

Summary of stakeholder/organisation responses to the Emerging Core Strategy

Chapter 5 – Vision for the Core Strategy

Issue:	Respondent:	Summary of response:
City Vision	Environment Agency (Keira Murphy)	<p>There is no mention of the need to mitigate and adapt to the impacts of climate change or improving the quality of the existing environment.</p> <p>The vision should be amended to include the importance of managing open space to benefit wildlife as well as providing recreation/amenity space.</p>
	East of England Development Agency (Andrew Fisher)	Support the need for a strong and sustainable economy which is responsive to markets and pioneering. The approach to employment is essential to this.
	Hertfordshire County Council	<p>The transport initiatives proposed in the consultation do not provide evidence of their feasibility. The city vision work did not include modelling to justify its aspirations.</p> <p>The suggestions of the City Vision are referred to within Chapter 13 (13.25, 13.30). There are already several bus routes that operate between the station and town centre. Careful consideration should be given as to the viability of another route and demand for bus access to the cathedral/Verulamium Park.</p>
	Wheathampstead Parish Council	The city vision needs to promote a more ecological approach to building and development in which high targets for low carbon and highly energy efficient dwellings is set.
	St Albans and Hertfordshire Architectural and Archaeological Society	<p>It is disappointing that there is only one master plan objective 'celebrating the historic environment' and none mention culture.</p> <p>A hotel in the St Michael's area would be likely to cause considerable damage to the underlying Roman and mediaeval remains, and therefore would be vetoed by English Heritage. A new hotel would be a wholly inappropriate building in a small-scale historic area.</p> <p>There is little reference to the need for attractive street furniture in our city and would suggest that one of the best ways of bringing our heritage into full view is to have statues of suitable people in appropriate places throughout our city.</p> <p>Although there is indeed reference in the LDF of the need for good quality architecture in our City, there seems to be no mention of this new 'vision' having at its centre a truly iconic building, which will show the best of 21st century</p>

		<p>architecture by resonating with its surroundings. An iconic building will appeal to residents and visitors alike.</p> <p>A landmark building for a relocated and enlarged museum of St Albans and related cultural uses – would meet the cultural values to which we aspire as well as economic benefits.</p>
	English Heritage	<p>At present, the vision statement refers to heritage principally in the sense of its potential for tourism development and this is disappointing. The historic character of St Albans should be a much broader, more positive dimension of the vision – as an asset which is fundamental to identity and quality of life, under-pinning prosperity and well-being. As the pre-eminent historic town of Hertfordshire this is a clear omission.</p> <p>Retail and service development should not result in major pressures on the historic fabric and quality of the city. The vision could set a more individual course for St Albans, based on its strengths.</p>
Rural Vision	Environment Agency (Keira Murphy)	<p>Chalk streams are natural assets and should be specifically identified.</p> <p>Protection and enhancement policies should be developed which also reduce local flood risk.</p> <p>River corridors may be used to promote sustainable transport such as walking and cycling.</p> <p>Improving quality of the existing environment needs to be mentioned.</p>
	Redbourn Parish Council (Diane Whiskin)	<p>There are inaccuracies in the rural vision document, which was rushed out and which is not incorporated into the Emerging Core Strategy or in its list of relevant documents.</p> <p>Note: Cllr Vivienne Windle identified a number of points. Only those relevant to the core strategy have been listed, all points will be sent to Urban Practitioners.</p> <ul style="list-style-type: none"> • Rural Vision not listed in evidence base list for core strategy • Shops and services in Redbourn are not in decline. • Wording re: traveller sites makes it sound as if the village is worried that the legal and illegal traveller sites would close, this is not a concern. • Transport and a car park are part of a wish list. Given that the draft LDF was prepared before this was written, the item of “development in the village” needs to be included in the LDF. • Bus links from villages do not allow travel to London without a car. • Protecting empty shop units to support vitality and viability of shops and services in the village needs to be included in the LDF. • The LDF needs to determine the percentage of affordable housing. Smaller developments should be required to be affordable. • Provision for a range of housing types and sizes should be included in the LDF immediately. • LDF should ensure that new development respects village character and is of a high design quality. A Village Design Statement in the LDF can help with this and the above point.

	Wheathampstead Parish Council	Local heritage and natural assets must be promoted, rather than 'can'. Each parish must be encouraged to produce a Village Design Statement in order to provide guidance to enhance the physical environment and new development and minimise any detrimental impact of development in rural areas.
	English Heritage	This statement provides welcome references to historic buildings and settlements.

Chapter 6 –Core Strategy Objectives (Q1/A1)

Issue:	Respondent:	Summary of response:
SO1 manage and improve the green belt	Environment Agency (Keira Murphy)	<p>“Green Belt” should be changed to “Green Belt and natural environment”.</p> <p>The Green Belt should be incorporated into the GI plan and used to create green corridors for wildlife and the local community, between areas of open space.</p> <p>Green Belt is not just a buffer to surrounding towns.</p>
	St Albans Civic Society	<p>Strongly Agree, however SO1 is not meaningful and is contradicted by SO3.</p> <p>SO1 should be re-worded as follows:</p> <p>“In order to achieve the redevelopment goals set out in the plan, the Council will seek the release of up to 200 hectares of Green Belt land. The usual presumption against inappropriate development will however continue to apply on the diminished extent of Green Belt land elsewhere in the District”</p> <p>(See table attached to full response which indicates 178 hectares of Green Belt Land needed to deliver the strategy)</p>
	Cllr Swendell	Strongly agree
	Herts Biological Records Centre	Strongly agree.
	CPRE – The Hertfordshire Society	Strongly support the Council’s commitment to protecting, managing and improving the Metropolitan Green Belt.
	The Ramblers Association – Hertfordshire & North Middlesex Area	Strongly support
	Cllr Swendell	<p>It does not help if you have a policy protecting Green Belt and rural communities, then propose building houses on Green Belt, such as with East of Redbourn.</p> <p>If you have a policy stick to it or lose credibility.</p>
SO2 Protect the natural and historic	Environment Agency (Keira)	Benefits should be for the community AND the environment e.g. enhancing wildlife or improving the quality of water bodies could also have a benefit for leisure/tourism.

assets	Murphy)	Safeguarding natural resources is an essential component of sustainable living.
	Hertfordshire County Council Historic Environment Unit (Andy Instone)	Sustainable development should include historic environment, a term favoured by Government. This is inclusive of archaeological sites, historic buildings and historic landscapes.
	Natural England (Catherine Whitehead)	Support Sustainable Community Strategy Priority 1 objectives, particularly SO2.
	St Albans Civic Society	Strongly Agree
	Cllr Swendell	Strongly agree
	Herts Biological Records Centre	Strongly agree.
	CPRE – The Hertfordshire Society	Strongly support this objective.
	Hertfordshire & Middlesex Wildlife Trust	Should be reworded to say ‘Protecting and enhancing natural and historic assets’
	Woodland Trust	Support, but would like to see biodiversity benefits included in the wording. Any changes to the district’s natural assets should bring about an improvement in biodiversity.
SO3 Provide sufficient land for development at suitable locations	Hertfordshire County Council Transport Department (Paul Donovan)	<p>Maximising development in areas already served by passenger transport can:</p> <ul style="list-style-type: none"> • increases its use, • improve viability of bus routes • provide opportunities to improve existing pedestrian/cycle/bus networks. <p>Development in less well served areas requires significant developer contributions to make development sustainable. This may not be achievable in small scale developments.</p>
	St Albans Civic Society	Don’t know
	The Ramblers Association –	Support, but oppose the provision of land for development where this infringes on the existing Green Belt or is detrimental to existing rights of way or other public access.

	Hertfordshire & North Middlesex Area	
	Thames Water	Support Strategic Objective 3 which seeks to provide land for development in sustainable locations capable of being served by appropriate physical infrastructure.
SO4 delivering high quality distinctive design	Environment Agency (Keira Murphy)	Support objective.
	Natural England (Catherine Whitehead)	Support Sustainable Community Strategy Priority 1 objectives, particularly SO4.
	St Albans Civic Society	Strongly Agree
	Cllr Swendell	Tend to agree
	Hertfordshire & Middlesex Wildlife Trust	Should be reworded to say 'Delivering high quality, distinctive and sustainable design which minimises energy usage and creates opportunities for biodiversity in new developments'
SO5 Establish St Albans as a hub for recreation, culture, leisure, heritage and tourism	St Albans Civic Society	Strongly Agree
	Cllr Swendell	Strongly agree
	St Albans and Hertfordshire Architectural and Archaeological Society	Strongly support. Our rich Roman and mediaeval heritage gives us a unique place among towns in the region and supports a strong related cultural life.
	CPRE – The Hertfordshire Society	"Regional " means the East of England, and it is unrealistic to expect St Albans to be in the premier league at that level. Even at 'sub-regional' level, St Albans would be competing with major established towns such as Watford, Luton and Stevenage. St Albans is not a KCDC, St Albans should be following the approach set out for rural areas.
SO6 provide more affordable homes	St Albans Civic Society	Strongly Agree

	Cllr Swendell	Tend to agree
	Wheathampstead Parish Council	This Objective should ensure that we also have a <i>mixture</i> of housing that is appropriate to the needs of individual communities now and in the future.
SO7 diversify the local economy and develop economic competitiveness	St Albans Civic Society	Strongly Agree
SO8 improve the vitality and viability of St Albans	St Albans Civic Society	Strongly Agree
	Cllr Swendell	Strongly agree
SO9 improve the vitality and viability of all centres	St Albans Civic Society	Strongly Agree
	Cllr Swendell	Strongly agree
SO10 support sustainable travel and reduce car usage	Hertfordshire County Council Transport Department (Paul Donovan)	This is essential to minimise the negative impact of proposed development and address congestion, air pollution, and accessibility issues.
	St Albans Civic Society	Strongly Agree
	Cllr Swendell	Tend to disagree
	Herts Biological Records Centre	Strongly agree.
	The Ramblers Association – Hertfordshire & North Middlesex Area	Strongly support.

SO11 create strong communities	Hertfordshire Police Authority (Lucy Biddle, RPS)	Strongly agrees with this objective and with priorities in the Sustainable Community Strategy. HPA welcome reference to building strong, safe and balanced communities as the objective to underpin the policy objectives of the Core Strategy.
	St Albans Civic Society	Strongly Agree
	Cllr Swendell	Strongly agree
SO12 development contributes to the mitigation and adaptation to climate change	Environment Agency (Keira Murphy)	Specific reference to water should be included, e.g. “.increase energy and water efficiency...” Objective should include. Resilience planning for flooding, water demand management, sustainable transport strategy and the need to protect and restore the quality of groundwater/ surface water.
	Hertfordshire County Council Historic Environment Unit (Andy Instone)	Where possible any mitigation or adaptation of climate change should conserve and enhance historic environment assets.
	St Albans Civic Society	Strongly Agree
	Herts Biological Records Centre	Strongly agree.
	Wheathampstead Parish Council	This Objective is quite complicated and difficult to make sense of. Suggest: “Development must seek to achieve the highest levels of energy efficiency and reduce carbon footprint by the use of low carbon and renewable energy sources. Developments should also mitigate harm of loss of amenity through financial contributions and/or contributions of land or facilities for the benefit of the immediate community”
	Woodland Trust	Support but fails to recognise the need to ensure habitats and species can adapt to climate change. The Objective should be broadened to ensure it covers the natural environment and places the emphasis on the district as a whole and not just new development.
SO13 Delivery of the strategy	Hertfordshire Police Authority	Strongly agree

	(Lucy Biddle, RPS)	
	St Albans Civic Society	Strongly Agree
	Wheathampstead Parish Council	Should be clarified and re-written.
	Thames Water	Support Strategic Objective 13 which seeks to achieve delivery of the strategy through the respective strategies, plans and programmes of all relevant delivery partners.
Other comments		
	St Albans Civic Society	The Strategic Objectives read as unexceptional aspirations. There are inherent contradictions, for instance between SO1 and SO3, and SO2 and SO8, which are not explained or explored in the document.
	English Heritage	<p>Recommend that the Core Strategy Objectives are strengthened in the following areas:</p> <ul style="list-style-type: none"> - Prominence should be given to the need to preserve and enhance the historic character of St Albans. - Sustainable transport is relevant to the priority 'Ensuring the District is a great place to be'. This link should be made explicit. • SO10: This is weak in relation to sustainable travel, and does not include any ambition for a modal shift from privatised motorised transport despite the acknowledged traffic problems within St Albans. •

Chapter 8 – Environment Sustainability Policies

Issue:	Respondent:	Summary of response:
Renewable and low carbon energy	EERA (Helen De La Rue)	The Council is encouraged to set ambitious local targets for carbon reduction and provision of renewable energy.
	Colney Heath Parish Council (John Dean)	Council supports any initiatives to reduce carbon footprint to more acceptable levels. (also see comment to Chapter 13, roads and traffic, other transport comments)
	East of England Development Agency (Andrew Fisher)	The Regional Economic Strategy includes targets for a 60% reduction in CO2 emission by 2031. Achieving this target will put the region at the forefront of tackling climate change and in a position to exploit the environmental goods and services market. The core strategy should contribute to the regional target. The Hertfordshire Climate change study should enable more specific targets to achieve environmental sustainability to be set.
	Natural England (Catherine Whitehead)	Climate change is the most serious threat to the natural environment. Natural England have launched a campaign to try and raise awareness of climate change impacts on wildlife and landscapes and wish to work with a range of partners. Natural England's focus is in increasing the ability of landscapes and ecosystems to adapt to climate change. The chapter should include a policy (linking to biodiversity policies) that covers adaptation of natural systems. The policy should: <ul style="list-style-type: none"> • Explain the importance of increasing the ability of landscapes and ecosystems to adapt to different weather patterns by increasing the range and extents of habitats. • Increase network of green corridors • Link isolated nature conservation sites to allow species to move as climate change makes their existing habitat unsuitable.
	Natural England (Catherine Whitehead)	Support principle of sustainable energy generation if it is appropriately sited. Renewable Energy Schemes can have negative effects on landscapes, nature conservation and people's enjoyment of the countryside. Natural England will consider renewable energy proposals against the extent to which they conserve and enhance the existing natural environment. The core strategy approach to renewable energy should include provision for protecting the natural environment.

		<p>When considering locations for energy installations the Hertfordshire Landscape Character Assessment should be referred to, to ensure minimum impact on landscape.</p> <p>Generally supportive of small scale energy projects as part of sustainable design and construction.</p>
	St Albans Friends of the Earth	Appreciate the importance of maintaining and enhancing the attractiveness of the District but feel that this should not stand in the way of the use of renewable energy facilities such as solar panels.
Sustainable design and construction	EERA (Helen De La Rue)	All Development should be encouraged to exceed minimum targets and timescales for sustainable construction and resource efficiency where viable.
	Colney Heath Parish Council (John Dean)	<p>New build design needs to take account of “green living” and planning should allow more eco type homes.</p> <p>Scope of Government Funding should be widened to allow more homes to benefit from improvement grants.</p>
	Environment Agency (Keira Murphy)	<p>Recommend a Sustainable Construction Pre-application checklist for dwellings and commercial premises such as one developed by Uttlesford.</p> <p>The checklist provides;</p> <ul style="list-style-type: none"> •Quick way for developers to provide information on sustainable building methods and materials; •Development proposal design criteria; and •The council a way of measuring adoption of sustainable building options against policy.
	Natural England (Catherine Whitehead)	<p>Would like to see Village Design Statements included in the policy wording or accompanying test as it is an initiative which they promote.</p> <p>The following points should be included in a policy.</p> <ul style="list-style-type: none"> •All development expected to incorporate sustainable design and construction principles and high quality design and materials, local distinctiveness and identity. •Opportunities for biodiversity conservation and enhancement should be an integral part of development. •Building design should reduce energy consumption. •Sustainable Urban Drainage systems should be promoted. •Supporting development that uses recycled materials in new construction and makes best use of existing buildings.

	Hertfordshire County Council Environment Department (Paul Donovan)	<p>The local planning authority has been proactive in its approach to addressing environmental sustainability and it is encouraging to see an ambitious target for new development to meet higher levels of sustainability than those required under statutory regulations.</p> <p>No reference is made to Government aspirations for all non-residential development to be zero carbon by 2019, local government buildings to be zero carbon by 2018 and schools and colleges by 2016.</p> <p>Emerging policies do not refer to the generation of stand alone renewable technologies. PPS1: addendum and PPS22 require local development documents to provide guidance on the location of stand alone renewable energy generation. PPS1: addendum states that planning authorities should consider identifying suitable areas for renewable and low carbon technology sources.</p> <p>PPS22 requires local level planning policy to provide guidance for stand alone renewable energy schemes and the accompanying practice guidance states that it is likely there will be “two different policy areas in a local plan to cover these”.</p>
	St Albans Friends of the Earth	The importance of soft landscaping – of trees, green spaces and green roofs – in mitigating climate change should be stressed.
Water and flood risk	EERA (Helen De La Rue)	Policy to promote water efficiency and recycling is encouraged.
	Environment Agency (Keira Murphy)	<p>Overall, agree with references to policy and guidance, and the content of this section.</p> <p>Site AoS3 is also affected by fluvial flooding (flood zones 2 and 3) and should be mentioned here.</p> <p>There are other areas affected by groundwater flooding that may require a level 2 SFRA.</p> <p>We support the use of a Level 2 SFRA for sites in the floodplain, providing there are no alternative sites.</p> <p>(also see response to Chapter 10, AOS3 and H7)</p> <p>RE: Water Cycle Study, Blackbirds Farm Sewage Treatment Works needs to be mentioned here alongside the Maple Lodge.</p> <p>Agree with requiring new developments to be built to a high water efficiency standard such as the Code for Sustainable Homes. St Albans is within an area recognised as being “water-stressed.” Every opportunity should be taken to build water efficiency into developments and innovative approaches should be encouraged.</p>

	East of England Development Agency (Andrew Fisher)	The Regional Economic Strategy includes a target for 20% reduction of household per capita water consumption (or reduction to 120 litres) by 2031. The Core Strategy should contribute to this. (also see response to Renewable and Low Carbon Energy above)
	Natural England (Catherine Whitehead)	Creating wet woodlands, reed beds and low lying pastures in flood risk areas can prevent flooding and create a wider range of natural habitats.
	Wheathampstead Parish Council	The Council needs to be much more specific about what its view is on flood plain development.
	Veolia Water	Welcome the active promotion of policies that promote water efficiency in new developments, in particular aspirations for all new properties to achieve Code for Sustainable Homes certification. In particular would welcome similar levels prescribed for private dwellings to match those levels determined for social housing by legislation (Csh3 to 2016, Csh 5 post 2016), and the active promotion of water efficient fittings during refurbishment and retro fitting of existing properties wherever possible.
Air quality	EERA (Helen De La Rue)	Support consideration of air quality.
	English Heritage	These policies should support a change to sustainable modes of travel linked to the relevant transportation policies.
Other comments	EERA (Helen De La Rue)	The core strategy should contain guidance on waste management and recycling, especially during development. Large scale schemes may present opportunities for generating energy from waste.

Chapter 9 – Green Belt Policies

Issue:	Respondent:	Summary of response:
Protecting Green Belt	Colney Heath Parish Council (John Dean)	<p>Support maintaining and protecting the Green Belt.</p> <p>Support wherever possible using Brownfield land for new development.</p>
	Environment Agency (Keira Murphy)	<p>Green belt should be managed to enhance biodiversity.</p> <p>It is important to improve river corridors through the Green belt Countryside.</p> <p>Farming and other land uses can have an impact on the river environment. Flood risk to all areas can be reduced by the creation of wetland areas.</p>
	East of England Development Agency (Andrew Fisher)	<p>The region's environmental and landscape assets have a direct impact on economic performance through positive impact on peoples' well being and productivity, and through direct economic opportunities.</p> <p>Protecting green infrastructure is an essential element of securing sustainable communities. EEDA supports the council's approach and aims for the long term management of the Green Belt that balances the need to accommodate future growth in a sustainable manner.</p>
	Natural England (Catherine Whitehead)	<p>Protecting Green Belt from development should continue.</p> <p>Much of the Green Belt is of uninspiring quality. There is potential to deliver more positive benefits for the natural environment and people's enjoyment of it.</p> <p>The Green Belt can increase pressure for the development of more environmentally sensitive sites elsewhere. There should be some flexibility in the designation of Green Belt boundaries and wherever possible land should be used for positive purposes.</p>
	Redbourn Parish Council (Diane Whiskin)	<p>It is vital to protect the Green Belt.</p> <p>The emerging core strategy is contradictory. It promises to protect the Green Belt but introduces plans to build on it in certain areas.</p> <p>Allowing Park and Ride to be built in Green Belt could open them up to threats of further development.</p>
	Anne Main MP	<p>Object to release of Green Belt for development.</p> <p>Concerned over volume of houses proposed in the Green Belt. This should be resisted as strongly as</p>

		possible.
	Go-East (Paul Fellows)	Concerned about the scale of Green Belt release proposed. Need to ensure that all opportunities to minimise Green Belt release have been taken. (see comments to Housing Land Supply Calculations)
	Wheathampstead Parish Council	Need more about the value that we place upon the Green Belt in preventing settlement coalescence and promoting sustainable and well planned development within existing settlements. Need to include a view on the density and type of development on land adjoining Green Belt – whether we believe that it should have a lower level of density and constraints upon the maximum height of properties.
	Harpenden Town Council	The Council wishes to express strong support for the maintenance of the Green Belt. The Green Belt around Harpenden defines the town and gives it much of its character. Green Belt land should be preserved and not sold to developers under any circumstances. The Council notes that the East of England Plan makes no provision for local Green Belt reviews other than at Broxbourne in Hertfordshire (SS7). If there was a general intention to allow local Green Belt reviews in the East of England, then the Broxbourne case would not have been singled out in Policy SS7. It is the Council's view such local Green Belt reviews in the St Albans District are not intended by the Regional Plan.
	English Heritage	The Core Strategy needs to be much clearer on the green belt and its purposes. Significant growth of historic towns results in additional demands on their historic cores and pressures on landscape settings.
	Verulam Residents Association	A fundamental and irreconcilable inconsistency of these proposals in the statement that “an overriding priority is to protect the Green Belt”. Yet huge tracts of Green Belt are being proposed for housing development.
	St Albans Community Forest Association	Policy appears to stress the value, and intent, of retaining the rural aspect, the consultation opts variously for the surrender of swathes of Green Belt land. This is doublespeak, there can be little ‘extra special circumstances’, as required by PPG2.
East of England Plan High Court Challenge	Dacorum Borough Council (Francis Whittaker)	A full picture of the RSS challenge has not been provided. Possibility that growth could be reinstated through either the “repair” process or review of the East of England Plan should be explained.

		<p>The core strategy should therefore acknowledge that it might have to be flexible to respond to any future changes.</p> <p>(also applies to chapter 10)</p>
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Chapter 10 – Housing Policies (Q3/B1 – density) (Q4/B2 – AOS1, AOS5) (Q5/B3 – AOS3, AOS8, AOS7) ((Q6/B4 – AOS4, AOS6, AOS2, AOS8) (Q7/B5 – affordable hsg) (Q8/B6 – gypsies and travellers)

Issue:	Respondent:	Summary of response:
Housing targets and long term green belt boundaries	EERA (Helen De La Rue)	Calculations for long term housing provision are consistent with Regional Policy. Concern of potential shortfalls without release of Green belt land is noted.
	Dacorum Borough Council (Francis Whittaker)	Commentary on the role of contingencies, the need for flexibility, and any risk assessment regarding non-delivery of sites needs to be included in the strategy to ensure robustness of the housing programme.
	The Ramblers Association – Hertfordshire & North Middlesex Area	Oppose any housing development on greenfield sites.
Housing land supply calculations	EERA (Helen De La Rue)	Calculations for long term housing provision are consistent with Regional Policy. Concern of potential shortfalls without release of Green belt land is noted
	Highways Agency (Darren Rhoden)	Whilst the HA considers the proposed approach to housing delivery appropriate there are concerns with the projected level of windfall development in the District. The HA is concerned that the windfall allowances are potentially ambitious and seek assurances that they are realistic and deliverable. The timing and scale of development within the GB beyond 2021 is dependent on the level of windfall development expected to come forward.
	Dacorum Borough Council (Francis Whittaker)	Support the contribution from windfall to housing supply over the lifetime of the CS. At the time of publication the SHLAA was in draft form. You may wish to note advice to Dacorum from the Planning Officers Society for a robust SHLAA, in particular it must be demonstrated that all assumptions and conclusions on individual sites are confirmed with the development industry.
	Hertsmere Borough Council (Maria Demetri)	Support justification of genuine local circumstances for using windfall sites as part of the housing requirement. This will help prevent releasing too much Green Belt land to meet housing targets.
	Go East (Paul Fellows)	Paragraphs 8 to 17 of the Go-East comments express concern as to whether the SHLAA fully informs the options chosen. These outlined in more detail as part of the SHLAA consultation analysis.

		<p>To minimise Green Belt releases, it is suggested that</p> <ul style="list-style-type: none"> • Other sources of supply identified in the SHLAA be considered and whether any constraints can be overcome. For example potentially developable sites. The SHLAA suggests that there is scope for further sites to be considered. • The flexibility and contingency planning approach in PPS3 be applied to those sites which are not included in the not deliverable/developable category. • Employment sites which are highly likely to be refused on grounds that they are contrary to existing saved policy be reconsidered. • The Council considers how PPS3 guidance on delivering flexible supply of land for housing can be applied. • Phasing be applied to help apply policy on building out previously developed sites before greenfield sites. • The application of a windfall allowance be reconsidered. • Options on density and how these may be applied to larger sites is considered. For example different density assumption may be applied to different sites to allow intensification on certain sites.
	Harpenden Town Council	<p>Strongly support the Authority's arguments set out in ECS paragraphs 10.17-8 in Appendix 7 and the draft SHLAA for the inclusion of a windfall allowance as part of the District's housing supply. The Council believe that the 'genuine local circumstances' of PPS3 paragraph 59 fully apply here. If anything, the Authority has been unduly conservative in the windfall allowance it has made in the ECS. Epsom and Ewell Borough Council is given as an example where an Inspector has accepted the inclusion of windfall.</p> <p>The Council consider that the release of Green Belt for development needs beyond 2026 is inappropriate. The Regional Plan states that DPDs should test whether the scale of growth after 2021 will be achievable in the local circumstances. The ECS does not do this. Even if the rate of housing construction picks up again following the current recession, it is likely that the lost years at a much lower growth rate will never be recovered.</p> <p>It would have been helpful if the figure (581) had been identified explicitly in the draft SHLAA to provide an explicit and unambiguous link between the SHLAA and the Core Strategy. The additional urban capacity further weakens the case for strategic Green Belt releases.</p> <p>The release from the Green Belt of further Safeguarded Land would be premature, given the principle of the 'brownfield first' sequential test supported by the Authority. To do otherwise would represent a 'predict and provide' approach rather than 'plan, monitor, manage'.</p>
	The Harpenden Green Belt Association	<p>Need to undertake further work looking at urban capacity as a matter of urgency. Sites such as Griffiths Way, West of St Peter's Street, former Eversheds, and Harpenden Station car parks need to be considered. Also employment sites and garage courts.</p> <p>Agree that there is sufficient justification for including a windfall allowance.</p>

Areas of Search and potential Housing sites:	Hertfordshire County Council Environment Department (Paul Donovan)	It would be helpful if the technical appraisal of all areas of search considered and a clear picture of how decisions have been arrived to could be brought together as a single appraisal – perhaps formally within the sustainability appraisal/strategic environmental assessment process.
	St Albans Civic Society	Strongly oppose all AOSs as they conflict with SO1.
	St Albans Friends of the Earth	<p>The population of St Albans and District is already imposing unsustainable burdens on the environment.</p> <p>Regarding the positioning of the houses, the proposed sites are a considerable distance away from services and transport links so the inhabitants would be car dependent.</p>
	Woodland Trust	Wherever new housing is located and at whatever density, the Trust would expect there to be no loss of ancient woodland or ancient trees as a result and would recommend the opportunity to create more woodland or increase canopy cover through the planting of small copses or street trees is taken.
	Sport England	Sport England would wish to use this opportunity to confirm that it would object to the loss of any playing field to potential housing development unless acceptable replacement playing field provision was made. These sites include Harperbury Hospital, Beaumont School, south of Sandpit Lane and Nicholas Breakspear School playing fields. This is pertinent in view of the significant deficiencies in playing field provision that have been identified in the Council's Playing Pitch Strategy and which are referred to in the consultation document.
	Friends of the Earth (Amanda Yoeworth)	<p>Strongly oppose all AOSs proposed for housing</p> <p>As we have stated before, the population of St.Albans and District is already imposing unsustainable burdens on the environment. The provision of water is of particular concern as water extraction is already at unsustainable levels and the water available is likely to decrease in line with climate change predictions. Therefore, adding large numbers of additional houses as proposed in this strategy is wholly unsustainable and should not take place. In addition, the Council is committed to decrease the carbon dioxide emissions of the District. There are no proposals to make the additional houses carbon negative and so they will lead to a substantial increase in emissions. Regarding the positioning of the houses, the proposed sites are a considerable distance away from services and transport links so the inhabitants would be car dependent.</p>
	Veolia Water (Nicolas Gilbert)	Veolia Water act as a statutory consultee and therefore do not have a position regarding the chosen development sites outlined in the Core Strategy. Would welcome the active promotion of policies that promote water efficiency in new developments, in particular aspirations for all new properties to achieve Code for Sustainable Homes certification, which does not appear to be covered anywhere else within this core strategy. In particular we would welcome similar levels prescribed for private dwellings to match those level determined for social housing by legislation (CsH 3 to 2016, CsH 5 post 2016), and the active promotion of water efficient fittings during refurbishment and retro fitting of existing properties wherever possible.

	London Colney Village Concern	All these options are opposed by local people. Nobody wants huge housing estates near their homes – because they will not be under full control for long.
• H1 – Oaklands City Campus		
• H2 – St Albans City Station		
• H3 – King Harry Lane Playing Fields		
• H4 London Rd/Alma Road		
• H5 Harperbury Hospital	Hertsmere Borough Council (Maria Demetri)	Hertsmere would like to work closely with St Albans in pre-application negotiations to minimise sustainability disadvantages of the site's locations. This is important as impact of any development on the site will be more noticeable in Shenley, Radlett and the surrounding area.
	Sport England	Object as development may incorporate playing fields.
• H6 BRE	Abbots Langley Parish Council	Concerned about the Building Research Establishment site being identified for 150 dwellings plus strategic employment site in the Green Belt. Consider such intensified use in the isolated location of the BRE site will be detrimental to the residential surroundings. Concerned about the impact of additional traffic that the proposal would generate in the parish, particularly along residential road of Bucknalls Lane. The accessibility/key services distance figures given in the Sustainability Appraisal for BRE are totally unrealistic in practice and do not contribute to fair evaluation of the sustainability of the site.
• AOS1 south west of St Albans	Highways Agency (Darren Rhoden)	Despite being an extension to existing urban areas, there is concern that AOS1 may not be sustainable given its distances from the city centre, potentially being difficult to serve by public transport and its close proximity to the strategic road network. Concerned that it will function as a car-dependent satellite development. (Also see response to Chapter 13, Western Orbital Route and Further Comments)
	Hertfordshire Police Authority (Lucy Biddle, RPS)	There would be scope to expand the St Albans Police Station to accommodate some new staff required to serve growth. AOS1 would be well placed to be served by an expanded St Albans police station. The allocation should recognise need for development to contribute towards police infrastructure including

		<p>expansion of St Albans Police Station.</p> <p>(see also Chapter 10, other comments below)</p>
	<p>Hertfordshire County Council Transport (Paul Donovan)</p>	<p>Highway Agency are responsible for the A414(T). A new Junction onto it will need their approval.</p> <p>If responsibility for the A414(T) is transferred to HCC Highways the County Council will maintain the current policy and oppose new junctions on the primary road network. A deviation from this policy will only be accepted where very special circumstances exist.</p> <p>AOS1 representatives have carried out a study into the overall traffic impact of the site and link road. The results indicate that;</p> <ul style="list-style-type: none"> • a significant amount of traffic is likely to divert to the new route relieving some of the congestion on the southern approaches to the city; • diverted traffic will lead to a significant increase in traffic on the A4147 Bluehouse Hill and Batchwood Drive; • there is only a relatively small impact on the amount of traffic in the centre of St Albans <p>The last bullet conflicts with the Emerging Core Strategy to reduce the amount of traffic in the town centre through possible traffic restrictions.</p> <p>The traffic modelling work uses an updated version of an old model which has not been validated. Although the modelling indicates the affect of the link road the results cannot be considered as a robust evidence base. Further investigations need to be carried out before HCC is in a position to agree with its conclusions that the route would result in major transport benefits for the city.</p> <p>An extensive sustainable transport strategy would be required. The initial work has identified several bus services in the area and suggests that it is possible to divert them into the site. There is no evidence in the report that takes this further.</p> <p>It would be useful to establish the feasibility of linking the new cycle route to the existing road network to the east and the town centre.</p>
	<p>Anne Main MP</p>	<p>Object for following reasons;</p> <ul style="list-style-type: none"> • Substantial loss of Green Belt • Coalescence of St Albans and other settlements • Not a sustainable location • Requires large amount of supportive development • Highways Agency may not agree new junction onto A414.
	<p>Cllr Swindell</p>	<p>Tend to support</p>

		Map is needed to accurately show the area the Council is talking about.
	Herts Biological Records Centre	It is important that if this proposal was considered, the Wildlife Sites Park Wood and Birch Wood are protected from adverse impacts.
	Bricket Wood Residents' Association	Strongly oppose. Loss of valuable open green field site, especially important to the historic setting of St Albans; detrimental/protruding extension of the urban built up area that will contribute to the merging of St Albans with Hemel Hempstead and towards Chiswell Green. If Green Belt land is needed to meet dwelling allocation, suggest alternative is to make Harperbury Hospital site big enough to be sustainable community with local shops and facilities such as primary school.
	Verulam Residents Association	Strongly oppose. Impact upon the green belt, historic environment and landscape. The proposed development will have an immediate and irreversible impact on the local environment.
	Abbots Langley Parish Council	Concerned about the significant harm that 1000/1200 dwellings and associated infrastructure would have on the openness of valuable Green Belt land. This large extension of the St Albans Verulam Estate would erode open green farmland and contribute to the merging of the urban areas of St Albans and Hemel Hempstead.
	CPRE – The Hertfordshire Society	Strongly oppose. Development 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. Beyond Bedmond Lane, there is no clearly defensible boundary to this part of the Green Belt. The integrity of Park Wood and Birch Wood would be at risk. There are also a number of designated Areas of Archaeological Significance in this area. 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.
	The Ramblers Association – Hertfordshire & North Middlesex Area	Strongly oppose. The area is attractive open Green Belt with pleasant views. It is part of the Watling Chase Community Forest and is readily accessible to walkers through well used rights of way. The putative benefits from a new western orbital route are not sufficient to justify this massive loss of Green Belt.
	English Heritage	Archaeological investigation in accordance with PPG16 should be carried out before a decision on this allocation, and its capacity, is taken. English Heritage may wish to comment further on the archaeological implications in the light of further information.

		Concerned that this site is being brought forward because of the potential funding for the western orbital link road. The orbital route is likely to have significant impacts on the historic environment, through increased severance of the Roman town to the north and potential degradation of this sensitive edge of St Albans.
	Bricket Wood Residents' Association	Strongly Oppose. AOS 1: south west of St Albans, Bedmond Lane - strongly oppose - Why? Loss of valuable open green field site, especially important to the historic setting of St Albans; detrimental/protruding extension of the urban built up area that will contribute to the merging of St Albans with Hemel Hempstead and towards Chiswell Green. If Green Belt land is needed to meet dwelling allocation, suggest alternative is to make Harperbury Hospital site big enough to be sustainable community with local shops and facilities such as primary school.
	Verulam Residents Association	Strongly oppose. The site is in the Metropolitan Green Belt and includes Park Wood and Birch Wood which are County Wildlife Sites and should be protected. It also includes several Grade II listed buildings. The area is also of high archaeological importance. Development will have an immediate and irreversible impact on the local environment. The proposal fails to adequately secure and enhance the quality and appearance of the landscape in the area. The proposal is contrary to Policy 143 of the St Albans District Local Plan Review 1994 and PPG2 Green Belts. No very special circumstances exist to justify the proposal.
• AOS5 East of St Albans (south west part) Beaumont school playing fields	Hertfordshire Police Authority (Lucy Biddle, RPS)	On-site facility would not be required but financial contributions would be sought for the provision of new police infrastructure within the local area. (see also Chapter 10, other comments below)
	Hertfordshire County Council Transport Department (Paul Donovan)	It is assumed that access will be taken from a new signalised junction from the A1057 Hatfield Road to the east of Oakwood Drive. The junction has been assessed and approved in principle as part of a recent application. There are regular bus services along Hatfield Road with evening and Sunday provision. Good pedestrian/cycle links will need to be provided through the site to Hatfield Road in bus services. It is important that further development of this site does not worsen the existing congestion on Hatfield Rd as this is an important bus route. Other measures to improve and encourage sustainable transport should be an integral part of a future development.
	Mrs Elizabeth Hitch (Beaumont School)	Strongly Support for following reasons.

		<ul style="list-style-type: none"> • Development of this area will release a large field to the east of the school for improved school facilities • Site is bounded by housing and roads, therefore does not act as buffer to prevent housing on the edge of an urban area and no longer serves its green belt purpose • There will be benefits for the community especially for health and safety of pupils, the staff and local residents • Development would result in enhancement of a playing field and sports activities • Health and safety improvements to school entrances • Development would allow provision of more parking for staff onsite • The current playing field is too small and unsuitable for winter use which limits PE curriculum • There would be associated traffic improvements • Would allow for increased class room accommodation and sports hall for school and community use. <p>The Council should bring the site forward in advance of adopting the Core Strategy.</p>
	Herts Biological Records Centre	It is important that if this proposal was considered, the ecological interest of local hedgerows and adjoining ancient, semi-natural woodland are protected from adverse impacts.
	Sport England	Object as development may incorporate playing fields.
	CPRE – The Hertfordshire Society	Tend to oppose. 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.
	The Ramblers Association – Hertfordshire & North Middlesex Area	Oppose, as it is both Green Belt and part of the Watling Chase Forest.
	Welwyn Hatfield Borough Council	<p>Object to AOS5 both north and south east parts for following reasons:</p> <p>Will have significant traffic implications on the already congested Hatfield Road. Will it be feasible to implement measures to mitigate the impact of development Development will erode fragile Green Belt and result in coalescence of St Albans and Hatfield. If the east of England plan repair process reintroduces large scale housing growth in Welwyn Hatfield or results in the need to release green belt land then there is potential for further green belt erosion, especially if growth west of Hatfield emerges as the most sustainable option.</p> <p>Policy LA3 refers to the provision of green infrastructure between Hatfield and Welwyn Garden City. This forms part of the development plan. A commitment to work with Welwyn Hatfield Council to provide this needs to be referenced in the Core Strategy.</p>

<ul style="list-style-type: none"> AOS5 East of St Albans (north part) Oaklands Smallford Campus, south of Sandpit Lane 	Hertfordshire Police Authority (Lucy Biddle, RPS)	<p>On-site facility of neighbourhood police space circa 150 sq metres to serve allocation would be required.</p> <p>Policy should include details of police infrastructure for inclusion within the development master plan.</p> <p>(see also Chapter 10, other comments below)</p>
	Hertfordshire County Council Transport (Paul Donovan)	<p>It is not clear from the information provided how/where the site will connect to the existing network or whether all or part of the eastern distributor route is to be provided as part of this proposal. Development of this scale will require major road and junction improvements. There are significant traffic implications associated with the proposal and the introduction of an eastern distributor route.</p> <p>Feasibility work that predicts how the proposal or the links will impact on the existing road network is required.</p> <p>A thorough sustainable transport strategy is required. Sandpit Lane is not well served in relation to bus services.</p> <p>Most of the site falls outside the 400 metre catchment for existing services, a development of this size should be designed to accommodate passenger transport.</p> <p>Bearing in mind the scale of the proposal and the lack of any information associated with sustainability and access arrangement it is difficult for the local highway authority to comment in any more detail.</p>
	Anne Main MP	<p>Object for following reasons;</p> <ul style="list-style-type: none"> • Loss of Green Belt • Development would compromise biodiversity • Development would urbanise area • Would have significant traffic implications
	Herts Biological Records Centre	<p>It is important that if this proposal was considered, the ecological interest of the surviving orchard at Oaklands and other local features are protected from adverse impacts.</p>
	CPRE – The Hertfordshire Society	<p>Strongly oppose. Would be a major extension of St Albans into the Green Belt. Development would significantly reduce the gap between St Albans, Smallford and Hatfield. The 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.</p>
	The Ramblers Association – Hertfordshire & North Middlesex Area	<p>Strongly oppose. Development in this area would adversely affect the amenity of existing rights of way, particularly North Drive, and would destroy much of the benefit of the new right of way through the area which has been promised in partial compensation for the Oaklands development.</p>

Proposed safeguarded Land:		
<ul style="list-style-type: none"> AOS7 North of St Albans 	Hertfordshire Police Authority (Lucy Biddle, RPS)	<p>If site is brought forward, development should include a Neighbourhood Police base circa 150 sq metres. Policy should include requirement for developer to incorporate an on-site facility within the master plan and deliver this at its own cost.</p> <p>(see also Chapter 10, other comments below)</p>
	Hertfordshire County Council Transport (Paul Donovan)	<p>The County Council's 'Tackling Congestion in Hertfordshire' document identifies this section of the A1081 as a congestion hotspot.</p> <p>1,000 additional dwellings will generate approximately 500 additional vehicle movements in the morning peak period. Without measures to ease the existing congestion any additional traffic is likely to make the situation worse.</p> <p>The A1081 Luton Road forms part of the county's primary distributor network. The average weekday traffic flow is approximately 18,000 vehicles. The highway authority will maintain the current policy position and oppose new junctions on the primary road network; a deviation from this policy will only be possible where very special circumstances exist.</p> <p>An extensive sustainable transport strategy is required. The development will need to be designed to accommodate public transport.</p> <p>A sustainable transport strategy for the site should include upgrading the shared cycle path on Harpenden Road.</p> <p>The feasibility of linking the new cycle route to the existing road network and the town centre and expand it to other facilities needs to be established.</p> <p>The site is somewhat remote from shops/services; an improved bus service is required to encourage sustainability.</p> <p>This proposal will have a significant impact on the road network. Network capacity, access and sustainability must be fully investigated at the earliest opportunity. The highway authority is not aware of any work that supports this proposal.</p>

	Anne Main MP	Object for following reasons. <ul style="list-style-type: none"> • Loss of attractive countryside • Ancient Briton and King William junctions are already congested • Development would add more traffic problems to this area • Would require supporting facilities which would add to traffic problems.
	Cllr Swendell	Tend to oppose
	Wheathampstead Parish Council	Concerned about Area of Search 7. It is not sufficiently clear how much land is proposed to be released. In addition release of this land could put pressure on the gap between St Albans and Sandridge causing coalescence. Very concerned to see the suggestion that some areas of Search Area 7 will need to be developed for housing before 2026. This is not at all clear in the main body of the consultation document.
	CPRE – The Hertfordshire Society	Tend to oppose. This is part of an area of attractive countryside.
	The Ramblers Association – Hertfordshire & North Middlesex Area	Oppose, Sandridgebury Lane is a quiet route which is likely to become an important route for walkers and cyclists between north west St Albans and the Heartwood Forest.
	St Albans Enterprise Agency (Mel Hilbrow)	The gap between St Albans and Harpenden needs to be maintained - there is currently a distinct “entering the country” feel in this area; this is less of an issue in the other two proposed areas.
Possible additional green belt releases:	Friends of the Earth (Amanda Yoeworth)	Strongly oppose all. The population of St Albans and District is already imposing unsustainable burdens on the environment. The provision of water is of particular concern as water extraction is already at unsustainable levels and the water available is likely to decrease in line with climate change predictions. Therefore, adding large numbers of additional houses as proposed in this strategy is wholly unsustainable and should not take place. In addition, the Council is committed to decrease the carbon dioxide emissions of the District. There are no proposals to make the additional houses carbon negative and so they will lead to a substantial increase in emissions. Regarding the positioning of the houses, the proposed sites are a considerable distance away from services and transport links so the inhabitants would be car dependent.
• AOS3 west of London Colney	Hertfordshire Police Authority (Lucy Biddle, RPS)	Development of this scale should be supported by a Neighbourhood Police base circa 150 sq metres. Policy should include requirement for developer to incorporate an on-site facility within the master plan and deliver this at its own cost.

		(see also Chapter 10, other comments below)
	Environment Agency (Keira Murphy)	<p>No objection to the majority of the sites put forward with the exception of sites H7 and AoS3.</p> <p>Both are in flood zones 2 and 3. The Sequential Test should be carried out to ascertain if there are available sites in flood zone 1 first, before looking at sites at higher risk of flooding.</p> <p>London Colney Stream runs through AoS3. A minimum eight metre naturalised buffer zone for the river would be expected.</p> <p>There is also an opportunity for de-culverting the London Colney Stream</p>
	Hertsmere Borough Council (Maria Demetri)	<p>Reservations over the possible green belt release of this site.</p> <p>Site lies close to Hertsmere, the effect of developing this site will be felt in Hertsmere.</p> <p>Development of this site would close the gap between London Colney and both Shenley and Radlett which would be against PPG2 objectives. This would be made worse by redevelopment of H5 or the former Radlett Aerodrome site.</p> <p>Development of AoS3 would be visually prominent from Shenley Ridge and have traffic impacts along Bell Lane and Harper Lane.</p>
	Hertfordshire County Council - Transport	<p>Improvement works to Shenley Lane will be required.</p> <p>An upgrade to the roundabout junction at Bell Lane/Harper Lane will likely be required. However, limited available highway land may restrict improvements.</p> <p>The Shenley Road junction with the A414 will also need to be tested in terms of capacity and the safety/accident history.</p> <p>The area is currently served by one bus route, which operates hourly Monday to Saturday. There is no evening or Sunday service.</p> <p>Bus service provision would need to be improved should this still be the case when the site comes forward. Bus services available from London Colney High St are over 400m from the site.</p> <p>Enhanced facilities as suggested within Appendix 8 would be beneficial to reduce the need to travel.</p> <p>Without further information regarding the proposed access arrangement, mitigation measures and sustainable transport strategy it is difficult for the highway authority to provide any further detailed comments.</p>

	Anne Main MP	Object for following reasons; <ul style="list-style-type: none"> • Loss of Green Belt • Lead to further degradation of village environment • Severe impact on conservation area • Problematic if no additional school are being considered
	CPRE – The Hertfordshire Society	Strongly oppose. Development would result in a significant loss in an area of Green Belt between St Albans and Radlett that is under heavy pressure from other development proposals.
	The Ramblers Association – Hertfordshire & North Middlesex Area	Strongly oppose – Green Belt Land and part of the Watling Chase Forest. This land provides a valuable ‘green lung’ for London Colney which is well used by joggers and dog walkers.
	English Heritage	Note the potential impact of the site on the conservation area and historic park and garden, and may wish to comment further.
	London Colney Village Concern	AOS3 would be an environmental disaster, and probably ruin our village – in conjunction with several other proposals affecting this area, which must be considered together as a long term threat.
<ul style="list-style-type: none"> • AOS8 North of Harpenden (south Part) 	Hertfordshire County Council Transport Department (Paul Donovan)	<p>The A1081 Luton Road is a congested road (see ECS Appendix 8 and County Council’s ‘Tackling Congestion in Hertfordshire’ document)</p> <p>Without measures to ease existing congestion, additional traffic is likely to make the situation worse.</p> <p>If this proposal goes ahead measures to deter residential streets being used as an alternative route to Luton road will need to be considered.</p> <p>Luton Road forms part of the county’s primary distributor network. The average week day traffic flow is approximately 18,000 vehicles. The County Council will oppose new junctions on the primary road network, a deviation from this policy position will only be possible where very special circumstances exist.</p> <p>Without any obvious points of access from Bloomfield Road (as it is residential without an access point to the site) and the predominately rural nature of both Cooters End Lane and Ambrose Lane there may be a case for introducing another arm to the existing junction with Roundwood Lane and thereby turning the existing three arm signal controlled junction into a four arm cross road junction (also controlled with traffic signals).</p> <p>An access is likely to change the character of the roads if sections are upgraded in terms of road width and the provision of footways.</p> <p>As a general design principle, development of approximately 300 dwellings requires at least one more access for emergency use.</p>

		<p>A sustainable transport strategy is required. There are several bus routes along Luton Rd, with regular weekday and evening services, although less frequent at weekends.</p> <p>Good pedestrian/cycle links will need to be provided through the site to Luton Road to access bus services.</p> <p>Developer contributions from this site could be used towards improving evening and weekend service provision and other sustainable transport links to the town centre.</p> <p>This area of search will have a significant impact on the road network in the area. Network capacity, access and sustainability must be fully investigated at the earliest opportunity. The highway authority is not aware of any work that supports this proposal.</p>
	Harpenden Rural Parish Council	<p>Strongly oppose.</p> <p>Would represent a step towards coalescence with Luton which given the short distance between Harpenden and Luton, should be strongly resisted.</p> <p>Firmly against any erosion of the greenbelt in their neighbourhood.</p> <p>Have serious concerns about the impact of such expansion on local infrastructure (traffic, town centre congestion, schooling, water resources etc) and are unaware of any proper consultation/study addressing these issues.</p>
	<p>Harpenden Town Council</p> <p>(Also See Harpenden Leaflet summary)</p>	<p>The Council strongly opposes the potential withdrawal from the Green Belt of AoS8 (SE). Future development of this site would be highly inappropriate especially on highways and transport grounds.</p> <p>Traffic congestion in Harpenden Town Centre is already acute and there is very poor vehicular access to the railway station, with no prospect of improvement.</p> <p>Development of the site would increase the danger of coalescence between Harpenden and Luton.</p> <p>The Council consider site AoS8 (SE) is important agricultural farmland. This land base should be retained for this purpose.</p>
	The Harpenden Green Belt Association and The Harpenden Society	<p>Strong opposition to the identification of Area of Search No. 8 as a possible site for release from the green belt.</p> <p>Strongly disagree that the site is a sustainable location for housing and consider the initial SA of the site to be flawed in relation to its assessment of accessibility to key services.</p> <p>High out-commuting will lead to traffic congestion. Almost all of the residents of north-west Harpenden drive into the town centre for shopping and leisure purposes. Walking 1km from the town centre would be strenuous due to the topography of the land.</p>

		<p>Development would lead to traffic, road congestion and parking issues. Should not be making decisions on sites without traffic modelling study.</p> <p>Schools including Roundwood Primary and Secondary Schools are over-subscribed.</p> <p>Development including possible growth to the south of Luton would also have an adverse effect on the open character of the countryside and would pose a threat to the important strategic gap which currently separates Harpenden and Luton.</p> <p>Impact on landscape, biodiversity and heritage noted.</p> <p>A flaw in the evidence base analysis is that the SA omits reference to the Chiltern Way running along Cooters End Lane in its discussion of adjacent rights of way.</p> <p>The Council has provided no information to demonstrate that existing utilities (such as water and sewage) would have the capacity to cope with a further 300+ homes to the north of Harpenden. Drains from the Victorian era run beneath Luton Road.</p> <p>Deficiencies in local infrastructure – no real planning benefits to be gained from development.</p> <p>The Council has not sufficiently assessed the reasonable alternatives.</p>
	The Harpenden Society	Urge SADC to withdraw completely the proposal to release AoS8 from the Green Belt. This would be consistent with the assurance given by Cllr Chris Brazier to the public meeting on 17.9.09 when he undertook to withdraw the proposal if there was on balance substantial hostility to it in Harpenden.
	CPRE – The Hertfordshire Society	Strongly oppose. Development would be a sizable incursion into the Green Belt and into open countryside. This is an attractive hillside site and forms part of the Landscape Conservation Area that was designated in the 1994 District Local Plan.
	The Ramblers Association – Hertfordshire & North Middlesex Area	Oppose.
• H7 East of Redbourn	Dacorum Borough Council (Francis Whittaker)	Do not see any adverse impacts on Dacorum Borough Council from the release of this site from the GB as it is only for 100 houses and will be safeguarded for post 2026 needs.
	Environment Agency (Keira Murphy)	<p>No objection to the majority of the sites put forward with the exception of sites H7 and AoS3.</p> <p>Both are in flood zones 2 and 3. The Sequential Test should be carried out to ascertain if there are available</p>

		<p>sites in flood zone 1 first, before looking at sites at higher risk of flooding.</p> <p>River Ver runs through Site H7. A minimum eight metre naturalised buffer zone for the river would be expected.</p>
	Redbourn Parish Council (Diane Whiskin)	<p>Statement on Page 46 on possible Green Belt releases for post 2026 needs is enough to encourage developers to submit applications and win on appeal.</p> <p>Object to H7 for following reasons.</p> <ul style="list-style-type: none"> • Flooding on the sites has been severe; • new homes will be exposed to flood risk; • an important drainage area from around the existing village will be lost; • River Ver is a rare chalk stream, building around it would be environmentally unsound; • A riverside walk is more appropriate to an urban park than a countryside area teeming with wildlife, this would not be worth the sacrifice of the flood plain and the Green Belt land; • impact on schools and medical services if 100 additional homes would not be enough to justify any additional facilities; • additional traffic from this site would exacerbate traffic congestion, particularly when there is an accident on the M1; • putting houses adjacent to the bypass makes nonsense of the reasons for building the by-pass in the first place; • access to the site from the High Street would cause traffic problems for the village; • access from the by-pass would be dangerous due to fast moving traffic; • there would be pollution implications from building so near to the River Ver. • Traffic and pollution problems at present, mean that it would be difficult to agree to more industrial or employment use. <p>Environmental enhancement along the River Ver on this site is supported. Residents have stated that they wish the site to be a wildlife and conservation area, with any environmental enhancement in keeping with the natural beauty of this site.</p>
	Cllr Swindell	<p>Strongly object for following reasons.</p> <ul style="list-style-type: none"> • Loss of Green Belt • Site is nature reserve • Will increase existing traffic issues • Poor access to site and rural areas by public transport • Lack of school facilities • Possible air quality issues • Will overburden infrastructure in the area.
	CPRE – The Hertfordshire Society	<p>Oppose. 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 part of the site is at high risk of flooding is a compelling reason for not</p>

		allocating it as a strategic housing site. With climate change, the risk of flooding is likely to increase rather than decrease.
	Ver Valley Society	Strong objections to the inclusion of H7. Very close to an existing and properly designated Herts & Middlesex wetland conservation site in which "Red Book" species such as crested newts have been identified. The site lies entirely within the green belt, and has the River Ver flowing all the way through it. It is also identified on the Environment Agency map as on the Ver floodplain. The land is a highly desirable wildlife & wetland site. Water supply issues which may result in precious chalk streams drying up.
• H8 Nicholas Breakspear School , London Colney		
Housing Sites no longer proposed:	Cllr Swindell	Tend to agree with all sites no longer proposed. East of Redbourn (H7) should be included in the list.
	St Albans Friends of the Earth (Amanda Yoeworth)	Strongly agree. These sites are positioned a long way from services and would be unlikely to provide opportunities for sustainable development.
	The Ramblers Association – Hertfordshire & North Middlesex Area	Strongly agree that they should be rejected.
• AOS4 south of London Colney	Hertfordshire County Council Transport Department (Paul Donovan)	Support proposed rejection of the site. Site is remote from existing bus services. There are bus stops within the local retail park but these would be over 400m away. Significant developer contributions would be required to improve bus services in order to enhance accessibility.
	CPRE – The Hertfordshire Society	Strongly agree. Development would effectively extend London Colney right up to the M25. The northern part of the site is at high risk of flooding.
	Bricket Wood Residents' Association	Tend to agree
• AOS6 Smallford	Hertfordshire County Council Transport Department (Paul	Support proposed rejection of the site. Smallford has relatively limited services and residents would probably need to travel to either Hatfield or St

	Donovan)	Albans for daily needs. The lack of local facilities increases the need to travel therefore the site is not very sustainable. Extra vehicle trips generated by the development may also have a significant negative impact on Hatfield Rd which is already congested.
•	CPRE – The Hertfordshire Society	Strongly agree. Development would significantly change the character of the Green Belt settlement of Smallford.
	Bricket Wood Residents' Association	Tend to agree
	Welwyn Hatfield Borough Council	Welwyn Hatfield Borough Council supports the rejection of housing site AOS6
• AOS2 South east of St Albans (south west part)	Hertfordshire County Council Transport Department (Paul Donovan)	Support proposed rejection of the site. Bus stops would be outside the 400m distance criteria for most of the site. Significant developer contributions would need to be sought to improve pedestrian/cycle/bus accessibility. The south western part of this site is remote from local services, and the major roads that surround the site may create barriers to movement.
	Herts Biological Reference Centre	Support the rejection of Area of Search 2
	The Harpenden Green Belt Association	It is noted that the Council favours a high quality business park on the north western part of the land. However, by the Council's own admission, the south western part of the site is largely surrounded by development, is a fairly sustainable location, is well related to the existing built up area, comprises elements of previously developed land and lies to the north of the A414, which already provides clear separation between St Albans and London Colney. Suggest that the site should not be ruled out until a decision has been made regarding the application for village green status at Napsbury Fields.
	CPRE – The Hertfordshire Society	Strongly agree. Development would effectively join London Colney to St Albans.
	Bricket Wood Residents' Association	Tend to agree
	South Birklands Residents' Association	Strongly support the decision to reject AoS2 as a strategic housing site. Napsbury Fields have been used for more than 30 years for recreational purposes by local residents. An application from the joint associations for Village Green status is scheduled for consideration by Herts County Council on 25 th September 2009.

		Applaud the City & District Council's consistent policy towards this area, and its rejection of a multiplicity of planning applications over the last 30 years to develop the site, on the basis that it is Green Belt land, and must remain so to prevent, amongst others, the coalescence of St Albans and London Colney.
• AOS8 North of Harpenden (north west part)	Hertfordshire County Council Transport Department (Paul Donovan)	Support proposed rejection of the site. This part of the site is less well located for development than its south-western part due to the increased distance from the town centre and other local services.
	Harpenden Town Council	Support the rejection of AoS8(NW) for the reasons given in Appendix 8 to the ECS.
	CPRE – The Hertfordshire Society	Strongly agree. Development of this site would represent a major extension of Harpenden into the Green Belt and very attractive open countryside.
	Bricket Wood Residents' Association	Tend to agree
	St Albans Enterprise Agency (Mel Hilborwn)	Disagree with rejecting this site. Unless the decision is based on other use e.g. employment/park & ride I am not sure why this area would be rejected iv) I am not clear why this area is less suitable than others for consideration as it is not extending the encroachment towards Luton and seems generally suitable
Housing Density	EERA (Helen De La Rue)	Policy for design standards and housing density should maximise opportunities for physical, economic and community regeneration in consideration of the built and natural environment.
	Colney Heath Parish Council (John Dean)	Density in any new build should show sympathy to rural areas.
	Hertfordshire County Council Transport Department (Paul Donovan)	Existing built up areas are likely to already have some passenger transport provision. Maximising densities in these areas increases the potential to use such services. Greenfield sites are likely to be less well served in relation to bus routes, pedestrian or cycle links. Measures to improve accessibility by sustainable transport modes may need to be greater than in existing built up areas. High densities can reduce the need to travel. Specific site characteristics need to be examined as some built up areas may be much better served than others. The need to travel can be influenced by effective land use planning and quality pedestrian/cycle and passenger transport links.
	Anne Main MP	Central Zone approach is for high density, low parking and reduced amenity standards. Housing in this zone should not have low parking standards as the problem gets pushed onto roads elsewhere.

		<p>Concerned that the Council does not achieve a uniform approach to housing density and does not allow amenity standards to be reduced.</p> <p>(also see response below, Housing mix and tenure)</p>
	St Albans Civic Society	Always difficult to increase density and more so in an historic city with conservation and heritage consideration paramount.
	Cllr Swendell	Support high density in built up areas and less development on greenfield sites.
	Bricket Wood Residents' Association	<p>High density in built up areas and less development on green field sites.</p> <p>Will protect the Green Belt land and high density creates more sustainable community in centres.</p>
	Harpenden Rural Parish Council	<p>High density in built up areas and less development on green field sites</p> <p>Our precious irreplaceable greenbelt needs to be preserved and innovative development promoted in existing urban areas.</p>
	St Albans Friends of the Earth	High density development gives far greater opportunities for housing which has lower energy requirements, makes more efficient use of energy and has the possibility of energy efficient schemes such as CHP.
	Wheathampstead Parish Council	Some suburban and village densities should not be above 30dph.
	Harpenden Town Council	The Council's preferred option is for high density in built up areas with no development on green field sites.
	CPRE – The Hertfordshire Society	Prefer 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.
	Friends of the Earth (Amanda Yoeworth)	<p>Support high density in built up areas and less development on green field sites.</p> <p>High density development gives far greater opportunities for housing which has lower energy requirements, makes more efficient use of energy and has the possibility of energy efficient schemes such as CHP. Such developments can be pleasant places to live designed skillfully- an example might be St.Albans central conservation area which is a highly desirable location in spite of high housing density. The use of green field sites for housing would reduce our ability to produce food locally and detriment the water table. Green field sites are at the periphery of urban areas and well away from transport links and services, therefore forcing the inhabitants to be car dependent.</p>

	St Albans Enterprise Agency (Mel Hilbrow)	Support High density in built up areas and less development on green field sites There is some scope for higher density in built-up areas and is also probably the only way to provide affordability. It is also OK to use some green field sites - especially where the area is not particularly attractive - but not to allow St Albans to merge into surrounding towns or villages.
	London Colney Village Concern	Prefer high density in built up areas and less development on green field sites.
Housing Mix and Tenure	Anne Main MP	There has been oversupply of flatted developments and lack of family housing. A mixture of housing types should be ensured in the Central Zone.
Affordable Housing	EERA (Helen De La Rue)	Support 40% target in light of local need.
	Colney Heath Parish Council (John Dean)	More affordable and key worker housing provision in the district is essential.
	Hertfordshire County Council Environment Department (Paul Donovan)	The relationship between 100 dwellings per annum and minimum 35% target for affordable housing is not clear.
	St Albans Civic Society	Support 35% based on regional policy.
	Cllr Swendell	Support 35% based on regional policy.
	Bricket Wood Residents' Association	The Council should accept 35% based on the regional policy One in three affordable houses appears a reasonable proportion
	Sopwell Residents Association	The Council should seek a higher percentage than 35% across the District. St Albans house prices are outside what most residents can afford resulting in children having to move further away from their parents.
	Wheathampstead Parish Council	Need greater definition of 'affordable housing' – in the context of the Core Strategy social housing is described as 'affordable', but we also need to specify the need for private market housing that is affordable. There is a need for a detailed and up to date Housing Need Assessment and not just a broad SHMA that covers three districts and concentrates on social housing.
	CPRE – The Hertfordshire Society	Strongly support the option of seeking a higher percentage than 35% across the District. Support a target of 40% affordable housing. The site size threshold should be reduced from 15 dwellings to 10.

	St Albans Enterprise Agency (Mel Hilbrow)	Support a higher percentage than 35% but only in areas of high demand In order to correct the current significant shortage of affordable housing where practicable we should seek higher levels of affordable housing - but this will not always be economically viable - probably only where it is viable to include flats or very small starter homes.
	London Colney Village Concern	The Council should seek a lower percentage than 35% across the District. The term 'affordable housing' is misleading (and political) as there can never be such a scenario. What matters is that residential areas are properly managed and respectable.
	Welwyn Hatfield Borough Council	Support that St Albans council must await for the completion of the Strategic Housing Market Assessment and Development Economics Study before reaching conclusions on affordable housing.
Gypsies Travellers and Travelling Show people	EERA (Helen De La Rue)	Support inclusion of Gypsy and Travellers accommodation within mainstream housing provision Pitch provision should be addressed with same consideration as mainstream housing i.e. the need for different types and tenure.
	Dacorum Borough Council (Francis Whittaker)	Support use of indicative criteria. Concentration of pitches in and around the northern eastern areas of Hemel Hempstead should be taken into account when drawing up the policy. This is a view of the traveller and settled community.
	Colney Heath Parish Council (John Dean)	Colney Heath, London Colney and St Albans District cannot sustain any further provision to meet Regional Assembly demands. Parish council supports District Council's policy to reject the demand to double the number of sites. More sites in St Albans is unfair to the people, provision must be found elsewhere. Transit sites must also be included so that seasonal incursions of the travelling community can go to a proper site and not become a problem for the local authorities. Waste of resource and revenue having to retrospectively deal with the county wide problem that needs addressing.
	Anne Main MP	Agree that there are too many pitches in the District already. Concerned that the Council says it will meet its obligation to deliver more pitches but does not say how this will be achieved.

	St Albans Civic Society	Object to sites within Green Belt.
	Cllr Swindell	Strongly agree with all criteria. There are enough sites in and around Redbourn on Green Belt land. Redbourn is saturated.
	Bricket Wood Residents' Association	St Albans already has a very high level of sites in the district; the provision is already disproportionate in comparison with other districts. Extending existing sites or new sites are most likely to be located in the Green Belt and there is intense pressure for all types of development in the Green Belt, especially in the southern half of the District.
	Friends of Rural Harpenden	The sustainable location of new sites is most important, and these must be closely related to existing facilities and services, and have safe access with good access to public transport. Design and landscaping cannot be used to overcome the siting of facilities in isolated greenfield sites remote from other development. Such sites will always cause harm to the character of the area, and this will run against the Strategic Objectives and their underlying Vision – and be unacceptable.
	Harpenden Rural Parish Council	Do not accept the proposed increase in sites for the District given the high level of sites already provided.
	Wheathampstead Parish Council	The district already has a substantial number of gypsy pitches the allocation of pitches to 2011 and beyond is unreasonable and disproportionate. The basis upon which the numbers for the district have been set is unclear.
	St Albans Enterprise Agency (Mel Hilbrow)	Convenient locations are desirable but tend to cause community problems - difficult to resolve unless some better way is found to integrate these communities (who generally do what they do because they do not want to integrate). Decent landscaped sites create a sense of pride and care and are less likely to be be messed up. How do we get travellers themselves to accept responsibility for their sites? - they are the only ones who can keep them decent.
	London Colney Village Concern	There are already many sites here, and numerous problems caused as a result.
	Welwyn Hatfield Borough Council	Policy H3 of the Revision to the East of England Plan identifies a need for two transit site in Hertfordshire and that local authorities should work together to establish a network of transit sites. The core strategy should commit to joint working in the county with aim of developing an agreed approach to establishing a network of transit sites.
Other Chapter 10 Comments	EERA (Helen De La Rue)	Where consistent with RSS policies, brownfield sites should be developed to the maximum potential but should not compromise the character of the area to achieve the regional target.

	Hertfordshire Police Authority (Lucy Biddle, RPS)	<p>Do not object to main housing sites proposed for delivery up to 2021 or to long term housing need post 2026, subject to provision of adequate police infrastructure to serve development.</p> <p>Housing growth up to 2021 will place additional pressure on police resources, additional infrastructure would be required (staff, new accommodation and vehicles).</p> <p>There would be scope to expand the St Albans Police Station to accommodate some new staff required to serve growth.</p> <p>(Also see comments to Chapter 15, community cohesion, inclusion and safety)</p>
	Three Rivers District Council (Jo Bowyer)	Three Rivers District Council will be consulting on the Three Rivers part of the Waterdell site which borders St Albans District. This is not specifically identified in the St Albans Core Strategy. Three Rivers will be seeking St Albans comments as part of the consultation.
	St Albans Civic Society	Strongly oppose all AOSs as they conflict with SO1.
	Sopwell Residents Association	Prefer brown field site development but are strongly against development in back gardens which tends to change the look and feel of the city.
	Harpenden Town Council	Much of the debate on alternative sites was held in exempt business and members of the public were excluded.
	Environment Agency (Keira Murphy)	Evidence Base Table: Strategic Flood Risk Assessment needs to be mentioned here under Chapter 10: Housing Policies.
East of England Plan High Court Challenge	Dacorum Borough Council (Francis Whittaker)	<p>A full picture of the RSS challenge has not been provided.</p> <p>Possibility that growth could be reinstated through either the “repair” process of review of the East of England Plan should be explained.</p> <p>The core strategy should therefore acknowledge that it might have to be flexible to respond to any future changes.</p>
	Hertsmere Borough Council (Maria Demetri)	<p>Core Strategy does not refer to or consider the judgement of the High Court Challenge, which is being reconsidered. The ruling could have major impact on implementing the St Albans core strategy in line with the updated East of England Plan.</p> <p>It is unclear how the core strategy can proceed given the uncertainty of the East of England Plan.</p>

Chapter 11 – Employment Policies (Q9/C1 – E1/AOS2, E2, E3, E4, E5/AOS7)

Issue:	Respondent:	Summary of response:
Employment Land Studies	East of England Development Agency (Andrew Fisher)	EEDA recognises the London Arc Jobs Growth and Employment Land Study, however the 2,621 new jobs to 2026 seems low when compared to the RSS target of 10,440 jobs growth between 2006 and 2021.
	Welwyn Hatfield Borough Council	Agree that strategic decisions need to be made about job numbers and location of future employment sites across Central Hertfordshire. The London Arc West authorities need to agree number of jobs each district will make provision for.
Job growth in existing built up areas	St Albans Friends of the Earth	The provision of suitable local employment is important to the long term sustainability of the District. However, oppose the development of sites which are a long way from public transport links or population areas and which would therefore attract car bound commuters.
Green Belt Employment sites	EERA (Helen De La Rue)	Priority should be given to the efficient and sustainable movement of freight, especially by rail. (rail freight depot application was not considered to accord with regional policy)
	Colney Heath Parish Council (John Dean)	Parish council does not support rail freight depot on GB land with vastly increased traffic. Such development cannot be viable on GB land and will crowd the already overused motorway networks in the county.
	East of England Development Agency (Andrew Fisher)	EEDA supports the provision of a wide choice of employment sites. EEDA also supports retaining existing employment sites unless evidence suggests otherwise. The quality of employment land is also important to attracting and retaining businesses. The St Albans Employment land review demonstrates that there is a shortfall of potential employment sites in built up areas; therefore exceptional circumstances may exist to consider green belt land for B1 and business park use. Three employment sites are identified within the Green Belt. EEDA broadly welcome the positive approach in responding to the needs for employment land that is both high value and well aligned with the skills of the local workforce.
	Anne Main MP	Resist Green Belt for employment. Re-use derelict business sites and maximise existing units.
	St Albans Civic Society	Strongly oppose all Employment sites as they conflict with SO1.

	Welwyn Hatfield Borough Council	<p>Green Belt Land should only be released in exceptional circumstances. The Core Strategy needs to demonstrate that the use of existing employment land has been maximised. On this basis, when there is a serious shortage of land in built up areas it is not appropriate to allow further loss of employment sites to residential uses unless there are overwhelming site specific reasons or suitable, accessible alternatives. This is particularly applicable to those sites assessed as average or good quality by the Central Hertfordshire Employment Land Review (2007).</p> <p>It is noted that Appendix 8 states that the reallocation of employment areas to housing has not been included in the emerging Strategic Housing Land Availability Assessment (SHLAA). This is supported and Welwyn Hatfield Borough Council hope this approach is maintained in the final SHLAA.</p>
Proposed Strategic Employment Sites:	St Albans Civic Society	Strongly oppose all Employment sites as they conflict with SO1.
	The Ramblers Association – Hertfordshire & North Middlesex Area	Strongly oppose sites due to impact on rights of way etc.
	Friends of the Earth (Amanda Yoeworth)	<p>Oppose E1, E4 and E5.</p> <p>We understand that one of the reasons for the high carbon footprint of St Albans inhabitants is their need to travel to London or elsewhere to work, so the provision of suitable local employment is important to the long term sustainability of the District. However, we oppose the development of sites which are a long way from public transport links or population areas and which would therefore attract car bound commuters. The Supplement to Planning Policy Statement 1 advocates "Shaping places that reduce the need to travel by promoting mixed-use development (paragraph 9)" and we suggest that this may be a more sustainable alternative to the proposal for new business parks.</p>
<ul style="list-style-type: none"> E1 (AOS2 north east part) London Rd adjacent to cemetery 	Hertfordshire County Council Transport Department (Paul Donovan)	<p>There are no access arrangements to the site in the consultation document. It is assumed that the access for the southern site will be taken directly from the London Road and the northern section of the site will be served from Highfield Park Drive.</p> <p>A1081 London Road forms part of the county's primary distributor network. The County Council will oppose new junctions on the primary road network unless very special circumstances exist.</p> <p>The London Colney roundabout junction can become congested at peak times. There are concerns that an additional junction serving the southern site will delay traffic exiting the London Colney roundabout and interfere with the safe operation of the junction. There are concerns that additional traffic generated by this proposal will impact directly on junctions operation in terms of capacity and safety.</p> <p>Several bus routes are available from London Rd and frequencies are good. Pedestrian/cycle access onto London Rd is important to provide access to bus stops. The site appears somewhat remote from local services, facilities and residential areas, however, it is understood that there is opportunity to provide links to</p>

		<p>existing rights of way routes and upgrade where required.</p> <p>An extensive sustainable transport strategy is required. Feasibility of linking the site to the existing road network and the town centre and expand on other facilities needs to be established.</p> <p>The site is somewhat remote from shops/services; therefore improved bus service to the site is required to encourage sustainability.</p> <p>There will be a significant impact on the road network in the area. Network capacity, access and sustainability must be fully investigated at the earliest opportunity. The highway authority is not aware of any work that supports proposal.</p>
	Anne Main MP	<p>Strong concerns for following reasons.</p> <ul style="list-style-type: none"> • Loss of green belt • Park and ride will lead to additional traffic problems at the London Colney Roundabout
	Bricket Wood Residents' Association	Strongly support.
	St Albans Enterprise Agency (Mel Hilbrow)	Tend to support
	London Colney Village Concern	Strongly oppose. Danger of coalescence between towns and villages. Abuse of conditions of use, disturbance of local residents.
	South Birklands Residents' Association	<p>This is yet again sacrificing the Green Belt. Erecting buildings here will dominate sacred ground due to the proximity to the cemetery. Plus the additional traffic will have an impact on the emotional state of mourners as they bury their loved ones. The document does not prove the need for a business park. City centre offices with good links to the rail station and/or historic St Albans makes much more sense.</p> <p>There is ample land near Hatfield University still to be developed.</p>
• E2 Rothampstead Research, Harpenden	Hertfordshire County Council Transport (Paul Donovan)	<p>There are no bus stops on the A1081 in the vicinity of the site. As the crow flies, the closest stops are in Southdown Rd. The busy A1081 is a barrier to access these stops.</p> <p>Other bus stops on Redbourn Rd and within the town centre are not within the recommended 400m distance criteria. The site is however within walking distance of the town centre.</p>
	Friends of the Earth (Amanda Yoeworth)	Tend to support
	St Albans Enterprise Agency (Mel Hilbrow)	Tend to support
• E3 BRE, Garston	Hertfordshire County	This site is not well served by bus services. There are no bus stops within 400m.

	Council Transport (Paul Donovan)	<p>The site is close to major roads which may create barriers to movement into Watford and the surrounding area.</p> <p>The site is remote from local services/facilities and therefore scores particularly poorly in terms of sustainability.</p> <p>A sustainable transport strategy will be required. Significant developer contributions will be required to improve and support accessibility.</p>
	Friends of the Earth (Amanda Yoeworth)	Tend to support
	St Albans Enterprise Agency (Mel Hilbrow)	Tend to support
Possible Additional Strategic Employment Sites		
<ul style="list-style-type: none"> E4 Roehyde 	Highways Agency (Darren Rhoden)	<p>HA Considers this as a remote location away from St Albans, segregated by the A1(M) and A414 from nearby residential areas of Hatfield and therefore more likely to attract employee commuter trips by car. For this reason HA are concerned about the sustainability of the site.</p> <p>(Also see Further Comments, Evidence Base)</p>
	Hertfordshire County Council Transport Department (Paul Donovan)	<p>This site is well situated to major roads but its location would not encourage use of sustainable modes of travel.</p> <p>The co-location of hotel with a business park may be effective if there is a need for accommodation for business travellers.</p> <p>Access to the site or travel from a further away by sustainable modes of transport would be problematic as the nearest bus stops are the other side of major roads and a roundabout. The major road is not pedestrian and cycle friendly.</p> <p>Developer contributions would need to be sought towards improving accessibility of the site by sustainable modes.</p> <p>The site requires an access on to the A414. The principle of the access has not been agreed (not as stated in appendix 9).</p> <p>Previous planning applications on this site have been refused. The reasons included the long term policy that restricts the introduction of new accesses on to the county's principle road network.</p>

		<p>In recent years the use of the site has become more established. As a result of this the existing access, although predominately temporary, has also become more established. However, the amount of vehicles using the access remains relatively small.</p> <p>Another reason for refusal was the design and safety of an access in this location. The vehicle speeds on the A414 in this location are increased as drivers accelerate away from the roundabout, lane changing is also taking place as three lanes exiting the roundabout reduces to two on the A414.</p> <p>Due to the close proximity of Junction 3 of the A1(M) any proposals for this site should also include consultation with the highways agency.</p>
	Welwyn Hatfield Borough Council	<p>Oppose the allocation of Roehyde as a possible additional employment site for a number of site specific reasons:</p> <ul style="list-style-type: none"> • It will result in the loss of the Green Belt between Hatfield and Colney Heath, which has important strategic function separating the two settlements and retaining the identity of Hatfield. Development of a large business park would significantly reduce the gap and increase the potential for settlement coalescence. • The site is segregated from the district's main centre, St Albans. It is therefore a considerable distance away from St Albans railway station and existing social and community infrastructure. This means it is not well placed to meet the City's need for further business floorspace and is therefore unsustainable. • Equally the site is segregated from Hatfield by the A1 (M) and is some distance away from the town centre and its facilities and services. • The site's location does not enable easy access by public transport, walking or cycling, so the site is likely to be very car dependent. • There is already serious traffic congestion on local roads such as the A414. • There are also potential concerns with access to the site. St Albans District Council would need to be certain that an improved access to the A414 (and onto the A1(M)) is in fact viable and would be supported by the Highways Agency. • Previous uses on the site mean that there is potential for contamination, which could delay development.
	Anne Main MP	<p>Object for following reasons.</p> <ul style="list-style-type: none"> • Loss of Green Belt • Result in coalescence with Hatfield • Would not support local economy or businesses in St Albans

		<ul style="list-style-type: none"> • Would compromise environment by increasing traffic • Would result in loss of biodiversity
	Bricket Wood Residents' Association	Strongly support.
	St Albans Enterprise Agency (Mel Hilbrow)	Strongly support
<ul style="list-style-type: none"> • E5 (AOS7) extension to Porters Wood 	Hertfordshire County Council (Paul Donovan)	<p>The nearest bus stops are not within the recommended 400m distance criteria and are served by local routes only. Access through to Harpenden Rd, from where the Rickmansworth/Watford-Luton bus route is available, is poor due to the narrowness of Valley Rd.</p> <p>The site is remote from local facilities – the shops in Marshalswick are not within easy walking distance. The site does not score highly in terms of accessibility by bus/pedestrians/cyclists.</p>
	Herts Biological Records Centre	If this proposal is taken forward, there is a need to ensure the Wildlife Site of Longspring is protected and enhanced as appropriate.
	Wheathampstead Parish Council	This site is in the Green Belt and Brownfield employment sites should be considered first.
	St Albans Enterprise Agency (Mel Hilbrow)	Tend to support
	London Colney Village Concern	Strongly support.
Other Sites Maylands Business Area	Dacorum Borough Council (Francis Whittaker)	<p>Limited references to the potential impacts of changes on the eastern side of Hemel Hempstead. Despite the high court decision on housing growth, the town remains a KCDC and the Maylands business area is an economic focus for that. It is of sub-regional importance and its potential extension should be referred to in the CS.</p> <p>Note St Albans concerns over boundary to East Hemel Hempstead Area. Potential growth and change in the Maylands business area through Maylands Gateway has potential for wider impacts into St Albans. These should be acknowledged to give a stronger spatial dimension and robustness to the St Albans Core Strategy.</p>
Other Comments	Highways Agency (Darren Rhoden)	Supportive of providing additional office space and business park land to reflect nature of native workforce on the grounds that it should reduce the need for local commuters to travel long distances by providing local job opportunities.
	East of England	Any skills strategy for St Albans should reflect the nature of employment growth being sought. This reflect

	Development Agency (Andrew Fisher)	RES Goal 5.
East of England Plan High Court Challenge	East of England Development Agency (Andrew Fisher)	Given the uncertainty around housing numbers in St Albans following the high court ruling, the strategy will need to be clear on how the consequent reduction in labour supply will impact on the key economic objectives and job growth targets.

Chapter 12 – Shopping Policies (Q10/D1 – Harpenden and St Albans Centres) (Q11/D2 – SH1, SH2) (Q12/D3 – SH3, SH4)

Issue:	Respondent:	Summary of response:
Retail Hierarchy	Sopwell Residents Association	Having all shopping concentrated in the city centre means local retailers will be disadvantaged. SADC should have a policy of encouraging diversity of retail outlets in local parades i.e. not fast food outlets but shops providing everyday things.
	St Albans Friends of the Earth (Amanda Yoeworth)	Support strengthening of the town centre economy close to public transport links and at the heart of the population. A sustainable economy will necessitate lower levels of consumption and so the provision of additional retail space should not be necessary. However, would prefer additional retail space to be in city centre locations rather than out of town locations.
Importance of Market and the internet	Colney Heath Parish Council (John Dean)	Farmers Market should be encouraged with transport to serve the community which would save CO2 footprint.
Comparison Goods floorspace:	Hertfordshire County Council Transport Department (Paul Donovan)	Either option (SH1 or SH2) is acceptable provided that the development is well connected to St Peter's Street, does not compromise the existing passenger transport network, reduce the capacity of the road network, fully considers sustainable transport (including car parking) and is safe.
	Anne Main MP	Large supermarket is not needed in the City Centre. It will not complement or support retail offering in the City Centre. A department store is a preferable option for a key City Centre site.
• SH1 west of St Peters St	St Albans Civic Society	Support
•	Cllr Swendell	Support
•	Sopwell Residents Association	Support the location but questions the need for a department store. Encourage small interesting retailers.
	St Albans Enterprise Agency (Mel Hilbrow)	Both locations at Drovers Way and Civic Centre Drovers Way is a mess and needs redevelopment. St Albans needs strengthening as a shopping destination, but also needs to be attractive to visit. Both these needs should be achievable with imagination.

• SH2 East of St Peters Street	Cllr Swendell	Support
	Sopwell Residents Association	Support the location but questions the need for a department store. Encourage small interesting retailers.
	St Albans Enterprise Agency (Mel Hilbrow)	Both locations at Drovers Way and Civic Centre Civic Centre is not a focal point as it could be and is a waste of prime central location for administration. St Albans needs strengthening as a shopping destination, but also needs to be attractive to visit. Both these needs should be achievable with imagination.
• SH3 Griffiths Way	Hertfordshire County Council Transport Department (Paul Donovan)	The site is relatively well served in by buses. The proximity of the Abbey Station also provides the opportunity for visitors to come by rail. Pedestrian and cycle access may be limited due to local topography, although there are residential areas within walking/cycling distance. Development may have an adverse effect on congestion along St Stephens Hill on the approach to the King Harry Lane junction.
	Anne Main MP	Support for following reasons. <ul style="list-style-type: none"> • Site has potential for retail warehousing which would offer valuable employment opportunities. • A lack of certain shops within St Albans could be met here.
	St Albans Civic Society	Tend to support.
	Sopwell Residents Association	Tend to oppose. Will encourage more traffic into the retail park which is already becoming congested.
	St Albans Friends of the Earth	Strongly oppose. Out of town retail developments cause decline in use of town centre shops and loss of vibrancy in town centres which is contrary to policies stated earlier in the strategy.
	Cllr Swendell	Tend to support
	Friends of the Earth (Amanda Yoeworth)	Strongly Oppose Such out of town retail developments encourage car use and so cause increases in pollution and congestion. Out of town retail developments cause decline in use of town centre shops and loss of vibrancy in town centres which is contrary to policies stated earlier in this strategy. Money spent at chain stores, such as those in out of town retail developments, returns much less to the local economy than money spent at locally owned businesses.

	St Albans Enterprise Agency (Mel Hilbrow)	Tend to support From the viewpoint of the quality of land which would be lost then SH3 is preferable. My view: out of town and town centre make sense - fringes of town less so.
Other Comments on convenience goods floorspace	Colney Heath Parish Council (John Dean)	Supermarkets to serve the local community must not destroy local or established businesses.
• SH4 Colney Fields	Colney Heath Parish Council (John Dean)	We are well provided by out of town centres and the London Colney retail shopping facilities serves the district well.
	Hertsmere Borough Council (Maria Demetri)	Could have negative impact upon retail vitality and viability in Hertsmere and St Albans Town Centre. St Albans Town Centre is identified for significant retail growth in the East of England Plan. Retail development would be contrary to PPS6 and East of England Plan. Traffic Impact Assessment and Retail Impact Assessment will be required which must take into account impacts on the surrounding Boroughs.
	Hertfordshire County Council Transport Department (Paul Donovan)	Colney Fields is an important retail facility for London Colney, but also attracts visitors from further afield due to the size of stores. It is served by several bus routes. To encourage the use of sustainable modes of transport, any further development of this site should include measures to promote bus use and improve information provision and signage. Future development would give the opportunity to examine whether improvements could be made to pedestrian and cycle access from a wider area.
	Anne Main MP	Colney Fields should not be expanded onto the Ridgeview site. Ridgeview should be used for substantial amount of housing of mixed tenure rather than releasing Green Belt land for this.
	St Albans Civic Society	Tend to oppose. Would not favour if Green Belt land is required.
	Cllr Swendell	Tend to support
	Bricket Wood Residents' Association	Retailing in St Albans should be enhanced and London Colney, Colney Fields retail park detracts from viability and vitality of St Albans.

	St Albans Friends of the Earth	Strongly oppose. Out of town retail developments cause decline in use of town centre shops and loss of vibrancy in town centres which is contrary to policies stated earlier in the strategy.
	Friends of the Earth (Amanda Yoeworth)	Strongly Oppose Such out of town retail developments encourage car use and so cause increases in pollution and congestion. Out of town retail developments cause decline in use of town centre shops and loss of vibrancy in town centres which is contrary to policies stated earlier in this strategy. Money spent at chain stores, such as those in out of town retail developments, returns much less to the local economy than money spent at locally owned businesses.
	St Albans Enterprise Agency (Mel Hilbrow)	From a traffic viewpoint SH4 is preferable; My view: out of town and town centre make sense - fringes of town less so.
	London Colney Village Concern	Strongly oppose. Colney Fields is already awful and dangerous. Traffic now blocks access. Area has major lorry-parking problems.
	Welwyn Hatfield Borough Council	As St Albans City is identified as a Major Town Centre in the East of England Plan, the level of development proposed for the city is in line with the regional hierarchy and therefore acceptable. However, the Council is concerned about the out-of-town retail development at London Colney. Depending on scale, additional development at London Colney could have an impact on the vitality and viability of Welwyn Hatfield's town centres and could impact on proposals to regenerate Hatfield Town Centre. Locating retail development within St Albans District centres would be a far more sustainable approach. It is suggested that St Albans District Council strengthen the sustainability appraisal analysis as it does not even consider the impact of the development on the vitality of St Albans city centre.
Convenience Goods Floorspace:		
<ul style="list-style-type: none"> • FS1 London Road / Alma Rd 	Anne Main MP	Evershed site should be resisted as it will compromise the diversity of St Albans City Centre. The site would be better used for schooling, mixed housing or smaller retail offerings.
<ul style="list-style-type: none"> • FS2 Harpenden Road Fire Station Site 	Sport England	Object as development may incorporate playing fields.
	Friends of Bernards Heath	The arguments that are put forward in favour of a food-store on the Ariston Works site and neighbouring land run counter to the proposal for housing that has previously been agreed, and to the key priorities noted in the Core Strategy document, ie preserving and enhancing open space, biodiversity, reducing car use, and

		promoting heritage and healthier life-styles.
• FS3 (AOS7) north of St Albans		
• FS4 West of St Peters St		
• FS5 East of St Peter St		
• FS6 Harpenden Town Centre		
• FS7 Southdown		
Out of centre sites:		
Shops and services elsewhere in the district		
Shopping culture and related facilities concentrated in St Albans city centre	St Albans Civic Society	Strongly agree
Improvements in shopping concentrated in Harpenden town centre	St Albans Civic Society	Strongly agree
Other Comments	Hertfordshire County Council Transport Department (Paul Donovan)	Town centres are sustainable locations for such developments as they add to existing facilities, maintain vitality of existing town centres, and are where there are most options in relation to sustainable modes of transport. Development needs to be designed in conjunction with passenger transport, pedestrian/cycle network improvements and an effective parking strategy in order that sustainable modes of travel are encouraged and new development doesn't simply attract new car trips, adding to congestion. If town centres are to be further developed it is important that this is not to the detriment of local centres which may be more commercially marginal and play an important role in reducing the need to travel, particularly for residential areas further from town centres. For instance the supermarket and associated shops in Southdown in Harpenden play an important role for the residents of the Southdown/Batford area and reduces the need for these residents to travel to the town centre.
	English Heritage	The character and quality of St Albans town centre can serve the town well as an alternative to other, less distinctive, shopping destinations. Large scale retailing can be difficult to fit into historic places and re-development within the town centre should respect the grain, street pattern and scale of the town, while also reflecting the current mixed-use feel. It would be detrimental to the vitality of the centre should the Council Offices be re-located from its current

		central position. Both Alban Arena and Aboyne Lodge School are locally listed buildings and this should be taken into account in considering the city vision proposals.
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Chapter 13 – Transport Policies (Q13/E1 – city centre traffic, bus, cycling and walking, park and ride, western orbital)

Issue:	Respondent:	Summary of response:
Transport plans	EERA (Helen De La Rue)	<p>Priority should be given to the efficient and sustainable movement of freight, especially by rail. (rail freight depot application was not considered to accord with regional policy)</p> <p>Attempts to address increasing transport pressure through studies and partnerships are supported.</p> <p>The St Albans transport strategy should be reviewed against the aims and objectives of DfT's Delivering a Sustainable Transport System programme. EEDA and EERA are taking forward the regional elements of this programme. (also see other comments to Chapter 11, Employment)</p>
	East of England Development Agency (Andrew Fisher)	<p>The St Albans Urban Transport Plan identifies congestion as a key issue and proposes measures to alleviate it.</p> <p>EEDA's Transport Economic Evidence Study suggests that congestion costs businesses and residents in St Albans approximately £28.6 million per year. This is expected to rise to £59.8 million per year by 2021.</p>
	Hertfordshire County Council Transport Department (Paul Donovan)	<p>The St Albans and Southern St Albans UTPs should consider including cycling measures such as:</p> <ul style="list-style-type: none"> • signalised junction improvements in the City Centre in Victoria Street; and • Ways to reduce severance and improve links for cyclists along the A414.
Roads and traffic	Colney Heath Parish Council (John Dean)	<p>Congestion at peak time or road traffic problems elsewhere often leaves Colney Heath with vehicle seeking M25 shortcuts. This results in more pollution.</p> <p>A 20 mph speed limit could be positive to dissuade the rat run.</p>
•	Wheathampstead Parish Council	<p>Volumes of traffic through village centres are of considerable concern – speeding traffic, large volumes of traffic at peak times and HGV use of rural and village roads which are not designed to cope with large vehicles.</p>
• Western orbital route	Highways Agency (Darren Rhoden)	<p>Significant concerns about new access and western orbital link road on the A414(T). It is a policy of the HA to assess proposals for new accesses onto national routes on a case by case basis, taking into consideration the standard and status of a given route as per DfT Circular 02/2007, pg 8.</p> <p>A414(T) is a key M1 feeder route. An additional Junction onto the A414(T) could impact upon the free flow and safety of this route.</p> <p>The link road could have widespread implications for the redistribution of background traffic. The primary concern is that the link road would have detrimental effect on the free-flow traffic entering and exiting the M1.</p> <p>Link road would also have a significant effect on the operation of the Park Street roundabout.</p>

		<p>HA will look at any technical details for a grade separated junction and a case for demonstrating the “need” for the link road and effects on St Albans and sub-region.</p> <p>(Also see Further Comments, Evidence Base)</p>
	Dacorum Borough Council (Francis Whittaker)	<p>In principle support proposals for improvement to east-west traffic flows on eastern side of Hemel Hempstead. Particularly where it may ease congestion along St Albans Road and around Maylands business area.</p> <p>Would welcome support for North East Hemel Hempstead relief road on the edge of St Albans Districts.</p>
	Hertfordshire County Council Transport Department (Paul Donovan)	<p>Whilst through traffic is likely to be diverted the provision of extra road capacity may simply attract extra vehicle trips and not tackle issues of congestion and increasing car use long term. It is important that there is a balance between road/junction improvements and sufficient and effective measures to encourage the use of alternatives to the car. An effective routing strategy is needed to ensure vehicles use roads appropriate to their journey purpose and which will act to discourage the use of cars in the area.</p> <p>The new route should be designed to encourage bus use. The need for such a route and the impact on traffic flows should be assessed through modelling.</p> <p>The St Albans UTP does not support the construction of an orbital route. This was a proposal in the earlier SADC 2007 core strategy document that the UTP considered as part of its development and recommended that the feasibility be considered prior to any further commitment.</p>
	St Albans Civic Society	Tend to oppose
	Herts Biological Records Centre	If this proposal is taken forward, it is important to ensure the ecological interests of Birch Wood Wildlife Site are fully protected. Some enhancements may be required given the loss of connectivity with the western part of St Albans.
	Verulam Residents Association	<p>Strongly oppose.</p> <p>AOS1 has no public transport nodes or transport infrastructure and there are other areas within St Albans which are better placed to access transport corridors.</p> <p>The proposed development of the orbital route will have an immediate and irreversible impact on the local environment.</p>
	St Albans Friends of the Earth	<p>Strongly oppose.</p> <p>Delays due to congestion are an important factor in encouraging cycling and walking and so we oppose major road improvements.</p> <p>Increasing the speed of vehicle traffic increases the danger they pose to cyclists and pedestrians.</p>

	St Albans Cycle Campaign	The scheme is disadvantageous to cyclists and counter effective to promoting sustainable transport policies.
	CPRE – The Hertfordshire Society	No evidence has been produced to substantiate the claims that the construction of this road would benefit the city centre. The 'knock on' effects of the proposed route have not been evaluated – impact of traffic arriving at the Ancient Briton junction. Transport modelling is needed.
	The Ramblers Association – Hertfordshire & North Middlesex Area	Tend to oppose the proposals for the western orbital route because of the impact on the Green Belt. Strongly oppose the proposal if it becomes a justification for permitting development in AOS1.
	English Heritage	Both the new western orbital, and the earlier proposal at St Stephen's church, would pose significant threats to the historic environment.
	Verulam Residents Association	AOS1 seems intrinsically linked to the building of the Western Orbital Road. Currently AOS1 has no public transport nodes, at variance with the recommendation of PPG13. Other areas within St Albans are much better placed to access transport corridors. Building a new road is a simplistic solution to the traffic problems of the town. This is at variance with guidance in PPG13 which clearly states that new road developments need to provide long term solutions and encourage less car use. The current proposals will just quicken the journey of cars to the same bottleneck at the top of Bluehouse Hill. The Highways Agency may not agree to a new junction on the A414.
	• Improvements to Park St and London Colney Roundabout	
	• Eastern distributor route	Highways Agency (Darren Rhoden) Concerned over impact on A1(M) Junction 3 and M25 Junction 22. Request for credible evidence which demonstrates the impacts on the above strategic road network. (Also see Further Comments, Evidence Base)
	CPRE – The Hertfordshire Society	Detailed transport modelling is needed to justify.
	Welwyn Hatfield Borough Council	The consultation document states that given the emerging major development schemes east and south east of St Albans, further consideration will need to be given to the case for an eastern distributor route. Hertfordshire County Council is considering commissioning a traffic modelling study to assess possible transport schemes. It will be important

		<p>for this study to assess any implications on Hatfield Road, which is already heavily congested, before any proposal is taken forward in the Pre-submission document.</p> <p>Welwyn Hatfield Borough Council reiterates concerns made in response to St Albans Issues and Options document in 2007: <i>'The Council is concerned that the road schemes are being proposed when there appears to be little evidence to support the need for them and they do not appear in the Hertfordshire Local Transport Plan. Option 41 (b) (the eastern distributor road) has the potential to act as a rat-run for traffic avoiding congestion on the A414 south of St Albans which is forecast in evidence submitted to the East of England Plan Examination in Public to be the subject of severe congestion. This is a matter of particular concern for the Council as it could result in significantly increased traffic flows on the A1057 St Albans Road West and the A1001 Comet Way – roads in Hatfield which are already heavily trafficked at peak times.'</i> (23/08/07)</p> <p>It is not clear why this proposal is not included on the key diagram when it is addressed in detail in the text and assessed in the sustainability appraisal</p>
Network St Albans (Quality Network Partnership, QNP)	EERA (Helen De La Rue)	Attempts to address increasing transport pressure through studies and partnerships are supported.
	Redbourn Parish Council (Diane Whiskin)	<p>The partnership should include villages and outer areas as many village residents can only access the City by car.</p> <p>The aim to use the QNP to reduce carbon emissions cannot work if the new services are limited to the City centre. Many of the cars causing congestion in the city centre are driven by village residents who have no other reliable way of getting into town.</p> <p>Improving access to surrounding countryside means that St Albans City residents need buses to take them to rural areas and villages.</p> <p>Access to local heritage means better transport links and an increase in cycle routes and footpaths.</p>
	Woodland Trust	Support the creation of 'Network St Albans' and hope that it will encompass the role that green infrastructure can play in providing more sustainable transport routes and encouraging cycling and walking among visitors and residents.
Public Transport	Colney Heath Parish Council (John Dean)	<p>Bus services to the rural areas are not meeting anywhere near local expectations.</p> <p>More links needed from rural areas to main transport hub/links to towns or centres via public transport.</p> <p>Colney Heath would be prepared to participate with short hire green car clubs or rentals, or future provision for electric car charging facilities.</p>
	Welwyn Hatfield	Reference to strengthened east-west public transport links is supported. However, this Council is concerned that the

	Borough Council	issue is not explored in the Emerging Core Strategy. Strategy Statement 22 of Welwyn Hatfield's issues and Options consultation (p218) states that public transport could be enhanced by securing funding for the use of high quality solutions, including trams and/or guided busways on main travel corridors (for example for east-west travel which is not served by rail). A similar approach should be taken forward in St Albans Core Strategy, to ensure consistency between the two local authorities.
St Albans City Centre – reduce Traffic and Improve the facilities for buses, cycling and walking.	Hertfordshire County Council Transport Department (Paul Donovan)	<p>Overall aims are very positive. How they are achieved is important.</p> <p>Central St Albans is traffic dominated and traffic is not free-flowing. This impacts upon bus services and is not pedestrian and cycle friendly.</p> <p>If access to St Peters street is restricted for public transport only, improvements will need to be balanced with improved bus services, bus priority measures, information provision, ticketing initiatives and marketing.</p> <p>To make sustainable modes of transport attractive, improved facilities need to be combined with an effective parking strategy and enforcement which discourages the use of the private car.</p> <p>The initiatives proposed in the consultation do not provide evidence of their feasibility. The city vision work did not include modelling to justify its aspirations.</p> <p>Whilst HCC are hoping to undertake modelling for central St Albans in the near future this may not be in time to inform the final LDF submission.</p>
	St Albans Civic Society	Tend to support
	Cllr Swendell	Tend to support
	St Albans Enterprise Agency (Mel Hilbrow)	Unless there is a clear plan for displaced traffic this is likely to cause more problems than it solves. People do not usually drive through city centres for choice. It should be tackled by giving better options. Options include the proposed western orbital route, but should we not be thinking of a complete orbital transport system so that the only people who would want to drive into the City are those that have good reason. A combination of better alternative driving routes and better public transport should obviate the demand to control city centre traffic by regulation, which will prove unpopular and could damage shopping unless part of a complete strategy.
Increase bus use, cycling and walking in the whole district	Hertfordshire County Council Transport Department (Paul Donovan)	<p>This is essential to enable anticipated development within the District to take place in a sustainable way.</p> <p>Bus routes and their frequencies need to be commercially viable. Funding used to support bus services are often for a limited time span therefore an assessment of the likely long term viability of a route is important. Long term viability can be achieved by increasing patronage</p>

		<p>Development which is designed in conjunction with passenger transport helps to make sustainable modes of transport more attractive. Factors to consider include:</p> <ul style="list-style-type: none"> •the design of new development so as to be conducive for bus access; •location of bus stops within reasonable walking distance; •high quality pedestrian and cycle routes to key destinations; •appropriate levels of parking; and •Measures to discourage rat running. <p>Mixed use developments can help reduce the need to travel. Considering the location of new development in relation to local services and accessibility by passenger transport, on foot/bicycle can reduce the need to travel.</p> <p>Diverting traffic onto orbital routes may reduce the impact of congestion on bus services in the short term but measures need to be in place to lock in the benefits of extra capacity (i.e. make public transport more attractive).</p>
	St Albans Civic Society	Tend to support
	Cllr Swendell	Strongly support
Mini Park and Ride	EERA (Helen De La Rue)	Park and ride facilities should be encouraged
	Hertfordshire County Council Transport Department (Paul Donovan)	<p>To be effective, there needs to be frequent, reliable, low cost buses available coupled with further measures to encourage its use such as;</p> <ul style="list-style-type: none"> • A parking strategy to manage parking within the town centre, • Improvements to bus infrastructure including waiting facilities, • Bus priority measures • Improvements to pedestrian and cycle access around the town. <p>Using local bus services can enhance patronage and increase commercial viability, however, services may be delayed if they have to come from further afield and would lack the branding and marketability of a dedicated park and ride service.</p> <p>The size of car parks provided determines the numbers of people able to use the park and ride, a small car park may limit commercial viability.</p> <p>The proposal for a site on London Rd may be effective as there are already bus routes using this route into the town centre. The other proposed sites are not so well served by existing services therefore thought must be given on how to fund improvements.</p> <p>Park and ride must be located where there will be;</p>

		<ul style="list-style-type: none"> • highest demand and potential use, • where existing services are with highest frequencies, • land available for the facility. <p>A robust business case will need to be made, combined with high quality facilities, and so potential users are offered a saving in time and cost over the car.</p> <p>Park and walk car parks might compete with park and rides and the provision of car parks may further encourage travel by car.</p> <p>The need for the Parking Strategy and the outcomes of the city vision work is paramount for the case of park and ride to be tested.</p> <p>Cannot prove that:</p> <ul style="list-style-type: none"> • Larger park and rides could not be supported in St Albans • Smaller park ride facilities have lower capital, running costs and cause less disturbance to the historic fabric within the city centre. <p>Evidence is needed.</p>
	St Albans Civic Society	<p>Strongly oppose, all sites are in the Green Belt and conflict with SO1.</p> <p>If adopted it would drive trade away to nearby centres that do not have park and ride.</p> <p>Where P&R has been successful, research shows that it furthers car based transport at the expense of public transport.</p>
	Bricket Wood Residents' Association	<p>Strongly oppose.</p> <p>Mini park and ride using existing bus services is strongly opposed because improvement of bus services is generally supported but for the same reasons that people living along a bus route do not use the service the mini park and ride will be inconvenient, time consuming and probably expensive to use.</p> <p>Depending on the location, park and ride will result in loss of open, probably green field land in the Green Belt and contribute to the merging of the settlements. Holywell Hill is not a suitable route. Vehicle parking facility beside Butterfly World will have a conflict of use.</p>
	St Albans Friends of the Earth	<p>Park and Ride facilities encourage car use and therefore oppose this proposal.</p>
	CPRE – The Hertfordshire Society	<p>Support the principle, but the sites would be located in the Green Belt, therefore must be fully justified in terms of need, effectiveness and viability before a firm commitment to it could be made.</p>

	The Ramblers Association – Hertfordshire & North Middlesex Area	Tend to oppose proposals for mini park and ride schemes because of their impact on the Green Belt.
	South Birklands Residents' Association	The Park & Ride schemes contradict the options proposed in the City Vision proposals, namely that cars should be able to access the city centre where considerable parking is planned. Previous consultations showed that there was effectively no support at all for them for St Albans.
• PR1 London Rd		
• PR2 Land near Butterfly World	Anne Main MP	<p>This is the least worst option of all suggested sites as it would;</p> <ul style="list-style-type: none"> • Enable Butterfly World visitors to access the City Centre without adding to local traffic. • Allow business users of the Thistle Hotel to access City Centre • Allow visitors to St Albans to park their cars without having to engage with local roads <p>Park and ride needs to enhance local transport links to make it worthwhile.</p>
	Bricket Wood Residents' Association	Butterfly World car parking provision is clearly inadequate as it is based on the planning application figures of 250,000 visitors but the visitor numbers for the Travel Plan are 750,000 and the visitor numbers given at Bricket Wood Residents' Association Open Meeting were over one million visitors. A park and ride facility nearby will be used by Butterfly World visitors rather than achieve the purpose of relieving congestion in St Albans.
	CPRE – The Hertfordshire Society	Hold particular reservations about this site due to the demand for parking which Butterfly World is likely to create.
• PR3 Park St roundabout	Anne Main MP	This should not be developed for park and ride (or Hotel).
• PR4 A414 (former M10) junction		
Walking and cycling	EERA (Helen De La Rue)	Park and walk facilities should be encouraged.
	Wheathampstead Parish Council	Accessibility of the green belt should be improved by planning and creating green belt cycle and footpath links. This will improve green travel between villages and local towns for recreation, shopping and work travel.
	CPRE – The Hertfordshire Society	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.
	The Ramblers Association – Hertfordshire & North Middlesex Area	<p>Strongly support measures to improve the facilities for bus, cycling and walking in the city centre and the district as a whole.</p> <p>Welcome the attention giving to walking within the document but note that there are no specific proposals for policies to ensure that the aspirations will be realised.</p>

	Natural England (Catherine Whitehead)	Support alternatives to car based transport. Supportive of footpaths and cycle ways as part of new development.
	Hertfordshire County Council Transport Department (Paul Donovan)	<p>Cycle route improvements in the city centre should link into the wider cycle network to enable people to come from further afield.</p> <p>Reducing congestion, priority measures, a network of high quality routes and cycle parking at key destinations provides an environment which is more attractive to cyclists.</p> <p>An effective pedestrian network which promotes safe, direct access to key destinations, crossing points and access to passenger transport (bus stops/rail stations) is essential.</p>
Other transport comments	EERA (Helen De La Rue)	<p>Support consideration of air quality.</p> <p>Priority should be given to the efficient and sustainable movement of freight, especially by rail. (rail freight depot application was not considered to accord with regional policy)</p>
	East of England Development Agency (Andrew Fisher)	<p>Transport principles and priorities in the Regional Economic Strategy should be reflected in the core strategy. These are:</p> <ol style="list-style-type: none"> 1. A resilient transport system that is used effectively and efficiently 2. Investment in transport to maximise economic growth 3. Increased economic benefit to the east of England from major international gateways 4. Reducing environmental impact of moving goods and people. <p>The core strategy should identify the extent to which transport could contribute to carbon emissions and what solutions would alleviate this. The St Albans transport strategy should be reviewed against the aims and objectives of DfT's Delivering a Sustainable Transport System programme. EEDA and EERA are taking forward the regional elements of this programme.</p>
	Hertfordshire County Council Transport Department (Paul Donovan)	<p>PPS12 states that LDF Core Strategies should be based on a robust and credible evidence base; this may include a traffic model used to assess the impact of specific development proposals and consider these against alternatives. To provide confidence in the Core Strategy proposals and ensure that they will not result in any additional unacceptable burden on the strategic road network, the HA seeks clarification of the traffic modelling works undertaken and the predicted effects of new development on and/or adjacent to the strategic road network known at this time.</p> <p>The HA would like to see evidence which assesses the effects of AOS1, the western link road, eastern link road and employment development at Roehyde on the strategic road network. Any assessment should be in line with PPS12.</p> <p>HA are happy to offer assistance in respect of assessing more strategic impacts with SADC and in cooperation with Hertfordshire County Council.</p>

Chapter 14 – Social and Community Facilities Policies (Q14/F1 – education) (Q15/F2 – youth facilities)

Issue:	Respondent:	Summary of response:
Education facilities	London Colney Village Concern	Why no secondary school for London Colney? The population is high now.
<ul style="list-style-type: none"> New secondary school north of St Albans 	Hertfordshire County Council Transport Department (Paul Donovan)	Access along Sandridgebury Lane, close to St Albans Girls School, would add to current congestion in the area around school start/finish times. The site is also close to other schools such as Townsend and Margaret Wix Schools. It would be beneficial if schools within St Albans are located where pupils can walk/cycle to them and are also accessible by local bus services. There are regular bus services along the A1081 although this may be outside the recommended distance criteria for a school (200m).
	St Albans Civic Society	Strongly disagree as conflicts with SO1.
	Cllr Swendell	Strongly agree
	Bricket Wood Residents' Association	Tend to disagree because location of schools should directly relate geographically to area of housing development and greatest need. Currently significant number of pupils from southern St Albans travel to northern half of District for secondary education.
<ul style="list-style-type: none"> New primary school west of St Albans city centre 	Hertfordshire County Council Transport Department (Paul Donovan)	<p>The location of a school needs to take into account where pupils are coming from so that the majority can be within walking/cycling distance.</p> <p>Large areas of housing development may justify a new school as well as other community facilities.</p> <p>Should a new school be within AOS1, this area currently has limited bus services which would need to be improved. The provision of quality pedestrian and cycle routes are important to encourage the use of sustainable modes of transport. (also see response to Chapter 10).</p>
	St Albans Civic Society	Strongly disagree as conflicts with SO1.
	Bricket Wood Residents' Association	Tend to disagree because location of schools should directly relate geographically to area of housing development and greatest need. Currently significant number of pupils from southern St Albans travel to northern half of District for secondary education.
<ul style="list-style-type: none"> Other education comments 	Colney Heath Parish Council (John Dean)	Issue of school places for local people is an emotive one. Huge numbers of children being bussed in from other districts creates a problem from families within the 3 choices sibling rule. Access to schools where boundary issues form part of a discriminatory position.

	St Albans Friends of the Earth	Support policies which enable children to attend a school within walking or cycling distance of their homes.
	Wheathampstead Parish Council	In recent years community cohesion has been undermined by a shortage of school places for some outlying villages. The shortage of school places in the Greater Harpenden area of the District is of significant concern and should be comprehensively addressed in partnership with the County Council.
	The Ramblers Association – Hertfordshire & North Middlesex Area	Oppose the creation of new schools in the Green Belt.
Non Educational facilities		
• Reprovision of Pioneer youth centre	Cllr Swendell	Strongly agree
• Reprovision of Harpenden youth centre	Cllr Swendell	Strongly agree
•	Bricket Wood Residents' Association	Strongly agree.
•	Harpenden Town Council	Strongly agree.
• Other youth provision comments	Sopwell Residents Association	Nothing has been said about the youth club in Leyland Avenue for young people who live in the south of the city, is there no policy for this?
	Bricket Wood Residents' Association	Agree except services and facilities for the young should be provided in ALL areas of the district.
Other Community Facilities	Colney Heath Parish Council (John Dean)	See response to Chapter 16, Sport and recreation.
	St Albans Friends of the Earth	Support the provision of local facilities which strengthen the local community and reduce the need to travel.
Police Station	Anne Main MP	If sites in St Albans and London Colney are no longer to be used for police stations they should be considered for increasing retail offering, potential hotel sites, housing development or a school.

Chapter 15 – Building Safer and Stronger Communities Policies

Issue:	Respondent:	Summary of response:
Community cohesion inclusion and safety	EERA (Helen De La Rue)	Provision of facilities for all aspects of culture and leisure should be addressed on appropriate scale to local settlements to promote integrated and sustainable communities.
	Hertfordshire Police Authority (Lucy Biddle, RPS)	HPA require all development proposals to be designed to Secure by Design principles and to achieve accreditation.
	Colney Heath Parish Council (John Dean)	Support initiative on providing both strong and safe harmonious community in both people and building design.

Chapter 16 – Leisure, Culture and Tourism Policies (Q16/G1 – new culture and entertainment and tourism) (Q17/G2 – hotels HT1, HT2, HT3)

Issue:	Respondent:	Summary of response:
Culture museums and entertainment	St Albans Civic Society	Strongly agree
	The Theatres Trust	<p>Would like to see a policy covering the particular objectives regarding the provision of cultural facilities. Recommend an entry in the Glossary to explain which facilities are relevant to their ‘umbrella term’.</p> <p>The Trust particularly asks that the document provides sufficient protection to ensure continued theatre use, particularly where buildings providing performance arts may not be covered by listing or conservation area designations, or may be affected by proposals which come forward for other development sites.</p>
	St Albans and Hertfordshire Architectural and Archaeological Society	The Society strongly supports the case for improved cultural facilities in the city centre, with a cultural hub, preferably in the Civic Centre area and a relocated City Museum.
	Abbey Theatre	<p>Disappointed by the absence of any reference to the existing cultural facilities outside the core City Centre area – of which the Abbey Theatre is clearly a key element.</p> <p>Request that any plans SADC have to expand or change the provision of live theatre in the so called ‘cultural hub’ around the Civic Centre should take fully into account and complement the existing and future provision by venues further out from the centre, such as the Abbey Theatre, Trestle Arts Base and Sandpit Theatre. Setting up new venues in direct competition would be in no-one’s interest.</p> <p>The Abbey Theatre Trust has, for several years, been making clear to Councillors and officials our medium and longer-term aspirations for the expansion of our facilities. There is no mention of any such expansion in the documents and we seek your assurances that these plans can be referenced and accommodated within the final version of the Core Strategy. This could perhaps be achieved by reference to Cultural Enhancements at Westminster Lodge.</p>
	St Albans Enterprise Agency (Mel Hilbrow)	With Butterfly World and potential hotel developments St Albans should increasingly be able to position itself as a destination. To achieve this features/facilities need to be top class. Verulamium Museum is close to being just that, but on its own is not significant enough. How can it be better integrated with the other Roman sites and what can be done for the rest of our significant history? The Middle Ages is very under-promoted except when we have a battle re-creation event. A lot has happened since.
	Cllr Swendell	Strongly agree with enhancing existing tourism facilities including museums.

		Tend to agree with culture, entertainment and hotel in city centre.
Sport and recreation	Dacorum Borough Council (Francis Whittaker)	Dacorum are investigating the principle of a town stadium within the East Hemel Hempstead Area Action Plan. Its possible location on the Borough-District boundary will likely to appeal to, and draw participants from the south western part of St Albans.
	Colney Heath Parish Council (John Dean)	Opportunities to maintain and provide new play equipment are not easy to acquire due to costs. Parish Council suggests that the District Council should provide periodic sums of monies from the leisure budget to assist in provision and maintenance of play equipment rather than spend large sums on facilities such as the mobile skate park. Local facilities help community spirit and save carbon footprint by easy access to local recreation facilities.
	Sport England	The summary of the conclusions of the Council's Sport and Recreation Strategy are welcomed in the consultation document. The proposals to include a core strategy policy which will encourage new and enhanced sport and recreational facilities in appropriate sustainable locations is particularly supported. The principle of proposing two new indoor leisure centres in St Albans and London Colney to address identified needs is welcomed. While the principle of providing a new leisure centre in London Colney is supported as this is responsive to identified needs, it is understood that the Cotlandswick site is currently playing fields. Sport England would be concerned about the loss of playing fields to facilitate the development unless appropriate replacement playing field provision was made.
	Natural England (Catherine Whitehead)	Outdoor recreation and access to countryside should be actively promoted, especially access to recreation in countryside around towns. Deficiencies in public rights of ways networks need to be identified and opportunities for walking, cycling and riding should be maximised. Access to countryside should be integrated with public transport.
Westminster Lodge	Anne main MP	Every opportunity should be taken to provide a first class sporting venue rather than just a health suite/spa. The loss of diving competitions at Westminster Lodge would be disappointing.
Cotlandswick	Anne Main MP	Concerns over this for the following reasons <ul style="list-style-type: none"> • Its location would result in possible loss of green space • Loss of green belt • Viability and affordability of the project given recent closure of another sporting centre in London Colney • The whole site may end up being developed, especially if enabling development is needed

Tourism	St Albans Friends of the Earth	Tourist attractions should be closely associated with links to public transport.
Hotels	St Albans Civic Society	It is difficult to see any material difference between the Council's preferred site near M25 J22 and a hotel near M25 J21A. (also see comments to HT site below)
	South Birklands Residents' Association	Accept that St Albans needs some further hotel development.
• HT1 St Albans city centre	Hertfordshire County Council Transport Department (Paul Donovan)	The city centre is well served by bus services therefore is a sustainable location for a hotel. If other built up areas are proposed, accessibility of the site by bus, rail, pedestrian and cycle networks needs to be assessed in order that sustainable modes of transport are encouraged and deficiencies addressed through the planning process and developer contributions.
	St Albans Civic Society	Tend to support
	Cllr Swendell	Strongly support
	South Birklands Residents' Association	Support the plan for a small budget hotel in the City Centre.
	St Albans Enterprise Agency (Mel Hilbrow)	Tend to support Why not a quality City Centre hotel/conference centre/arts centre? The Civic Centre location would seem ideal. I think this would require a shuttle bus to any local interest points and so probably not ideal for a major conference centre hotel, which ideally requires a major point of interest on the doorstep. This is better suited to a middle of the road business hotel. Talk to hotel specialists about where they would want to put a hotel. Great if the business park goes ahead. Otherwise, out on a limb.
• HT2 London Rd (adjacent to cemetery)	Hertfordshire County Council Transport Department (Paul Donovan)	A number of routes are available from London Rd and stops would likely be within 400m of most of the site. Good pedestrian/cycle access onto London Rd is important to access bus routes into the town centre. The co-location with employment uses may be effective if there is a need for business traveller accommodation. (also see comments Chapter 11)
	St Albans Civic Society	Tend to oppose as conflicts with SO1
	Cllr Swendell	Tend to support
	St Albans Friends of the	Strongly oppose.

	Earth	Out of town hotels would be hard to access except by car and would cause an increase in car use and congestion.
	The Ramblers Association – Hertfordshire & North Middlesex Area	Strongly oppose – would result in development in Green Belt and Watling Chase Forest land. It would destroy the amenity of the rights of way which cross the area and the quiet calm of Nightingale Lane which provides a walking/cycling link between London Colney and St Albans.
	London Colney Village Concern	Strongly oppose. Other sites are already available.
	South Birklands Residents' Association	Oppose, a location closer to the M25 would be for more suitable (vacant land at junction 21A of the M25).
• HT3 Roehyde	Hertfordshire County Council Transport Department (Paul Donovan)	This site is not in a location that would encourage the use of sustainable modes of travel. The co-location of hotel with a business park may be effective if there is a need for accommodation for business travellers. Access to the site would be problematic as the nearest bus stops are the other side of major roads and a roundabout which do not present an environment that is pedestrian and cycle friendly (also see comments Chapter 11)
	St Albans Civic Society	Tend to oppose as conflicts with SO1
	Cllr Swendell	Tend to support
	St Albans Friends of the Earth	Strongly oppose. Out of town hotels would be hard to access except for by car and would cause an increase in car use and congestion.
	The Ramblers Association – Hertfordshire & North Middlesex Area	Oppose any development of this site which would impact on the existing rights of way in that area or reduce the buffer between Hatfield and Colney Heath.
	St Albans Enterprise Agency (Mel Hilbrow)	Tend to support
	Welwyn Hatfield Borough Council	The Council has the same concerns with regard to access issues and the loss of green belt land as outlined in the response to Chapter 11. In addition, it is not clear why this option has not been assessed in the sustainability appraisal.
Other hotel comments	St Albans Civic Society	The Society endorses the unfavourable view of hotels that cater for M25 trade. The Society has noted that the City Vision project is proposing hotel development in St Michaels. This conflict with the Core Strategy

		needs to be resolved.
Other comments	EERA (Helen De La Rue)	Provision of all facilities for all aspects of culture and leisure should be addressed on appropriate scale to local settlements to promote integrated and sustainable communities.

Chapter 17 – Built and Historic Environment Policies – (Q18/H1)

Issue:	Respondent:	Summary of response:
Built environment	EERA (Helen De La Rue)	Policy for design standards and housing density should maximise opportunities for physical, economic and community regeneration in consideration of the built and natural environment.
	East of England Development Agency (Andrew Fisher)	EEDA welcome approach set out in the core strategy as it contributes to the Spatial Economy goal of the Regional Economic Strategy.
	Woodland Trust	Keen to ensure that ancient woodland and ancient/veteran trees are both explicitly referenced as key historic assets.
	St Albans Civic Society	Retaining and respecting our heritage is vital. The City and District has many areas of special and conservation merit. Development into these areas must be of the highest architectural standard and must be shown to be in the greater public good. The Society considers the sentiments to protect the existing heritage to be hypocritical, in view of the recent disbanding and dismembering of the Conservation and Design Team.
	Redbourn Parish Council (Diane Whiskin)	Officers and planning committee members need to bear the rural vision in mind when making decisions. Currently spatial and design standards appropriate to St Albans or Harpenden are used when considering planning applications and developments in Redbourn.
	St Albans Civic Society	Tend to oppose as conflicts with SO1
	Cllr Swendell	Strongly agree
	St Albans Enterprise Agency (Mel Hilbrow)	Essential if we want to be a destination City - if we see that as our role and unique proposition in Hertfordshire.
	Marshals Drive Residents Association	Marshalswick should be listed as an Area of Defined Residential Character. This will help protect Marshalswick from inappropriate 'backland' development, for which there is great pressure.
Historic environment	Colney Heath Parish Council (John Dean)	The District's historic environment must be preserved along with the issues of ensuring the community spirit remains. Support initiative on providing both strong and safe harmonious community in both people and building design. Support the District Council policy to seek the best new development opportunities in the city centre. Development can shape new areas which blend harmoniously with the ancient, historic and traditional

		elements of the city.
	Hertfordshire County Council Historic Environment Unit (Andy Instone)	<p>It is important that there is a policy for the historic environment, including historic environment assets which exist. Archaeological heritage should also be included within this policy.</p> <p>17.11 The district also contains locally, regionally and nationally important archaeological sites listed in the Hertfordshire Historic Environment Record and Urban Archaeological database. It is important to recognise that many nationally important archaeological sites within the District may not be 'scheduled'</p> <p>17.12 The archaeology strategy should include historic buildings and landscapes. It should be an historic environment strategy.</p> <p>17.13 The Core Strategy should resist development which may harm the historic environment including archaeological sites, historic buildings and historic landscapes as well as views of the district's historic skyline and character of conservation areas.</p>
	East of England Development Agency (Andrew Fisher)	EEDA welcome approach set out in the core strategy as it contributes to the Spatial Economy goal of the Regional Economic Strategy.
	St Albans Civic Society	<p>In view of the recent disbanding and dismembering of the Conservation and Design Team the Society questions how the Council is going to protect existing heritage.</p> <p>17.11 should also mention urban common land.</p> <p>The need to protect the city's skyline should be given greater priority.</p>
	Cllr Swendell	Strongly agree
	St Albans Enterprise Agency (Mel Hilbrow)	Essential if we want to be a destination City - if we see that as our role and unique proposition in Hertfordshire.
	English Heritage	<p>Conservation Area Character Appraisals are a key part of the evidence - the Character Appraisal report for St Albans should be identified within the key elements of evidence.</p> <p>The completion of the St Albans Character Appraisal is crucial so that it can inform the Core Strategy options alongside the Archaeology Strategy and Historic Landscape Report.</p>

Chapter 18 – Green Infrastructure, Natural Environment and Countryside Policies (Q2/A2)

Issue:	Respondent:	Summary of response:
General	Hertfordshire County Council	<p>Chapter does not fully address landscape objectives set out in the East of England Plan and emerging national guidance.</p> <p>SADC should signpost towards a fuller set of objectives.</p> <p>Protect and enhance the diversity and local distinctiveness of the countryside character areas by:</p> <ul style="list-style-type: none"> • developing area-wide strategies, based on landscape character assessments, setting long-term goals for landscape change, targeting planning and land management tools and resources to influence that change, and giving priority to those areas subject to most growth and change; • developing criteria-based policies, informed by the area-wide strategies and landscape character assessments; and • securing mitigation measures where, in exceptional circumstances, damage to local landscape character is unavoidable.
	Friends of the Earth (Amanda Yoeworth)	<p>Whilst the Green Infrastructure etc. policy deals adequately with rural locations and parks, we would like to see it recognize the importance of green spaces integrated into the urban environment. The temperature increases associated with global climate change will increase the requirement for the cooling effect of green spaces especially in built up areas. Therefore, we think that the policy should provide measures to ensure the provision of high quality green spaces in new developments and the development of such spaces in existing developed areas. Where space is limited the planting of trees or use of green roofs should be used. We feel that green spaces could also be used for local food production (e.g. through the planting of fruit trees) and sustainable fuel production (e.g. through the planting of woodland for coppicing) and still fulfil their amenity and conservation function. We would like to see the policy reflect this. We would also like to see mention of the importance of the cooling and water absorbing effect of urban green spaces and the importance of this with respect to climate change. We would like to see soft landscaping features incorporated in developments wherever possible, including tree planting and green roofs.</p>
	St Albans Enterprise Agency (Mel Hilbrow)	<p>Background: This section fails to mention several relevant national and regional policies regarding green infrastructure, natural environment and Countryside Policies, as follows: National Policy has not been noted at all - PPS9 (Biodiversity and Geological Conservation); PPS1 (Delivering Sustainable Development); PPS7 (Sustainable Development in Rural Areas). Relevant extracts of these policies are included below. The prioritising of 'Green spaces and playing pitches' before either 'Green Infrastructure' or 'Natural environment and the Countryside' is inappropriate. We recommend that either 'Natural Environment and the Countryside'</p>

		or 'Green Infrastructure' be prioritised, and appear first. Green Spaces and playing pitches: Section 18.4, Provision should be made to protect and enhance existing green corridors as well as identifying appropriate opportunities for additional creation of green corridors. Natural environment and the countryside: Section 18.16. This section should read, 'The District contains 2 Sites of Special Scientific Interest, 6 Local Nature Reserves and 199 Local Sites (197 Wildlife Sites and 2 RIGS [Regionally Important Geological & Geomorphological Sites]).
Green spaces and playing pitches	Environment Agency (Keira Murphy)	Loss of green spaces should be avoided as open spaces form part of vital green corridors within urban areas. 'riverbanks' should be changed to 'rivers banks and adjacent buffer zones.'
	Natural England (Catherine Whitehead)	Regional and local plans should identify a network of multi functional green spaces providing a range a environmental and quality of life benefits. These should be designed into all major new development and regeneration schemes. Open space standards should be based on nationally recognised standards. The core strategy should specifically mention English Nature's Accessible Greenspaces Standards and Accessible Natural Greenspaces Standards. Accessible Natural Greenspaces Standards require every home to be within 300 metres of accessible natural green space of 2 hectares in size. Each home should also have access to: <ul style="list-style-type: none"> • One 20 hectare site within 2 kilometres • One 100 hectare site within 5 kilometres.
	St Albans Civic Society	Strongly Agree with approach to parks and open spaces, the natural environment and the Countryside. Should be made clear that there will be no development on or of existing public open spaces, not just those spaces with high value audit scores.
	Cllr Swendell	Strongly agree
	Sport England	The proposal to include a core strategy policy which will meet the need for playing pitches is particularly supported.
	Hertfordshire & Middlesex Wildlife Trust	The prioritising of 'Green spaces and playing pitches' before other 'Green Infrastructure' or 'Natural environment and the Countryside' is inappropriate. Recommend that either 'Natural Environment and the Countryside' or 'Green Infrastructure' be prioritised and appear first. Provision should be made to protect and enhance existing green corridors as well as identifying appropriate

		opportunities for additional creation of green corridors.
	Friends of Bernards Heath	Opposed to any development at Lower Field, Bernards Heath. The Core Strategy document makes no reference to the Council's commitment at the outcome of the "Village Green" Public Inquiry in 2001 to preserving the playing field 'in perpetuity' as open space with public access. The mixture of grassland, scrub and woodland in and around the Lower Field are host to many indigenous species. There are no policy objectives in the Core Strategy that would support eroding this urban biodiversity.
Green infrastructure	Environment Agency (Keira Murphy)	Green infrastructure is important for climate change. It can provide urban cooling, carbon consumption, contribute to water quality and management and provide migration corridors for wildlife.
	Natural England (Catherine Whitehead)	Wish to see an overall net gain in green infrastructure.
	St Albans Civic Society	Society notes that management of visitor numbers is vital so that nearby settlements are not overwhelmed. Society concerned that Heartwood Forest may require considerable parking, interpretation buildings with retail elements, toilets, signs etc.
	Cllr Swendell	Strongly agree
	Herts Biological Records Centre	Retention or development of ecological corridors or networks is desirable where appropriate
	Hertfordshire & Middlesex Wildlife Trust	If development must take place within the vicinity of biodiversity-rich sites, provision must be made to safeguard and buffer such sites and to integrate green corridors to maintain links between sites.
	St Albans Friends of the Earth	Whilst the green infrastructure policy deals adequately with rural locations and parks, would like to see it recognise the importance of green spaces integrated into the urban environment. Would like to see mention of the cooling and water absorbing effect of urban green spaces. Where space is limited the planting of trees or use of green roofs should be used. Green spaces could also be used for local food production.
	Woodland Trust	While providing greater access to the countryside is a key component of green infrastructure, would like to see other benefits such as mitigation and adaptation to climate change, improved air and water quality, biodiversity enhancements etc. to be acknowledged. Urge the Council to ensure any policy to protect and enhance the natural environment and countryside is explicit regarding the protection provided for ancient woodland and ancient trees.
	Wheathampstead	Reference should be made to the commons in the District.

	Parish Council	
	Welwyn Hatfield Borough Council	The intention to address green infrastructure in the Core Strategy is supported. Welwyn Hatfield Council would be happy to explore the potential of working with St Albans Council on a Green Infrastructure Strategy, particularly given the reference in policy LA3 of the RSS.
Natural environment and the countryside	EERA (Helen De La Rue)	Where development is planned for Greenfield sites, proposals should seek to maximise opportunities for environmental protection and habitat creations, where viable. Measures to avoid and mitigate loss of best quality agricultural land should be included in the strategy.
	Environment Agency (Keira Murphy)	This section should mention rivers as a feature of the natural environment. This should relate to the comment on buffer zones and wildlife corridors. Rivers in St Albans should be shown on natural environment and countryside map. Last bullet of 18.18 should also state "both statutory and non-statutory."
	St Albans Civic Society	Strongly agree with approach to parks and open spaces, the natural environment and the countryside. Absence of policy or mention of urban trees is a serious omission. Existing trees make significant contribution to the urban environment and deserve recognition and protection.
	Herts Biological Records Centre	There is nothing whatsoever in the Core Strategy which refers to the importance of farming in helping to sustain the ecology of important sites. Without traditional farming, including extensive grazing, the maintenance of ecologically rich grasslands becomes almost impossible, however much protection they are given. The currently threatened Hedges Farm is a good example of this - livestock manage the former quarry site as well as river valley meadows, and are then processed and sold to the public from the on-farm butchery. Almost exactly as it should work - ironically threatened by the current SRFI proposals. Consequently we suggest that some appreciation of this is included within the Core Strategy.
	Hertfordshire & Middlesex Wildlife Trust	Section 18.16 should read 'The District contains 2 Sites of Special Scientific Interest, 6 Local Nature Reserves and 199 Local Sites (197 Wildlife Sites and 2 RIGS). Bullet point 2 should read, 'The need for development to be consistent with the objectives of the Hertfordshire Biodiversity Action Plan and in line with guidance found in PPS9, PPS1, PPS7 and ENV1, ENV2, ENV3, and ENV5 and in line with guidance found in the NERC Biodiversity duty'.

		Bullet Point 3 should read, 'Protection and enhancement of designated national conservation sites as well as local wildlife sites and RIGS.
	Woodland Trust	Policy on the natural environment should avoid focusing on designations alone. Only 14% of the UK's ancient woodland is included within SSSI and the remainder has no statutory protection. Biodiversity protection should look beyond designated sites as part of a landscape-scale approach to nature conservation.
Biodiversity	Natural England (Catherine Whitehead)	The Core strategy should include policy on protection and enhancement of biodiversity and geodiversity. The policy should secure this by: <ul style="list-style-type: none"> • Safeguarding of national and international protected sites for nature conservation from development. • Consideration being given to European and nationally protected sites • Protection and enhancement of network of local wildlife sites and corridors, and links between areas of natural green space. • Ensuring development produces a net gain in biodiversity by designing in wildlife and mitigating unavoidable impacts. • Promoting wildlife enhancements which contribute to habitat restoration targets in national, regional and local BAPS. • Encouraging conservation management of the network of sites and wider fabric of landscape. <p>A policy on biodiversity should include <i>following point in line with PPS9 para 12, "ensure the protection and enhancement of a network of local wildlife sites and wildlife corridors, links and stepping stones between areas of natural green space to avoid fragmentation"</i></p> <p>Planning contributions should be sought to help deliver Local Biodiversity Action Plans.</p> <p>New development should build in biodiversity –"Biodiversity by Design".</p>
	St Albans Civic Society	Strongly agree with approach to parks and open spaces, the natural environment and the countryside.
	Cllr Swendell	Strongly agree
Landscape	Natural England (Catherine Whitehead)	Encourage a specific policy on landscape to protect and enhance designated landscapes and those based on the Hertfordshire Landscape Character Assessment (LCAs). LCAs should be included within the policy framework of the core strategy.
Watling Chase Community Forest	St Albans Friends of the Earth	Strongly agree.
Heartwood Forest	Woodland Trust	Happy to see recognition of Heartwood's ability to offer residents and visitors the prospect of quiet

		<p>enjoyment of the countryside and its value for wildlife.</p> <p>Would like to see other benefits recognised including educational benefits, community cohesion, health and wellbeing and biodiversity.</p>
	Wheathampstead Parish Council	<p>The Council will not look favourably on attempts to provide tourist facilities connected with Heartwood Forest</p> <p>Heartwood Forest should become an area for low intensity recreation – remove the word important. Management of visitor numbers is already a critical issue, rather than ‘will become’.</p>
	St Albans Civic Society	<p>Management of visitor numbers will be a critical issue if nearby settlements are not to be overwhelmed. Also concerned over parking, interpretation buildings with retail elements, toilets, signs, and proliferation of general urban paraphernalia.</p>
Other	Hertfordshire & Middlesex Wildlife Trust	<p>The background fails to mention several relevant national and regional policies regarding green infrastructure, natural environment and countryside policies (PPS9, PPS7, PPS1 etc.)</p>
	St Albans Civic Society	<p>The absence of a policy, or even mention, of urban trees is a serious omission.</p>

Chapter 19 – Infrastructure Delivery Policies

Issue:	Respondent:	Summary of response:
HIIS		
District Council Approach		
Other	National Grid (Paul Cudby)	<p>Infrastructure budgets are heavily constrained by OFGEM. National Grid plan reinforcement projects on a reactive basis, when new loads connect to their network. Reinforcement requirements are subject to an economic test to apportion costs.</p> <p>Only constraint on growth is timescales, this should not be a problem at the local level.</p> <p>Accumulative effect of a large number of loads could overload the system and these reinforcements could cause delays in gas provision.</p>
	Anne Main MP	<p>Core strategy should contain policy on the delivery of telecommunications masts.</p> <p>There should be a commitment in the Core Strategy, potentially funded through S106, for a school bus and a hopper bus service around the city centre to link both stations and major supermarket in the area. This would help maximise public transport use and minimise car use.</p>
Developer Contributions	Sport England	<p>The approach to infrastructure delivery is welcomed in principle.</p> <p>The core strategy policy and the related Section 106 SPD should ensure that provision is made for new development making appropriate contributions towards community sport and recreation infrastructure. The Sport England Planning Contributions Kitbag online guidance should be used.</p>

Chapter 20 – Emerging Spatial Strategy

Issue:	Respondent:	Summary of response:
Settlement Hierarchy	Dacorum Borough Council (Francis Whittaker)	Redbourn remains as large village excluded from the Green Belt, this is supported.
	Welwyn Hatfield Borough Council	See also response to Strategic Employment Sites, Roehyde. The consideration of green belt development at Roehyde is contrary to the identified settlement hierarchy.
St Albans City Centre		
St Albans - rest of city		
Harpenden		
London Colney		
Large Villages excluded from the green belt	Redbourn Parish Council (Diane Whiskin)	<p>Page 8 says that Redbourn and Wheathampstead have their own identities. This should become a material planning consideration in the future.</p> <p>Planning officers and members of Plans North need to take into account that the scale and density of development in large villages excluded from the Green Belt should be lower than that in towns to retain their character.</p>
	Wheathampstead Parish Council	The broad policy approach to development in the large village should specify that development will be lower than in the towns, rather than it will 'generally' be. This is too vague.

Chapter 21 – Implementation and Delivery

Issue:	Respondent:	Summary of response:
DPDs and SPDs	Redbourn Parish Council (Diane Whiskin)	<p>Village Design Statements (VDS) should be adopted as a Supplementary Planning Document and included in the list.</p> <p>(See the Parish Council’s briefing paper on adoption of VDSs in LDFs for more details)</p>
Core Strategy Content	Anne Main MP	<p>More emphasis should have been on the role and use of the market with consideration given to a “shop and drop” delivery service similar to that operated by Leicester Market.</p> <p>Concerns over the impacts of a piazza on local businesses and people passing through the City Centre.</p> <p>It is important that the vision is not unrealistic.</p> <p>There should be a strategy to enhance the city’s secondary shopping areas.</p> <p>There are concerns about the gaps between vision and reality. The Council should ensure that it is clear on what exactly its aims are and how achievable they are, rather than offering rhetoric which may not be applicable to the real situation in the city.</p>
	Thames Water	<p>Due to limited information on location of development (red line maps) and the complexities of sewerage networks, Thames Water are unable to determine the infrastructure needs at this stage. Drainage areas do not fit neatly over local authority boundaries and therefore we also need to consider neighbouring boroughs’ ambitions as well.</p> <p>Thames Water has concerns that development within St Albans could result in sewer flooding, in addition there are also concerns regarding the treatment capacity of Maple Lodge Sewage Treatment Works.</p> <p>Water and sewerage undertakers therefore rely heavily on the planning system to ensure infrastructure is provided ahead of development either through phasing or the use of Grampian style conditions.</p> <p>Given the differences in the timescales of the water and sewerage companies’ investment programmes and the LDF and the potential environmental implications of development being provided ahead of any necessary infrastructure upgrades it is essential that the Core Strategy makes reference to the provision of adequate sewerage infrastructure to service development.</p> <p>A proposed policy and supporting text is included with submission.</p> <p>Would like the sewage treatment works at Piggotshill Lane, Harpenden and Meads Lane, Wheathampstead to be included in the Core Strategy as major developed sites in the Green Belt. Such measures would assist with</p>

		ensuring that any future developments required to deliver an increase in capacity or environmental improvements can be undertaken.
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Other Issues (Q19/I1)

Issue:	Respondent:	Summary of response:
East of England Plan	EERA (Helen De La Rue)	The East of England Plan is no longer referred to as RSS14.
Structure and Style of Document	EERA (Helen De La Rue)	Attention to regional policy is thorough but local policy content needs to be developed
	Dacorum Borough Council (Francis Whittaker)	<p>You may wish to consider places separately from the over-arching district wide strategies. This approach has been commended by GO-East.</p> <p>This may provide greater clarity on and a focus for how settlements differ from each other and how they differ from the approach to the wider countryside.</p> <p>This approach has helped Dacorum set out individual visions for settlements and identify specific issues affecting it.</p>
	Go East (Paul Fellows)	<p>Document is clearly presented, concise with links to other plans and strategies.</p> <p>Chapter 4 and 20 are very useful to the reader.</p>
	Harpenden Town Council	Tables should be numbered.
	St Albans Civic Society	The printed version has a host of unnecessary, irrelevant and distracting images. The layout, particularly when combined with tables, is poor. It looks more like a public relations exercise than a professional and carefully considered presentation of a document that will serve as a statutory reference for the next twenty years.
The LDF Evidence Base	Go- East (Paul Fellows)	<p>An incomplete evidence base for the consultation document made it difficult to respond.</p> <p>Need to ensure that all evidence base work is complete and publicly available for the pre-submission document. in particular:</p> <ul style="list-style-type: none"> • Strategic Housing Market Assessment. • Development Economics Study. • Strategic Housing Land Availability Assessment. This was only available towards the end of the consultation period. The SHLAA Panel needs to include local house building and property market representatives. • Housing Monitoring Report. • Hertfordshire Infrastructure Investment and Infrastructure implementation Plan • Further work on the need for a western orbital route and eastern distributor road.

		<ul style="list-style-type: none"> • Traffic modelling. This may have implications for the choice of strategic development options. • Further work on retail as outlined in paragraph 12.18. • Further work on employment as mentioned in paragraph 11.18.
Hemel Hempstead	Dacorum Borough Council (Francis Whittaker)	Welcome reference to inter-relationship between St Albans and Hemel Hempstead. This needs to be expanded to take account of planning issues arising in Hemel Hempstead.
Paragraph 2.10	Environment Agency (Keira Murphy)	<p>Paragraph needs to include the importance of rivers and their valleys/floodplains within the District.</p> <p>Text needs to be more specific about which areas needs enhancement.</p> <p>General enhancements of river corridors need to be considered.</p> <p>Chalk streams environments are rare and need higher profile.</p>
Development Pressure (paragraphs 2.17 to 2.27)	Environment Agency (Keira Murphy)	<p>Section on redevelopment of Brownfield sites is needed.</p> <p>Redevelopment provides opportunity to deal with historic contamination. There have been isolated industrial sites (cf. St Leonards Court, Sandridge) where contamination has been an issue.</p>
Corporate Plan	Environment Agency (Keira Murphy)	The first bullet point should be changed to “To safeguard and enhance the environment” as this should be more aspiration and encourage improvements through development, e.g. improving the status of water bodies, reduction in carbon emissions, water demand management etc.
Key Strategic Influences	East of England Development Agency (Andrew Fisher)	A sustainable approach to future employment land provision should be identified as one of the key strategic influences.
Options	Go-East (Paul Fellows)	<p>Need to clearly demonstration why options have been chosen and others rejected.</p> <p>(see also comment on Sustainability Appraisal below)</p>
Sustainability Appraisal	Go East (Paul Fellows)	<p>Assessment of options needs to be fully informed by the Sustainability Appraisal.</p> <p>The Sustainability Appraisal needs to assess all options, proposed and discounted.</p>
Consultation process	St Albans Civic Society	<p>The consultation exercise appears low key and ineffective. This could prejudice the adoption of the Core Strategy.</p> <p>Dismayed by the simplistic and largely meaningless wording of the questionnaire, and the false choices that are presented in certain places.</p>

	St Albans Civic Society	It is stated that the Core Strategy is to include policies (para 7.1). However, there are no policies as such to be found anywhere in the document. If the final document includes policies that have not been seen by the public or been the subject of consultation, this will undermine the whole process and render the Core Strategy inherently unsound.
Existing problems	London Colney Village Concern	Need a complete appraisal of local problems and must include any impact on the River Colne catchment and waterways, plus air, particulate, noise, light and acoustic pollution emanating at Junctions 22 and 21A and other major roads at present. Social housing policy needs examination, as does a lax planning regime for commercial premises: while inadequate drainage is causing flooding; and bad parking is creating congestion and danger.
	London Colney Village Concern	The main problem is a preoccupation with St Albans City, not the effects on surrounding countryside, which is already at capacity for traffic, pollution and human pressures. We all want improvements, but what if we cannot cope with a bigger population. Existing infrastructure is not maintained – serious backlog of social, physical and environmental issues here.