

St Albans LDF Emerging Core Strategy ‘Shaping Our Community’ July 2009
Response by CPRE – The Hertfordshire Society

Core Strategic Objectives

We have the following comments on the Key Priority 1 objectives listed in Chapter 6:

SO1: We strongly support the Council’s commitment to protecting, managing and improving the Metropolitan Green Belt which extends right across the District.

SO2: We strongly support this objective of protecting natural and historic assets.

SO3: We accept that the Council is obliged to provide sufficient land for development as required by central government through the Regional Spatial Strategy (East of England Plan). However, the qualifying issues of sustainability, accessibility and provision of appropriate infrastructure must be applied rigorously and consistently across the board. This is not entirely evident from some of the proposals in this Emerging Core Strategy.

SO5: We question the objective of establishing St Albans as a regional cultural hub and premier location for the activities listed. “Regional” means the East of England, and it is unrealistic to expect St Albans to be in the premier league at that level in all these categories. Even at ‘sub-regional’ level, St Albans would be competing with major established towns such as Watford, Luton and Stevenage. Policy SS3 of the East of England Plan identifies the Key Centres for Development and Change where new development should be concentrated. The list does not include St Albans. Instead, Policy SS4 for towns other than Key Centres and the rural areas sets out the approach to development that St Albans should be following.

Housing

Q. B1 Housing Density

Preferred option: (i) High density in built up areas and less development on green field sites.

With the use of careful and imaginative design and layout, development of around 50 dwellings per hectare can be achieved in urban areas without loss of amenity. This is particularly so if a high proportion of affordable housing, as opposed to large market housing units, is provided. This more efficient use of land has the advantage of conserving precious open space and countryside outside the urban areas.

Q. B2 Housing Sites for the period to 2021

We **strongly oppose** the following proposals:

(i) **AOS1:** South west of St Albans, Bedmond Lane.

This area between the A414 (formerly A10) and the A4147 Hemel Hempstead Road and extending partly to the west of Bedmond Lane represents a massive extension of the Verulam Estate into the Green Belt. While development in this area would not actually result in coalescence, it would significantly diminish the existing gap between St Albans and Chiswell Green on the one hand and St Albans and Hemel Hempstead on the other. Development in this part of the Green Belt would be contrary to other green belt purposes given in PPG2 of checking the sprawl of large built-up area and avoiding encroachment into the countryside.

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Beyond Bedmond Lane, there is no clearly defensible boundary to this part of the Green Belt once the existing boundary has been breached. Although Park Wood and Birch Wood would be protected as County Wildlife Sites, development up to them would put their integrity at risk. There are also a number of designated Areas of Archaeological Significance in this area.

The main justification put forward for this proposal is that it would pay for an improved western orbital route around St Albans. This in itself does not justify development of 1,000 – 1,200 dwellings plus associated education and shopping facilities in the Green Belt. Moreover, as we demonstrate in the section on Transport Policies below, the case for a western orbital route has not yet been proven, so it would be premature to allocate this site for development on that basis.

(ii) **AOS5 (north part)**: East of St Albans at Oaklands Campus, south of Sandpit Lane. This is a large area of Green Belt extending south of Sandpit Lane as far as North Drive and the Oaklands College Smallford Campus. With a potential capacity of 800 – 1,000 dwellings, plus some new community facilities, this would be a major extension of St Albans into the Green Belt. Contrary to the claim in Appendix 8 of the Emerging Core Strategy, this proposed development, together with the associated proposed eastern distributor road, would significantly reduce the gap between St Albans, Smallford and Hatfield. This Green Belt gap is already under tremendous pressure from the proposed expansion of Oaklands Campus which has now got planning permission and from the possible expansion of Hatfield westwards.

This option appears to be favoured by the Council because it offers the possibility of an eastern bypass of the city from London Road in the south to Sandpit Lane in the north east. We comment on that proposal in the Transport Policies section below.

We **tend to oppose** the following option:

(ii) **AOS5 (south west part)**: East of St Albans at Beaumont School Playing Fields/ Winches Farm Drive.

We have previously objected to planning applications to develop this site, and would be reluctant to see it removed from the Green Belt. However, we regard it as the ‘least worst’ option if it proves necessary to expand St Albans into the Green Belt. The site is well related to the existing urban area and to local facilities and bus services on Hatfield Road, and would therefore be a relatively sustainable location.

Q B3 Long Term Housing Needs

We **strongly oppose** the following options:

(i) **AOS3**: West of London Colney.

This would be a significant extension of London Colney and the Napsbury Park development into the Green Belt. Although it would not in itself cause coalescence with any of the

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surrounding settlements, it would be a significant loss in an area of Green Belt between St Albans and Radlett that is under heavy pressure from other development proposals – in particular, the proposed Strategic Railfreight Interchange on the other side of the railway line. This sector of the Green Belt is already scheduled to accept around 350 dwellings on the Harperbury Hospital site in the period up to 2026 (Site H5 in the consultation document).

(ii) **AOS8 (south east part)**: north of Harpenden, Luton Road/Ambrose Lane. Although this is a reduced version of the option offered in the Core Strategy Issues and Options (July 2007) of development along the A1081 Luton Road, development of around 300 dwellings up to Cooters End Lane would be a sizeable incursion into the Green Belt and into open countryside. Contrary to the suggestion in Appendix 8 of the Emerging Core Strategy, this is an attractive hillside site and forms part of the Landscape Character Area that was designated in the 1994 District Local Plan.

Traffic congestion through the centre of Harpenden is a major factor affecting development of this site. Development of 300 dwellings would undoubtedly add to this congestion, and there is no obvious way of dealing with this in terms of improvements to the A1081 or a bypass of the town. Further study of the traffic implications of development in Harpenden, together with the knock-on effects of the massive development proposed for the Luton/ Dunstable/ Houghton Regis conurbation a few miles to the north, is urgently required.

We **tend to oppose** the following option:

(iii) **AOS7**: north of St Albans at Harpenden Road/Sandridgebury. This would be a significant incursion into the Green Belt north of the city. Housing development of 600 – 1,000 units (20 – 33 hectares at the minimum density of 30 dwellings per hectare given in PPS3), together with local shopping facilities and possibly a food superstore, a primary school and an extension to the Porters Wood employment area, would extend development up to and probably encompassing the Woollam Playing Fields.

This is part of an area of attractive countryside extending beyond the railway line to the east and northwards towards Harpenden.

We also **oppose** the following option which is listed in Chapter 10 as a possible additional Green Belt release but, for some unexplained reason, is not included on the questionnaire:

H7: East of Redbourn, south of Harpenden Lane. This site forms part of the narrow strip of Green Belt between the existing built-up area and the bypass of Redbourn. There is a case for saying that development should not be allowed to extend up to the bypass, which was never intended to form the edge of the village. The fact that the bypass separates the area from open countryside is a strong argument for retaining and improving site H7 for its nature conservation and informal leisure interest easily accessible from the village.

The fact that part of the site is at high risk of flooding is a compelling reason for not allocating it as a strategic housing site. With climate change, the risk of flooding is likely to increase rather than decrease.

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Q B4 Strategic Housing Sites no longer proposed

We **strongly agree** that that the following options should be rejected:

(i) **AOS4:** South of London Colney.

Large-scale development in the area of Green Belt would effectively extend London Colney right up to the M25. The development would be cut off from the existing built-up area by the Broad Colney Nature Reserve and the flood plain of the River Colne. The northern part of the site is at high risk of flooding.

(ii) **AOS6:** Smallford

Large-scale development of this area would significantly change the character of the Green Belt Settlement of Smallford. This is a narrow and fragile part of the Green Belt separating St Albans from Hatfield, and development of this area together with the proposed extension of St Albans and Oaklands College eastwards and possible expansion of Hatfield westwards would effectively cause the two towns to merge.

(iii) **AOS2:** South east of St Albans.

Large-scale development in this area of Green Belt would effectively join London Colney to St Albans, separated only by the A414/A1081 roundabout.

(iv) **AOS8 (north west part):** North of Harpenden.

Development of this site would represent a major extension of Harpenden into the Green Belt and very attractive open countryside. In addition to the reasons for objecting to development of the south east part of this area (AOS8 above), it would be very difficult to form a defensible outer boundary to this site.

Q B5 Affordable Housing

We **strongly support** the option of seeking a higher percentage than 35% across the District. We would support a target of 40% affordable housing.

The need for more affordable housing in St Albans District is a key issue, as the Council recognises. Experience suggests that it is advisable to seek a higher percentage on every development above the site size threshold in order to achieve at least 35% across the board. We agree that the site size threshold should be reduced from 15 dwellings to 10 or more dwellings.

Transport Policies

Q. E1 (iv) Western orbital route

The consultation document states (paragraph 13.13) that the Council is “minded to support” an improved western orbital route, consisting of two elements – a new link road from the A414 (former M10) to the A4147 Hemel Hempstead Road; and junction improvements at the Bluehouse Hill/ King Harry Lane roundabout, the Batchwood (A5183) roundabout and the Ancient Briton (A1081) junction.

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Paragraph 13.14 indicates that traffic would be routed via the Park Street roundabout (A414/A405/A5183 junction), along the A414 (former M10) to the new link road to the A4147, and then along Hemel Hempstead Road, Bluehouse Hill and Batchwood Drive. The Transport diagram shows the new link road as running roughly north – south between the A414 and A4147, some distance to the west of the south western edge of the built-up area of St Albans.

Such a road would cut through the Green Belt, and would be regarded as inappropriate development in the Green Belt unless very special circumstances could be demonstrated. The consultation document claims that the western orbital route would result in a large diversion of traffic from the city centre and would considerably reduce traffic at the King Harry junction. This may well be true, but no evidence has been produced to substantiate it, in terms of surveys of the origins and destinations of traffic coming to or passing through St Albans. Nor have the ‘knock on’ effects of the proposed orbital route been evaluated. For example, what is supposed to happen to traffic arriving at the Ancient Briton junction? And will measures be taken to either discourage or prevent traffic using the B4630 through Chiswell Green as an alternative to the A405 approach to the Park Street roundabout?

The Emerging Core Strategy refers to the St Albans Urban Transport Plan (SAUTP) 2009 in support of the western orbital route. Perusal of the SAUTP, however, produces no factual evidence to justify a western orbital route. Instead, it identifies *CO5: Highway construction to increase highway capacity on western orbital road network and reduce levels of through traffic* as an option requiring further study to assess the possible benefits and impacts on congestion. The SAUTP goes on to propose (Appendix A, Table 8.3) that transport modelling with regard to CO5 should be carried out in Year 1 (presumably 2009/2010).

Appendix 8 to the consultation document (but not Chapter 10 of the consultation document itself) discloses that the proposed western orbital route would be funded by development of the South West of St Albans Area of Search 1 (AOS1), involving development of 1,000 – 1,200 dwellings in the Green Belt. This suggests that the advancement of the orbital route at this time is opportunistic, and that the two related proposals are being used to justify each other. As indicated above, far more work needs to be done in the form of cost benefit analysis before decisions can be taken on whether a western orbital route can be justified.

Eastern distributor route

This proposal is floated in paragraphs 13.19 – 13.20 of the consultation document, but is not included in Question E1, which is misleading for members of the public.

Again, reference is made to the St Albans Urban Transport Plan in support of this proposal. What the SAUTP actually says (in paragraph 2.25) is “*District Council options within the Core Strategy issues and options paper (July 2007) included ...an eastern distributor road from London Road to Hatfield Road ...*”. There is no mention of the extension to Sandpit Lane which the Council is proposing. The Emerging Core Strategy states that the highway authority is “considering” commissioning a traffic modelling study. Although the SAUTP

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contains a proposal for transport modelling with regard to option CO5, as noted above, there is no specific commitment to examining the case for an eastern distributor route.

As with the proposed western orbital route, the eastern distributor would cut through the Green Belt for almost its entire length. There therefore needs to be a fully justified case amounting to very special circumstances before the Council makes any planning commitment to it. To include it in the Pre-submission Core Strategy document as the Council is suggesting would not be likely to pass the test of soundness unless there is sufficient evidence to prove the need for, and efficacy of, the proposed route.

Mini Park and Ride

While we support the concept of park and ride in principle, it appears that any park and ride site around St Albans would have to be located in the Green Belt. It would therefore have to be fully justified in terms of need, effectiveness and viability before a firm commitment to it could be made.

We note that the St Albans Urban Transport Plan (paragraphs 5.79 – 5.83) discusses the possibility of a feasibility study of a park and ride scheme linked to east-west parkways (out-of-town bus interchange sites with parking and waiting facilities for passengers). However, Table 8.3 in Appendix A of the SAUTP shows that the scoping study (scheme CM7a) and the feasibility, design and business case (scheme CM7b) are programmed for Years 4 and 5 respectively. This completely undermines the credibility of a fully justified park and ride scheme being included in the current round of LDF documents.

With regard to the possible locations for mini park and ride sites suggested by the Council in the Emerging Core Strategy, we would have particular reservations about site PR2 if it were to be located close to the new development at Butterfly World, Chiswell Green and site PR4. The Butterfly World development is likely to attract large numbers of private vehicles requiring extensive parking space, and it would not be wise to mix this with park and ride facilities serving the city centre. Site PR4 would be associated with the proposed western orbital route, which we have questioned above.

St Albans City Centre and increased bus services, cycling and walking facilities

We strongly support the Council’s proposals for environmental and traffic management improvements in the city centre and measures to increase bus usage, walking and cycling.

25 September 2009