

CPRE Hertfordshire representation on St Albans City and District Council Draft Local Plan 2041 Regulation 18 Consultation (September 2023)

Chapter 1: A Spatial Strategy for St Albans City and District

Our position

Preparation of a Local Plan is a statutory requirement for all Local Planning Authorities in the country but the timing and content is a matter for the Council concerned. St Albans City and District Council (SACDC) has prepared this Regulation 18 Draft Local Plan (DLP) document to provide planning policies and proposals for the period up to 2041.

CPRE Hertfordshire believes that local plans are best developed using an integrated approach that puts climate change, biodiversity, well-being and social inclusion at the centre of the plan. We also believe that planning is crucial to empowering local communities and making sustainable, liveable places; seeking to ensure that everyone has an affordable home that meets their needs is essential to that, both in town and country.

Equally, it is vital that new development is planned intelligently. Our countryside is precious and finite and urgently needs better management in the face of the climate and nature emergencies. Critical to this is that land is not lost to development unnecessarily.

It is important to note at the outset that a Regulation 18 Draft Local Plan is a draft for consultation and does not contain formal proposals for development. There is no formal commitment to any of the draft policies and proposals and this is a true opportunity for local residents and others to influence the content of a local plan.

Key priorities

The St Albans District Council Plan 2023-2028 sets out five key priorities and the Draft Local Plan is noted as having a vital role in helping to deliver these five priorities to 2028 and beyond. While supporting the five key priorities identified, the huge omission in both the Council Plan and the DLP is recognition of the presence and contribution of designated protected open land in St Albans and the surrounding countryside.

A key priority should clearly be appropriate recognition of the Green Belt and its contribution to the intrinsic characteristics of the City and District. The DLP should include

policy and proposals to protect and enhance designated protected land, as required by legislation, particularly where it has been degraded.

More new homes are undeniably needed and there is plenty of scope to use previously developed urban land (i.e. “brownfield”) and take advantage of the changes taking place in town centres, working practices and elsewhere to help address this need. The provision of truly affordable housing is a highly complex matter and not assisted by over-simplistic statements of priority which suggest that the problems can be solved by using open countryside.

It is neither necessary nor appropriate for St Albans City and District Council to be conducting a public consultation on its DLP in the present period of uncertainty regarding the Government’s imminent amendments to the National Planning Policy Framework (NPPF). The DLP proposes very considerable releases of Green Belt based on out-of-date projections of future household growth and it is highly likely that the formula for calculating housing need in the future will be amended to take account of recent demographic changes which will have significant implications for St Albans.

The Spatial Strategy

The Spatial Strategy introduced in Chapter 1 focusses almost entirely on housing provision to the exclusion of all other sectors and concerns (paragraph 1.34). Table 1.2 - Local Plan Objectives mentions Green Belt only once, as “Sustainable use of land/Green Belt” and nowhere else as a key priority of the Draft Local Plan to protect and enhance.

The DLP is in effect a plan for housing provision as opposed to a comprehensive and multi-sector plan for the full range of economic, social and environmental issues affecting land uses and development. To identify Hemel Hempstead as a Tier 1 major centre for St Albans City and District (Table 1.3) by virtue of “expansion ... planned” is highly inappropriate and misleading, given the speculative nature of the proposals for the “Hemel Garden Communities”.

Policy SP1 refers to “require(ing) new growth that enhances attractiveness and unique character of the District(sic)” and we believe this emphasis is profoundly inappropriate. “Growth” as a term used in the DLP appears to signify traditional definitions of economic development as expressed in terms of the major physical development of residential and commercial uses and activities.

In noting that “Growth will be located to make the most sustainable use of land” (Policy SP1), this clearly means development, not growth, which cannot be ‘allocated’ as proposed by the policy. Strategic Policy SP1 is thus ambiguous and misleading as a basis for the rest of the DLP and the use of the term “growth” throughout the document appears to conflate a desire for the economy to grow with the physical expansion provision of housing and other development.

This is significant because the unquestioned need for ‘growth’ is used as a justification for use of land in the Green Belt for much of what follows. In our view, the DLP should be the vehicle for testing the costs and benefits of various land use outcomes for local communities, businesses and stakeholders, and promoting innovative economic development policies which benefit social and environmental goals and objectives.

We welcome recognition of the significance of climate change and the need to protect, maintain and enhance the natural environment as noted in the Local Plan Objectives. However, there is a major inconsistency in the DLP which relates to all issues in the natural environment which is under unprecedented threat from urban development and reflects the imbalanced nature of the Draft Local Plan.

The treatments of climate change and biodiversity issues with virtually no policy formulation beyond bland statements of intent and minor development management proposals, such as bird and bat boxes or provision for hedgehog-friendly fencing, are meagre. Assertions regarding the provision of trees and landscaping features, for example, are meaningless in the face of the scale of loss of open countryside and Green Belt envisaged by the DLP.

The need for biodiversity net gain to be demonstrated for all development will be introduced in November of this year, to ensure that habitat for wildlife is in a better state than it was prior to development taking place. The DLP needs to include specific spatial policies to achieve this requirement which will be enforced through the 2021 Environment Act.

Re-stating national policy without identifying the local spatial impacts of development policies and proposals in environmental terms is a huge lost opportunity. The incorporation of specific minor development management matters such as bat boxes and hedgehog gaps in fences within policies is no substitute for a comprehensive review of environmental priorities and their impacts on physical development throughout the City and District.

Chapter 2: Climate Emergency

St Albans City and District Council declared a Climate Emergency in 2019 and the DLP is seen as the key mechanism for the Council to implement the requirements of this declaration and it is noted as a key priority. The four pages of Chapter 2, out of a total 122 in the document are no more than general statements of intent with regard to this critical agenda.

This is an entirely inadequate treatment of this crucial area for a local planning authority with one of the highest proportions of protected countryside in the country. As noted in the recently published “State of the Green Belt 2023” report by CPRE national office (CPRE - the countryside charity, London, August 2023) the Green Belt performs a wealth of functions related to ameliorating climate change, protecting biodiversity and the natural environment, including precious water courses and wildlife.

Despite the requirements of the NPPF and the Planning and Compulsory Purchase Act 2004 and subsequent legislation, the proposed policies and subsequent justifications in the Draft Local Plan fail to define any meaningful means of implementation. Policy SP2 omits entirely any reference to the potential roles of the countryside and Green Belt in tackling the Climate Emergency, and subsequent Policies CE1, CE2 and CE3 lack any specific spatial implications or policy related to local conditions in St Albans and constitute simply a re-statement of strategic goals.

This is a major opportunity lost for a Council area with such high environmental quality. A more detailed carbon reduction pathway should be identified and promoted through spatial policy for St Albans to meet national obligations for net zero emissions by 2050.

Chapter 3: Sustainable Use of Land and Green Belt

Green Belt

Effectively, all land within the city and District boundary outside the built-up areas is designated as Green Belt. The Green Belt includes nationally and locally designated environmental sites which are key characteristics of St Albans contributing greatly to the quality of life for residents and visitors. It is unacceptable that its protection and enhancement is not regarded as a specific Key Priority in the Council Plan.

A basic characteristic of the Green Belt is its permanence, and it should be regarded as a principal constraint to development and a huge asset for the City and District. Even within the Local Plan Objectives (Table 1.2), the Green Belt is referenced only once, and this is in relation to locating new development rather than reinforcing its value as an asset. The DLP thereby reduces the Green Belt in prominence and significance.

The minimal treatment of Green Belt in policy terms in the DLP appears intentional and Policy SP3 is in effect a policy indicating housing provision and little else. This is entirely inappropriate in a District where protected countryside is a highly valued and valuable resource.

This chapter is mainly about development, and quotes national policies in paragraph 3.3 but not those on protection of designated areas including the Green Belt, which do not appear until later in paragraph 3.15. Approximately 790 hectares of designated protected land are allocated to be removed from the Green Belt for housing, employment and other uses, with damaging environmental implications for residents, visitors and wildlife.

More specifically, the flaw in the interpretation of the NPPF evidenced by Policy SP3 and paragraph 3.8, is that housing requirement is not the same as the calculated housing need, which takes no account of any local issues other than house prices and average salaries. The housing need calculation based on either the Government's Standard Method or other

formula (which should of course be based on up to date information) is just a starting point from which SACDC should take into account national designations including Green Belt.

The DLP sets out a series of proposals for major development in the Green Belt, which directly conflicts with the first Objective of the Plan's Spatial Strategy, set out in Table 1.2, "protecting and enhancing" the Green Belt. Similarly confused reasoning notes in paragraph 3.2 that development land is allocated to Previously Developed Land (PDL) first: "so that growth is as sustainable as possible". This ignores the fact that not all PDL is in sustainable locations and a primary reason for development of PDL is to minimise loss of greenfield Green Belt, as is appropriate in a chapter headed Green Belt.

Policy interpretation

Paragraph 3.11 states that Government requirements for housing and employment growth must be met in line with the law and policy, and that these therefore lead to the housing figures in the Plan. This is a flawed interpretation of the NPPF on housing provision used as the basis for setting the DLP's housing requirement.

SACDC has failed to take account of the NPPF as revised in July 2021, paragraph 11, footnote 7. This permits local planning authorities to restrict the scale of development due to planning constraints including protection of Green Belt and other designated areas and sites.

The DLP states that it is a requirement for SACDC to provide for housing need in full, as assessed by the Government formula (the 'Standard Method'). We believe this is an incorrect interpretation of the NPPF with regard to housing provision and are deeply concerned by the associated decision to use the 2014-based household projections as the basis for calculating housing need.

The use of the old projections is now totally discredited and it is vital, as many other local planning authorities are doing including neighbouring Three Rivers District Council, that no commitment is made by SACDC to any proposals in the DLP until the projections and studies based on them are updated and the implications carefully considered.

With regard to Policy LG1 - Broad Locations, this makes no reference to minimising impact on adjacent Green Belt. CPRE Hertfordshire is particularly concerned by the treatment of the so-called Hemel Garden Communities which is given excessive prominence in the DLP, culminating in Policies LG2 and LG3 and covering five pages which is more than the treatment of the Climate Emergency (Chapter 2). These policies are hugely controversial and should be subject to review in the light of demographic and related changes which challenge the need for housing and other uses in the proposed location.

Hemel Garden Communities

By contrast with the treatment of Green Belt and the climate emergency, the treatment of the Hemel Garden Communities emphasises the skewed nature of the DLP as a programme for excessive housing. All the urban extensions are in the Green Belt, contrary to national policy unless justified by exceptional circumstances. These proposals should in any case be based on up-to-date and reliable assessments of housing need.

Policy LG5 states that proposals will be assessed in accordance with national (planning) policy although this appears not to apply to the Council's own proposals. All the urban extensions proposed in Chapter 3 are in the Green Belt, contrary to national policy, and exceptional circumstances cannot be said to exist at the moment because there are no reliable assessments of housing need or requirement, nor of employment land needs, based on up-to-date information.

Policies LG5 to LG9 proceed to identify circumstances relating to development within the Green Belt which continues the skewed treatment of this major topic. At no point are the advantages or contribution of the Green Belt to the City and District recognised in a chapter devoted to the subject.

Specifically, we believe that Policy LG5 is wrong to support schools in the Green Belt which are by definition inappropriate development according to the NPPF. The policy wording implies they will be supported anyway.

Policy LG7, criterion 'c' should say that harm to the purposes of the Green Belt should be minimised or avoided, not "limited", to be consistent with other policies and good practice.

Reuse of land

The reuse of Previously Developed Land (PDL) is considered mainly in terms of the release of Green Belt land in Strategic Policy 3 – Land and The Green Belt; the only time Green Belt is mentioned in strategic policy terms. Both the impact of the pandemic, and projected social and economic trends are likely to create many more opportunities for the conversion of commercial and other space to residential use.

A significant concern in paragraph 3.13 relates to the search for PDL sites. The DLP notes that: "the Plan (sic) ... has undertaken an extensive and rigorous search for PDL within existing built-up areas", ... "leaving no stone unturned".

This indicates a total failure to understand that PDL is not just underused or derelict land or land identified by its owners for potential development. It can include all of the land inside or outside urban areas which have buildings on them, to identify the potential and need for regeneration or redevelopment.

SACDC has therefore failed to follow national policy to make as much use as possible of suitable PDL sites and underutilised land. Policy SP3 contradicts itself on protection for the

Green Belt, and all proposed allocations should be opposed pending sound new and updated studies of potential capacity and development

The re-use of urban car-parks for development is welcomed and a more comprehensive treatment of PDL is needed to provide an accurate picture of what may be possible beyond what is presently identified on the Council's Brownfield Register. Huge changes are taking place in the form and function of town centres, commercial activities and workspace and this is likely to increase the role of regeneration and reuse.

In both failing to assess accurately the potential of suitable PDL sites and underutilised land, and using out-of-date data, as already noted, Policy SP3 is wrong to set out the need for major release of Green Belt for housing and employment. A more positive place making strategy is needed as part of a detailed brownfield land review of the existing built environment with benefits for existing and new residents.

In the requirements for growth in paragraphs 3.7 to 3.12, a reference is made to the need for "a significant amount of employment floorspace" required to support the local area. There has to be significant doubt over this assumption which is based on the South West Herts Economic Update (which is already based on the earlier study) that was published in 2019.

Several momentous events have occurred since then that require a new study based on current facts and trends in the economy and changed policy context before the scale and nature of any significant changes to employment floorspace can be determined. This is particularly important if the Council contemplates provision of such floorspace in the current Green Belt.

The above comment is also relevant to paragraph 3.33 onwards on Hemel Garden Communities and Policy LG2 for which the employment element is unjustified pending new studies and the conclusions of current national policy reviews, and is mainly proposed in the St Albans Green Belt.

Chapter 4: Housing

Over-provision of housing

The most fundamental issue in this chapter is the flawed interpretation of the NPPF on housing provision used as the basis for setting the Draft Local Plan's housing requirement. SACDC has failed to take account of the NPPF as revised in July 2021, paragraph 11, footnote 7. This permits local planning authorities to restrict the scale of development due to planning constraints including protection of Green Belt and other designated areas and sites.

The DLP states that it is a requirement for SACDC to provide for housing need in full, as assessed by the Government formula (the 'Standard Method'). We believe this is an incorrect interpretation of the NPPF with regard to housing provision and are deeply concerned by the associated decision to use the 2014-based household projections as the basis for calculating housing need.

The use of the old projections is now totally discredited and it is vital, as many other local planning authorities are doing, including neighbouring Three Rivers District Council, that no commitment is made by SACDC to any proposals in the Draft Local Plan until the projections and studies based on them are updated and the implications carefully considered.

CPRE Hertfordshire accepts there is a need for housing in St Albans as elsewhere, especially truly affordable housing for local people, but the projections used in the DLP are excessive and out of date. The latest projections, currently available for 2018, show a decrease in new households in the City and District, and initial results from the 2021 Census indicate that this trend is likely to continue.

Recently, alternative interpretations of the NPPF have related to the requirement to provide a supply of land for housing for five years. Over-riding the ability to constrain development for protected land, has led to councils allocating Green Belt for housing, and planning inspectors to allow appeals on Green Belt. This is bringing the planning system into disrepute and has led over 50 councils throughout England to pause preparation of their Local Plans pending clarification by the Government of the basis for calculating housing need.

By contrast, SACDC has made the decision to continue preparation of a DLP, allocating sites with huge implications for protected countryside throughout the City and District. The DLP is in effect a plan for the over-provision of housing rather than a comprehensive development plan for all land uses and activities, as required by legislation.

Paragraph 4.6 pre-judges that the potential of urban sites (on the limited definition of PDL used in the DLP i.e. land inside built-up areas) to generate increased numbers of dwellings is "limited". This ignores the potential for regeneration and redevelopment for alternative uses.

Affordable housing

The provision of affordable housing is given some prominence in the Draft Local Plan with the implication that this justifies Green Belt release by permitting housing with a proportion of appropriate units. The DLP also notes that St Albans is "prosperous" and "relatively wealthy" and that house prices are well above the national average, approaching £620,000.

With regard to Policy HOU2, it is entirely misleading to suggest that truly affordable housing can be provided by private sector developers on Green Belt sites. Notwithstanding the almost complete failure by market housing developers to achieve their policy commitments

for affordable housing, often explicitly stated in Section 106 agreements, the existing definitions of affordable housing used by Government mean that no average earning household can afford even "an affordable" house in Hertfordshire as a whole, let alone in St Albans.

Many public statements have been made by SACDC leaders with regard to the provision of affordable housing which it is implied will be through conditions on planning permissions granted to private market developers in the Green Belt. This approach, as incorporated in Policy HOU2 a) to h) is highly inappropriate and completely unrealistic and should not be used as justification for the release of Green Belt, even by implication.

Policy HOU3 - Specialist Housing includes a criterion (a) on siting "with good access to public transport and local facilities". This wording is inadequate and weak and the requirement should be that siting should have access to frequent and regular current and future bus and rail services. This criterion should apply to all new residential development, not just specialised housing, and should therefore be the first criterion in Policy HOU1; it would not then be necessary to repeat it subsequently.

The proposal in Policy HOU6 for sites in East Hemel (criterion 'c') should be deleted, along with the residential and employment proposals there. This relates to the unbalanced and inappropriate treatment of proposals for the Hemel Garden Communities which receive undue prominence.

Chapter 5: Economy and Employment

Growth and development

We have noted in our response to Chapter 1 that Policy SP1 is ambiguous and inappropriate as a basis for the rest of the DLP in that it refers repeatedly to "growth", and the requirement for it, rather than development. Economic development does not, and should not automatically mean that there is a demand for new greenfield sites to accommodate it.

This is important because it presents the unquestioned need for 'growth' as a justification for use of land in the Green Belt elsewhere in the DLP. It sets out a series of proposals for major development in the Green Belt which directly conflict with the first Objective of the Plan's Spatial Strategy, as set out in Table 1.2, to protect and enhance the Green Belt.

There is no discussion in the DLP of the appropriateness of further economic growth which requires the use of Green Belt land in the future. The Levelling Up and Regeneration Bill presently under consideration in Parliament seeks to promote opportunities for development throughout the country which should lead to the reduction of pressure to use designated protected land for new services and facilities, especially in south east England.

This is particularly relevant for proposals for the release of Green Belt land for the Strategic Rail Freight Interchange near Park Street, and for “Hemel Garden Communities”, and where the Draft Local Plan identifies in Policy SP5 sites totalling 88 hectares of Green Belt that “criterion b” indicates is “an agreed over-supply of land for employment in St Albans”. There is no justification for such exceptional use of Green Belt pending studies based on up to date information.

“The Rural Economy” (page 51) is mentioned in two brief paragraphs immediately prior to Policy SP5 noted above, which makes similarly passing reference to “The Council also supports a prosperous rural economy(sic)”. This is entirely inadequate and an inappropriate treatment of a crucial topic for the DLP and misses the opportunity to promote innovative solutions to rural activities based on sustainable and environmentally appropriate development outcomes.

Policy EMP4 indicates blanket support for unidentified new development in the Green Belt at Rothamsted and the BRE at Bricket Wood which is contrary to national Green Belt policy.

Paragraph 5.8 refers to the South West Herts Economic Update 2019 as justification for the Plan’s proposals, but this is of limited use because it is out of date, as noted above. Policy EMP1 and its associated schedule of employment sites should therefore be reviewed, based on up to date information, trends and policy context, before seeking to restrict changes of use of floorspace to what may be uses with a higher local priority.

Policy EMP2 – Strategic Rail Freight Interchange should not suggest that the site is removed from the Green Belt in the future. If the Interchange is determined to be a nationally important transport infrastructure development, it should qualify as an appropriate development in the Green Belt under the NPPF, whereas removal from the Green Belt could allow the site to be redeveloped for inappropriate development in the future.

Chapter 6: City, Town and Village Centres and Retail

No comments

Chapter 7: Community Infrastructure

The DLP fails to deal adequately with the deficiencies which are increasingly apparent in the provision of community facilities, including health and education facilities in local rural communities, particularly in the south of the SACDC area. We are aware, in liaison with local community representatives opposing local development proposals, of significant

shortfalls in local provision, for example, of general practice doctors' surgeries and other facilities.

To limit initial strategic discussion of these issues to one paragraph each for Healthcare (paragraph 7.5) and Education (paragraph 7.6) is unacceptable. The subsequent treatment of Education (under the second Education heading at paragraph 7.12 seq.) is also inadequate and identifies circumstances relating to development within the Green Belt which continues the skewed treatment of this major topic.

With reference to Policy COM1 – Education, school developments in the Green Belt are by definition inappropriate, and subject to the demonstration of exceptional circumstances for land to be released. There is no discussion of such circumstances or the spatial implications of such provision in the DLP and this is a significant omission. Similar concerns apply to Policy CPOM – Cemeteries and Burial Grounds in the Green Belt.

Chapter 8: Transport

The support for “the use of active and sustainable means of transport” and Hertfordshire Council Council’s Local Transport Plan 2018-2031 which promotes similar principles is welcomed. Similarly, an overarching approach of concentrating proposed development in existing centres in order to reduce transport needs would be generally supported. Sadly, the DLP does not propose such an approach.

Instead, the majority of proposed development in the DLP is on the outer fringes of existing built-up areas, far away from public transport interchanges. As a result, residents will be heavily car-dependent and existing severe traffic congestion and car-parking problems in both rural and urban areas will be made much worse

Proposed Policies SP8 and TRA1 to 4 concentrate almost entirely on transport provision for new development, much of which we oppose. There is no recognition of the problems of access, lack of public transport, and congestion in rural areas where development has taken place recently and where services have been reduced or removed altogether.

Accepting that many of these concerns lie outside the responsibilities of the SACDC, and rest with other agencies, it should be expected that the DLP will reflect local community requirements and seek to promote action by such agencies. There is also an absence of any meaningful policies and proposals relating to the promotion of walking and cycling other than a passing reference in Policy TRA4 which deals mainly with parking, and this is a serious omission.

Chapter 9: Utilities Infrastructure

Water, waste and other utilities provision

The Draft Local Plan devotes one paragraph each to water supply, sewerage, gas and electricity, with slightly more detailed treatment of digital infrastructure. Given the known deficiencies and pressures in these areas, this is entirely inadequate.

Generalised statements are made with regard to future provision by statutory undertakings, without any specificity or discussion of the acknowledged water supply deficiencies which are themselves noted by Affinity Water as quoted in the DLP.

Waste water treatment capacity is noted as supporting growth only up until 2031 (paragraph 9.5). This is clearly inadequate as the DLP period is to 2041.

There is a complete lack of discussion or policy related to the provision of utilities which have a major impact on rural areas, specifically ground mounted solar installations and wind turbines. With the increasing emphasis on renewable power generation, these issues have particular relevance for the rural areas of the City and District and the absence of treatment in the DLP is disappointing.

CPRE Hertfordshire supports fully the national CPRE campaign promoting the use of roof-generated solar power as opposed to ground mounted arrays in the Green Belt. Further, there is the opportunity to require solar panels to be installed on municipal structures such as car parks and other public buildings and this would be an example of a spatial policy which is so lacking in the DLP.

Chapter 10: Natural Environment and Biodiversity

Natural environment

We welcome recognition of the natural environment and that the DLP acknowledges the globally critical chalk streams of the Rivers Ver, Colne and Lea as significant. We also welcome the recognition that “The natural environment is fundamental to people’s health” and the benefits of experiencing nature.

Having said that, the more detailed treatment of the topic of chalk streams is woefully inadequate in all respects; both in terms of identifying their existing status and the actions needed in the future to ensure their survival, let alone improvement. Notwithstanding the responsibilities of the other agencies, such as Affinity Water, it should be expected that SACDC would indicate a policy position for their protection in the DLP.

This is a major inconsistency in the DLP which also relates to other issues in the natural environment. The environment is under unprecedented threat from urban development and the lack of detailed treatment in policy terms reflects the imbalanced nature of the DLP.

Biodiversity

Similarly inadequate is the treatment of biodiversity issues with no policy formulation beyond bland statements of intent and minor development management proposals, such as bird and bat boxes or provision for hedgehog-friendly fencing which have welcome but limited impact. Assertions regarding the provision of trees and landscaping features, for example, are meaningless in the face of the scale of loss of open countryside and Green Belt envisaged.

The DLP fails to address in any meaningful way the reduction of biodiversity and species and developers routinely conflate 'habitat' with 'species' which does nothing to reverse this chronic decline. Specific proposals for 'country parks' related to new development and limited unspecified noting of 'green infrastructure' are poor substitutes for meaningful strategic spatial policies promoting the highly valued and protected countryside.

The need for biodiversity net gain to be demonstrated for all development will be introduced in November of this year, to ensure that habitat for wildlife is in a better state than it was prior to development taking place. The DLP needs specific spatial policies to achieve this requirement which will be enforced through the 2021 Environment Act.

Specifically, statements such as those in paragraphs 10.15 and 10.36 are meaningless in the face of the proposed scale of loss of designated protected countryside. In Policy NEB 1, trees should be supplied from the United Kingdom, and stated in Policy NEB 10.

With regard to the Chilterns Beechwoods Special Area of Conservation (SAC), and the present Natural England direction restricting development due to impact of public use at the Ashridge Estate, it seems highly likely that people will continue to be drawn to the Beechwoods SAC even where Suitable Alternative Natural Greenspace is provided locally. This is a further reason to oppose large-scale increases in housing which will increase pressure on valued public open space.

Policy NEB 4 includes proposed Significant Publicly Accessible Green Areas, some of which exist and which we are pleased to support. Others, however, are part of major development proposals to which we are fundamentally opposed.

We believe that a preferable policy position should be developed through a partnership of landowners, the local authority and other stakeholders to deliver such new Green Areas which are not linked to massive new housing. The existing Heartwood arrangement provides a suitable example of such an initiative.

With reference to Policy NEB 5, no development proposals should impact on watercourses or waterbodies. There is growing and heightened awareness of the significance of water supply and sewerage issues but again very sparse treatment of this vital topic.

Policy wording is vague and general, and standard wording referring to Affinity Water and Thames Water responsibilities for these areas is nothing more than statements of fact. There is no reference to the current problems with over-abstraction and sewage pollution, which increased housing and development will worsen.

Policies NEB 6, 7 and 10 and their commentary paragraphs are limited and unspecific. Generally, DLP discussion and policies relating to biodiversity net gain are generalised and particularly inadequate with regard to the spatial implications of taking account of increasingly significant environmental priorities.

Re-stating national policy without identifying the local spatial impacts of development policies and proposals in environmental terms is a huge lost opportunity. The incorporation of very specific minor development management matters such as bat boxes and hedgehog gaps in fences within policies, as noted above, is no substitute for a comprehensive review of environmental priorities and their impacts on physical development throughout the City and District.

Chapter 11: Historic Environment

No comment

Chapter 12: High Quality Design

This chapter lacks reference to any policies related specifically to generalised local conditions and tends to concentrate on detailed development management policies without reference to local conditions or places. Hence for example, Policies DES 4 and 5 specify requirements for individual buildings which could be located anywhere, and incorporated in any Local Plan in the country.

Such treatment is necessary but incomplete without reference to the specific characteristics of St Albans which should be enhanced by good design, and promotion of the place-making agenda which should guide the achievement of high quality design. A key component of this agenda should be the recognition of the contribution of the open countryside and rural settlements and the maintenance and enhancement of their inherent qualities.

Such treatment is entirely lacking in the DLP. Proposals and policies in this section, as elsewhere, appear to be bland and unambitious re-statements of commonly stated objectives without reference to the local context. Where local context is suggested, as in

“Areas of Special Control” for advertising in Policy DES8 e), for example, these are undefined.

Chapter 13: Public Health and Wellbeing

It can reasonably be suggested that a major component of wellbeing, and increasingly recognised with regard to public health benefits, is the presence of open countryside. Initial comments with regard to the importance of “healthy place-making” (paragraph 13.2 seq.) are not elaborated, nor is the specific local context identified.

This chapter lacks reference to any policies related specifically to generalised local conditions and tends to concentrate on detailed development management policies without reference to local conditions or places. A key component of the well-being agenda should be the recognition of the contribution of the open countryside and rural settlements and the maintenance and enhancement of their inherent qualities.

Such treatment is entirely lacking in the DLP. Proposals and policies in this section appear as bland and unambitious re-statements of commonly stated objectives without reference to the local context. The widely recognised public health benefits of the Green Belt, so critical for St Albans residents, are not specified and this is a crucial omission.

The inherent value of open countryside is not identified, even in general terms, and policies in this chapter, as elsewhere in the DLP relate overwhelmingly to new development. This leads to severe imbalance in the plan as a whole and reduces its relevance to local communities and conditions.

Chapter 14: Implementation

The systematic reduction in the direct role that local planning authorities can play in the implementation of development proposals, through the virtual disappearance of locally public sector funded development, for example in low cost housing, means that proposals at a local scale are increasingly dependent on private sector involvement. This tends to aid the skewing of policies and proposals toward new development, at the cost of not recognising the value to local communities, and the City and District as a whole, of open countryside and the natural environment which is increasingly under threat.

The DLP should be a means of redressing this imbalance in line with local community concerns and aspirations but this has not occurred. As a result, this DLP is an entirely inadequate response to the challenges facing the City and District in the future.

Appendix 1: Site Allocations

H1, H2, H3 and H4

With regard to site allocations, CPRE Hertfordshire has consistently opposed the proposed site allocations in both St Albans City and District and Dacorum Borough comprising the so-called Hemel Garden Communities. We continue to maintain our strong opposition to these proposed site allocations, i.e. H1, H2, H3 and H4.

In this SACDC Draft Local Plan, 460 hectares of Green Belt will be lost at these four sites, constituting more than 50% of the Green Belt proposed for allocation in the DLP, for 5,500 new dwellings.

Our opposition begins with the use of the term “garden communities” which appears to take no account of the strong statutory protection of the land affected. The Garden City movement has an illustrious history since the beginning of the 20th century in promoting a sophisticated and comprehensive set of criteria and guidelines controlling all aspects of the development of a sustainable community.

Its early influence was considerable but the approach has been diluted since by the general addition of the word ‘garden’ to any number of low density residential proposals without consideration of the community and social infrastructure intrinsic to the original concept.

We are also opposed to the massive loss of designated protected land that will occur if the Hemel Garden Communities concept goes ahead. The land is in the Green Belt, and in the setting of the Chilterns Area of Outstanding Natural Beauty (AONB).

It is entirely inappropriate that the Crown Estate, the main land-owner involved, is promoting a development of many thousands of houses on this designated protected land. The Crown Estate notes: “as a public body it (i.e. the Crown Estate) always seeks to work with the grain of prevailing government policy” (Crown Estate website: About us/Our structure and governance). Prevailing government policy as set out in the NPPF protects the Green Belt and states that development within the settings of AONBs should be designed to avoid and minimise adverse effects on the designated areas (in this case the Chilterns AONB).

The proposed four large Hemel Hempstead site allocations in the DLP (H1, H2, H3 and H4), if developed, will also cause severe harm to existing communities. Despite the DLP assertion of a “permanent green buffer” between Hemel Hempstead and Redbourn, the impact of H1 and H2 would effectively be the coalescence of Hemel Hempstead with Redbourn. This is unacceptable. In addition, H4 would effectively engulf the community of Leverstock Green, and this too is unacceptable.

There are also serious worries over the major physical infrastructure such as transport, sewerage and water supply which would be required. Both SACDC and Dacorum Borough’s

evidence bases for their DLPs point up the need for extensive near-term network upgrades in infrastructure which would be both disruptive and hugely expensive.

There would also be severe damaging impact from these huge new developments on the nearby Chilterns Beechwoods Special Area of Conservation (SAC). The SAC will inevitably receive more visitors notwithstanding the provision of any SANGs in conjunction with H1-4. Circa 14,000 more local people living in the proposed 5,500 new dwellings at H1-4 would be within close proximity and easy reach of this sensitive and already over-visited site.

The promotion of this Hemel Garden Communities development in this location continues the full fronted assault on the Green Belt which is causing massive damage to highly valued and productive countryside. The proposed development would destroy a large area of Green Belt countryside, impact hugely on the adjoining Chilterns Area of Outstanding Natural Beauty (AONB) and its setting, destroy productive agricultural land, cause damage to wildlife habitats including an area of international importance, and impact on heritage assets. The new homes proposal appears to take no account of major deficiencies in infrastructure including water supply, wastewater disposal, and road capacity.

The letter to all MPs written by Michael Gove, the Secretary of State for Levelling up, Housing and Local Communities, dated 5th December 2022, states: “we will be clear that local planning authorities are not expected to review the Green Belt to deliver housing”. In the light of this statement any future Local Plan seeking to use any Green Belt, let alone the substantial area involved in the Hemel Garden Communities proposal, is likely to be found to be unsound.

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