

St Albans Strategic Local Plan – Part B

Comments from the Harpenden Society

Policy SLP1 – page 24. Spatial Strategy and Development Strategy

6. The policy is unsound for the 4 reasons indicated. It is not positively prepared, justified, effective and consistent with national policy.

The policy states that the standard Green Belt policy will apply. (NPPF, SLP2 and policies to be set out in the DLP) However in section (b) the Development Strategy states ‘Broad Locations – Principally Housing to be excluded from the Green Belt includes North West Harpenden 500 dwellings’.

The National Planning Policy Framework (NPPF) states that

- *‘New Green Belts should only be established in exceptional circumstances’ (para. 82)*

The District Council has never justified why exceptional circumstances apply to this Green Belt development.

- *Local planning authorities should prevent neighbouring towns merging into one another (para. 80)*
- *Local planning authorities should define boundaries clearly, using physical features that are readily recognisable and likely to be permanent’ (para. 85)*

There is a strong possibility of the equivalent of a small town being built immediately adjoining the North boundary of Harpenden in years to come. Legal and General, who control most of the fields beyond the county boundary North of Harpenden, are well advanced in discussing potential planning development. Central Bedfordshire Council have said it wants to pursue this too. If the building of 500 houses North West of Harpenden goes ahead there will be but half a field between Harpenden and potential development from the North. If the 500 housing development extends North beyond Cooters End Lane into that field, which now seems likely, there will be no defensible boundary at all between Harpenden and Luton/Central Beds. Even though such development by Luton/Central Beds would be under their administration, its population would naturally look towards Harpenden as its centre, thereby creating even more pressure on our inadequate infrastructure in addition to altering much of the character of the town. The extent to which St Albans and Central Bedfordshire councils have discussed this is unknown but it is essential that a defensible boundary of at least a whole field between Harpenden and any development to the South of Luton is maintained.

The following comments relate to Policy SLP 1 and specifically to statements made in the introduction to the SLP under ‘Key influences’.

1.11 Quote ‘The National Planning Policy Framework states that Local Plans are the key to delivering sustainable development that ‘reflects the vision and aspirations of local communities’. All plans should be based upon and reflect the ‘presumption in favour of sustainable development’.

The ‘vision and aspirations’ of the Harpenden Community have not been properly assessed. Paragraph 1.22 suggests that representations from the public ‘have been key in shaping this

document'. It is known that many of the views expressed, including those from the Town Council, were highly critical, but have largely been ignored.

1.17 Quote 'The Sustainable Community Strategy sets out the overall strategic direction and long term vision for the economic, social and environmental wellbeing of a local area, in a way that contributes to sustainable development. It seeks to improve the quality of life and services in the local area'.

The proposed development will diminish the social and environmental wellbeing of the area. The adverse impacts to Harpenden would outweigh the benefits, in terms of pressure on transport, roads, school provision, GP's surgeries, social services, water supply and waste disposal, in addition to reduced access to countryside.

7. Modification suggested:

That the reference to 'North West Harpenden 500 houses' is deleted from the policy as it is contrary to the Green Belt policy and the NPPF and for the other reasons stated. Other sites should be reconsidered or the targets reduced (see under proposed modifications for SLP 2 and SLP 13 below).

Policy SLP9 – page 53. Affordable Housing

6. The policy is unsound for the 4 reasons indicated. It is not positively prepared, justified, effective and consistent with national policy.

The Council says that developments should have 40% affordable homes on future sites. Ideally affordable housing should be near the town centre and its services. However, the site in North West Harpenden is on the edge of the town and too far from the town centre to be accessed reasonably without a car.

7. Modification suggested.

Affordable homes could be provided on brown field sites such as;

- 1950's garage sites in local authority ownership.
- Office conversions to flats in the centre of town.
- Building over car parks at the station and near the shopping centre.

Policy SLP13 (c) - page 62. North West Harpenden Broad Location – Principally Housing

6. The policy is unsound for the 4 reasons indicated. It is not positively prepared, justified, effective and consistent with national policy.

The plan says that the Objective is to provide an urban extension primarily for housing in a sustainable location close to existing communities and facilities in Harpenden. This will not be the case as it is too far from the town centre.

The site is not able to accommodate 500 dwellings, plus a primary school and recreation space, even at a density of 40 dwellings per hectare. It will have to spill onto adjacent land and create a boundary that is not defensible (see comments on SLP1 above).

6.20 Housing.

- *Broad Locations have been selected as locations where development will cause least damage to Green Belt purposes and on the basis that new housing is well located for ready access to services and also best able to support economic development objectives.*

The site chosen in Harpenden does not have ready access to services.

Broad Locations have been identified through a comprehensive Green Belt Review and detailed evaluation of alternative locations with the Plan Sustainability Appraisal Framework and the SLP Spatial Strategy.

This Review was seriously flawed. Many of the ratings used were challenged by community groups but ignored, particularly regarding traffic and accessibility to the town centre and services. Also the site chosen in Harpenden is right on the boundary with Luton and Bedfordshire and would encourage merging of the two urban areas, which is one purpose for which the Green Belt was designed to avoid.

6.73 North West Harpenden – Broad Location

A wide range of facilities including those in the town centre are accessible within walking and cycling distance. Topography is favourable for walking and cycling. It is considered that satisfactory vehicular access can be provided and that traffic impact is likely to be acceptable.

This statement has been consistently challenged but ignored, see below.

6.75 Proposal

The development will be required to deliver;

Significant improvements to existing and/or new walking and cycling facilities to promote car free access to Harpenden town centre and railway station

Most people will not walk the 1.25 miles to the town centre very often. The A1081 is congested, polluting and dangerous for cyclists. The only other road into the town centre is Ambrose Lane, which is narrow, bordered closely by residential housing and crosses an old railway bridge on a dangerous bend, where it is effectively single track. Modification of this bridge to ease traffic flow and provide a cycle track, even if practicable, would be so expensive that it would be unlikely ever to be afforded.

7. Modification suggested.

The reference to the North West Harpenden site should be removed from the plan.

The plan should revert to the site priorities agreed in the 2009 assessment of sites suitable for development. As said in 6.20 above, the change of ratings from the 2009 assessment and those used in the Green Belt review were seriously challenged during the first consultation period by community groups but were systematically ignored by the Planning Policy Committee and the planning officers alike.

Policy SLP 25 – page 92. Transport Strategy.

6. The policy is unsound for the 4 reasons indicated. It is not positively prepared, justified, effective and consistent with national policy.

The plan says that new development should be concentrated in accessible locations which will reduce the need to travel, encourage walking and cycling, and where good public transport services can be provided or which connect into, maintain and improve the existing transport infrastructure or hierarchy.

This not the case with the site in North West Harpenden - see response to 6.75 above.

No proper assessment has been carried out of the traffic implications of the site on the A 1081 or Ambrose Lane and beyond into narrow residential roads, which are entirely unsuitable for through traffic.

9.17 Roads

However, the evidence included in the Urban Transport Plans indicates that traffic levels will not necessitate the provision of major new transport infrastructure, when considered on a national scale. The rising trend towards more home-working both full and part time, the rising trend in fuel prices and the significant extra capacity on the rail network to be delivered through the Thameslink Programme may additionally ameliorate impacts on the road network.

This is not correct as stated above. Many residents drive their children to school and most drive to the shops. Fuel prices are no longer rising. Increased use of both the rail network and Luton airport will both increase traffic flows on local roads.

9.18 Nevertheless, there is expected to be increased stress on the highway network, particularly in St Albans City Centre, at key junctions on the main roads into St Albans and in Harpenden Town Centre. Therefore some road improvement measures, such as junction improvements, will be required.

This is an admission that the roads are overloaded and an understatement of the amelioration measures that would be required, even if they were practicable.

9.23 Traffic congestion

Traffic congestion and its consequent impact on the amenity of residents is a serious issue across the district and will be addressed in all settlements.

The SLP is full of bland statements and promises like this but there is serious doubt that they would ever be delivered.

9.25 Car Parking

The Council's parking strategy will set out to manage public parking across the District and will be updated as required. The DLP will contain a policy setting out levels of parking for broad classes of development.

There is no realistic strategy. Car parking is one of the main issues of concern to local residents now. The proposed development will only make the situation worse. Increased parking capacity at the station, even if it happens, would only provide stop gap relief as demand continues to grow.

11. Infrastructure

Strategic Objective 7 – Delivering infrastructure

The Council will take appropriate measures throughout the plan to ensure that an historic infrastructure deficit is redressed and that new development fully addresses current and future physical, social and green infrastructure.

These are bland, undeliverable assurances. Infrastructure payments by developers under S106 will only provide a fraction of the expenditure needed to address even the additions to this deficit created by the proposed development. Current and likely future local authority budgets will not be able to meet these assurances. The result will be that the development will go ahead and very little compensating infrastructure will be provided.

11.11 The use of planning obligations and S106 agreements is likely to continue to be an important element in infrastructure provision in the short term until a Community Infrastructure Levy is adopted.

This will not be enough to deliver what is needed.

7. Suggested modification

A new survey should be carried out on the A1081, Ambrose Lane and roads that it feeds to provide up to date information about current traffic flows and the likely effect of further housing development.

A similar car parking survey should be carried out.

That no development should go ahead until an agreement with developers in writing has been delivered to the Council about required improvements to the infrastructure and a bond for the cost should be fully funded. Also the Council should commit to meeting any outstanding deficit.