

HARPENDEN GREEN BELT ASSOCIATION

**HEARING STATEMENT FOR EXAMINATION IN PUBLIC OF
ST ALBANS DISTRICT LOCAL PLAN**

**MATTER 7 – THE BROAD LOCATIONS FOR DEVELOPMENT:
SPECIFIC MATTERS**

NE Harpenden

NW Harpenden

1. For ease of reference, Harpenden Green Belt Association's ("HGBA's") response to the 2018 Consultation is at **Appendix 1**. NE Harpenden is addressed at Section IV; NW Harpenden at Section V.
2. References to the appendices to this statement are given below as "**Appx 1, 2**" etc.
3. HGBA sets out below each of the Inspectors' questions; provides a summary answer with (where appropriate) additional explanation in numbered paragraphs.

NE Harpenden S6(vii)

Q1: Is the site suitable for housing and are there any specific constraints or requirements associated with it, or the need for mitigation measures?

A: There are three important constraints which the Council has failed adequately to take into account, namely (1) the presence of heritage buildings, archaeological assets in the vicinity, (2) the limiting network of roads around the broad location as well as isolation accentuated by the river/lack of crossings and (3) the fact that the broad location is on a steep slope in a flood risk area with a historic landscape characteristic that Herts County Council designates as conserve and improve. There are additional issues which need consideration.

1. **Heritage assets:** There are a number of heritage assets in the vicinity that will be further at risk from the effects of development including a number of listed buildings; and the potential for archaeological finds given the historic nature of the local (Doomsday Book) mill sites. In addition, with Roman finds and a local Anglo-Saxon graveyard, there is significant potential for further archaeological significance.
2. **Road network:** The proposed site is bounded by the already over-capacity Lower Luton Road on one side and historic country lanes, woodland and field structures on the other. Neither are capable of sustaining more traffic, and there are no alternative routes proposed. The Lower Luton Road is adjacent to the River Lea and both are prone to flooding all year. Limited river crossings mean traffic from this isolated proposed new development will be routed down already over-capacity/crowded roads, Station Road or Westfield Road residential areas that already have traffic and speed restrictors. There is no viable alternative to car ownership in this location because of distance/isolation from Harpenden (and proposed lack of local facilities). Additional

access and the implications of traffic via the already problematic Common Lane also appears not to have been considered.

3. **Landscape/natural environment impacts:** the NE Harpenden broad location is on a steep slope from country lanes down to the Lower Luton Road (a relatively narrow winding main road in a valley setting beside the river). It is a highly visible collection of ancient fields form a historic context adjoining more ancient fields and historic woodland. Herts County Council see these field structures to be conserved and improved, given their historic setting in Hertfordshire's dwindling mixed farming legacy. The broad location is close to Batford Springs Reserve and a chalk stream that will be at risk from additional pollution and development-led flood risk. The valley setting would accentuate existing (visible) pollution and problems with river mists/fogs.
4. There are other issues which the Plan does not adequately address, including how the development can be adequately integrated into the existing East Harpenden community and indeed Harpenden itself, given existing demographics, distances and spread of the proposal, and how this can be effected without further collateral intrusion into the sensitive fields and road structures that lead in to the countryside and villages. More details will be given by the Batford Community Action Group, which HGBA supports.

Q2: What evidence is there to demonstrate that the proposed broad location is capable of delivering 760 dwellings?

- A. None. Furthermore, it is a matter of concern that Policy S6(vii) prescribes a minimum level of housing, but no maximum. There is a risk of development at a substantially greater density than is appropriate at this out-of-town location.

Q3: What further infrastructure work needs to be undertaken, and is this appropriate to be left to the masterplanning stage?

- A. Substantial infrastructure work needs to be undertaken, and it is inappropriate to leave this to the master planning stage. Failing to do so ignores the wishes of Harpenden residents as expressed through the Neighbourhood Plan.

1. Planning for infrastructure to support new development and remedy existing infrastructure deficits should have taken place from the earliest stages of plan-making.

Without such planning it cannot be known whether any proposed development meets the test of sustainable development and/or whether there are exceptional circumstances necessitating the release of land from the Green Belt: consequently, it is inappropriate to leave it to the master planning stage. Moreover, Harpenden Neighbourhood Plan emphasises the need for new development to be supported by infrastructure.

2. The work which needs to take place in respect of both Harpenden sites includes:

- (1) Planning for transport infrastructure (road and rail);
- (2) Planning for health infrastructure (about which the Infrastructure Delivery Plan (“IDP”) is vague);
- (3) Planning for waste water infrastructure (which the IDP identifies as necessary but for which no provision has been made);
- (4) Planning for effective and useable walking and cycling routes which will actually encourage people out of their cars and are more than merely window-dressing;
- (5) Addressing the dire problems of town centre and station parking in Harpenden, which development across north Harpenden, and within the town, will exacerbate.

Q4: Should the policy refer specifically to the provision of sports facilities?

A. Yes. Para. 9.107 of the IDP identifies a need for a substantial number of additional pitches. Given the volume of growth planned for North/East Harpenden, it would be appropriate for a sports pitch to be provided at this broad location. As an equalities issue, it is noted that most sport facilities are for predominantly male sports, which leaves an ideal opportunity to redress the balance and provide facilities for predominantly female sports (severely under-supplied in the district, disadvantaging girls/women).

Q5: How have heritage assets been considered and is a Heritage Impact Assessment required?

- A. Heritage assets have not been properly considered at all and an independent Heritage Impact Assessment is required.
1. As discussed above, NE Harpenden is bounded by a high number of heritage buildings and the potential for significant heritage archaeological finds. Neither have been properly considered: the existence of heritage assets was not a criterion which featured in the evaluation of sites for green belt release. CD 009 St Albans Local Plan Sustainability Appraisal Report 2018 (which was available to consultees when the Plan was published) failed to make any reference to heritage assets at all. Following intervention by Historic England, in CD 012 St Albans Local Plan - SA Addendum March 2019, the effect on the historic environment has been changed to “*minor adverse*”. But without a proper heritage assessment, there is no evidence that the impact will only be minor.

Q6: Is the site suitable for development in relation to flood risk?

- A. The Council has carried out only an initial, high level flood risk assessment: ENV 001 South West Hertfordshire Strategic Flood Risk Assessment. The broad location has not, as far as HGBA is aware, been properly assessed in relation to flood risk. The site is adjacent to the flood zone of the River Lea and the Strategic Flood Risk Assessment correctly records repeated flooding, including at Batford. The site makes a significant contribution to mitigation of flooding on the Lower Luton Road and River Lea Valley. Removal of the natural remedy means not only significant risk but also that significant measures may need to be taken to avoid run-off onto the Lower Luton Road/into the River Lea.

Q7: Has consideration been given to air quality and any mitigation measures?

- A. No consideration has been given to air quality issues at all by the Council. There are likely to be significant air quality issues due to queuing traffic on the roads around the broad location, when taken in addition to the emissions from the proposed expansion of Luton Airport and the proposed Lea Bank Energy Park.

Q8: Should specific provision be made for a new neighbourhood centre?

- A. Yes. The volume of proposed development in this location justifies a new neighbourhood centre. Batford is now a large housing estate disconnected physically

from Harpenden by the Lower Luton Road and the River Lea. There are no cycling links to and from Harpenden Town Centre and it is not within walking distance. The Council does not appear to have taken a consistent approach to the decision whether a neighbourhood centre is required: for example, Policy 6 vi is a site in St Albans with a projected minimum capacity of 1100 dwellings. This broad location is to receive a new neighbourhood centre, with wide-ranging community facility provision. NE and NW Harpenden will have a combined minimum of 1340 dwellings with no facilities. Neither site is within walking distance to the town centre and therefore need either a neighbourhood centre or local centre.

NW Harpenden S6(viii)

Q1: Is the site suitable for housing and are there any specific constraints or requirements associated with it, or the need for mitigation measures?

A: There are three important constraints which the Council has failed adequately to take into account, namely (1) the presence of listed buildings, including one in the middle of the broad location (2) the limiting network of roads around the broad location and (3) the fact that the broad location is on a steep slope in an area which both the Council and Central Bedfordshire designate as of particular landscape significance. There are additional issues which need consideration.

1. **Listed Buildings:** Cooters End Farm is in the middle of the broad location: the broad location comprises pre-18th century enclosures which are the setting for the listed building. The listed building also forms the focal point of views across countryside from Ambrose Lane, Cooters End Lane, A1081 Luton Road and houses on Bloomfield Road. In addition, the Bell public house is immediately adjacent to the broad location. Policy S6(viii) does not even require the retention of Cooters End Farm and it requires development at a density which will inevitably cause substantial harm to its setting.
2. **Road network:** Cooters End Lane runs from the A1081 Luton Road through the broad location, over the plateau to the east to join Thrales End Road. It is a very narrow, single carriageway, country lane leading into other country lanes. Development of the broad location is likely to encourage substantially more traffic down Cooters End Lane than it can accommodate: on the other hand, widening/upgrading it would have a substantial adverse effect on the landscape to the east of the broad location which is of particularly high quality. Ambrose Lane runs along the east of the broad location

towards Harpenden via a very tight and dangerous bend over the Nickey Line (a former railway, now leisure path), into a very narrow and constricted arrangement of Victorian streets. At **Appx 2** is a slide obtained from Hertfordshire County Council in April 2019 showing the initial results of the traffic modelling under the COMET system which indicates that an additional 1000 cars will use Ambrose Lane and an additional 500 cars will use Cooters End Lane, in the AM peak. Moreover, HCC has explained that these figures do not include the effect of school traffic to the proposed primary school on Ambrose Lane. Traffic at that volume would result in complete gridlock and massive air quality issues. Whilst there may be mitigation measures available to prevent vehicles using Cooters End Lane and Ambrose Lane, those will divert large volumes of traffic onto the already congested A1081 Luton Road, including to the Park Hill/Nickey Line Bridge junction just south of the broad location, which is a “pinch point” where the road narrows under a bridge. HGBA has seen no evidence that these issues have been properly considered, let alone addressed.

3. **Landscape impacts:** the NW Harpenden broad location is on a steep slope from the Thrales End plateau down to the A1081 Luton Road, which runs through a valley. It sits in an area which is designated under the Council’s current local plan (District Local Plan Review 1994) as a Landscape Conservation Area. It is also immediately adjacent to an area of Central Bedfordshire which has been designated an Area of Great Landscape Value. The Council is proposing to allow the development of a school on land which the Green Belt Review considered should be kept free of development for landscape reasons and is proposing to allow development on the broad location at a density (and therefore height) which is likely to have a significant landscape impact.
4. There are other constraints which the Plan does not adequately address, including a small parcel of woodland in the south east corner of the broad location, which is likely to be ancient woodland associated with Ambrose Wood and Westfield Wood across Ambrose Lane, and the ancient woodland at Ambrose Wood which will be immediately adjacent to the proposed school site: see **Appx 3** for analysis of its ancient woodland status.

Q2: What evidence is there to demonstrate that the proposed broad location is capable of delivering 580 dwellings?

A. None. This figure is achieved by a sleight of hand, designed to ensure “strategic” status for the NW Harpenden broad location for political reasons, since it would otherwise not be considered of sufficient size to be a strategic site.

1. See the HGBA Consultation Response, Section V, paragraphs 5-9 at **Appx 1** for a detailed critique of this figure.

2. Moreover, the evaluation process for the broad location is contradictory. At **Appx 4** is a copy of the evaluation sheets which led to the selection of the broad locations as areas for green belt release. The area of land analysed for this purpose for NW Harpenden is shown on the diagram, but is not the same area of land which is shown on the Policies Map. This is because for the purpose of evaluating the impact on Green Belt purposes, the Council used the area identified by the Green Belt Review. On the other hand, for the purpose of calculating capacity, the Council took the larger area of land shown on the Policies Map. Similarly, in respect of NE Harpenden the area evaluated is not the same area as shown on the Policies Map.

Q3: What further infrastructure work needs to be undertaken, and is this appropriate to be left to the masterplanning stage?

A. Substantial infrastructure work needs to be undertaken, and it is inappropriate to leave this to the master planning stage. See response to Q3 for NE Harpenden above.

Q4: Should specific provision be made for a new neighbourhood centre?

A. Yes. The volume of proposed development in this location justifies a new neighbourhood centre. See response to Q8 for NE Harpenden above.

Q5: Should the policy refer specifically to the provision of sports facilities?

A. Yes. See response to Q4 for NE Harpenden above.

Q6: How have heritage assets been considered and is a Heritage Impact Assessment required?

A. Heritage assets have not been properly considered at all and an independent Heritage Impact Assessment is required.

1. As discussed above, NW Harpenden contains a grade II listed building within the broad location and another close by. Neither have been properly considered: the existence of heritage assets was not a criteria which featured in the evaluation of sites for green belt release. Policy S6(vii) does not even require retention of Cooters End Farm, let alone preservation of its setting.

2. The Council has consistently sought to downplay the impact of development on Cooters End Farm, because for political reasons it wishes to promote the site for development. Thus CD 009 St Albans Local Plan Sustainability Appraisal Report 2018 described the impact on the Historic Environment as “*uncertain*”. Historic England complained about this designation, saying:

“Without sufficient policy protection in place, and with development proposed on three sides of Cooters End Farm, we consider that the impact is likely to be negative/adverse. The land forming this allocation site forms part of the setting of the Farm and the NPPF is clear that development within the setting of a heritage asset may lead to harm to the significance of that asset.”

In response, in CD 012 St Albans Local Plan - SA Addendum March 2019, the effect on the historic environment is said to be “*minor adverse*”. But without a proper heritage assessment, there is no evidence that the impact will only be minor: common sense suggests that dense development on three sides of a listed building is likely to have a substantial adverse impact on its setting.

3. Thus any heritage assessment should be carried out by those truly independent of the Council: experience otherwise suggests that the evidence will be unduly influenced by the Council’s political objectives.

Q7: Is the site suitable for development in relation to flood risk?

- A. ENV 001 South West Hertfordshire Strategic Flood Risk Assessment identifies some risks which require further investigation. The Council has not followed the sequential test in deciding where development should go.

Conclusions

Policies S6 (vii) and S6 (viii) are unsound because they are not justified, effective or consistent with national policy. Mere amendment of the policies will not address the fundamental problems which flow from site selection on a political, rather than evidence-driven, basis. Substantial work of assessment and as regards the provision of infrastructure is needed.

APPENDICES

1. Harpenden Green Belt Association's 2018 Consultation Response
2. Initial results of COMET traffic modelling, April 2019
3. Extract from rights of way report evidencing Ambrose Wood's ancient woodland status
4. Evaluation sheets, NE Harpenden & NW Harpenden PPC May 2018