils on Butterfield Lane and surrounding roads within the public highway. Therefore a parking and circulation facility is likely to need to be provided within the site.

Harpenden - Potential Site A - Land east of Luton Road, Harpenden

To be read in conjunction with drawing ST-2152-3

General

Site A is located to the east of the A1081, Luton Road on the northern edge of Harpenden. The site is split into two areas with Cooters End Lane running between Area A and Area B. Area A is the larger of the two areas to the southeast of Cooters End Lane, bound by Luton Road to the southwest and Ambrose Lane to the northeast. Area B is located to the northwest of Cooters End Lane.

Existing Road Network

The site is bounded by Luton Road along the southwest boundary with fields to the northwest and northeast. Residential development is located to the southwest of Luton Road and along the southeast boundary of the site, associated with Bloomfield Road. The northeast side of Site A is bound by Ambrose Lane, which provides a link to Bloomfield Road and continues onto Hollybush Lane to the north of the town centre. Ambrose Lane serves a private hospital and The Kings School, which is an independent primary school.

The A1081 runs from northwest to southeast, from junction 10a of the M1 motorway in the southwest corner of Luton, running through the centre of Harpenden and continuing on to St Albans.

Luton Road is within a 40mph limit as it approaches Harpenden from the northwest. The 30mph limit begins just to the southwest of the Cooters End Lane junction. Cooters End Lane itself is within a derestricted speed limit zone.

There is an existing right turn lane facility on Luton Road serving Cooters End Lane. Wide splays are in place within the highway boundary at the entrance to Cooters End Lane, and the road is of sufficient width to accommodate two way traffic for approximately 20m from its junction with Luton Road. From this point, the road narrows to a single track country lane with passing places.

Cooters Lane runs north, northeast from Luton Road to the B653, Lower Luton Road which runs from Luton, across the northeast side of Harpenden to Wheathampstead. A fairly significant traffic flow is generated along the road at present due to the link onto the B653 and access to The Kings School. We do not consider that the road would be suitable for a significant increase in traffic and HCC highway policy does not generally allow improvements to be carried out on country lanes if they would affect the nature of the road.

There are generally no footways along the northeast side of Luton Road, except in the location of a bus stop to the northwest of the Cooters End Lane junction.

Access Arrangements

SECTION 2 – POTENTIAL SCHOOL SITES

HCC highway policy restricts the provision of new accesses off A roads within the county. Therefore a new access to serve the school off the A1081, Luton Road is unlikely to be acceptable.

As Cooters End Lane forms an existing junction, there may be scope to provide an access off the south western end of the road. Positioning of this access would need to be optimised in relation to its distance from the junction with Luton Road and avoiding any significant works on Cooters End Lane. We would anticipate that the access should be at least 30m from the junction with Luton Road, which would involve some improvements at the southwest end of Cooters End Lane.

Although it is anticipated that the majority of vehicles associated with a potential school site in this location would be likely to arrive via Luton Road, there could potentially be a significant increase in traffic along Cooters End Lane, which is not suitable for this purpose.

An alternative access could possibly be provided off Ambrose Lane in the northeast corner of the site. However access to the site could impact heavily upon residents of Bloomfield Road, Hillside Road and Ambrose Lane. Bloomfield Road is 6.1m wide and could potentially accommodate school related traffic. However, at the junction between Bloomfield Road and Luton Road, visibility to the right when exiting Bloomfield Road is poor.

The existing right turn lane junction arrangement between Luton Road and Cooters End Lane would appear to be suitable for school related traffic. Analysis of the existing junction and predicted vehicle movements would be required to determine whether any improvements are required to accommodate the predicted significant additional vehicles

Our main concern would be whether vehicles could be effectively moved into the site without hold ups which could potentially back up into Luton Road. In this respect, the site access would be better provided into site B, which would avoid right turn movements from Cooters Lane into the site. If access is provided into Site A, vehicles travelling southwest along Cooters End Lane could block vehicles turning right into the site, and with the access only 30m from the junction with Luton Road, there would be potential for vehicles to back up onto Luton Road.

It would not be acceptable for parking associated with the school to occur on the A1081, Luton Road or other adjacent roads. Therefore, a facility will need to be provided within the site to accommodate drop off and pick up movements. However, these movements will exacerbate potential issues regarding access into the site close to the junction with Luton Road.

We would recommend that the 30mph limit be extended to west of the potential school site in order to reduce speeds in the vicinity of the school access.

Pedestrian/Cycle Access

We would recommend that the pedestrian accesses to the site are segregated from the vehicular access, assuming that the vehicular access is taken from the southwest end of Cooters End Lane. There is a pedestrian crossing phase on the existing traffic signal controlled junction between Luton Road and Roundwood Lane, which would be suitable for use by school pupils. We would recommend that the main pedestrian access to the site is located near to these traffic lights in order to encourage pupils to cross Luton Road using the signal controlled junction.

SECTION 2 – POTENTIAL SCHOOL SITES

Footways along the northwest side of Luton Road will need to be improved to suit anticipated pedestrian desire lines.

It may be feasible to provide a rear pedestrian access to the school in the northeast corner of the site, to encourage pupils from the east of the school to travel on foot. However, this would potentially encourage drop offs in this location which would increase traffic flows on Ambrose Lane and Cooters End Road, which would not be recommended. Possible provision of a footway from the southwest end of Bloomfield Road running north on the east side of the A1081 Luton Road to the traffic lights and proposed pedestrian access would obviate the need for such an access on the north side of the site.

There are no formal cycle lanes adjacent to the site. However, the former Nicky Line Railway runs from northeast to southwest to the southeast of the site. There may be scope to provide a cycle lane along Luton Road, although it would be necessary to link this to nearby cycle routes and would be subject to significant safety assessments.

Public Transport

The nearest bus stops are located directly adjacent to the site on Luton Road. These stops serve routes 202, 321 and 636 which serve Dunstable, Luton and Leagrave as well as Harpenden, Watford, Rickmansworth and Hatfield.

Conclusion

Luton Road experiences high traffic flows during the AM and PM peak periods, with significant queuing at signal controlled junctions leading into the town. However, the road would be suitable for accommodating traffic associated with a school as it would have minimal impact on residential areas.

It would appear technically possible to achieve an access off Cooters End Lane, providing the Highway Authority will accept minor improvements to the southwestern end of the road to achieve a sufficient distance for the access from Luton Road. It will be necessary to ensure that any access arrangements do not generate queuing onto Luton Road. Therefore, the access route into the site should be clear of parking or turning facilities for a significant length to enable vehicles to access the site unobstructed.

It is anticipated that the majority of traffic approaching the site will travel directly along Luton Road from either direction. Therefore, analysis of surrounding junctions including the signal controlled junctions will be necessary to ensure that they can accommodate the additional flows.

We would not recommend that any access arrangements encourage vehicular use of Cooters End Lane or Ambrose Lane as these roads are not suitable for a significant increase in traffic. However, due to potential congestion on Luton Road, it is possible that the above roads could be used as a rat run avoiding congestion on the main route through Harpenden. Analysis of the surrounding junctions will identify whether the additional traffic flows will cause significant enough delay to those travelling by car that they would be likely to use Ambrose Lane and Cooters End Lane as a quicker route.

Some increase in traffic on the country lanes surrounding the site will be inevitable.

SECTION 2 – POTENTIAL SCHOOL SITES

It is unlikely that the Highway Authority will accept the principle of parents dropping off pupils on Luton Road and surrounding roads within the public highway. Therefore a parking and circulation facility is likely to need to be provided within the site.

In order to ease the flow of traffic off Cooters End Lane into the site, it would appear that access would be better provided into Area B to allow vehicles to turn directly left into the site. A right turn into the site is more likely to generate queues back onto Luton Road.

A new footway would need to be provided along the northeast side of Luton Road adjacent to the site. An existing pedestrian phase on the signal controlled junction between Roundwood Lane and Luton Road would be a suitable location for pedestrians to cross Luton Road adjacent to the site. We would recommend that a pedestrian access be located in the vicinity of this junction to avoid interaction between pedestrians and vehicles at the main vehicular access to the school site. This would also provide a pedestrian access into the site closer to the main residential areas.

We considered that provision of a pedestrian access off Ambrose Lane would encourage parents to drop off in this area and continue along the country lanes. Therefore, to avoid encouraging additional vehicles along this route, we consider that a rear pedestrian access would not be suitable.

A suitable pedestrian link will be required between Area A and Area B, which would enable pupils to move between the sites. As Cooters End Lane experiences a significant volume of traffic considering its single track nature, careful consideration will need to be given to crossing facilities, to ensure that suitable visibility can be achieved between pedestrians and vehicles. It would seem appropriate to extend the 30mph limit to the west of the site on Luton Road and along Cooters End Lane. Although provision of a speed hump would not be appropriate on Cooters End Lane as a derestricted road, it may be possible to install a raised crossing point if the 30mph limit is extended along the road.

From initial inspection, we would consider that the existing right turn lane junction between Cooters End Lane and Luton Road would be suitable for school related traffic, and would avoid disruption to normal traffic flows. However, this would be subject to detailed junction analysis.

Harpenden - Potential Site F - Land north of Lower Luton Road, Harpenden

To be read in conjunction with drawing ST-2152-4

General

Site F is located to the north of the B653, Lower Luton Road on the north east side of Harpenden. Batford is immediately to the northwest.

Existing Road Network

The site is bounded by the B653, Lower Luton Road along the southern boundary with fields to the east and north. Common Lane runs along the western boundary of the site, joining Lower Luton Road at a mini roundabout adjacent to the southwest corner of the site. Batford is located to the northwest of Common Lane.

Enclosure 13

Google Maps Cooters End Ln



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Cooters End Ln

Harpenden

Enclosure 14

Accommodating Development Needs

