

Your Harpenden Neighbourhood Plan



HARPENDEN
NEIGHBOURHOOD PLAN

We would like to thank local residents, who have shaped the Harpenden Neighbourhood Plan by completing 3,467 surveys and have made up the 450 people attending Harpenden Neighbourhood Plan events.

We are now carrying out a third round of engagement to get your views on the draft Neighbourhood Plan.

The draft Neighbourhood Plan sets out a number of proposed policies that future developments in our area will need to conform to.

We need your views to shape these policies and your support to bring forward the Neighbourhood Plan.

How can you get involved?

Please complete a Survey to tell us your views on the draft Neighbourhood Plan.

Copies of the complete draft Neighbourhood Plan are available to view at the Town Hall and on the Town Council website.

The Survey is available online at: www.surveymonkey.com/r/HNPE3 or in hard copy from the Town Hall.

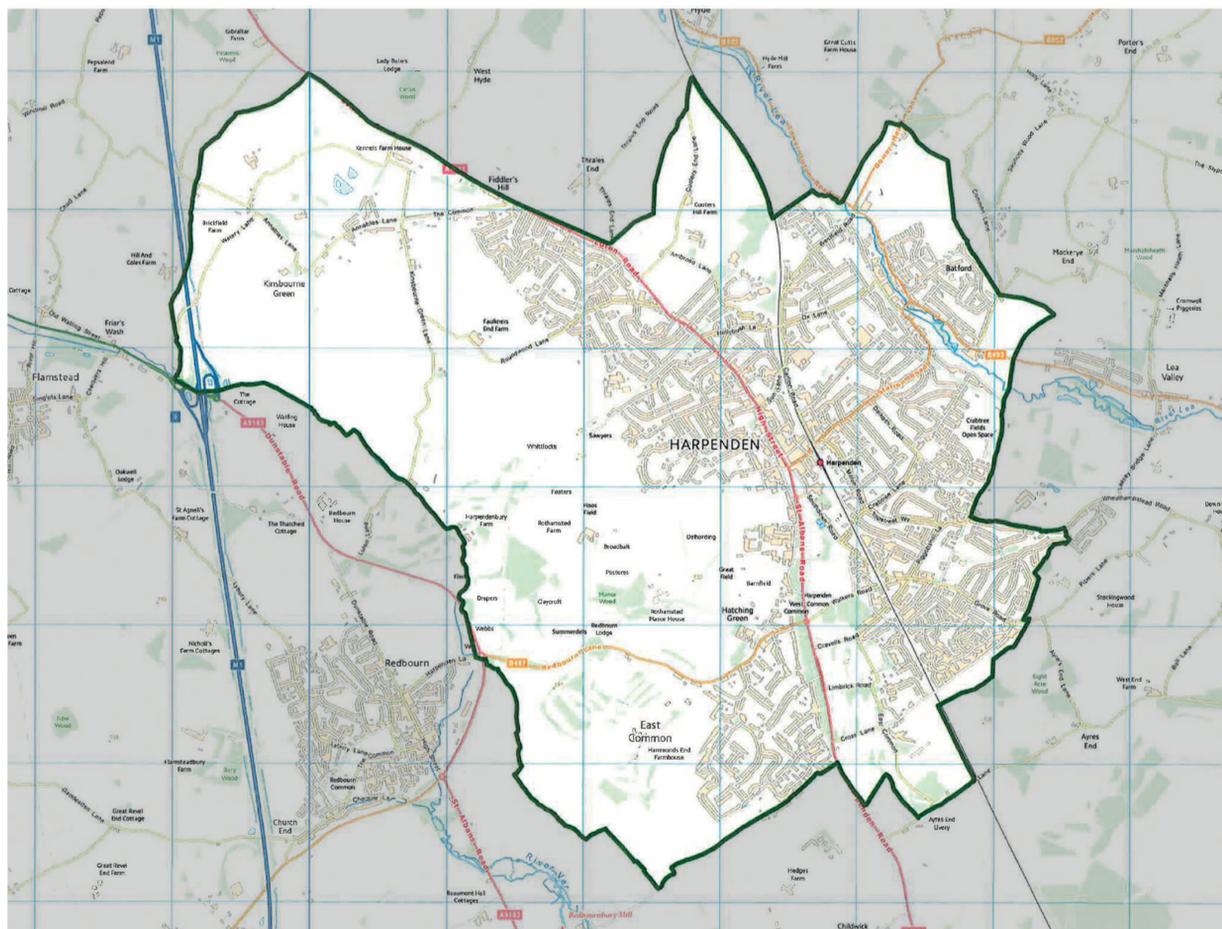


Town Council Website:
www.harpenden.gov.uk



Email:
Philip.wright@harpenden.gov.uk

Please sign up!



The Harpenden Neighbourhood Plan: Timeline



HARPENDEN NEIGHBOURHOOD PLAN



The Harpenden Neighbourhood Plan: Spatial Strategy



SS1 – The Spatial Strategy

- The Built up Area of Harpenden should be the priority for new development in the Harpenden Neighbourhood Plan Area. The Built up Area Boundary of Harpenden is shown opposite. Planning applications for new development proposals outside the Built up Area Boundary must either:
 - Be an exception to inappropriate development in the Green Belt; or
 - In the case of what would normally be deemed inappropriate development in the Green Belt, must demonstrate:
 - Very special circumstances for development in the Green Belt; and
 - Why the proposal cannot be located within the Built up Area Boundary of Harpenden.
- Development proposals in Harpenden Town Centre, as shown opposite must have regard to the special characteristics of the town centre, in accordance with the policies of this Neighbourhood Plan.

SS2 – Infrastructure Zones

The five Infrastructure Zones are shown below. In order to mitigate the impact of new development, certain proposals in each zone must meet the following criteria as well as satisfying the policies of this Neighbourhood Plan.

<p>Significant development proposals in the North West must:</p> <ul style="list-style-type: none"> Demonstrate how impact of new development on the A1081 and local roads will be mitigated; Demonstrate adequate provision for appropriate education facilities in close proximity to new development or proposed additional capacity*; Demonstrate sufficient convenience shopping within a close proximity to new development*; Demonstrate sufficient recreational space within a close proximity to new development*. 	<p>Significant development proposals in the North East must:</p> <ul style="list-style-type: none"> Demonstrate how impact of new development on the Lower Luton Road and Station Road will be mitigated; Incorporate a proportionate amount of public open space, preferably sports and recreational space*; Demonstrate adequate provision for appropriate education facilities in close proximity to new development or proposed additional capacity*; Demonstrate sufficient convenience shopping within a close proximity to new development*; Demonstrate sufficient recreational space within a close proximity to new development*.
<p>Significant development proposals in the South West must:</p> <ul style="list-style-type: none"> Demonstrate how impact of new development on the A1081 and Redbourn Road will be mitigated; Demonstrate how Harpenden Common will not be negatively impacted by new development, including key views in to and from the Common; Demonstrate adequate convenience shopping provision in close proximity to new development*; Demonstrate adequate provision for appropriate education facilities in close proximity to new development or proposed additional capacity*; Demonstrate sufficient recreational space within a close proximity to new development*. 	<p>Significant development proposals in the South East must:</p> <ul style="list-style-type: none"> Demonstrate how impact on key routes such as Southdown Road, Grove Road, Wheathampstead Road and Piggotshill Lane will be mitigated; Demonstrate adequate provision for appropriate education facilities in close proximity to new development or proposed additional capacity*; Demonstrate sufficient recreational space within a close proximity to new development*; Demonstrate how pressure on parking will not significantly increase as a result of the proposed development.
<p>Major development in Harpenden Town Centre must:</p> <ul style="list-style-type: none"> Demonstrate how road congestion will be mitigated or reduced as a result of the proposed development; Demonstrate how the proposed development will protect the appearance of the historic town centre; and Demonstrate how pressure on parking will not significantly increase as a result of the proposed development. 	

* Residential proposals only

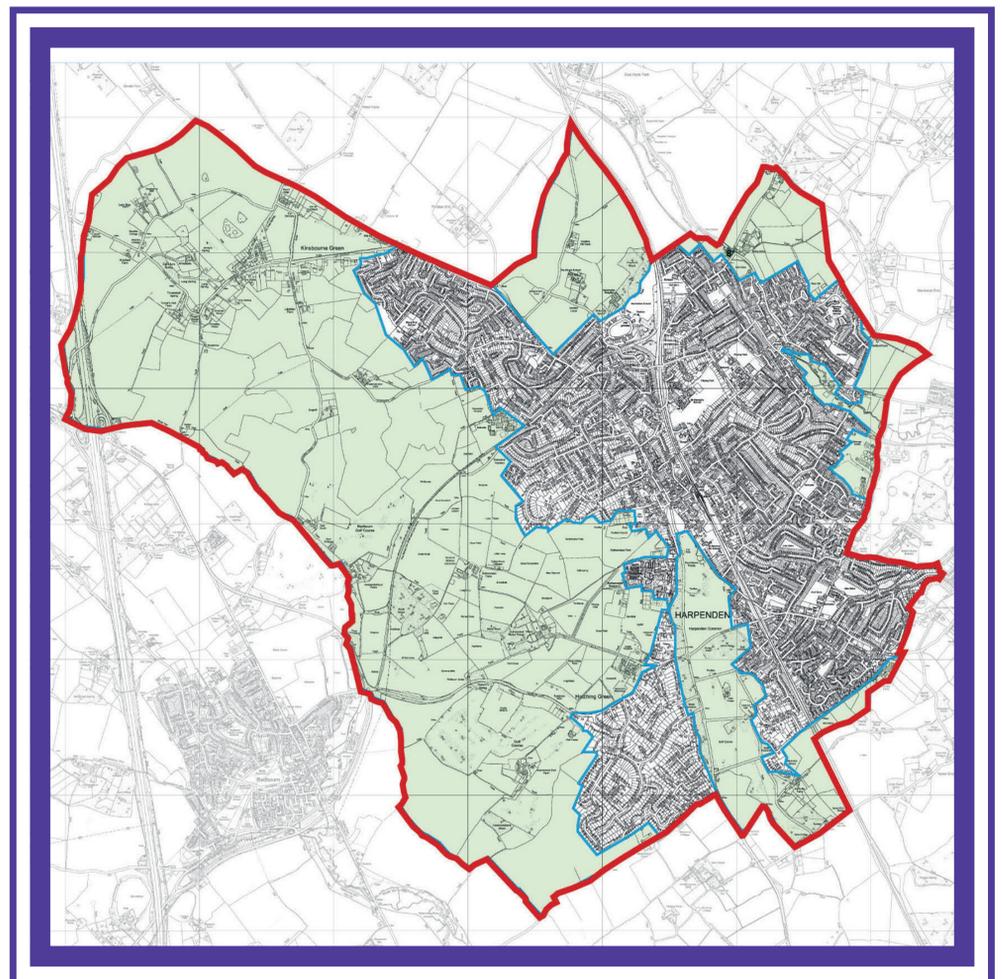


Figure 1: Built up Area Boundary

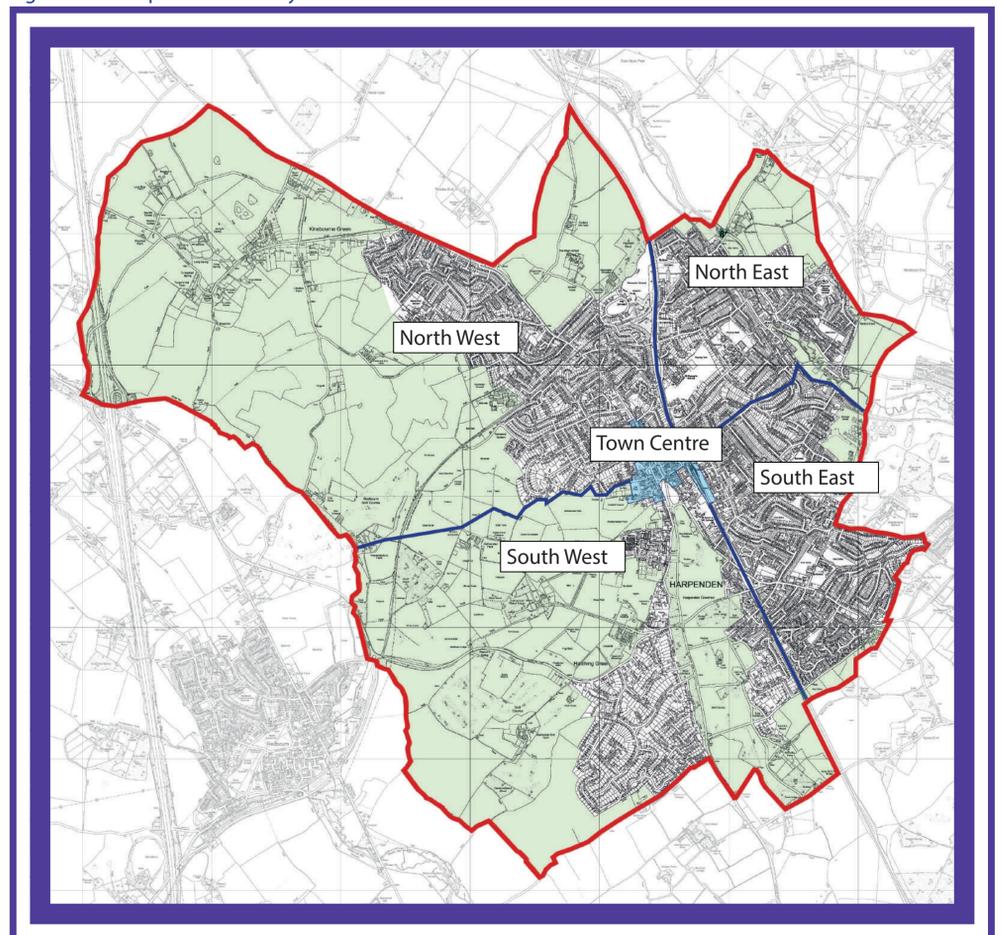


Figure 2: Infrastructure Zones

The Harpenden Neighbourhood Plan: Employment and Retail



HARPENDEN
NEIGHBOURHOOD PLAN

ER1 - Supporting Harpenden's Economy

In order to support the Harpenden economy, the following proposals will be supported:

1. Appropriate improvement, enhancement and redevelopment of existing employment and retail sites for such uses.
2. Provision of smaller commercial units suitable for use by local businesses.
3. Appropriate facilities for the use of flexible workers.

ER2 – Designated Employment Locations

The locations set out in the table below and shown opposite are designated as protected employment locations. At these locations, change of use to a non-B Class use will not be supported unless it can be demonstrated that the premises are no longer suitable for business use or there is clear evidence that there is no prospect of a new commercial occupier being found.

Reference	Name
DEL1	Rothamsted Research
DEL2	Southdown Industrial Estate
DEL3	Coldharbour Lane
DEL4	Batford Mill Industrial Estate

ER3 – Rothamsted Research

This Neighbourhood Plan supports appropriate redevelopment or expansion of Rothamsted Research to meet Rothamsted's long-term needs and to accommodate firms carrying out complementary knowledge-based research and development activities. Subject to an appropriate proposal, the Neighbourhood Plan would support a very special circumstances case made by Rothamsted Research for development not normally considered appropriate in the Green Belt.

ER4 – Designated Retail Areas

The table below identifies the designated retail areas within the Harpenden Neighbourhood Plan Area, which are identified at the figure opposite.

Reference	Name	Type
DRA1	Harpenden Town Centre	Large retail area
DRA2	Southdown Local Centre	Large local centre
DRA3	North Harpenden Local Centre	Small parade of shops
DRA4	Kinsbourne Green Local Centre	Small parade of shops
DRA5	Batford Local Centre	Small parade of shops

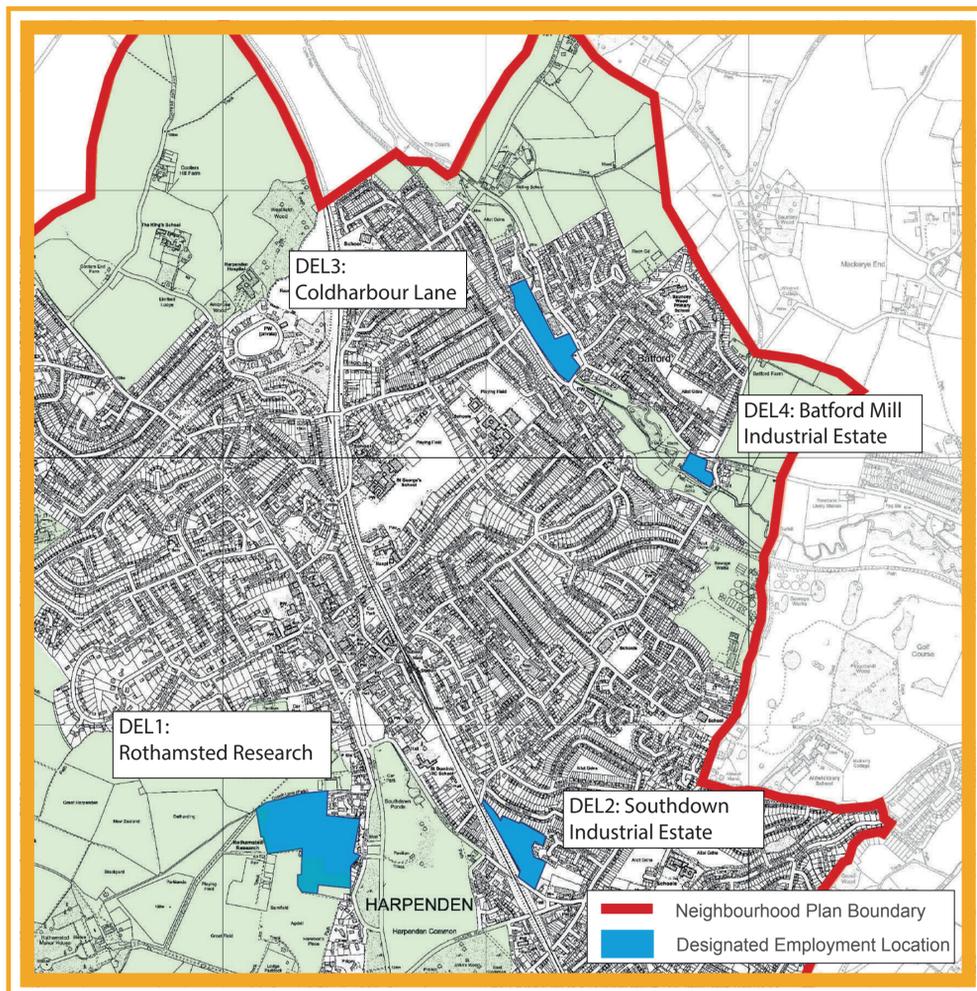


Figure 3: Designated Employment Locations

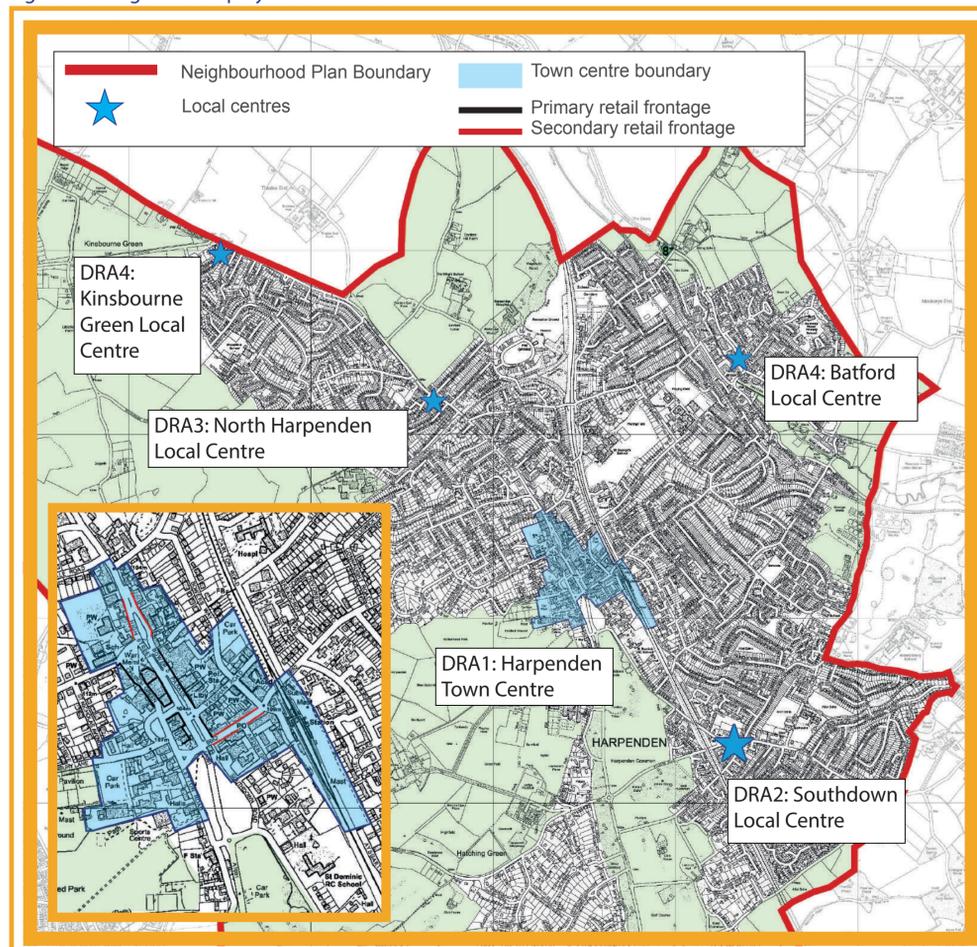


Figure 4: Designated Retail Areas

The Harpenden Neighbourhood Plan: Employment and Retail



ER5 – Supporting Harpenden Town Centre Economy

In Harpenden Town Centre, as identified at Figure 5.2, proposals will be supported that:

- Provide an appropriate mix and balance of retail units, as follows:
 - o In the Primary Shopping Areas, as identified at Figure 5.2, at least 60% of shopfronts (by length) should remain in Use Class A1 and 90% of shopfronts should remain in A-Class uses.
 - o In the Secondary Shopping Areas, as identified at Figure 5.2, at least 50% of shopfronts (by length) should remain in Use Class A1 and 90% of shopfronts should remain in A-Class use.

Proposals that would place the overall percentage of units below these figures will not be supported unless in exceptional circumstances where the community benefit of doing so outweighs the loss of an important retail unit:

- Provide important social infrastructure including community facilities, particularly where there is no negative impact to retail uses;
- Provide ground floor active frontages. It will not be acceptable to have new ground floor residential uses on Primary or Secondary frontages in Harpenden Town Centre;
- Support the regeneration of Arden Grove, Station Approach and Harding Parade, developing an attractive gateway into Harpenden;
- Promote the enhancement of the public realm in Harding Parade, Thompsons Close and North High Street; and
- Proposals that would result in the loss of employment floorspace in the town centre will not be supported unless in exceptional circumstances where the community benefit of doing so outweighs the loss of an employment site.

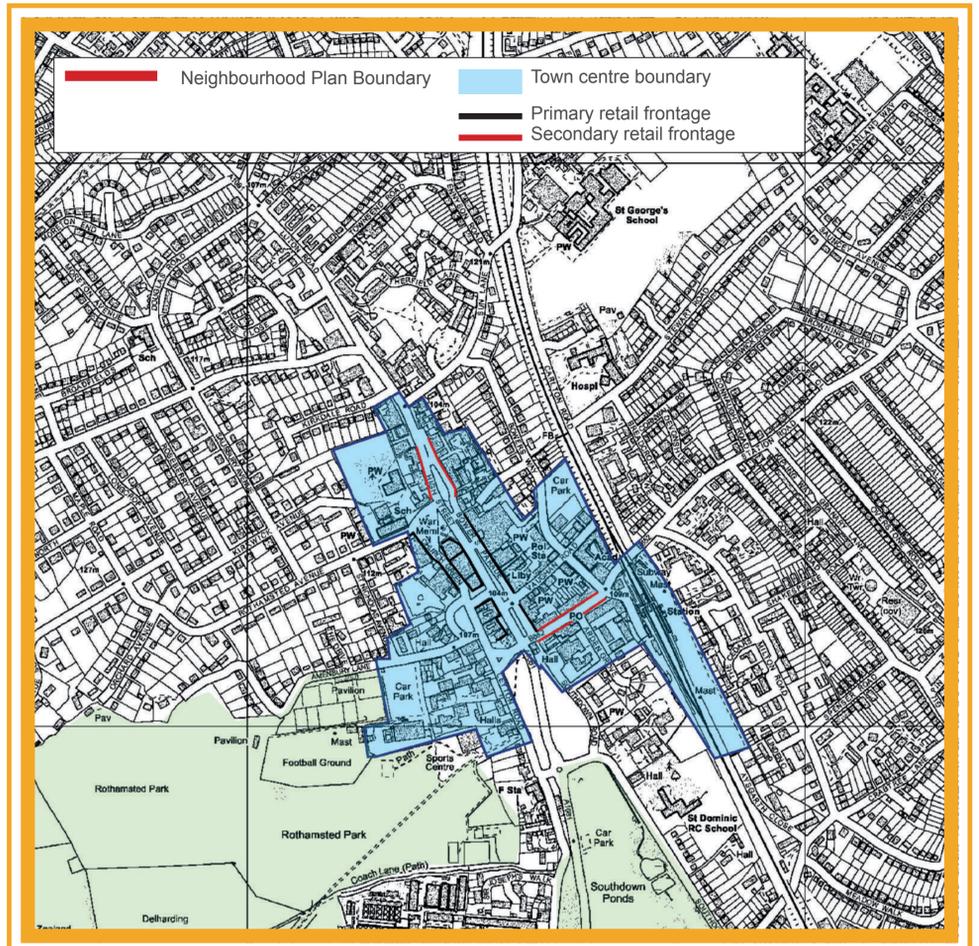


Figure 5: Town Centre

ER6 – Supporting Local Centres

In local centres, appropriate and proportionate proposals for local retail facilities and service development will be supported. Proposals involving the loss of a convenience shop without reprovision in the same local centre will not be supported.

ER7 - Employment Uses above Shops

In Harpenden Town Centre and Southdown Local Centre, employment uses above shops will be encouraged, to enhance the vibrancy and vitality of the local economy, provided any alteration to the premises does not impact on the viability of the commercial use below, does not reduce the existing commercial floor space for that business below and is consistent with the other policies of the Neighbourhood Plan.

ER8 – Adaptable, Innovative and Up to Date Retail and Employment Centres

Major retail and employment proposals must demonstrate that sufficient infrastructure is in place to meet an increase in demand and must utilise latest technologies wherever possible.



The Harpenden Neighbourhood Plan: Environment and Sustainable Design



HARPENDEN NEIGHBOURHOOD PLAN

ESD1 – Design Strategy

All developments must be visually appealing, designed to a high quality; they must also maintain or enhance the character of the area and support Harpenden as a low carbon place to live and work.

For major developments in the Neighbourhood Plan Area, a Design Brief must be produced for the whole site, setting out the principles for development prior to the submission of a planning application. The Design Brief should demonstrate consideration of the following (where applicable) in addition to the requirements of the other policies of this Neighbourhood Plan:

- i. Promotion of sustainable development, sustainable use of resources, green technologies and high levels of energy efficiency in order to minimise the impact on the environment of delivering the development and of the residents or users of the developments thereafter;
- ii. How the development will promote sustainable living for housing developments and sustainable use for non-residential developments;
- iii. Facilities made available for pedestrians and cyclists;
- iv. Location, type and management of open space, leisure and recreation facilities;
- v. Protection against the loss of or significant harm to ecological or landscape value;
- vi. A proportionate assessment of views to and from the proposed development and key views of townscape, including how views of landmark and gateway buildings, and important landscape features will be retained or enhanced. Visual impact should be minimised through the design of the site layout, buildings and landscape;
- vii. Materials palette (if it is not possible to indicate exact materials then a broad type should be specified);
- viii. How the development is sensitive to and makes a positive contribution to the local character of the area;
- ix. How permeability of land surface has been maintained and / or enhanced in the development and how the development is using sustainable solutions to reduce flood risk;
- x. How the water efficiency standard for housing has been applied;
- xi. How best practice measures have been used to avoid pollution to air, water and soil; and
- xii. Environmental performance. An environmental performance and sustainability statement (demonstrating how environmental issues have been fully considered in the location, site layout, general design, building design and construction and future use of the development) is required. This should be related to advice provided by the Hertfordshire Building Futures Design Toolkit¹.

Developments must be implemented in accordance with the principles set out in the Design Brief. Applicants are encouraged to engage with Harpenden Town Council / Rural Parish Council (whichever is applicable) to discuss the contents of the Design Brief.

¹ Or any subsequent amendments or successor toolkits

ESD2 – Local Character and Heritage

The height, scale and design of all developments must be considerate of and make a positive contribution to local character and heritage, maintaining or enhancing positive elements and seeking to address negative elements.

In particular, proposed developments involving or in the setting of statutory or locally listed buildings or the Harpenden Conservation Area (major developments only) must provide a Heritage Statement that assesses and outlines the significance of those heritage assets affected. The Heritage Statement must then demonstrate no negative impact to those assets or, in the case of negative impact, that the public benefits of the proposals outweigh this impact. In the case of development in the Conservation Area, Statements must demonstrate how the character of the Identity Area it sits within, as set out in the Harpenden Conservation Area Statement, is retained.

Necessary repairs to listed buildings should preserve as much historic fabric as possible using proven techniques (normally traditional and natural methods and materials, carried out sensitively). Reinstatement of traditional and natural materials, where doing so will not cause undue harm, will be encouraged.

The sensitive retrofitting of energy efficiency measures and the appropriate use of micro-renewables in historic buildings will be encouraged, while safeguarding the special characteristics of these heritage assets for the future.

ESD3 – Shopfronts

Proposals to create new or alter existing shopfronts will be welcomed where the design contributes to the attractiveness of the shopping area. Traditional timber shopfronts with large unobstructed windows are favoured. Any advertisements in or on shopfronts should be modest, particularly in the Conservation Area or where the proposal will affect a Listed Building.

ESD4 – Streets as Social Spaces that are Pleasant to Be In

Improvements to the public realm should be designed to encourage the activities intended to take place within it. Streets should be designed to accommodate a range of users, create visual interest and amenity, and encourage social interaction.

New residential streets must be designed in a way that encourages and prioritises pedestrians and cyclists rather than vehicle traffic. These streets should be suitable for a range of social activities, such as children's play, with 20mph generally being the maximum speed limit. Oppressive or divisive boundary markers will not be permitted.

ESD5 – New Car Parking Design

Parking, garages and servicing/ delivery yards for new development must be visually attractive or concealed by attractive design features. Cars must not dominate public areas and pedestrian and vehicular conflict must be minimised.

ESD6 – Refuse and Recycling

All proposals involving the creation of new residential units or non-residential floorspace must ensure sufficient bin capacity for waste and recycling is provided. Applicants must engage with St Albans City and District Council to confirm this. Storage must be incorporated, which should obscure views of bins from the public realm. Bins should be stored in a location where collection can take place conveniently without causing unacceptable disruption to road users and, where possible, should be secure.



The Harpenden Neighbourhood Plan: Environment and Sustainable Design



ESD7 – Green and Open Spaces and Areas of Ecological and Landscape Value

Developments must seek to maintain and enhance the quality and character of the varied open and green spaces, rivers and the natural environment within the Neighbourhood Plan area. Development should not result in the loss of or significant harm to ecological or landscape value of the varied green spaces, rivers and natural environment.

Significant developments must include proportionate new public open spaces, including green spaces.

ESD8 – Key Views

The Harpenden Neighbourhood Plan area includes the following Key Views, which are shown opposite:

1. The Common
2. The High Street
3. Batford Springs
4. Kinsbourne Green Common

Development proposals must include evidence that detail protection or enhancement of key views to and from these locations, including attractive green spaces and important townscape features, such as landmark and gateway buildings.

ESD9 – Views in New Developments

Views along streets and/or open spaces to the surrounding countryside must be created within new developments where there are opportunities to do so. Development should not have a harmful visual impact on the townscape or landscape.

ESD10 – Access to the Natural Environment

Proposals should retain and enhance public rights of way. Where practical, major development proposals should create new public rights of way and cycle paths. These should act as green links, improving accessibility and connectivity between the town and green spaces including open countryside.

ESD11 – Allotments

Allotment sites that are registered as statutory allotments will be protected, and enhanced where possible as defined in the Town Council's statutory duty. Requests to develop additional allotments will be supported should there be demand for them.

ESD12 – Biodiversity

The protection and enhancement of urban and rural biodiversity will be supported. Efforts to enhance biodiversity, such as through the creation of new habitats, the enhancement of existing sites and the development and implementation of ecological management plans will be supported. Green roofs and walls will be encouraged where appropriate.

Design and landscaping of proposed developments should be formed in the context of biodiversity conservation. Major developments should incorporate design features which support local wildlife such as incorporating swift bricks and swift or bat boxes in developments.

The integrity and value of green corridors such as watercourses and disused railway lines should be maintained and opportunities to strengthen such green links are not to be unacceptably compromised.

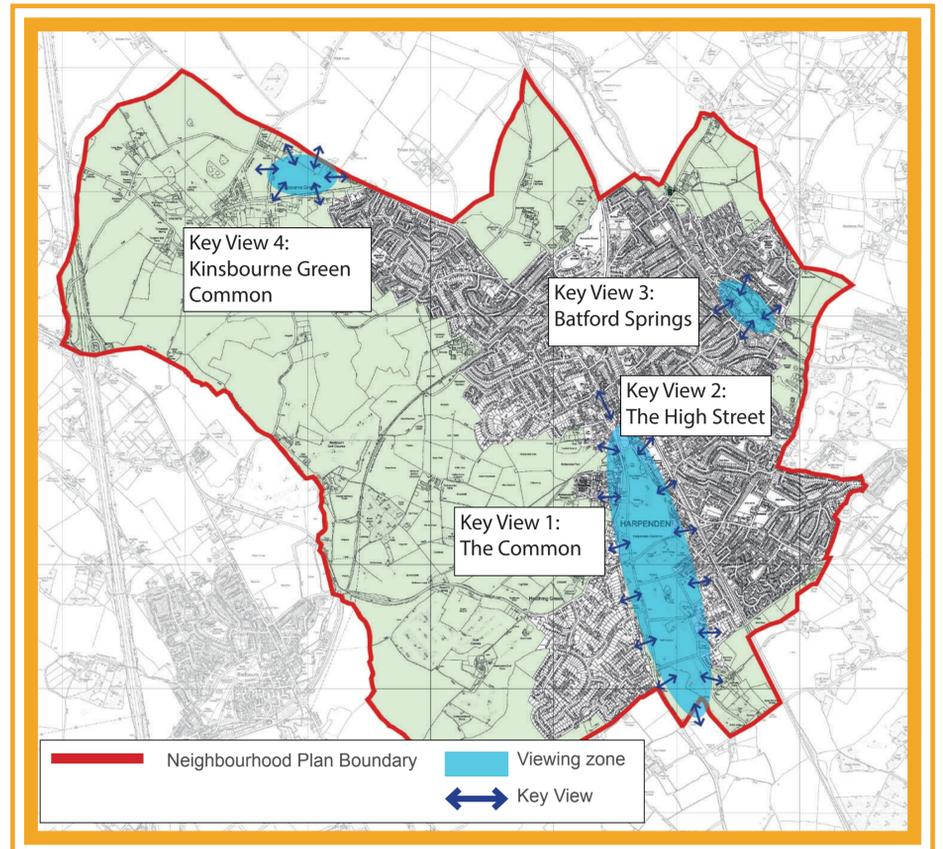
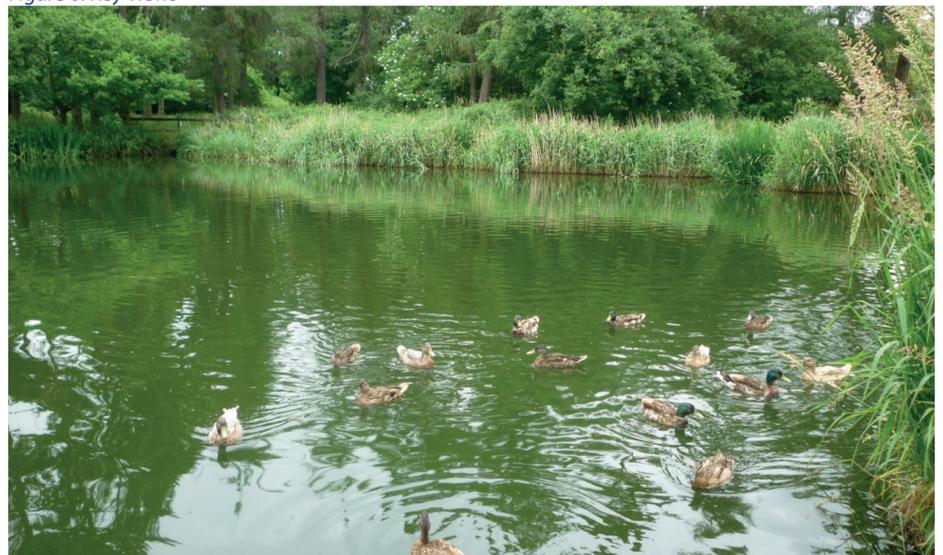


Figure 6: Key Views



The Harpenden Neighbourhood Plan: Environment and Sustainable Design



HARPENDEN NEIGHBOURHOOD PLAN

ESD13 – Trees and Hedges

Development proposals should be designed to retain ancient trees or trees or hedgerows of arboricultural or amenity value and should be accompanied by a tree survey that establishes the health and longevity of any affected trees. Development proposals must not result in unacceptable loss of – or damage to – existing trees or woodlands or hedges or significant landscaping during or because of development.

Any trees lost as a result of development must be replaced at a ratio of at least 1:1 within the site, with a preference for native trees and for fruit and nut trees. The responsible planting of additional trees that reduce or absorb air pollution from traffic will be supported throughout the Neighbourhood Plan Area.

ESD14 – Sustainability and Energy Efficiency

All development must support the objectives of making the Neighbourhood Plan Area a low carbon area, supporting sustainable living, sustainable working and sustainable leisure and mitigating the impacts of climate change. Developments should be designed to minimise energy consumption including through the use of sustainable materials, high-energy efficiency levels, the incorporation of renewable energy initiatives and the efficient design of the building. Developments should aim to be carbon neutral.

Major developments are required to support sustainable living and utilise best practice in the use of sustainable resources, green technologies and sustainable transport infrastructure such as renewable energy and storage, decentralized heating systems, heat from waste systems, rainwater harvesting and electric car charging points.

ESD15 – Carbon Dioxide Emissions

Major developments must demonstrate an improvement to the baseline Target Emission Rate for carbon dioxide emissions as set out in Building Regulations.

To reduce carbon dioxide emissions from developments, energy use should be reduced by sustainable use of energy in accordance with the following energy hierarchy:

1. Reduce energy usage. This can be achieved through adopting sustainable design principles that reduce the amount of energy needed;
2. Supply energy efficiently. This can be achieved for example by using decentralised energy systems/combined heat and power; and
3. To use renewable energy.

Carbon neutral developments would be welcome.

ESD16 – Community Energy Initiatives

Community energy initiatives will be encouraged. In particular, the Neighbourhood Plan supports renewable energy schemes that demonstrate evidence of community consultation at early stages in the development, especially when this leads to a tangible benefit to the community. This could, for example, be in the form of allowing community investment in the scheme or developer investment in other low carbon initiatives in Harpenden. However, any community energy initiatives must not have a negative impact on the amenity of local residents or the appearance and character of the surrounding area.

ESD17 – Flood Risk

Proposals must incorporate a sustainable and integrated approach to the management of flood risk, surface water (including run off) and foul drainage. These proposals should be robust to the expected impacts of climate change.

Developments over one hectare or all developments in Flood Zone 2 or 3 must be supported by a Flood Risk Assessment.

All development involving the loss of permeable surfaces, loss of trees, loss of soft landscaping or loss of any other feature that reduces flood risk is required to use appropriate mitigation measures to prevent an increase in flood risk within the site or elsewhere.

Sustainable Drainage Systems (SuDS) should be used proportionately to mitigate any predicted increase in flood risk. These may include:

- i. Planting, particularly trees;
- ii. Introduction of permeable driveways, parking or other 'hardstanding' areas;
- iii. Rainwater water harvesting and storage features (including butts);
- iv. Green roofs;
- v. Attenuation tanks;
- vi. Soakaways;
- vii. Attenuation ponds.

SuDS must be designed as an integral part of the green infrastructure and street network. The system should effectively mitigate any adverse effects from surface water run-off and flooding on people, property and the ecological value of the local environment. A surface water sewer should be seen as a last resort and no surface water will be permitted to enter the public foul sewage network.

Major developments must provide a SuDS Strategy and drawings showing all SuDS features. This must be supported with calculations showing how surface water flood risk will not increase.

ESD18 – Water Conservation

All developments must be designed taking into account best practice in water efficiency, such as water efficient fittings and appliances, water harvesting and storage features, and green roofs. All major developments must provide evidence of anticipated internal water use at or below 120 litres per person per day.

ESD19 – Pollution

Appropriate best practice measures should be incorporated into developments to avoid pollution to air, water and soil both during construction and in the operation of the completed development.

Developments should not increase air pollution levels in the area and actions should be taken to mitigate this such as planting, appropriate siting of air outlets, and designing to ensure any air pollution can dissipate.

Developments should be designed to minimise light pollution for example by appropriate siting of lights, appropriate light fittings, and management of external lighting.

The Harpenden Neighbourhood Plan: Housing



HARPENDEN NEIGHBOURHOOD PLAN

H1 – Housing Strategy

New residential development will be supported as long as it meets the requirements set out in the latest housing need assessment prepared by St Albans City and District Council subject to compliance with other Development Plan Policies. Such housing should firstly come forward through sites identified in the Neighbourhood Plan and then through infill and brownfield development wherever possible.

H2 – Housing Renewal

The redevelopment of existing residential properties that are no longer fit for purpose will be supported. The Neighbourhood Plan defines a property as no longer fit for purpose if it meets one or more of the following criteria: unsafe, in disrepair, unsustainable, or makes inefficient use of its site.

Redevelopment must be of a high quality design and conform to all other relevant policies in the Neighbourhood Plan.

H3 – Dwelling Size and Type

Major residential developments are required to submit a Dwellings Mix Strategy as part of the Design and Access Statement with any planning application. The strategy must clearly demonstrate how the proposed development addresses the objectively identified need for different sized and types of housing as set out in the latest assessment of housing need carried out by St Albans City and District Council. Proposals that are not considered to meet an identified size/type need will not be supported.

H4 – Residential Density

New major residential development must be at an appropriate density subject to local character and in accordance with the desire to protect the Green Belt insofar as possible. A minimum density of 40 dwellings per hectare must be met unless an applicant can demonstrate doing so would have a negative impact on local character, a designated heritage asset, biodiversity, trees or flood risk. Higher density developments may be acceptable in Harpenden Town Centre subject to design considerations.

H5 – Affordable Housing

Proposals for major housing developments are expected to provide 40% of affordable housing subject to viability until such time as a new St Albans Local Plan is adopted with a revised target for affordable housing.

On all such schemes, affordable housing will be provided on-site as part of the residential development and will be fully integrated within it, other than in exceptional circumstances. Affordable housing should usually be approximately 60% socially rented and 40% intermediate.

H6 – Advertisement of Market Housing

Developers of market housing in the Neighbourhood Plan Area should seek to advertise locally in the first instance.

H7 – Lifetime Homes

New housing should be capable of meeting the changing needs of residents over their lifetimes. It should be accessible to those with limited mobility and capable of adaptation for residents who are wheelchair users.

On major housing developments, at least 10% of homes shall be built to be 'Wheelchair Adaptable' as defined by Building Regulations M(2) or whatever standard supersedes it.

H8 – Specialist Accommodation

Proposals for specialist accommodation and residential care will be supported where they are:

- Within easy access to a choice of sustainable travel options.
- Within walking distance, on a safe route to town and local centre shops and services.

- Well integrated with existing communities.
- Of a safe and stimulating design.

H9 – Higher Density Development

Subject to compliance with other policies in this Plan, residential or mixed-use residential proposals that look to build upwards as a way of increasing density will be supported as long as it meets the following criteria:

- Situated in an appropriate location, either in Harpenden Town Centre or Southdown Local Centre
- No taller than three stories in height unless in exceptional circumstances.

H10 – Housing Site Allocations

Proposals for residential development will be supported on the sites set out in the table below, provided the proposed development is in accordance with the special conditions set out in the table below and the other policies of this Neighbourhood Plan and the Development Plan. The sites are identified in the figure below numbers of dwellings are subject to design considerations

Site Ref	Site Name	Indicative number of dwellings	Special conditions
HA1	Pan Autos	41	
HA2	Jewsons, Grove Road, Southdown	40	
HA3	Westfield Allotments	24	100% affordable housing
HA4	Garages at Noke Shot	8	
HA5	Land at 63 High Street	5	
HA6	Land and Garages at Longfield Road	5	
HA7	Victoria, Alexandra, Littleport and Collingham Houses, Marlborough Park	5	Requirement to re-provide the same amount of employment floorspace as currently provided on site.
		128	

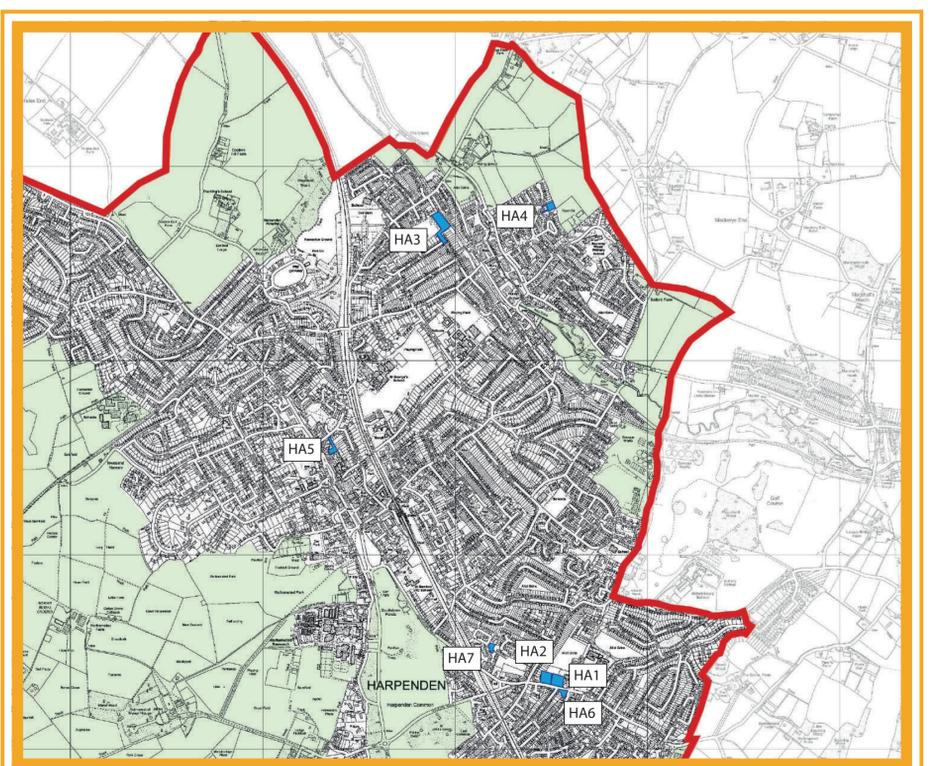


Figure 7: Housing Site Allocations

H11 – Private Amenity Space for Residential Development

Appropriate private outdoor amenity space must be provided for all new dwellings. In exceptional circumstances in the case of flats, it may be acceptable to provide this as shared amenity space.

The Harpenden Neighbourhood Plan: Housing



HARPENDEN
NEIGHBOURHOOD PLAN



HA1: Pan Autos



HA2: Jewsons, Grove Road, Southdown



HA3: Westfield Allotments



HA4: Garages at Noke Shot



HA5: Land at 63 High Street



HA6: Land and Garages at Longfield Road



HA7: Victoria, Alexandra, Littleport and Collingham Houses, Marlborough Park

The Harpenden Neighbourhood Plan: Social Infrastructure and Community Facilities



SI1 – School Development

Proposals to address any shortfall of accessible school places within Harpenden through temporary or permanent expansion of existing schools will be supported. Where expansion is not feasible or appropriate, we would support appropriate proposals for:

- New secondary schools to serve additional and existing residents
- New primary schools to serve additional and existing residents
- Pre-school and/or early years' places

Proposals for new schools must demonstrate that the chosen site is sustainably located in the context of its expected pupil intake, in order to minimise any traffic impact. Proposals must incorporate travel plans that encourage a reduction in the use of private cars for school journeys.

SI2 – Protection of Community Uses

Development proposals that would lead to the loss of buildings or facilities used, or last used, for community uses¹, will not be granted planning permission unless the use is suitably re-provided elsewhere or it can be clearly demonstrated that the building or facility is no longer required.

¹ Including dental practices, doctors surgeries, medical centres, faith buildings, public halls, nurseries, schools, indoor and outdoor sports facilities, Public Houses, Post Offices, hospitals, town halls/parish offices, children's and family centres, public open spaces, allotments/community orchards

SI3 – Venues for Community Use

Subject to compliance with other policies in this Neighbourhood Plan, the enhancement of existing and development of new community uses, including faith buildings, community halls and school dual use facilities is supported providing that they comply with the latest design guidance set by the relevant regulatory authority.

Any planning application proposal involving the creation of a new school must:

- Set out how, and to what extent, the facilities will be made available for sports and arts community use; and
- Set out how, and to what extent, the facilities will be made available to providers of adult health and wellbeing activities.

SI4 – Provision of Sports and Leisure Facilities

Proposals that enhance or provide new community sports and leisure facilities are supported, in particular where they are:

- Inclusive and suitable for residents with disabilities
- Accessible to users by public transport, walking and cycling
- Accompanied by an adequately-sized car park having regard to the likely modes of transport to and from the venue as well as nearby parking availability
- Including a mix of facilities that have been determined in consultation with the local planning authority, Town Council, local sports clubs and other stakeholders.

SI5 – Provision of Arts and Cultural Facilities

Proposals that enhance or provide new arts and cultural facilities will be welcomed in particular where they are:

- Inclusive and suitable for residents with disabilities
- Accessible to users by public transport, walking and cycling
- Accompanied by an adequately-sized car park having regard to the likely modes of transport to and from the venue as well as nearby parking availability
- Including a mix of facilities that reflect a range of cultural pastimes that have been determined in consultation with the local planning authority, Town Council and other stakeholders.

SI6 – New Sports Centre and Cultural Venue

The Neighbourhood Plan supports the development of a new Sports Centre and Cultural Venue at the current site of Harpenden Swimming Pool and Sports Centre. The new venues should improve upon the current offer provided by the Swimming Pool, Sports Centre and Public Halls.

SI7 – Accessible GP Practices

New major residential developments should make appropriate funding towards GP provision where pressure on services is increased. Applicants should engage with the relevant health authorities at the earliest possible stage to agree the increase in capacity required to facilitate the proposed development. Developers of significant residential developments, should include on-site provision if preferred by the health authorities.

SI8 – Harpenden Memorial Hospital

Proposals to redevelop the Harpenden Memorial Hospital are supported, provided that they include a Health and Wellbeing hub of equivalent floorspace to the existing healthcare use at the site, which:

- enables residents to access a wide range of health services and support in one place
- includes an increased GP provision
- provides specialist care for the elderly and those with physical and learning disabilities.

SI9 – Visitor Accommodation including Hotels

Proposals for new visitor accommodation, including hotels, are encouraged in appropriate locations that are in close proximity to Town and Local Centres.



The Harpenden Neighbourhood Plan: Transport and Movement



T1 – Transport Assessments

Major development proposals will be supported by a Transport Assessment, which must demonstrate predicted levels of traffic generated from the proposed development and the impacts of this additional traffic on key roads and junctions within the town. Transport assessments must identify areas of established traffic congestion. Where negative impacts on the network are identified developers will be expected to fund proportionate improvements to mitigate this impact.

T2 – Proposals Affecting the A1081, B653 and B652

Major development proposals for development that directly accesses onto the A1081, B653 (Lower Luton Road), B652 (Station Road) or Redbourn Road that would involve an increase in traffic on those roads (as demonstrated by a Transport Assessment) will be required to make provision for, and contribute to, appropriate measures to ease traffic congestion on those roads. Applicants must demonstrate that measures are incorporated that will ensure the proposals do not further inhibit the free flow of traffic on those roads or, in the case of the A1081 and its nearby streets, increase parking stress.

T3 – Travel Plans

New major development proposals must provide and agree a Travel Plan setting out how opportunities for encouraging, facilitating and supporting use of and improvement to sustainable travel modes have been maximised and will be delivered with the aim of reducing pollution levels. This should be proportionate to the likely impact detailed in a Transport Assessment.

T4 – School Travel Plans

Proposals to improve the safe delivery of pupils to all Harpenden schools on foot, by bicycle, school bus or car will be supported. All school-related planning applications that are likely to impact the transport network, whether new schools or redevelopment, are required to produce a detailed School Travel Plan in support of this.

T5 – Road Layouts

On main routes, new road layouts that enhance the free flow of traffic and thus reduce pollution levels will be supported, provided it is demonstrated that proposals are developed in liaison with and supported by local people.

T6 – Improvements to the Sustainable Transport Network

Appropriate provision of new and improved walking or cycling routes, improvements to the public transport network and the introduction of electric car charging points are supported.

T7 – Integrated Pedestrian Network

All new housing developments must provide safe pedestrian access to link up with existing or proposed footpaths, ensuring that residents can walk safely to bus stops, schools, work and other facilities.

T8 – Bus Stop Layouts

In order to improve traffic flow and reduce congestion, proposals for significant residential development must provide appropriate road layout changes to ensure existing and new bus stop areas serving new residents are provided off the main highway (in a layby) to ensure traffic flow is not impeded.

T9 – Harpenden to St Albans Cycle Route

Improvement of the Harpenden to St Albans Cycle Route within the Neighbourhood Plan Area will be supported, particularly through the provision of a cycle only lane from Beesonend Lane past West Common.

T10 – Parking in Harpenden Town Centre

Appropriate proposals to increase car parking and cycle storage capacity within Harpenden Town Centre are supported. In particular proposals for a multi-level car park at the Station and an increase in parking provision alongside the proposed redevelopment of Harpenden Sports Centre and Swimming Pool. Where appropriate in the context of local character and heritage, the Neighbourhood Plan supports proposals that seek to introduce a second tier to surface car parks, subject to appropriate traffic modelling that determines no negative impact to local highways.

T11 – Residential Parking Standards

Proposals for all new homes to be built in Harpenden should provide an appropriate level of off-street parking, having regard to site-specific circumstances & maximum parking standards set out in the 2002 St Albans City and District Council Revised Parking Policies and Standards (or the most up to date parking standards). Should an amount of parking be proposed that exceeds or significantly falls below the maximum standards, this must be robustly justified with evidence of anticipated demand. Where parking includes a garage, the minimum dimensions should be 6m long by 3m wide and have an appropriate height to allow most vehicles to be parked.

Policy T12 – Access for All

Proposals incorporating practical measures to assist residents and visitors with limited mobility will be supported. This includes careful placing of disabled car parking spaces, safer crossings giving ample time to cross and wider pathways. Proposals that would make access difficult for people with limited mobility will not be supported.



F All responses to the survey

APPENDIX B – ALL RESPONSES RECEIVED

Do you agree with the Policy SS1 - The Spatial Strategy?
Proposed building on the NW site of Harpenden will create the most enormous bottle neck. Already traffic on the A1081 can back up as far as Luton Hoo at rush hour. It also brings us perilously close to the boundary with Bedfordshire over which we have no control. Finally it will take away yet another important tranche of agricultural land. Expansion should take place in areas of fallow unproductive land, as well as brownfield sites.
Affordable housing desperately needed.
agree re character is important do not agree with any further green belt development
Agree to trying to minimise building on the green belt, and maximise building with already built up areas.
As environmentalists, we would prefer - as suggested by SS1 - that the Green Belt not be built on, to preserve biodiversity, however, we are very pragmatic that new housing is needed to meet the needs of the next generation. So, whilst we would clearly prioritise any brownfield land, in its absence, we understand that exceptions are sometimes needed.
Because it protects the greenbelt - but the St Albans plan might still erode the greenbelt, which remains a concern.
Concerned with the infill of several properties for 1 property with little consideration for extra traffic, safety for current owners, school capacity etc
Fully agree, the green belt surroundings of Harpenden are a key element of what make it a good place to live
Green belt should be protected, we need our wildlife and open spaces. I believe no exceptions should be allowed.
However the policy must be enforced rigorously with developers must do more than just give lip service to demonstrating special circumstances
I agree with SS1 Policy point 2. I disagree with policy 1. While the not building on green belt and we must build on brownfield sites policy seems overall to be a good policy. It doesn't appear to work well for Harpenden if the overarching need is to deliver new homes and a balanced view taking into account Green belt development needs to be considered. There have recently been a few brownfield residential developments which would meet this policy. However they have been at the expense of commercial/industrial land in the Lea Valley estate and hotel use with associated employment. Further urban development will be at the permanent expense of employment use and it will not necessarily reduce the need to travel car. Taking the Jewson and Pan Autos sites for example if these were built out at residential it is likely that most new residents will still drive to work in surrounding towns and/or drive to the station. Also a key point (to me) about SS1 is the quantity of new homes needed. The plan alludes to a very small number of units. If this doesn't meet the need maybe this is further evidence that edge of town development is needed.
I agree with the points raised on p19 of your document. However, if you are also looking for comment re: the section on page 18 where you mention the vision and spatial strategy together, I think it is a key omission not to mention parking. I think that this is a key issue that is taking over our town and threatening to destroy its character, so deserves to be pulled out at a summary level.
I am not sure which refers to the "built up area". The map is confusing. If by built up area we mean the blue bounded area then I agree. The red bounded area appears to contain a lot of green belt land or at least huge areas which currently has no housing on it. I think it's important to keep green spaces, and I do not agree with building on the greenbelt. Re town centre development I agree have regard of the environs
I don't know whether I agree, because the phrase "very special circumstances" is ambiguous. Crucially, does a very high level of demand for more housing in itself constitute such

Do you agree with the Policy SS1 - The Spatial Strategy?

circumstances? If it does, then this part of the wording of SS1 is meaningless and misleading, because the existence of a high level of demand is unarguable, so it is a condition that is clearly met. If so, then it would be more honest for SS1 to say: '...In the case of what would normally be deemed inappropriate development in the Green Belt, must demonstrate: o That the high level of housing demand in this area hasn't miraculously dissipated since the creation of this plan; and o Why the proposal cannot be located within the Built up Area Boundary of Harpenden.' In my view, high demand for more housing cannot sensibly be interpreted as being very special circumstances, in the context of green belt rules, because the whole point of green belt rules is to prevent housing demand leading to excessive urban sprawl and loss of countryside. Such an interpretation is the sort of 'doublethink' that feeds the growing cynicism of ordinary citizens about politics. SS1, or the commentary to it, should make clear that the HNP considers that the high level of demand for housing in this area is not, in itself, 'very special circumstances', unless the government changes the NPPF to make clear that this is what it means. I'm pretty sure that there's a huge amount of political pressure not to be too obstructive to green belt development. I understand a town council cannot resist this. But at least let's be honest. Let's not keep pretending that the NPPF in practice means what it seems to mean.

I'm not confident that this strategy (or indeed any other) will give Harpenden Town Council any robust means of controlling development. Whilst the vision is reasonable the reality, it seems to me, is that it only creates an inconvenient hurdle for developers before they negotiate with a higher authority - in effect a delaying mechanism rather than a means of curtailing developments which fall outside the strategy. I suggest strengthening the wording by changing "should" to "will" in the first sentence of SS1 1. This would complement the "must" used elsewhere in SS1.

I'm not convinced that this, or any other, strategy will give the local council enough power to exert sufficient control over undesirable developments, however strengthening the wording may help. To this end I suggest that "will" replaces "should" in the first sentence of SS1 1. This complements the "must" elsewhere in the strategy.

No, I believe the Green Belt should be developed in a planned fashion. The Green Belt Policy was originally established in the 1940s to control urban growth. It is now 'out of date' and needs to be reviewed urgently. The pressures to build now necessitate the 'release' of more land for housing. I read that 92% of Hertfordshire is greenbelt with the Council already owning a significant amount of this land. In my opinion it is preferable to carefully develop chosen greenbelt sites than to constantly infill the centre of Harpenden - which is now resulting in areas within Harpenden that are less pleasant to live in than they were 20-30 years ago. There is far more biodiversity per square metre in a mature back garden than a single field that can often essentially be a monoculture.

Some of the objectives are sound, however it leads to infill development and there is a need to recognise saturation issues. Where exceptional development bordering into the green belt is considered then there is a need from a Harpenden perspective to identify whether the need is that of Harpenden or that which Harpenden is taking on on behalf of others. If there are considerations that Harpenden provides services for smaller neighbouring settlements, then there is a need to establish the degree to which that occurs and that the neighbouring settlements are in accord having fully evaluated the alternatives including provision of service in the smaller settlements, particularly if provision produces a large scale influx of people and associated traffic.

The draft Harpenden Neighbourhood Plan (HNP) states at Strategic Policy SS1: "1. The Built up Area of Harpenden should be the priority for new development in the Harpenden Neighbourhood Plan Area. The Built up Area Boundary of Harpenden is shown in Figure 4.1. Planning applications for new development proposals outside the Built up Area Boundary must

Do you agree with the Policy SS1 - The Spatial Strategy?

either: • Be an exception to inappropriate development in the Green Belt; or • In the case of what would normally be deemed inappropriate development in the Green Belt, must demonstrate: o Very special circumstances for development in the Green Belt; and o Why the proposal cannot be located within the Built up Area Boundary of Harpenden.”

As an observation, CEG notes that draft Strategic Policy SS1 does not make provision for any strategic allocations outside the identified Built up Area which may emerge within the new District Local Plan, including by the release of land from the Green Belt. This includes the land at North West Harpenden which was identified in the previous Strategic and Detailed Local Plans.

CEG suggests that, in order to ensure a reasonable prospect of alignment between the emerging HNP and the new Local Plan, establish a neighbourhood plan with sufficient flexibility to address changing circumstances, and avoid prejudicing opportunities for strategic development, draft Strategic Policy SS1 should also refer to development on land within the Green Belt/outside the current Built up Area (where this is allocated through the new Local Plan).

CEG therefore suggests that draft Strategic Policy SS1 should be amended as follows: “1. The Built up Area of Harpenden should be the priority for new development in the Harpenden Neighbourhood Plan Area. The Built up Area Boundary of Harpenden is shown in Figure 4.1. Planning applications for new development proposals outside the Built up Area Boundary must either: • Be an exception to inappropriate development in the Green Belt; or • In the case of what would normally be deemed inappropriate development in the Green Belt, must demonstrate: o Very special circumstances for development in the Green Belt; and o Why the proposal cannot be located within the Built up Area Boundary of Harpenden.; or • Be located on land identified for release from the Green Belt and allocated for development through the emerging Local Plan preparation process.”

Whilst green belt development may be unwanted it is not clear how this might be delivered in the context of likely SADC house building targets. It is not clear if more dense in-town building is better or worse than carefully selected use of the greenbelt.

Whilst we agree with the general thrust of the policy, the provision of a test of ‘why the proposal cannot be located within the built up area boundary of Harpenden’ is not appropriate for any Strategic Allocations made through the emerging St Albans Local Plan. The policy could be improved by expressly acknowledging the emerging development plan or providing a reference back to the explanatory HNP para 3.3-3.4.

It doesn't matter what the public say you will do what you like anyway.

It is impossible to compress more development into the existing built up area and at some point this has to change. We as a community must recognise that we can't keep using hotels, light industrial unit areas etc as the source of new residential development. This is a finite resource. Furthermore the restriction accentuates the continual garden grabbing which reduces amenity for residents in areas where this is becoming prevalent. In addition these small infill developments make no contribution to town infrastructure in terms of schools, doctors, parking etc. This infill development is unsustainable

it is right to say that The Built up Area of Harpenden should be the priority for new development in the Harpenden Neighbourhood Plan Area. However this statement and Policy SS1 is ridiculously trite in that there are several areas of priority which should be observed regarding building within the area. The incredible way in which houses of character are being emasculated in order to build on garden plots and worse, proposals to build tiers of flats in garden areas mean that residents can no longer rely upon the Council and councillors to give

Do you agree with the Policy SS1 - The Spatial Strategy?

balance to the town. The issue is made all the worse by the way in which the local planning regulations allow developers to assume that one car per household is a valid planning assumption? Clearly it can be but most certainly not always. Worse, if a planning application made on such an unchallenged assumption is approved then almost in every case in Harpenden will we see further street parking. The present system is wrongly cast so that the only control is for residents to be left to object to any such proposal when more correctly this one car option per household for some new dwellings should one where the developer should be required to justify in the application. This Policy should make clear that planning approval will be changed.

It is unrealistic that future housing needs (as dictated by SADC and Central Government) can be delivered through infill and use of brownfield sites - so this should be recognised. Using infill and brownfield detracts from residential amenity and suitable sites for non residential facilities e.g. car garages, care homes etc that are as important for the local residents as continual development of residential properties

It may be necessary to recognise two requirements: 1. that a large (say 200+) housing development will be forced on Harpenden - in which case where in the Green Belt to minimise the impact; 2. the need for land (to the west?) for roadbuilding to eventually relieve Harpenden of through traffic, which will only increase given the weight on the M1 and the impact of Luton Airport. This may then allow a rethink of some of the other policies for the town centre and the placement of green belt housing. In reality any proposed 'urban' development in Harpenden will always be limited, must impact on the conservation area and be limited in scale. I would like to see in the plan a clearer articulation of the Harpenden Conservation Area and its status in the Neighbourhood Plan.

It's vital to preserve harpenden's green spaces and surrounding green belt - they are a big part of what make it a nice place to live and prevent urban sprawl.

Nothing radical here

Public open spaces should be protected, but development should be allowed in the green belt given that we want more affordable housing and there just isn't enough space within the Built Up Area.

Strongly agree that brownfield sites should be developed first

The Council is conflicted concerning the need to provide sufficient housing stock, but does not wish to build on the outskirts.

The green belt should be preserved as much as possible and development kept to a minimum using the area inside the built up boundary. After all the infrastructure can only support so much. Water levels are low already. Very careful thought has to be maintained regarding parking, At the moment it works quite well but 500 new homes will beat the best of us. There simply will not be enough room. Public transport must feature a good deal more

The need for more houses at affordable prices / rents and social housing may require building in current green belt area and extension of green belt boundaries

The plan identifies needs but then goes on to fail to meet those needs. To much is said in the plan that ALL residents of Harpenden know is not deliverable by this council. We have no confidence in the adherence to democratic or council process in terms of consultation and communication.

The term 'very special circumstances' in SS1, section1, requires detailed definition. Fulfilling St Albans 'quota' on new housing, as per the latest draft Local Plan, should not, per se, constitute 'VERY SPECIAL CIRCUMSTANCES'.

There should been building on green belt land and no further development of Rothamsted Research.

theres next to no space within the built up area so to limit building to this area is to severely restrict building. any building outside the area should not be excessive

Do you agree with the Policy SS1 - The Spatial Strategy?

This policy aims to protect the Green Belt - this is paramount, hence my support

We need to accept that the need for new affordable houses will require building on green belt land which was defined decades ago when the pressure on housing was so much less.

What does this mean?

While agreeing with SS1 I am concerned that the green belt will be given up too easily to development. The Neighbourhood Plan is for the benefit of Harpenden and for local people to determine, not for Councillors to crumble in the face of developers who have nothing to do with the wish of the local people.

With the caveat that additional pressures on infrastructure and amenities be mitigated.

Do you agree with the Policy SS2 - Infrastructure Zones?

As Bethany Community Church we would be interested in facilities that would provide recreational space for youth, children and the elderly. Some form of drop-in/community centre for these groups. This would be particularly in or near the Batford Estate. Currently, the only indoor recreational facilities are the sports centre and swimming pool which is right the other side of the town, and not easily accessible to residents of Batford.

Concerned that demonstrate is a weak word which can be misconstrued

Create an incentive to stop people with big gardens from selling them for development

Development in any of the zones must demonstrate how demand for supporting infrastructure will be satisfied. Firm commitments to investing in infrastructure must be forthcoming before permission is granted.

Development in the north west zone must demonstrate that the additional 'run-off' of additional paved areas will not affect the possibility of flooding along the A1081, The High Street and Southdown (ESD17). there is an old water course which runs through Harpenden from Chaul End, it's source all the way to the River Colne.

Dictionary definition of mitigated is 'made less severe', its use here implying that road congestion might be eased by new housing development. Some hopes! 'Minimised' would be more appropriate and the best that could be expected. Re: the Town Centre proposals, it is suggested that road congestion might even be REDUCED - surely a totally unrealistic expectation.

For each zone I would add the following requirement: "Contribute to the upkeep and improvement of the road network specifically in order to improve the flow of traffic and specifically not to add any traffic calming measures." The purpose of this clause is to ensure that developers who take profit from their projects in Harpenden return something to the community for the benefit of all, which will include their customers.

I agree with most content, however, I believe that actually, the comment: Demonstrate how pressure on parking will not significantly increase as a result of the proposed development... is actually more relevant to developments outside of the town centre (ie should be included in the other four quadrants as well) as it is new residents in new developments outside of the town centre, who will come into town in cars and will further impact our already overloaded road and parking network. Therefore I have marked my answer as neither agree nor disagree, because I feel that the policy should include comments re parking in all quadrants.

I am not sure why there are four "zones" the requirements are broadly the same for all four. Maybe some simplification here. It also seems to be missing a term such as "significant impact". Any development will result in additional traffic. Although this may not have a significant impact on traffic. The same applies for parking.

Do you agree with the Policy SS2 - Infrastructure Zones?

I fully support the sentiment, but my concern here is the use of unquantified language such as "sufficient", "adequate" and "close proximity". Without any definition of what would be considered "sufficient", "adequate" and "close proximity" for a development of 50, 100, 200, 500... residential dwellings surely these statements are potentially meaningless and open to interpretation and argument by developers keen to build and planners at SADC keen to meet their housing targets?

I have insufficient expertise too comment further

I think more attention needs to be paid to existing roads that are struggling to cope and how overall traffic congestion can be reduced - including how Harpenden copes when there is a traffic incident outside the town which causes gridlock on key Harpenden routes.

It seems an unnecessary complication to split Harpenden into 5 areas when many of the issues are common to all parts - ie impact of traffic and the need for fewer car journeys, close proximity to educational and retail facilities and good, safe non car access (cycling or walking)

mitigating impact of new development is of utmost importance

Mitigation of how roads will be affected is key, Harpenden traffic is already terrible, with many new homes planned how will this work? We need better public transport and cycle lanes to reduce the traffic. People need amenities close to where they live to prevent the need to drive to the other side of town for shops/schools/doctors etc.

NW, NE, SW no need for convenience shopping/recreational facilities .need for adequate routes to circumvent already busy rush hour A1081. Avoid congestion narrow Lower Luton Rd. Need to maintain common . Why is SE only site parking is mentioned, there must be problems in town centre and prob SW. Have residents & workers local to those areas been invited to specifically comment on parking, not via leaflets which cost money, but in local paper?

Possibly an unnecessary complication splitting Harpenden into different zones when many of the issues are common - eg traffic and parking, proximity to educational and retail needs with good non- car (walking, cycling, public transport) links

Re South East zone - Topstreet Way, Cherry Tree lane and Ferrers Lane should be added to key routes. Retail facilities in the zone also need to be improved.

The council has been totally in denial about the impact of a new school and the airport extension on the Lower Luton Road (using an argument that the road cannot take the airport expansion when fighting Beds Intentions, but then saying the school will have no significant impact. Two faced arguments do nothing for council credibility

The Harpenden Town Centre zone needs to include reference to the provision of adequate education facilities (as is already in the four other zones). The non Harpenden Town Centre zones need to include reference to ensuring how the proposed development will maintain views and visual sight lines across the open aspects of Harpenden and surrounds.

The lists of points that developers would have to 'demonstrate' are unrealistic and look very much like they could be used by NIMBYs to stop desperately needed housing being built.

The residents of Southdown definitely need access to a Harpenden secondary school. Currently many have to go to St Albans which is a ridiculous situation.

These are trying to do the right thing in principle, but the levels of road congestion, unfriendly conditions for cyclists etc are so bad in some places already that it feels unrealistic to add major new developments and expect these not to get worse. There's a lot of emphasis on what new developments must be like but a lack of acknowledgement of the pressure they will add to existing roads etc. Topstreet way needs to be on the list of specifically mentioned routes.

This is a terrible idea which will be used to allow development on Green Belt land and at Rothamsted.

This is all very well provided all of the proposals have to accede to the criteria that needs to be satisfied.

Do you agree with the Policy SS2 - Infrastructure Zones?

This makes complete sense for special consideration and conditions to be met for the infrastructure zones.

This policy seeks only to ensure that new planning demonstrates no problems in specific areas. Those drafting this plan have apparently not grasped the key fact that the town is already suffering - and this after at least two decades of inaction. What should be shouted here is that there will be improvement in a huge number of areas of Harpenden, not keeping the status quo. Great God, this is a plan for fifteen years hence and there is no mention of improvement? The town centre is dying and as many are saying - even in the National Press - the problem is that shoppers are being excluded from the High Street by their inability to park near shops.

Those who commute from outside Harpenden and park in the streets to obtain free commuter parking and with it a cheaper season ticket, must be prevented from doing so without any solution being imposed that effectively requires the residents rather than the transgressors having to pay or be inconvenienced. An Act of Parliament akin to that taken out by Exeter would solve this problem. The same applies to those who park in Harpenden's streets and thereafter use the bus as a way of getting cheap airport parking. The revelations of the expansion of Amazon's warehousing so far in 2017 (five times larger than any of their already expanding competitors) underscores the massive need for MUCH more parking access to the town, yet this plan simply and only seeks to ensure that new planning 'demonstrates' no change from the status quo. That is unacceptable

"Demonstrate" is not a strong enough term for dealing with the actual outcome of a development should the assumptions discussed and agreed in the demonstration beforehand turn out to be wildly incorrect. Some outcomes may be better or worse than assumed due to matters under or partly under the control of the developer - or on the other hand the approving authority. Why not have a risk/reward arrangement whereby the developer is required to post an upfront Bond supported by a reputable finance house which would pay out to the approving authority in given circumstances under the control of the developer. Likewise, the approving authority would repay some or all of the Section 106 monies in the event they were responsible for the incorrect assumption.

Also public transport/cycling/walking access between new developments and the local amenities should be considered.

As well as education provision, provision for services such as GPs etc should also be included. As well as demonstrating how the impact on Luton Road and surrounding roads will be mitigated proposals should include a commitment to fund these mitigations,

However needs to add the same protection that the Common enjoys to all open Green areas in the town eg Batford Springs, Westfield Park, etc. Ditto all areas should have the same statement about Parking as SE Harpenden, In fact don't understand why different areas are treated differently. Should just cover the whole urban area with no discrimination.

I'm not sure that the word "demonstrate" on its own gives sufficient weight to impact mitigation. These are all predictions of outcomes based upon assumptions. Whilst the assumptions will no doubt have been discussed (and compromised) with the relevant approval authority they may turn out to be unrealistic. It seems to me that to the developer and the approval authority should share the risk as well as the reward from significantly different outcomes due to significantly incorrect assumptions over say the first 5 years post-completion. The risk could be in the form of the developer providing an upfront security (e.g. a Bank Bond) which would pay out in specified adverse outcomes (e.g. failure to provide adequate affordable housing/recreational space/convenience shopping). The reward for more favourable outcomes could be by way of a refund to the developer from the Section 106 payment.

Major developments should also have to consider adequate provision of services such as health not just education (eg for the north west infrastructure zone). Developers should also have to

Do you agree with the Policy SS2 - Infrastructure Zones?

commit to providing funding for mitigations on the impact of roads (eg on the Luton Road). Is there also the provision to challenge the assumptions used by developers (eg assumptions on the number of cars/household which must be above the national average in this area) - and therefore ensure that the motivations are appropriate based on appropriate assumptions.

Major developments should also have to consider adequate provision of services such as health not just education (eg for the north west infrastructure zone). Developers should also have to commit to providing funding for mitigations on the impact of roads (eg on the Luton Road) Is there also the provision to challenge the assumptions used by developers (eg assumptions on the number of cars/household which must be above the national average in this area) - and therefore ensure that the motivations are appropriate based on appropriate assumptions.

Parking should be factored in for all zones.

Policy does nothing to redress historic imbalances in provision of education facilities in South East and South West. The largest gap in provision in recent times has been the lack of secondary education in this area - no attempt is made to institute facilities for this shortfall. Ironically South East has the second largest shopping provision in the Town, North East is arguably the most remote in that the river Lea divides and there are limited facilities in Batford - again no balance is sought

Southwest Harpenden is relatively lacking in community infrastructure

The draft HNP states at Strategic Policy SS2 that significant proposals within the North West zone defined at Figure 4.2 must meet the following criteria: “• Demonstrate how impact of new development on the A1081 and local roads will be mitigated; • Demonstrate adequate provision for appropriate education facilities in close proximity to new development or proposed additional capacity*; • Demonstrate sufficient convenience shopping within a close proximity to new development*; and • Demonstrate sufficient recreational space within a close proximity to new development*.” * Residential proposals only CEG broadly supports the proposed approach in draft Strategic Policy SS2, which allows proposals to be assessed on a case-by-case basis on their merits. However, CEG considers that the wording of the draft policy is currently unclear in relation to the need to demonstrate the availability of education facilities, convenience shopping and recreational space. In particular, CEG suggests the terms “adequate” and “sufficient” are not precise, clear or capable of objective assessment.

CEG therefore suggests that draft Strategic Policy SS2 should be amended as follows: “• Demonstrate how impact of new development on the A1081 and local roads will be mitigated; • Demonstrate provision for appropriate education facilities in close proximity to new development to meet the need for school places resulting from the proposed development, or that additional capacity to meet the needs arising will be provided ; • Demonstrate that convenience shopping facilities to meet day-to-day needs are available within a reasonable walking distance of the new development*; and • Demonstrate that the proposals meet any adopted local open space standards*.” * Residential proposals only

We note the L&G land (NW Harpenden Broad Location) is within the north west zone in which significant developments are required by the criteria in this policy to demonstrate: how impact of new development on the A1081 and local roads can be mitigated, adequate provision for appropriate education facilities, sufficient convenience shopping and sufficient recreational space. In that context we note that the site is located close to an existing local centre (as defined by HNP policy ER4), and can confirm that the matters of highways, education and recreational issues will be addressed as appropriate. However, as a potential Strategic Allocation, we anticipate such matters to be fully addressed directly through site specific allocations made by the emerging SACDC Local Plan.

Traffic congestion must be dealt with as part of any development, this seems to have been lacking for years. Realistic proposals must be made with the option to refuse permissions if

Do you agree with the Policy SS2 - Infrastructure Zones?

there are no viable proposals. Harpenden is already at a stand still and will not get better with more houses and thus more cars. Plans must be made to reduce traffic and commuter parking on residential roads.

We would welcome an additional requirement, that any new developments demonstrate how walking, cycling and public transport will be actively supported through their design. (This is covered later by objective ED08 but could also be incorporated in SS2.)

Southdown has an historic and largely unspoilt characteristic which must be protected and preserved

Siting of proposed school on LLR will cause traffic chaos

The proposed new school on the Lower Luton road will cause major traffic problems for both the LLR and Station Road. How can this development on the Green Belt be mitigated, I believe that it can not. the growth of Luton Airport from 10 million to 18 million passengers a year will exacerbate the situation

Do you agree with the Policy ER1 - Supporting Harpenden's Economy?

"Charity begins at home!

...but what is 'suitable' or 'appropriate'? One man's meat....

A vibrant local economy is one important component of resilience to rising oil prices, reducing the miles travelled by the goods residents purchase, and increased food security and clarity of provenance. We would welcome additional emphasis within the neighbourhood plan on the important role of locally-owned businesses in the Harpenden economy, and specifically the need for business incubation units to support the start-up of new local businesses.

Best practice measures should also apply during construction

Better facilities and better infrastructure for people who work from home, or in the vicinity. Especially if this is over 2000 people as mentioned in the plan. Places to meet others for meetings that don't cost the earth. Places with chairs that are not a heathy risk and reliable broadband.

Cannot see how new development could support residents that work at or primarily from home. Why is loss of employment locations in Grove Road, ie Pan Autos and Jewsons, - working contrary to the Neighbourhood Plan's ER1 policy aspirations - not mentioned?

Define small units

Doesn't go far enough - we should promote more economic activity in Harpenden

ER1, subparagraph 2 (provision of smaller commercial units suitable for use by local businesses -- I think it would be helpful if more detail were provided here, such as the terms and conditions under which such facilities would or could be provided.

I agree with what it sets out regarding supporting existing economic sites in harpenden but a) this is then incompatible with Jewsons and Pan Autos being allocated for residential development and b) there is little mention about how new economic activity can be generated in Harpenden which I think would be advantageous.

Keen for jobs to be in harpenden as well as it being in the commuter belt

Maybe if existing employment and retail sites have more protection (i.e. not a preferential site for new homes) this might keep costs down and encourage new or adaptable employment spaces.

More local work also helps with sustainability due to reduced travel time to work.

Need to do something about the parking and truck/lorry access

I suspect that most flexible workers are likely to be home based

Principle is good but historically a lot of low cost local employment has been lost to housing use. Not sure if provision is too little too late - any proposed release from use could be aligned

Do you agree with the Policy ER1 - Supporting Harpenden's Economy?

to new provision. New provision appears directed to Rothamsted, not sure that such lack of choice is good for the Town

No need for Rothamsted Research to expand at all.

Since we have empty shops, will we have even more if we build more? We need affordable shops as well as affordable houses.

The word "appropriate", without clarification is too vague. It will allow application to drive a coach and horses through the Policy. My suggested clarifications are: " Appropriate proposals will: - not reduce the overall number of employed staff in the area being redeveloped - provide at least one parking space for each employee - for the protection of pedestrians and cyclists passing by the new development, provide a smoking area away from the boundaries with adjoining streets and ban smoking at those boundaries." There may well be other desirable provisos that could be included.

We feel that facilities for start-up businesses are important. We would be interested in supporting these types of units, perhaps offering the central servicing facility for such a project

Whilst not part of the HNP rateable values and changing shopping habits are key factors and the development of the High Street is actually more driven by retailer demand than HTC supply. I would like to see a more diverse range of shops - not more coffee shops or boutiques. However, Harpenden will only ever have a 'local' shops economy given the proximity of London, St Albans, WGC/Hatfield and MK. This will be encouraged by better transport including parking (particularly for weekends).

With the additional consideration that needs to be given to Affordable housing so that these points can be realistically implemented.

Within this there needs to be adequate provision for free shop worker parking - often up to eight hours a day - as well as free half hour parking for residents and increased ease of parking for those with limited mobility but who do not qualify for blue badge status. Why does Harpenden (and St Albans DC for that matter) persist in restricting and disadvantaging those with disabilities? Unless you are fit and strong or have a Blue Badge those with restricted mobility – and that includes many over the age of 50 – cannot shop in the town without the help of a car. Then when they get to the town the car parks (with the exception of Waitrose's) are far too far away from the shops. A complete rethink of needed parking in the town needs to be conducted and implemented. It is simply inappropriate in Harpenden for those using cycles to use them for shopping.

Yes we must support the economy of Harpenden otherwise it becomes a soulless commuter town. I would love to work more locally rather than commute to London, but there aren't enough opportunities, particularly for part time workers.

harp town centre would benefit from a market hall type building where specialist businesses could afford to trade from. Specialist shops would also draw more visitors to the town centre and increase trade

Do you agree with the Policy ER2 - Designated Employment Locations?

..but same caveats as ER1

Agree with those listed to be protected but again what about encouraging new ones?

Area DEL 2 Southdown does not recognise existing employment locations locally outside the Southdown Industrial estate.

As selected development partner by the Lawes Agricultural Trust (the Trust), Hill Residential ('Hill') support this draft Neighbourhood Plan policy which seeks to support a high quality offer through improvements to existing employment areas including new and redevelopment opportunities. It is acknowledged that the NP does not allocate sites within the Green Belt. However, as submitted in the response to Call for Sites, the Trust and Hill has identified a

Do you agree with the Policy ER2 - Designated Employment Locations?

suitable site with development potential at Land at Townsend Lane and Hill will be pursuing its allocation through the Local Plan process. Located on the edge of the Rothamsted estate, Land at Townsend Lane has been identified by the Trust as suitable for development given its limited ability to function for research purposes. The site is capable of assisting the Trust to provide funding towards Rothamsted Research, ensuring facilities continue to attract and retain research students in the globally competitive environment, in turn supporting Harpenden's economy.

But this needs to be combined with the provisions set out in my previous comments. Often the reason for these organisations leaving is the poor quality of infrastructure and the fact that the first organisation needs to pay 100%. For example broadband. As it tends to be private land a company may be charged thousands to have fibre but this is the minimum so they move.

Cannot see where local businesses will locate to in the plan. I can't read the remainder of the handwriting in full, mentions lorries disrupt traffic and a suitable location

I agree those identified should be protected BUT - 1) the identification of Jewson's and pan autos as sites for development conflicts with promoting employment in harpenden 2) what about new employment?

it seems wrong that the employment area along the Lower Luton Road has been developed into housing, an area the has high flooding risk and is now lost as employment.

Keen to keep businesses active in those areas

provided that development does not restrict access for walkers/ cyclists . In particular, Rothamsted research seems to have had a policy in recent years of closing off footpaths through the site which have been in use by walkers over many years without any obvious problems or detriment to Rothamsted and this is an unwelcome trend.

Rothamsted Research should not expand or build on any more of its site.

The Pan Autos/Jewson area should be considered an DEL. Rothamsted is party of Harpenden's history. Would be good if this site was all protected. The DEL1 site doesn't seem big enough.

This policy is too prescriptive. If a proposal to change industrial premises to housing saves green belt land from housing then it should overrule this policy.

We have some concerns with this as we are considering the possibility of using such an industrial type unit as a Church/community hub. This would most likely not be classed as B usage, but would be looking to employ a number of people in the running of such a facility

Yes we must maintain locations across the town in multiple locations. Particularly keen to maintain and enhance Southdown industrial estate, but it needs improving. For example pavements need to go all the way to Big Space, to encourage people to walk rather than drive.

Yes, we must protect current retail and employment centres otherwise everything will be just houses.

Do you agree with the Policy ER3 - Rothamsted Research?

Add provision to the policy to provide appropriate support to facilitate individuals with specific research and development skills and experience coming into the area to work at Rothamsted (including overseas residents).

Again the word "appropriate" needs further clarification

Any development should be positioned as far as possible from neighbouring existing residents

Any proposed development should be relevant to Rothamsted's core activity - not any development.

As things stand, I have little confidence in the future of Rothamsted. Start-up businesses may establish and be a way forward, although why they should come to Harpenden rather than

Do you agree with the Policy ER3 - Rothamsted Research?

places like Cambridge is another matter. I would like to see a Harpenden bypass using Rothamsted land (there is no other practical option) and maybe some housing development as the farm seems to be largely redundant these days

But Brexit could have a huge impact on the future of Rothamsted so plans will need to be made for a change of use if required

however, there seems to have been an unwelcome trend by Rothamsted Research in recent years to close off several footpath links on the site which have been in use by walkers for generations without causing any obvious problems or inconvenience to Rothamsted. Future development should respect/ enhance site access for walkers

I have lived in Harpenden for 36 years and watched the development and expansion of Rothamsted grow to the huge successful site that it is today. Its buildings are large, many and grand. Rothamsted has always played the 'underfunded by the Government' card and managed to quietly increase its infrastructure, not to the benefit of Harpenden or the residents. ER3 states ... 'Subject to an appropriate proposal, the Neighbourhood Plan would support a very special circumstances case made by Rothamsted research for development not normally considered appropriate in the Green belt.' This is wrong, ER3 should state the Neighbourhood Plan would CONSIDER SUPPORTING a very special circumstances case It is this attention to detail that concerns me. Whereas there is going to be good argument put up by Rothamsted and their expensive solicitors for planning permission for redevelopment for Rothamsted research this should NOT extend to Rothamsted selling off land for development so that they can raise finances, this must NEVER be considered as very special circumstances.

ER3 - Rothamsted Research on Page 28 sets out the concept of a more relaxed planning policy in relation to any proposal by Rothamsted to utilise the Green Belt for their own research and development facilities. The residents in and around Townsend Lane/Hartwell Gardens are very concerned about this wording as it may well be used as justification for the Lawes Trust proposal to develop an agricultural field adjoining Hartwell Gardens and Townsend Lane for a housing estate. The text needs to make it abundantly clear and explicit that the Lawes Trust is not being given an easy ride for any development on Green Belt land and that they should comply both with normal planning rules, release of Green Belt needing permission from the Secretary of State, and the criteria set down in the policies in the Neighbourhood Plan. The planning details we have seen so far from the Lawes Trust and their developer are for a housing density 2.5 times that of the surrounding housing, on land which can easily be seen from the Nicky Line - a green artery used by thousands for daily walks, cycle rides etc. Their so-called justification mentions that the land is of marginal use for experimental work - our private enquiries from Rothamsted staff indicate that the opposite is true - it is a valuable experimental field. This high-density housing will impinge on the amenity of surrounding houses, traffic on local roads, access to the 1081 main road etc.

I'm not against building on the green belt at all. However Rothamsted could be leaders in the development of facilities in green belt, especially given the field they are working in. So let them build, but it must add in a positive way to the environment.

it's a dangerous precedent to grant Rothamsted special status with regards to supporting its applications to build on the green belt. Wording is inconsistent between ER3 (line 8) and 5.6 (line 10) insert the word 'consider' after would in ER3

No - preserving the green belt should be the highest priority

No expansion, development on existing site at all should be permitted.

presumably on their farmland

Protection of the employment area referenced as DEL1 Rothamsted Research is supported.

Do you agree with the Policy ER3 - Rothamsted Research?

Rothamsted Research at present is a welcome 'green space'. Recent new building for accommodation for students has been positioned right on the border with existing homes, with adverse effect on wildlife and neighbourhood privacy. If any further 'development' is planned, it should be as far from existing homes as possible.

Rothamsted Research is an agricultural research centre. Surely developing on the green belt goes against their whole purpose for being?

Rothamsted Research is an integral part of the town and if necessary must be looked at as a special case to ensure the growth & development of the Centre.

Rothamsted Research should not be given carte blanche to build on its land - which seems to have been the case in recent decades.

Rothamsted should retain its open outlook for the local community to enjoy as was originally envisaged and not turned into an industrial estate

See earlier comment. This Policy needs to be completely reworded to make it abundantly clear that it ONLY applies to the use of land for agricultural research NOT the release of Green Belt land for use for housing to release capital to add to Rothamsted funding.

Strongly agree that any development for expansion of Rothamsted would meet the special circumstances. Although it would be good if additional protection is included so they don't sell of their land for housing (like BRE)

We believe Rothampstead plays a vital role in researching the - sometimes controversial - solutions to environmental issues, including how to feed a growing population on a finite planet, and should be supported in its development.

We should be supportive of the future needs of Rothamsted Research to expand because of the benefits to the local economy and local jobs.

As something Harpenden can, and should be proud of, we should support their development

Should be tempered with other use at Rothamsted as the largest parcel of land in the area.

Yes this is a big employer in the town and must be maintained.

Yes, Rothamsted Research is a world class institution that must be allowed to develop.

The Neighbourhood Plan's support for the redevelopment or expansion of Rothamsted Research to meet Rothamsted's long-term needs and to accommodate firms carrying out complementary knowledge-based research and development activities it strongly supported. The provision for the Neighbourhood Plan to support cases of very special circumstances for development which would not normally be considered appropriate in the Green Belt is welcomed. As currently worded, it could be read that any application would need to be made by Rothamsted Research. It may be that other parties could make an application within the Rothamsted estate for development which would support the work of Rothamsted Research and therefore we suggest that the policy is re-worded to read: 'This Neighbourhood Plan supports appropriate redevelopment or expansion of Rothamsted Research to meet Rothamsted's long-term needs and to accommodate firms carrying out complementary knowledge-based research and development activities. Subject to an appropriate proposal, the Neighbourhood Plan would support a very special circumstances case made at Rothamsted Research for development not normally considered appropriate in the Green Belt.'

I understand that a new hotel is to be built at Rothamsted. It is a great shame that Harpenden's two existing hotels were expropriated by greedy developers. they were more centrally located

RR should be encouraged to (and/or given permission to) provide accommodation for visiting speakers and delegates to their conferences

Do you agree with the Policy ER4 - Designated Retail Areas?

But Harpenden needs some decent shops from bigger companies - the little local shops are not relevant to many younger residents, so we have to go to Luton or Stevenage or MK for proper shops

Cannot see any ER4 policy to agree or disagree with.

doesn't really say why they need to be designated, I presume to avoid eg houses being built in these areas

I think the authorities should control the mix of retail and commerce types allowed to operate in the High Street if we are to avoid becoming a town of charity shops, estate agents and coffee shops. For example, we do not need yet another restaurant, however a plumbers merchants that was highly useful and in existence for 30+ years, has gone because of "market forces"!! This would put a restriction on the licensing of premises and would require more detail on what the licensing would allow by way of types of usage, however it is vital to do this to prevent the degradation of Harpenden shopping in a way that is replicated across the country. I don't see why we couldn't live with just 15 restaurants on the High Street, and encourage a Hardware store or a Computer shop through preferential rates?? The town is already degrading due to the uncontrolled volume of infill building, to the extent that areas which were highly desirable to live in, such as The Avenues, are becoming significantly less so due to lack of available parking, traffic. We must take back control!

I think the importance of Southdown should not be underestimated. It is an important centre which is more accessible to people in the area and has easier parking than Harpenden centre. It has some excellent shops and more should be encouraged especially if plans to focus the new housing in Southdown are adopted.

Important all local areas have a paper/sundry shop

Local shops are essential for local residents and will minimise congestion in the town centre

Maybe Southdown and Batford needs an area defined and not just a star. I'm not sure if this designation actual has any policy relevance but the Southdown retail area could easily end up shrinking over time.

need a wider mixture of shops

Not to forget the small retail section of Westfield Road

Please add the proviso "Nothing in this policy precludes the inclusion of further Designated Retail Areas, should new housing proposals make them desirable"

Priority should be given to local and independent businesses (over national and international chains).

See comments for ER2

subject to necessary infrastructure improvements for cycling/ walking access

The areas designated are hardly adequate. For example the Batford Designated Retail Area can hardly be called a parade. It is a coop and a fish and chip shop.

These local centres are very important and help to reduce the use of cars.

This however does not go far enough. All such out of town areas relieve the centre from lock up and therefore they should be expanded rather than simply maintained.

Too subjective and the powers that be will have their way (as always)

Also feel that Harpenden needs a new supermarket with lots of parking - perhaps located near to one of the newly planned development sites in North Harpenden or Batford. Waitrose and Sainsbury's with their limited parking are not sufficient to meet the needs of this growing town. An out of town supermarket would reduce congestion in the town centre - I don't believe it would lead to the demise of small retailers. Currently I know of many people living in Harpenden who are now choosing to go out of town to do a 'big' shop.

Do you agree with the Policy ER4 - Designated Retail Areas?

We note and support the designation of DRA3 North Harpenden Local Centre and DRA 4 Kinsbourne Green Local Centre (both small parades of shops) as local centres. We note that these are within walking distance of the L&G/CEG land at NW Harpenden, and confirm compliance with HNP Policy SS2 - Infrastructure Zones through the confirmation of access to convenience facilities.

Were there to be noticeably sized development in SW Harpenden, this should include local shopping

Yes we need to maintain amenities in multiple locations. And encourage diversification of amenities in these areas. For example we must keep the pharmacy in Southdown, and we could do with a doctors surgery here too.

Do you agree with the Policy ER5 - Supporting Harpenden Town Centre Economy?

Agree that the secondary streets - Thompson's Close, Station Rd etc need some rejuvenation to expand the offering and attractiveness of the town centre beyond the High Street. However, until the issue of rents and rates, which I appreciate is outwith the scope of this plan, is dealt with the high street will continue to decline into a street of charity shops, coffee shops and hairdressers.

Although I agree, I fear this proposal is attempting to hold back the tide. With the continual expansion of internet shopping, conventional retail areas will become under increasing pressure and we may well see shrinkage in demand. Can the policy please address what would happen if a developer demonstrated that the demand for retail units had fallen to the extent that existing units were no longer needed. Failure to do this will result in, probably irresistible, pressure from developers to replace them with residential units.

But nothing will improve until you improve the parking

But the parking question is not addressed properly, see below.

Don't see definition - for the layman - of Class A and A1. In reality, 'community benefit' of different types of shop is outweighed by harsh considerations, most notably the rents charged by greedy or not-so-greedy landlords. Proposals to 'Support the regeneration of Arden Grove...' and 'Promote the enhancement of the public realm...' are too vague to be worthy of inclusion.

I make no apology for harping on about this! It would greatly help the Harpenden Town Centre economy to have improved parking facilities - it is regularly almost impossible to find a parking space in town if you arrive after 10am.

I would like to see more support from the town council for protection of facilities and services provided by retailers. The allowing of the Post Office to vacate the Station Road premises and move into smaller less suitable premises sharing with W H Smith has been an absolute disaster which should never have been allowed. We have gone from a fit for purpose post office to one which is not fit for purpose. We must make sure this does not happen again and I strongly urge all to act now to protect pharmacies such as Southdown which are threatened with closure with similar disastrous consequences predicted.

Loss of hardware, mens clothes and other practical shops is worrying but difficult to mitigate whilst rates are so high

more bike parking vitally needed

My main concern with retail moving in to the area is the number of branded coffee shop chains that are appearing. I am concerned that these are stifling local entrepreneurs from starting businesses.

New tesco store luton road / roundwood. The store is a great asset to the community but the close by residents suffer and the risk of an accident due to lack of parking and motorists being inconsiderate will result in accidents

Do you agree with the Policy ER5 - Supporting Harpenden Town Centre Economy?

Promote more shops that are useful for everyone of all incomes and backgrounds, and not encourage more shops that are aimed more at the wealthy end of the market.

providing an attractive gateway to Harpenden is most important and will encourage independent retailers which we need

See above. Unless parking and traffic flows are improved there should be no more growth plan in the town centre.

The emphasis on A1 use seems too high. While it would clearly be desirable to have a traditional town centre full of shops with more and more use of online ordering maybe some flexibility for office/business/leisure use in the town centre would provide some employment and use of all buildings.

use class A1, A class; where does it define what these are, so how can the public, without researching, find out and comment in an informed manner? no extra community facilities are needed. agreed no need for ground floor additional residential properties as defined. no need to spend money on regeneration of Arden Grove etc, there isn't enough money to do so , its not a gateway into the town. also no need to enhance public realm etc, these ideas show a lack of understanding how voters want their money spent.

Would like care to be taken agreeing to new Charity shops/restaurants/hairdressers and estate agents Encourage independent shops Would like to end up similar to hitchin rather than becoming a town only with a handful of different types of shops

Yes the town centre is vital. Please can we have more "normal" shops, somewhere to buy normal clothes, whilst also maintaining the diverse independent businesses. Business rates need to be lower? It feels like a lot of businesses are closing recently. Need to promote the side streets better, maybe have more maps around the town to encourage people to look up the side streets - we need to know what is up there!

yet even with these plans more is needed. Waitrose needs an upper tier car park as do all other present car parks in the town. There must be a solution found to stop commuter parking in the town's streets - one that does not involve double yellow lines.

I would include the local shops in Kinsbourne Green as well as the final row of shops at the north end of the high street as part of the gateway to Harpenden. Both areas would benefit from some regeneration. Encourage the high street to really blossom north of kwik fit.

Limited agreement - appears to protect against loss of trading outlets, but if economic case prevents retail outlets from trading then will not achieve objective. Development of Arden Grove, Station Approach etc could equally look at better 'public facilities' particularly access to rail station which is unsatisfactory - if redevelopment helped enhance this (by creating ability to flow traffic more successfully through station area, including better linkage to other public transport) the serious consideration should be given to such schemes (possibly over and above retail)

Whilst agreeing with the spirit and intent, and agreeing with the area selected, it is not clear to me if this makes sufficient recognition of changing shopping habits, leading to reduced use of shops - eg most recently the decision of Nat West to close the Harpenden Branch. The objective should be broader and focus on restaurants etc as well.

Do you agree with the Policy ER6 - Supporting Local Centres?

Existing services and facilities must not be decreased. Future demand will be higher than at present.

It would have been good if the Town Pharmacies could have been spread across the town instead of being mostly in the town centre.

keeps communities vibrant, areas of dense housing need access to local shops, restaurants, GP surgery & schools

Do you agree with the Policy ER6 - Supporting Local Centres?

Kinsbourne Green local centre needs regeneration especially with extra houses/flats being built up there

Local centres need boosting

Strongly support, particularly Southdown. The parking at coop is very useful. The charity shops have high quality stuff. A greengrocer would be useful. As would a doctors. Increasing employment in this area is key. Improved bus services in this area would reduce traffic.

The policy does not envisage the possibility that one or other local convenience facility might not be viable. Worse it assumes that what we have currently is the best mix. It is not. This policy needs to be better drafted to indicate that support for change will only be given in cases where an improvement can be made in the mix of facilities and in the event of economic viability.

Under paragraph 5.11, re: on-site parking at convenience shops, example of Tesco, opened about four years ago on corner of Luton Road and Park Mount, shows that development permission is given despite vigorous protests from residents nearby about non-existent parking facilities.

We need more general purpose shops such as the old C&A or kingston House. High rents and rates keep driving shops away

whilst supporting this aim, is it possible to ensure reprovision

The draft HNP states at Policy ER6: "In local centres, appropriate and proportionate proposals for local retail facilities and service development will be supported. Proposals involving the loss of a convenience shop without reprovision in the same local centre will not be supported." The draft Plan lists four Local Centres, including at North Harpenden (ref DRA3). CEG endorses the proposed requirement to support and retain the provision of local retail facilities and services at Local Centres, including at North Harpenden. It is considered that these facilities provide an important function for existing and potential new residents and can help to reduce the need to travel to meet basic day-to-day needs.

We support the protection of the retail facilities at DRA3 North Harpenden Local Centre and DRA 4 Kinsbourne Green Local Centre (both small parades of shops) provided through this policy.

Am concerned that a number of retail outlets are becoming restaurants, coffee shops etc thus reducing the choice and variety of shops in the town centre

Do you agree with the Policy ER7 - Employment Use Above Shops?

I don't think this is promoted enough in Harpenden. Employment above shops would bring more people to the town centre shops - however parking costs need to be more reasonable

If space above retail units is used for housing and saves the green belt as a result, then it should be support in favour of conversion to business use

The town centre gets congested.. perhaps more employment should be in the cold harbour area

Too many remain empty, owners being protected by stupid law

Unrealistic proposal. Currently above shops in Harpenden are either residential apartments - which must be retained to meet urgent housing need - or warehouse/storage space for the retailer below.

Will this not cut down on accommodation in the town?

Yes employment is vital, please do this!

Whilst employment above retail is important supporting residential use above these spaces too should be encouraged in an attempt to meet as much of the housing need within the boundary (non green belt)

Whilst employment is positive should (where appropriate) priority not be given to accommodation/housing in order to fulfil as much of the housing need within the existing town boundary and not on green belt.

Would strongly support local centres including increasing number of retail outlets where possible in order to reduce need for people to travel to the town centre for essential services

Do you agree with the Policy ER8 - Adaptable, Innovative and Up to Date Retail and Employment?

difficult to see how new major retail and employment proposals will not have an adverse effect on traffic (and attendant parking and pollution issues) unless a major push to non- car use is implemented

Harpenden ticks over pretty well. These policies will ensure this continues and use the already designated areas. People from other areas come to Harpenden to look around and hopefully shop here. the many already successful restaurants attract people also. I am envied by my friends fro living here.

However the council should seek to approach infrastructure provision centrally.

I would like to see a more realistic approach from landlords to rental prices which will see a resurgence of independent retailers. We want to reduce the incidence of charity shops and chain stores.

Infrastructure such as high speed broadband and electric charging points

It is important that new developments do not exacerbate current traffic and parking problems and must focus on sustainable transport for workers

it is right that Major retail and employment proposals must demonstrate that sufficient infrastructure is in place to meet an increase in demand but it is wrong to 'require' that they utilise latest technologies wherever possible. This must be changed to making 'appropriate and sensible' use of new technologies.

more local employment is good for our young people.

no need to use latest technologies, up to businesses if they can make a profit. agreed need for eg adequate parking

Not I my my experience or remit

Please delete "and must utilise latest technologies wherever possible". As a community we do not have the knowledge to justify such a specific demand and "latest" is not necessarily best or even desirable. This clause might preclude some very worthwhile proposals. For example, supposing somebody proposed a new shop selling hand-knitted woollens made on the premises. This would provide a retail outlet and employment, but could be rejected because it does not use "latest technology."

This needs a bit of context on negative impacts and significant negative impacts. "While the Neighbourhood Plan supports the development of retail and employment locations, it seeks to ensure that this does not negatively affect existing occupiers or nearby residents." The above is clearly desirable. Is it practicable or necessary or sustainable? In my opinion, no. All development retail/employment or otherwise usually will have negative effects on neighbours. Frequently these negative effects may not be significant and should be (in accordance with NPPF) weighed against the benefits of the development.

Too vague to be meaningful.

We don't want a high street full of women's clothes and charity shops. Diversity is essential, reduce the rates for new businesses to become established

We must plan for increased demand in future. Is it realistic for the whole of Southdown to be supported by just one ATM? What happens when this is out of service? Such basic facilities must be available in sufficient capacity.

Do you agree with the Policy ER8 - Adaptable, Innovative and Up to Date Retail and Employment?

Not clear what is meant by latest technologies - is this pointing towards electric charging points?

Not clear what is meant by latest technologies - is this trying to encourage electric charging points or something?

Do you agree with the Policy ESD1 - Design Strategy?

Harpenden is a great place to live, the open green spaces accessible to all need to be maintained and promoted. It is encouraging to see so much use of the common eg carnival, classic cars, circus etc. These sites must not be developed and any development in the surrounding areas should be sympathetic to the feel of the town (not the monstrous Public Halls)

Harpenden isn't currently low carbon, we need to improve this. We need better, cheaper more frequent bus services. We need cycle lanes and cycle parking. We need improvements to parks and open spaces. A regular bus from Southdown/Cross Farm would reduce traffic - there is a bus service but not at commuter times, and isn't even hourly in the afternoon. Hourly all day would be a start, but more frequent (every half hour at least) would be better. Commuters might use if frequent, at the moment impossible.

However, proposals all too vague and, as such, not practically enforceable, especially in relation to 'low carbon' considerations and sustainability.

I'll be honest. I know only a little about a planning. Building Design I do for a living. Why or why oh why ... at pre-application stage does have to carry out an Environmental Performance Sustainability Statement in accordance with the Hertfordshire Building Futures Design Toolkit??? These design issues are important. But this can and is addressed at a NATIONAL LEVEL through the use of Building Regulations which are regularly reviewed and updated. A local Hertfordshire successor to the old Code for Sustainable Homes system doesn't seem necessary/reasonable/practicable etc. etc. and especially at pre-application level. Please please please. We don't need specific local environmental standards. Everything else on that list. Lovely. But please ditch this box ticking environmental assessment

it is right that all developments must be visually appealing, designed to a high quality; they must also maintain or enhance the character of the area. However to include the same demand level for low carbon for all developments is simply unreasonable and will impact on almost every change - however minor that might be needed in dwellings and buildings of character. This policy is mischievously drafted as it stands and will promote demands by the building community to effect unnecessary demolition of quite viable locally listed dwellings. By all means have this as an aim but not as a requirement.

More sustainable transport is good.

Not only consideration but priority to be given to new properties being suitable for surroundings

One key local green space is the Nicky Line - used by hundreds of local residents for walking, cycling, horse riding etc. It is a green artery out of Harpenden. The views from the Nicky Line should be safeguarded and it should be specifically mentioned in the Plan in ESD1

provision for cyclists and pedestrians; inc that for vehicles.

replace low with reduction

The appearance is particularly important for affordable housing. In the past affordable housing has always been made to look very different to other housing which can give a run down appearance.

The approach proposed by the Neighbourhood Plan towards the design is broadly supported. Notwithstanding this however, the necessity to prepare a Design Brief to establish the

Do you agree with the Policy ESD1 - Design Strategy?

principles of development sites, prior to the submission of any major development application is queried. In the event of a full application, a proposal will be fully worked up in detail. Pre-application process will further assist the process to ensure the preparation accords with the LP and NP aims. Whilst a Design Brief has merit, it should not be a mandatory requirement for all major applications (e.g. 10+ units).

This is very woolly. A more relevant quantified strategy would make sense. However, increased development suggests we need a relative target rather than an absolute target.

this should be elaborated to request developments are considered from all view points including from private residential gardens i.e. non street frontages as this seems to be that developers are allowed to disregard the impact where development is 'hidden' by existing residential development the local plan should encourage the development of a local vernacular style both in terms of design and also type of developments appropriate with existing density

We strongly welcome the importance placed within the heart of the proposed plan on environmental sustainability. Sustainability interrelates with all aspect of the plan; housing, transport and a vibrant local economy. On point (iii) we would welcome it being strengthened to say, "Pedestrians and cyclists should be prioritised, and facilities made available for them. This should consider both how they can get around the development itself (for example from housing to local shops and educational facilities) and also how they can get safely from the major development into the town centre and to Harpenden station." We would welcome two additional dotpoints here, one concerning the promotion of public transport to and from any new major development and a second encouraging the provision of electric car / bike charging points (linking to T6 later in the plan).

ESD1 - Introductory statement The draft HNP provides a number of design criteria for new development. It begins with the following introductory statement: "All developments must be visually appealing, designed to a high quality; they must also maintain or enhance the character of the area and support Harpenden as a low carbon place to live and work." CEG suggests that the phrase "visually appealing" should be deleted because it is subjective. CEG therefore proposes that this phrase is deleted and the introductory sentence amended at draft Policy ES1 as follows: "All developments must be designed to a high quality, maintain or enhance the character of the area and support Harpenden as a low carbon place to live and work." ESD1 - Criteria Draft criteria v and ix within draft Policy ESD1 state that a Design Brief must be produced for major developments in the HNP area. Further, the Design Brief is expected to demonstrate the consideration of a number of criteria, including the following: "v. Protection against the loss of or significant harm to ecological or landscape value; ix. How permeability of land surface has been maintained and / or enhanced in the development and how the development is using sustainable solutions to reduce flood risk." CEG suggests that draft Policy ESD1 should recognise that it may be appropriate to mitigate adverse impacts where this would make a proposed development acceptable, particularly in relation to the loss of, or significant harm, to ecological or landscape value (draft criterion v) and the permeability of land (draft criterion ix). This approach would provide flexibility for developers to address issues arising on sites and ensure appropriate development can come forward. CEG therefore proposes that draft Policy ES1 criteria v and ix (in particular) are amended as follows: "v. Protection against the loss of, or significant harm to ecological or landscape value, or demonstrate the provision of appropriate mitigation or compensatory measures; ix. How permeability of land surface has been maintained and / or enhanced in the development and how the development is using sustainable solutions to reduce flood risk, or the provision of appropriate management or mitigation measures to address potential impacts."

Given the 15 year life of this plan we cannot regard environmental considerations highly enough.

Do you agree with the Policy ESD1 - Design Strategy?

Like the idea of the design brief - would like to know if it could have any teeth though - what feedback can be given as well as just encouraging consultation (last sentence).

Like the idea of the design brief, would be good to know if it could have any teeth - what would the feedback to the developer be, could this prevent/delay a planning application until the proposals meet all aspects of the Neighbourhood Plan?

Whilst in support of the general thrust and objective of this policy we are concerned at the use of subjective terminology such as 'must be visually appealing' and 'a low carbon place'. Additionally, in terms of 'protecting against the loss of significant harm to landscape value' it would be beneficial if the policy recognised the exception of Strategic Allocations made through the emerging St Albans Local Plan, for example through a reference back to the explanatory HNP para 3.3-3.4. Similarly, the requirement for a Design Brief is likely to duplicate the requirements of the emerging St Albans Local Plan and should therefore be set out in more flexible terms, including reference to the overarching role of SACDC. We are also concerned that the level of detail required by policy ESD1 goes beyond the requirements of a Design Brief and should potentially be more limited although we recognise that para 6.8 explains that 'Policy ESD1 connects with a number of the other policies in this chapter and is largely related to the communication of the design rather than the requirements of design, which are mostly detailed in the remaining policies of this chapter'. In terms of water efficiency standards, this is a requirement under building regulations and is not therefore necessary to repeat in planning policy requirements.

Something must be done to stop householders turning their front gardens into impermeable car parks. Where impermeable surfaces have been laid can pressure be applied to encourage more sensitive and eco-friendly surfaces.

Do you agree with the Policy ESD2 - Local Character and Heritage?

Design moves on, and hopefully so does Harpenden, although I'm not holding my breath

Don't want high rise flats. Don't need anymore mansions. Want to keep historic buildings such as the Red House. A lot of the town is 70s (in Southdown anyway) which isn't particularly attractive, so keeping the historic buildings is priceless.

I am not sure which box to put my comments but I'll take this one. I think it is very strange coming out with all this neighbourhood plan when you see lovely houses on Wheathamstead Road flattened, to be replaced no doubt by some monstrosity. And to think that they don't even pay VAT to do this. How can you let this happen?

I have no strong views on character or heritage. What is right for people living here today in the modern world is what is important.

I welcome para 6.11 and the need to the many areas of Local Character outside the conservation area, notably the Carisbrooke Estate, the Manland / Sauncy ave are and post-war estates Aldwinckle and Wheathampstead (though innappropriate redevelopment has already occurred.

Need to avoid Harpenden turning into an eating capital with associated night life for visitors from north London and nearby towns with the noise and behaviour that comes with it

Observing a number of developments in the HCA the principles have been of limited effect on developers but of bigger impact on residents.

Subject to Listed Building and Conservation Area restrictions, there should be no other restrictions placed on development to retain Harpenden's "character" - no reason why we shouldn't modernise!

The sentiment is right. My concern is that this statement is too vague and could be over zealously applied by a hostile planning reviewer to reject what is a reasonable application. The

Do you agree with the Policy ESD2 - Local Character and Heritage?

policy needs to be clarified to prevent this otherwise our local council will be seen as a blocker, making it easier to get appeals upheld.

The statement needs to emphasise and perhaps be more specific about what considerate height, scale and design means. Developers are being seen today to push these to the limits and in some cases used the national planning inspectorate to override local decisions. How does the local plan propose to deal with aggressive strategies like this?

This statement needs to be clearer in order to protect existing residential amenity and street scenes from overbearing development especially when commercial developers are seeking to convert 'Brown field' sites to housing. The developers first responsibility should be to property owners in the immediate vicinity and undertake proper consultation - this should involve local residents in decisions rather than being asked opinions and views. Too often developers play lip service to this

We welcome the retrofitting of heritage buildings with energy efficiency measures and micro-renewables. The expertise of world experts BRE on our doorstep could be very useful here.

Yes but HNP aspirations likely to be outweighed by SADC planning decision makers.

Yes, we want to maintain the character of Harpenden

"a positive contribution to local character and heritage" is not just more of the same - innovation can also add to local character as well

Whilst in support of the general thrust and objective of this policy and in support of a requirement for the provision of a heritage statement to support planning applications, we are concerned that the policy potentially goes beyond the NPPF para 134 and 135 requirements by setting a test of 'no negative impact' .

Do you agree with the Policy ESD3 - Shopfronts?

Welcome SPD

Yes need to keep everything looking nice to encourage people out!

Do you agree with the Policy ESD4 - Streets as Social Spaces that are Pleasant to Be In?

"New residential streets must be designed in a way that encourages and prioritises pedestrians and cyclists rather than vehicle traffic" Many new residential streets with higher density housing end up with inadequate parking resulting in cars parking partly on the pavement. So I would prefer "encouragement" of adequate parking rather than less parking

especially focus on cycling./ walking needs taking precedence over vehicle needs

Generally important but people will still need cars and that should not be ignored

i have lived in roundwood park for 41 years and like several roads in our town it is appreciated by many who do not live in the road because of the tree lined. character etc. SADC under its original Local Plan intended to categorize such roads and 'special' to protect their development and the idea has been completely lost and over development and Herts CC reluctance to maintain previous high standard of street tree maintenance. All such roads need a more co-ordinated approach

If the speed limit is 20mph that is too fast for children to play in. Children should not play in the street.

Pavement space is too limited, there has to be a proportionate balance between pedestrians and car accessing the shops - the former outnumbers cars at the weekend

Strongly agree but it wouldn't let me comment and tick this! Need to maintain green spaces, benches to sit on, picnic benches around would be nice for the summer. Prioritising pedestrians good, far too many cars in the centre. Be nice if no cars allowed along the narrow street on the

Do you agree with the Policy ESD4 - Streets as Social Spaces that are Pleasant to Be In?

high street (that goes past the library) or maybe just disabled. Pavements too narrow so pushchairs forced into the road. Not good teaching for children.

The new residential areas must contain enough places for car parking for the residents as well as catering to pedestrians and cyclists. in my opinion the pavements should be properly demarcated and riding of bicycles on pavements should be discouraged.

There is also need to recognise the key role certain roads in the centre play with respect to traffic relief - Station Road, Victoria Road, Vaughan Road and Bowers Way spring to mind. Allowing on road parking, weekdays and weekends, creates traffic hazards and inevitably acts as a detraction to the 'social spaces' objectives. Roads and car parks should be considered together.

We should get rid of the fussy chain link fences which restrict movement around the town centre, in favour of a more open design where pedestrian routes are not restricted.

We very much support the emphasis here on cycling and pedestrians, and on children playing outside within their community (in-line with our own Playing Out programme).

Welcome the mention of children

Why do we want to encourage children to play in the street? Harpenden is currently blessed with Green Belt, parents should spend time exploring the countryside with their children.

Appears impractical

I suggest the "should" in the first sentence is changed to "must" - in line with all other obligations throughout the ESD sections

Whilst in support of the general thrust and objective of this policy we are concerned at the reference of making streets 'suitable for children's play' and the implementation of a 20 mph maximum speed limit. Whilst there will be locations within strategic housing allocations where these objectives can be achieved, it will not be appropriate for all routes, for example primary routes which also need to accommodate public transport provision such as buses.

It is vitally important that streets prioritise pedestrians and cyclists

Do you agree with the Policy ESD5 - New Car Parking Design?

A stronger presumption in favour of pedestrians and cyclists

Again we are seeing an "anti-car" mentality. Cars should not dominate public areas, but neither should dogs, horses, smokers, loud music - the list goes on. We must recognise the role of cars in a modern society and provide for them rather than stigmatise their use.

Agree that Improvements to the public realm should be designed to encourage the activities intended to take place within it. Streets should be designed to accommodate a range of users, create visual interest and amenity, and encourage social interaction. However the wholesale requirement of 20mph streets is already shown to bring with it an increase in accident rate and in a diversion of attention - see the reaction of the police to such zones. Many cars speedometers do not allow for control of speed to within the 10% legal limit at 20 mph. I suggest that this policy does not demand but rather requires an appropriate use of such controls.

Although I agree with this comment, work does need to be done on improving town centre / station car parking, which is something which will encourage use of the High Street more.

Although it is desirable that cars must not dominate public areas, this should not mean lack of access, e.g. to the town centre.

Anything which improves parking and traffic flow is to be commended even if it diverts some traffic away from roads like Station Road.

As well as additional parking spaces, the time limit of 1 hour parking is unsatisfactory and should be a minimum 2 hours to allow time for shopping, dining etc

Do you agree with the Policy ESD5 - New Car Parking Design?

Car parking must not increase congestion.

I also wonder about the price of parking. People park on the streets (and create fumes and congestion driving round looking for spots) because they have to pay for parking. I've mixed feelings about a multi storey - I just hope it's designed attractively as most multi storeys look like 1960s eyesores. It could ruin the look and feel of the town if not done sympathetically. The station car parking is a particular problem - the approach roads are narrow and congested. Can nothing be done to make access to the parking easier (and safer for pedestrians)? One side is very narrow and the other side is full of taxis (with almost no chance of parking for 5 minutes to pick someone up or buy a rail ticket).

I am not sure what these 'sustainable and healthy forms' of transport are that you expect large numbers of people to use apart from walking and cycling. I think it naive to expect a large reduction in car use, more important to develop the car parks to increase capacity and make them cheaper or free to reduce/remove the need to park on the high street etc and encourage more people into the town. It is easy to see the large numbers of cars driving round & round the town to find that essential car parking space because they do not want to pay for parking. This adds to the traffic & pollution in the town as well as creating a hazard to pedestrians & cyclists.

I don't think its realistic to expect parking for example to be visually attractive, there's a lack of parking in many Harpenden areas and flow of traffic needs to be considered , use by cyclists and pedestrians should be a reasonable consideration ; why are no comments asked for ESD4?

Ideally, we would prefer new developments did not have parking, to discourage car ownership. However, in the real world we understand that parking is needed in which case we agree it should be well designed.

in particular giving priority to walking/cycling over car traffic

More parking provision across the town is essential

Most people using the station come from outside Harpenden and do not want to pay car parking charges, greater policing of illegal parking required (examples are all day parking on the Common, misuse of disabled parking in Vaughan Road etc.

Multi storey at station is ok. But there should not be any additional parking for the new leisure centre in the park -if there is to be, why was it not made clear how much of the current park would be lost? There will be a legal challenge to this if a massive new car park is proposed.

must be sufficient parking

Need better public transport to reduce reliance on cars. Need bike lanes and parking.

Need many more car parking spaces and a Multi-story at the Station which is full by just after 08:30 in the morning. But the design needs to be good and fit in with the local environment.

'Pedestrian and vehicular conflict' already ensured when kerbs were removed in Lower High Street between Vaughan Road and Thompsons Close - a bad precedent for elsewhere.

Sufficient car parking must be provided

The issue I have here is that 'car parking design' has to include the charging structure which is an SADC policy. We have a situation where we have charges on a Sunday in town centre car parks but no parking restrictions (or enforcement) on the surrounding areas.

The second sentence "Cars must not dominate public areas and pedestrian and vehicular conflict must be minimised." should either be removed or changed to "Cars, bicycles, smokers, pedestrians or market stalls must not dominate public areas and pedestrian and conflict must be minimised." My point is stop picking on motorists - the car is an essential part of life in Harpenden and its use should only be discouraged by positive measures and not negative ones like speed humps and unreasonably low speed limits.

There cannot be more car parking provided if there is a serious wish to reduce pollution and increase walking and cycling

Do you agree with the Policy ESD5 - New Car Parking Design?

All new development and densification should allow for adequate on site car parking in line with the high level of car ownership in Harpenden. Harpenden urgently needs a new car park and consideration needs to be given to making a 2 or 3 deck underground Car Park beneath the Public Halls Site.

Practicality is an issue here - demonisation of cars before any real alternative is offered is too idealistic

parking on pavements has become a problem in Harp, especially in residential areas

car parks (particularly multi storey car parks) need NOT look industrial. The development of commercial units on the outer edge at ground level only makes financial sense, it softens the impact at street level.

Do you agree with the Policy ESD6 - Refuse and Recycling?

But a near-impossible aspiration.

I am not sure what the policy is but I think the collections are about right. I think it is hideous to see all these wretched bins all over the place. How did we do it "in the old days"? Would it not greatly improve the aspect of the town if we got rid of these eyesores?

Lots have houses have bins on view - not a problem

The southdown center needs to be open 7 days each week.

We are lucky in that the service is generally good and reliable, and most bins are hidden. But can the infrastructure cope with an increase?

We would add to this a specific requirement for food waste collection and, wherever possible, composting.

Relies on continuity of policy at SADC and reasonable behaviour towards waste site provision on part of HCC - recent reductions in hours and the lack of practical options have probably been contributory in appearance of more fly tipping

The number of recycling bins and boxes now required is producing very untidy street scenes in many places

Consider penalties for blatant misuse

Do you agree with the Policy ESD7 - Green and Open Spaces and Areas of Ecological and Landscape Value?

depends what is meant by significant development, 10 houses or a 100?

I approve of the stated intention but it makes no mention of the access. Greenspaces must have appropriate access - in some cases to horse riders too. This policy does not cover the better interconnexiion of bridleways and it should

I suggest that the words "significant harm" are replaced by "harm".

If "landscape value" = "pretty view", development should not be prevented where housing needs can come first

No building on green belt please

Only in the particular of using open spaces for housing in Southdown.

See earlier comment on adding the Nicky Line as a distinctive and valuable local Green Space where the views from it should be safeguarded from any intrusive development of the Green Belt land.

Set examples with fly tippers, council seem to be losing the battle, consider local encouragement and tips open 7 days a week

There should be no development building or change to Green Belt Land. Then nothing else needs to be said. Harpenden's local plan should not accept the terrible revised definition of what can be done on green belt land proposed by St Albans in their unapproved plan -it was based on a consultants report which would have shredded our wonderful green belt by allowing infill building wherever Jarvis wanted to build.

We also suggest that this policy includes a desire for green spaces to include community growing spaces.

We need to keep the green spaces we have

The statement appears to have no link to practicality - infill is unlikely to adhere to this policy. Examples of new development to date that recognise this are difficult to see in any recent plans in the Town.

Who is to judge 'the loss of or significant harm to'? If the current management of the Common is anything to go by, I have little confidence in this statement

Why does Harpenden need so many golf courses? Could we lose one to make new green space for all to enjoy? Rather than the current situation of having to avoid flying golf balls when walking on the common.

Do you agree with the Policy ESD8 - Key Views?

Add the area around Rothampstead Park and the Rothampstead Estate

Common, High Street and Batford? - Yes Kinsbourne Green?? Don't agree that it provides visual openness. It is fairly open around there anyway with all the fields and huge houses with massive open gardens.

Get rid of the golf course on the common.

Rothampstead Park and Nicky Line need to become Harpenden assets

See earlier comment re views from the Nicky Line

The sentiment is right but the wording is very clumsy, making it both difficult to understand and open to being misinterpreted. Suggested rewording, with changes shown between *s is given below. The Harpenden Neighbourhood Plan area includes the following Key Views, which are shown in Figure 6.1: 1. The Common 2. The High Street 3. Batford Springs 4. Kinsbourne Green Common Development proposals must include evidence that ** protection or enhancement of key views to and from these locations, including attractive green spaces and important townscape features, such as landmark and gateway buildings *** has been included ***.

There should be a distance restriction on views to prevent unreasonable denial of development

This is very important to ensure that the character of Harpenden is maintained.

What about Rothamsted park?

Why isn't West Common (the green belt off Reborn Lane, Hammonds End golf course etc a key view. People live on adjacent roads you know!

Yes we must keep these green spaces. Would like to add land owned by Cross Farm - this open space is key for residents in the area to maintain their happiness. Also maintain all allotments.

But also include Farm Land on the Urban Fringe.

In two minds about this with regards to the whole of West Common. To the west side, there's a thin strip of the Common where there are large areas of impenetrable scrub which don't really constitute Common Land in my opinion. This area is within easy walking distance of the rail station and small, discrete pockets of it could be used for affordable housing - obviously designed to be sympathetic to the area.

the choice of views seems a little introspective. The Common is clearly an asset - Church Green on the High Street is understandable, but other aspects less so. Batford Springs appears characterised by development in some areas that enhances the views, while in others - notably

Do you agree with the Policy ESD8 - Key Views?

the change in design from the aspiration of the Volunteer Centre to a building that would look at home in a 1960s motorway service forecourt does little to enhance the appearance of Batford Springs. No comments are made about any other views that surround Harpenden which is a serious omission, however not unexpected when the Town Council is for the most part derisory about views in certain matters.

Do you agree with the following Policy ESD9 - Views in New Developments?

Any new development on green belt land will inevitably have a harmful visual impact on the landscape.

I would like to see this statement referencing the views into new developments from surrounding properties - such as overbearing development or height not in keeping with existing or surrounding properties. Developments should be sensitive to those existing surrounding properties

subjective what a harmful view would be , ie to what extent

Views into and off new developments should be considered from all view points and consider the views of surrounding residents over and above those of professional developers - local people need a voice to influence developments in their areas. Too often inappropriate developments are being approved where developers appeal and seek national approval over that of local people

appears like making the appropriate noises, but difficult to see practicality.

View onto new significant developments. Eg Adding trees, where possible to maintain as much of the existing rural landscapes. Cooter's end lane is on a hill and therefore properties opposite will, rather than facing fields, be exposed to looking over the whole developments. Comments about existing trees being kept/new trees added from a biodiversity perspective as well as protecting views

What about views of new developments? Nice that the new developments will get views of the countryside but what about those who are loosing views of the countryside if/when the green belt is built on. Using trees to minimise visual impact. How will developments on greenfield not "have a harmful impact on landscape". Like the idea but not sure how it will be implemented in reality.

Do you agree with the Policy ESD10 - Access to the Natural Environment?

although it might be too easy for developers to say ' it's not practical' to avoid compliance

Current rights of way need maintaining and need to link up, a lot only join up by walking on narrow country roads (eg. mud lane and the path between Ferrers Lane and Pipers Lane).

Cycle paths must be a priority.

especially safe cycle paths and rights of way

Footpaths are a requirement but this does not need to extend to extra cycle paths. Cycle paths are rarely used around Harpenden, the vast majority of cyclist use the roads.

if practical

Must also keep and promote Byways open to all traffic (BOAT)

should include to rural road where priority should be given to cyclists/runners/walkers/horse riders

'Where practical' is alas a let-out clause for the developers who will want to build on every square metre.

Yet, this policy omits bridleways. It should not in such a rural area of Harpenden and in a county with high horse interest

Do you agree with the Policy ESD10 - Access to the Natural Environment?

Equestrian activity not mentioned, please reconsider

Equestrian access is not mentioned. Harpenden has a large equestrian facility at Greenways (off the LLR). there is a riding school, meeting place and lessons for riding for the disabled, adults and a very successful show jumping yard. Equestrian access to the natural environment is paramount

Do you agree with the Policy ESD11 - Allotments?

As an allotment holder (Pitgottshill) strongly agree with the support for allotment sites in Harpenden. An opportunity should be taken if possible to create another site in NW Harpenden. With increasing cost of food due to Brexit we need to grow more of our own food and allotments are part of the solution to low food-miles healthy produce - fruit and vegetables.

Building houses on allotment land is a lesser evil than building on green belt.

How big is the demand for allotments ? Will this reduce with the newer residents?

how much do they cost voters eg to build and maintain allotments? if they don't pay for themselves, then we shouldn't be creating more

Much as I like allotments in areas like ours where many people have big enough gardens, allotments should be linked to the needs of others

These are a key resource and should be defended.

These green spaces definitely need protecting. I'm dismayed to see one site earmarked for development.

Yes we shouldn't sell of allotments, these should be kept for the residents of Harpenden. They are vital. New allotments should be built too.

You should not be allowing building on the allotments

Do you agree with the Policy ESD12 - Biodiversity?

Add wildlife corridors, all new developments should enhance wildlife, no fences so hedgehogs can roam

All new development should be rigorously scrutinised for impact on biodiversity.

Sounds good, but the test will be how it is implemented and which criteria are given prime status

This kind of biodiversity can also be encouraged by - for example - bee friendly planting on roundabouts and verges.

what is meant by supported, is there financial outlay? how much?

Do you agree with the Policy ESD13 - Trees and Hedges?

An exception should be made where existing trees and hedgerows impinge on footpaths, effectively reducing their width. There should be a requirement to cut them back to the land boundary, even if this means damaging them. Pedestrian safety must take priority.

but developers should pay for eg new trees not voters

I would like to see protections for trees and hedges go further

More detail needed as to 1:1 tree replacement policy - a sapling is not going to replace a 170-year-old oak

Most important that all trees and shrubs are retained. Building or redevelopment must have new planting also.
My only concern is that with higher density developments unsuitable trees might be selected for planting within the new developments, which will become too large and cause damage to properties.
Very necessary as trees are ??? at key sites
Increase ratio - take opportunity to increase trees not just replace 1:1
Practicality again questionable
Ratio should be more than 1:1 - take the opportunity to increase the number of trees not just replace like for like - especially when the replacement trees are likely to be younger and smaller.
This would be great - it doesn't happen now for new infill garden developments where nearly all the trees are being removed.

Do you agree with the Policy ESD14 - Sustainability and Energy Efficiency?

A commendable aspiration but near impossible to enforce without more specifics, eg thermal insulation of walls, roofs etc.
attention also needed to retro fitting existing harpenden e.g. electric car charging points and renewable energy sources for existing developments
Depends on Gov standards
Much prefer this approach to the box ticking approach proposed in ESD1
replace low with reduction, mitigation should not be a priority - rather we should act to reduce emissions not deal with their impacts
This takes no account of the most recent thinking that the problems of the world are not in fact 'carbon related' after all. The wording should accommodate later revelations.
Whilst in support of the general thrust and objective of this policy we are concerned that the requirements for major development are too specific and should rather be set out as aspirations rather than requirements.

Do you agree with the policy ESD15 - Carbon Dioxide Emissions?

the most effective way to reduce carbon dioxide emission is to discourage the use of motor vehicles and provide good safe cycling and walking routes
And subsidies
Car usage must be discouraged
Don't waste any more money on cycle ways please.
Largely unnecessary to have this as a local policy as this is covered at National Level under Building Regulations. I suppose there is no harm having this.
Needs to go further too. A lot of work is needed to make Harpenden cyclist friendly
Road humps cause rise in Co2 emissions
This is urgent. A survey should be carried out to assess the level of Asthma in our children, which I think is higher than similar towns which have higher elevation. We should take active steps to control access to the town centre and some measures to limit the volume of traffic during busy times... Mandatory School buses for example??
This may not be practical, eg when redeveloping a derelict site with medium density housing
We wonder if this policy could go even further, and create a "carbon offset fund" in the way that London has, which could be used to pay for carbon-cutting projects. For example, here is an

Do you agree with the policy ESD15 - Carbon Dioxide Emissions?

excerpt from Kensington and Chelsea. *** Since 1 October 2016, London Plan policy 5.2 has required any new homes forming part of major developments to be zero carbon. Further guidance on this zero carbon standard is set out in the Mayor's Housing Supplementary Planning Guidance (SPG) published in March 2016 and the GLA's guidance on Energy Planning. To achieve the zero carbon home standard set by the Mayor, the residential element of all major schemes proposed in the borough should achieve a minimum 35 percent reduction of regulated carbon emissions on-site, and offset all remaining carbon emissions up to 100 percent. On-site reductions in carbon emissions can be achieved in a number of ways, for example by maximising energy efficiency, using decentralised energy networks or through the use of on-site renewable energy technologies. However, where it is demonstrated that a 100 percent reduction in emissions cannot be achieved on-site, the council has established a carbon offset fund for cash in lieu contributions from developers to meet the standard off-site. The offset monies received will then be spent on carbon offsetting projects around the borough to achieve carbon savings. To accord with the requirements of the London Plan, from the 1 April 2017, the council will fully implement the zero carbon standard through the creation of a Carbon Offset Fund. New proposals will be assessed against this standard using information provided in their energy assessment (see the Mayor's Energy Planning guidance for further information). The council's carbon offset price is £1,800 per tonne of carbon.

WHY IS THERE NO MENTION IN THIS REPORT ON THE EFFECT OF THE EXPANSION OF LUTON AIRPORT? THE NOISE OF AIRCRAFT OVERHEAD IS INCREASING AND NIGHT FLIGHTS SEEM TO BE SIGNIFICANTLY MORE THAN THE AMOUNT AGREED. I THINK THAT YOUR PLAN SHOULD INCORPORATE A STRATEGY TOWARDS REDUCING THE NUMBER OF NIGHT FLIGHTS AND THE NOISE AND POLLUTION THAT THESE AIRCRAFT CAUSE TO OUR TOWN

Very important

Do you agree with the Policy ESD16 - Community Energy Initiatives?

Comment as ESD14 and 15, as well as being all too vague.

community investment must not be through council

energy initiatives must not have a SIGNIFICANT negative impact on the amenity of local residents or the appearance and character of the surrounding area. I have no idea what these energy initiatives are. But as mentioned above any development usually has some negative effects. The policy should be based on avoiding significant negative impacts. Rather than just negative impacts.

Great idea!

It is highly unlikely a community Energy initiative will be proposed during the lifetime of this neighbourhood plan. I do however support the individual use of renewable energy systems.

There is no reason why Harpenden should not be seen as a pioneer for community energy

There is potential for hydro electric generation of electricity from the river Lea as a clean source of energy and would generate income for the benefit of the local community. Such a proposal could be incorporated into a traditional water mill designed housing for aesthetic satisfaction. The river Lea has the suitable flow all year round to support this as a viable suggestion.

We strongly agree with that community energy should be supported, and could be subsidised using a carbon offset fund.

Do you agree with Policy ESD17 - Flood Risk?

Applies to higher land which drains to Central Harp and Lea Valley

Do we have one?

Don't allow development in flood risk areas, why would you, it is a flood risk area.

insufficient knowledge to comment

Major developments should also include suitable provisions to pay for the maintenance of any SuDs systems

Very important policy

Well more drains and cleaning thereof might be a start.

When roads are re-surfaced local inspectors must stop contractors blocking drains with re-surfacing materials.

We are going to get wetter winters, wetter than ever before. Notions of 1 in 100 events are having to be reset.

Do you agree with the Policy ESD18 - Water Conservation?

Again another national issue covered by Building Regulations. I'm not sure how 120 l/p/d matches with current Building Regulations but I would question why this is needed in a local plan.

unsure if this limit is practical

Water could be a big issue with added growth to the community

Do you agree with the Policy ESD19 - Pollution?

Air pollution is strongly linked to motor vehicles and the best way to combat this will meaningful sustainable transport initiatives

all garages to have doors wide and high enough to get cars into the garages.

AS BEFORE UNTIL THE COUNCIL TACKLES THE AWFUL POLLUTION FROM THE SKIES THEN THE POLICY IS REDUNDANT

Developments should not SIGNIFICANT increases of air pollution levels in the area and actions should be taken to mitigate this such as planting, appropriate siting of air outlets, and designing to ensure any air pollution can dissipate. As before reasonable policy but needs to be based on significant increase/effects. I would strongly recommend adding a noise policy in as well especially if there are plans to build residential developments next to Dark Lane recycling centre and/or a builder's merchants. Something along the lines of Developments should not result in SIGNIFICANT adverse effects for future residents due noise pollution in the area. Developments should include mitigation measures to ensure satisfactory levels of amenity of residents. This should include measures to reduce noise levels both inside homes and within private and/or communal gardens.

motor vehicles are a major pollutant and policies must be developed to discourage their use

This policy could also mention electric car charging, in-line with T6.

Whilst in support of the general thrust and objective of this policy we are concerned that the policy is not sufficiently precise, potentially restricting any 'air pollution' rather than requiring that air pollution should not exceed recognised levels and thresholds of specific pollutants as set out in relevant guidance.

Do you agree with Policy H1 - Housing Strategy?

Brownfield sites should take priority - we cannot afford to lose any more green spaces

But there are far too many congested new builds going up

Do you agree with Policy H1 - Housing Strategy?

Every effort should be made to ensure that SADC's housing need assessment is not met disproportionately by development in Harpenden.

Fundamentally disagree with targets being given to St Albans for additional housing - I wonder who determined these and on what basis. Can they be challenged? Within that constraint I agree with the approach - I just disagree with the constraint. Harpenden is in danger of becoming too big to sustain its character.

Green belt development should be considered at the same time as brown site development.

Harpenden (St Albans) , in its planning regulations allow developers to assume that one car per household is a valid planning assumption. Clearly it can be but most certainly not always. Worse, if a planning application made on such an unchallenged assumption is approved then almost in every case in Harpenden will we see further street parking. The present system is wrongly cast so that the only control is for residents to be left to object to any such proposal when more correctly this one car option per household for some new dwellings should one where the developer should be required to justify in the application.

How practical is it to build starter homes for local people? With the attractiveness of the town there would be great demand from far & wide for these homes. This may be less for homes for older people to downsize to as many older people are established in the area and would like to remain close to friends & family.

I am concerned about excessive development

I do not feel at the moment that the St Albans planning laws are strict enough. I don't feel that they support the other comments that you rightly make re development of varied types of housing (without destroying the character of the town) in the plan. It feels at the moment in Harpenden that there are so many infill houses, with no question from the council. Though as you rightly say in the plan, where permission is occasionally refused, people are gaining approval through appeals. The plan talks about protecting the wonderful character and beauty of our town, and I feel it is currently being eroded very quickly through an overuse of the infill technique.

I do not think we should be building lots more houses simply because there is a market for them and the developers are keen to make money.

I don't like that St Albans can dictate this to us.

I note that the bulk of new housing (of which affordable housing is much needed) is to take place in Southdown and that plans to develop NW Harpenden have been abandoned. One wonders if the voice of those in North and Central Harpenden are louder than those of the South.

I can see there is land which could be developed to the west of Grove Road though it would be a shame to lose all of it. Also Grove Road is becoming increasingly congested and unless this is addressed more and more people will use Leycroft Way as a 'rat run' and use the back lanes to St Albans. These lanes are already in a bad state with traffic churning up the banks and travelling far too fast for the walkers and cyclists among us.

The sites which I have concerns about are that of the excellent Pan Autos, a highly rated local business.

Jewsons should certainly go! Their vehicles represent a major hazard and spoil that part of Grove Road. I would think local business should be encouraged.

I am concerned to see how little housing development is to take place elsewhere as there must be small sites within the rest of Harpenden which could support social housing development.

People with overlarge gardens should be encouraged to sell of part of their plots and where large houses are to be knocked down and replaced, there should be an expectation of social housing

Do you agree with Policy H1 - Housing Strategy?

within this as part of the planning application process. Having said that I have little faith in the planning process as my neighbour built a huge garden shed which clearly infringes planning regulations yet was granted retrospective planning permission.

I think it should be more clearly expressed that development above that required by local plan should not be supported as it would be detrimental to the character of Harpenden. I do not support the allocation of jewsons and pan autos as residential sites as they are valuable local services and generators of employment. I do agree that infill and brownfield development should be prioritised.

I would like this to be clearer that the HLP does not condone or invite any development on green belt. It merely acquiesces, if targets are foisted on the area from higher up. Should Housing Objective 1 be reworded to something that is remotely achievable? It would be lovely if we could achieve this objective (along with world peace and a cure for cancer), but aren't you just creating false expectations?

insufficient detail

More affordable housing desperately needed, and for people to buy or social rent (NOT private rented).

More proper social housing needed

Need a mix of social housing, affordable housing and commercially devised housing - all we seem to get in Harpenden is the last.

Need to recognise that development will need to include sensitive use of green belt land

The drive for more housing comes from Government, but we can not continue to build houses, at some point we have to stop.

The emphasis must be on smaller units, densification and ??? of redevelopment which enlarge houses

The NP policy proposes that the ability of the Built up Area of Harpenden to provide appropriate new housing is exhausted prior to delivery of new housing in the Green Belt. Whilst recognising that the NP does not seek to allocate sites within the Green Belt, we do not consider it appropriate for the Neighbourhood Plan to require that sites in the Built up Area are exhausted first. This process has potential to delay the delivery of appropriate housing sites, and the testing process to evidence that all areas are exhausted would be imprecise and subjective. St Albans has a median house price to median gross annual ratio of 16.76. If the local plan determines that land needs to be released from the Green Belt to meet needs, delivery of Affordable housing should not be delayed until all urban land has been built on. If land supply is constrained it is inevitable that prices will rise and affordability will worsen.

THE PROBLEM IS THAT THERE ARE NOT SUFFICIENT SPACES TO BUILD UPON TO SATISFY THE GOVERNMENT PLAN OF OVER 10,000 HOUSES BY 2036. I DISAGREE THAT WE SHOULD BUILD ON SITES LIKE PAN AUTOS, JEWSON ETC AS THEY CRING EMPLOYMENT AND A NECESSARY SERVICE TO THE TOWN. I THINK THE COUNCIL NEEDS TO OFFER A GREEN BELT AREA SUCH AS ONE OF THE GOLF CLUBS FOR DEVELOPMENT, BUILD A SIGNIFICANT AMOUNT OF HOUSES TO SATISFY GOVERNMENT REQUIREMENTS AND STOP THE DISRUPTION AND OVERPOPULATION WITHIN THE TOWN.

The proposed developments site ref HA1 and HA2 will put unsustainable pressure on local infrastructure (esp roads, parking and education) and remove sites that offer useful services and create employment.

The social structure town has been/is being ruined. Families are split up with grown up children being forced to live many miles away. This results in lonely parents who rely more heavily on government services and is combined with an influx of new residents who 'use', rather than contribute to the town's schools, clubs, etc,
Key workers cannot afford to live in the town so have to commute and are not a part of the community. The town is far too desirable for some - the very affluent - and not accessible to others. I am sure I am one of few voices, if not a lone voice, but I believe that planning permission for new

Do you agree with Policy H1 - Housing Strategy?

dwelling should be restricted to social or genuinely affordable housing. That means affordable to the likes of a shopworker, nurse or teacher. When a 2 bedroom terraced house can cost over 10 times the combined salary of two young teachers something is rotten in the town of Harpenden. I am afraid we need to build on the green belt. We also need radical solutions. Too many residents live in houses which are far too big for them. Aldwickbury Golf Course would make a fabulous 'retirement' community with a large number of purpose built dwellings and community facilities. Large houses released could be converted to accommodate more families, etc, etc, Will it happen ?

There should be a cessation of the building of apartments as there are now too many. Instead there should be a concentration of 2/3 bedroom housing

There should be homes built in North East Harpenden as per the original plan. No more than this.

However careful use of Green belt may be a better outcome than bad use of infill & brownfield (eg loss of views, loss of employment)

Infill and brownfield should definitely be first below greenfield sites are lost. What input can the town have on the new towns proposals - perhaps a way for some of the housing need to be met whilst new infrastructure is provided rather than bolt on developments into areas like Harpenden with little or no additional infrastructure provision.

Need to identify some green field sites/green belt areas to meet the current housing needs

Paragraph 7.8 The draft HNP states at paragraph 7.8, which forms supporting text to Policy H1: "The Neighbourhood Plan also recognises the role of the Green Belt and supports the prioritisation of its protection. Therefore, the Neighbourhood Plan proposes that the ability of the Built up Area of Harpenden to provide appropriate new housing is exhausted prior to delivery of new housing in the Green Belt. In accordance with this approach, a number of housing site allocations are proposed in the Built up Area of Harpenden." CEG appreciates that the draft HNP seeks to support the role and purposes of the Green Belt. However, CEG considers that draft paragraph 7.8 is overly restrictive, particularly in the context of the established level of local housing need. It should not be necessary to "exhaust" all sites within the Built up Area before allowing any new development outside of this area. Some sites within the Built up Area may be unlikely to come forward in the short term, and the provision of urgently needed new homes should not be delayed as a result of needing to wait for all capacity in the Built up Area – which is very difficult to define – to be used up. Furthermore, and as noted in relation to Policy SS1, CEG considers that draft paragraph 7.8 should recognise that SACDC may release land from the Green Belt to accommodate strategic housing sites through the emerging Local Plan preparation process. CEG therefore suggests that draft paragraph 7.8 should be amended as follows: "The Neighbourhood Plan also recognises the role of the Green Belt and supports the prioritisation of its protection. A number of housing site allocations are therefore proposed in the Built up Area of Harpenden. The Neighbourhood Plan also recognises that the District Council may release land from the Green Belt to provide land to help meet the need for new housing."

The policy suggests whatever comes from SADC is fine - it implies no desire to have a say in SADC policy making on behalf of local population

What can be added here about the towns input into SADC wider local plans (eg new towns). May provide extra housing whilst also ensuring infrastructure is provided rather than bolting on considerable number of new homes with effectively existing infrastructure. Agree about infill and brownfield

Whilst we agree with the general thrust of the policy, we do not agree with a requirement (para 7.8) that the HNP housing allocations within the built up area of Harpenden are exhausted before delivery of new housing in the Green Belt. The policy must be revised to both expressly acknowledge the key role of Strategic Allocations for Green Belt housing made through the emerging St Albans Local Plan and that they are appropriate for early delivery. This could be achieved through a reference back to the explanatory HNP para 3.3-3.4.

Do you agree with Policy H2 - Housing Renewal?

Disagree strongly with "The Neighbourhood Plan defines a property as no longer fit for purpose if it meets one or more of the following criteria: unsafe, in disrepair," This gives developers 'carte blanche' to knock and rebuild rather than restore - where the property is more representative of the area in its original design.

Each case should be taken on its own merits. We should not be overdeveloping sites and causing misery to the next door neighbours if it's not appropriate

I agree that the redevelopment of existing residential properties that are no longer fit for purpose should be supported. However the definition of fitness for purpose is far too vague. To simply use as a trigger the fact that a property is allegedly 'unsustainable' (however that definition might change over the years) or makes 'inefficient use of its site' is to give open up a developers' charter which will target older properties of the town with medium to larger plots or those older properties with characterful features. This policy needs urgent redrafting.

I agree with reuse and redevelopment, however I think this should not allow the demolition of one dwelling to be replaced inappropriately by two or more smaller dwellings simply because the developer sees an opportunity to make more money from it. I can think of several examples where this has happened in recent years and they typically spoil the look of the streets, making them overcrowded. And in all cases the smaller dwellings were sold at ridiculous prices (because they were close to schools) so couldn't even be argued on the basis of providing affordable housing!

I am concerned about excessive development

I think this policy should actively promote redevelopment of existing sites that are suited to renewal and are currently used inefficiently to enable local plan housing requirements to be met without threatening the green belt.

'Inefficient use of site', ie, encourage multiple developments on the site. Harpenden's 'character', of which much is made elsewhere, is in its unit housing stock. These sites form part of the character. I think that this proposal conflicts with the HCA and should not be permitted in the HCA - but could be acceptable elsewhere.

Perfectly good houses should be repaired not demolished - new houses have a massive price premium on them making them too expensive and this just lines the pockets of the developers. Also increases the density of population and this has implications for traffic, education parking etc - regardless of other things put in place to mitigate this - it never fully works.

Redevelopment of houses in Harpenden seems mainly to consist of knocking down substantial houses and rebuilding as larger mansions. This section needs rewording.

There is a significant number of very large homes in the town which occupy a lot of land. These could be used much more efficiently by redeveloping the sites with more homes of a smaller but still very generous size in the same land area. Who can actually afford to live in all these huge houses? Some could be retained for conversion to other uses e.g. elderly care homes, a new hotel ect.

this needs to be managed carefully, the evidence in the town shows that buildings that are not fit for purpose are redeveloped into flats costing millions of pounds - hardly starter homes.

Will this prevent development of small houses into large houses, thus reducing affordable houses?

Yes we should definitely redevelop existing first!

Do you agree with Policy H3 - Dwelling Size and Type?

Agree with the principle however enforcement of this seems difficult for Harpenden council - based on recent developments which are characterised by expensive apartments targeting specific demographics and somewhat 'gated estates' (Gleneagles, the bourne, the new developments off leyton road) - whilst gates may not be present the impression is of gated developments - and are certainly not mixed in type

Do you agree with Policy H3 - Dwelling Size and Type?

Developers Should be held to account so that the initial planning submission which is approved can't later be changed to reduce the number of affordable units as has happened in the past.

Extremely important objective

I am concerned about excessive development

I struggle with the concept of identified size/type mix. I do not believe that it is feasible for everyone to be able to live in the exact town they want to.

MORE SMALLER 2 TO 3 BED PROPERTIES SO THAT YOUNG FAMILIES CAN AFFORD THEM. Does 40 houses per hectare provide parking for cars at property

My principal concern is the absence of provision of accommodation within walking distance of town centre to motivate potential downsizers to release large family houses/ 2 bed 700/800 sqft apts will not do

No more 5 bed houses

See above. Need for smaller units suitable for older people wishing to downsize

No more luxury or 'executive' homes - we need more houses/flats for ordinary families.

The requirement for major residential developments to submit a Dwelling Mix Strategy as part of the Design and Access Statement is supported.

there are insufficient small / medium sized properties in the area and too many excessively large dwellings

There is a danger that this is too prescriptive, which could lead to the rejection of developments that gets overturned on appeal. This makes later appeals easier as the policy becomes discredited.

There should be a cessation of the building of apartments as there are now too many. Instead there should be a concentration of 2/3 bedroom housing

These are great words but otherwise are meaningless nonsense that will have little effect on developments that are eventually executed. A big issue is developers' profits and viability statements in a place like Harpenden. Also is the onsale market and then permitted development. In addition, for people wanting to downsize, there is also the issue of stamp duty, which is well beyond the HLP.

They should allow greater green space and pavements including mandatory garden space.

This should include council houses

This should include the requirements of Affordable Housing as addresses in H5

Today there are too many massive houses going up crammed into small plots.

We feel that the proportion of homes for the first-time buyer, young families wanting to locate to Harpenden, and children of Harpenden residents needs to be given priority.

With SADC the planning authority, there is clearly no way to prevent the ongoing trend in Harpenden for smallish houses (and bungalows) to be demolished and replaced by 5-, 6- and 7-bedroom mansions costing £2 million and upwards.

The draft HNP states at Policy H3: "Major residential developments are required to submit a Dwellings Mix Strategy as part of the Design and Access Statement with any planning application. The strategy must clearly demonstrate how the proposed development addresses the objectively identified need for different sized and types of housing as set out in the latest assessment of housing need carried out by St Albans City and District Council. Proposals that are not considered to meet an identified size/type need will not be supported." CEG supports the proposed approach within draft Policy H3 which requires major residential developments to provide an appropriate mix of homes to reflect the objectively identified need for different sizes and types of dwelling, including for affordable housing, within the latest assessment of housing need prepared by SACDC. This approach provides the flexibility for each proposed development to include an appropriate dwelling mix based upon the specifics of the scheme but serving to meet the overall identified need for each size and type of home as identified by SACDC.

Do you agree with Policy H3 - Dwelling Size and Type?

A careful balance needs to be struck and this should be aligned with SADC policy (and contribute to it)

Do you agree with Policy H4 - Residential Density?

40 dwellings per hectare will only allow for very small houses with small gardens and space for only 1 car. Density should be reduced

a minimum density would conflict with maintaining current 'vernacular' in certain areas and encourage overbearing apartment blocks in areas where it might be deemed inappropriate and overdevelopment is sites. How does the local plan propose to prevent over development of sites? I see no detail of over development being referenced?

Average person completing this survey has no idea what 40 dwellings per hectare looks like. Does Shanly Homes development at Tuffnells Way/Derwent Road meet that criterion? It seems unlikely.

Density is far too high and should be made more realistic. Including sizes of homes of 2/3 beds to be larger than they are today.

Desire? Insofar as possible? No - we have to protect our green spaces!

I am concerned about excessive development

I don't agree with the 'desire to protect the Green Belt.'

I support this provided all the other policies about development can be met whilst achieving this density, again to protect the green belt and green spaces

incorrect wording (min should be max?) , difficult to visualize density

The caveats must include pressure on local services, resources and infrastructure.

The last sentence implies that higher densities than 40 dwellings per hectare will not be acceptable other than in Harpenden Town Centre. If this is true then the 40 dwellings per hectare in other areas is both a maximum and minimum. If this is correct then the policy should state that and if it is not correct then the last sentence should be deleted.

The requirement for residential development to have a minimum density of 40 dwellings per hectare is noted and the desire to maximise the potential of sites is welcomed and encouraged to boost the number of residential unit numbers on a site. Given the nature of existing neighbourhoods in Harpenden, with its varied densities, the policy will need to be applied with care to ensure new development balances the need to make efficient use of sites with the need to respect the character of existing areas and the relationship of the town with the countryside/Green Belt. The density of residential developments should not be subject to a 'on size fits all' approach and individual sites should be considered on a site by site basis, in line with the site's context and surrounding area.

This is again drivel. 'Higher density developments may be acceptable in HTC subject to design considerations'; what a get out clause! In addition what is the current density in Harpenden; below 40 dwellings/hectare I am sure and set to impact character and the HCA.

This is badly worded. If the "minimum" is 40 then higher values will, not "may" be acceptable. So what is the requirement? Is it a target of 40 a minimum of 40 or what? This must be clarified

It needs to be difficult to justify lower density, except for flood risk

No comment is made about prevention of concentration of particular types of housing - balance should lead to balance in density across the town - to not do so is seeking to overload some areas (with densest housing) relative to preserving the area for others.

No idea what 40 houses per hectare looks like! Shouldn't imagine many people do!

No mention of car parking spaces within the development. I suggest each housing unit should have off-street parking for at least one car and roads within the development will have on-street parking for say one car per 5 properties (for visitors and deliveries).

Do you agree with Policy H4 - Residential Density?

The draft HNP states at Policy H4: "New major residential development must be at an appropriate density subject to local character and in accordance with the desire to protect the Green Belt insofar as possible. A minimum density of 40 dwellings per hectare must be met unless an applicant can demonstrate doing so would have a negative impact on local character, a designated heritage asset, biodiversity, trees or flood risk. Higher density developments may be acceptable in Harpenden Town Centre subject to design considerations." CEG considers that draft Policy H4 should provide greater flexibility, recognising that different density levels will be appropriate at different sites, depending on their character and context. CEG therefore suggests that the proposed minimum density of 40 dwellings per hectare should be deleted from draft Policy H4, as follows: "New major residential development must be at an appropriate density subject to local character and in accordance with the desire to protect the Green Belt insofar as possible, taking into account local character, designated heritage assets, biodiversity, trees, and flood risk. Higher density developments may be acceptable in Harpenden Town Centre subject to design considerations."

Do you agree with Policy H5 - Affordable Housing?

40% is about right

Affordable and social housing is needed.

Affordable housing is in desperate need as property prices are continuing to spiral out of range of affordability for the average person. Control is also needed where rented property is concerned - particularly now that the social security annual cap applies forcing people on low incomes away from the town.

Affordable housing should be mandatory. This is too weak. It should be integrated as part of all multiple accommodation developments.

Affordable must include social rented property

All recent developments have been granted on the basis of a proportion being affordable housing and then the developers somehow manage to change this percentage in the course of building so it is a redundant concept

Drivel again - what is a viable level in Harpenden for a developer! Viability should be an upfront criteria not subject to later amendment. Agree with principal just do not see it happening.

everything is affordable to someone, but we need a lot more starter homes for young people on low incomes

How would such a policy be enforced in an area where land is expensive and developers see the opportunity to provide expensive apartments houses and maximise profits - this is not conducive to provision of affordable housing. I haven't seen any enforcement of this in recent developments

I agree with this sentiment, but we can't keep building new houses just to ensure there's always affordable housing available. As soon as a house is sold it becomes subject to market forces and will be next sold at the going rate or a house that size in Harpenden. And if it's part of a new development that includes proximity to a good school then that's a high price. What's to stop people buying the houses then selling quickly for a profit? How are people identified as being eligible for affordable housing? Perhaps there needs to be some innovative thinking about ways to maintain designated housing as being "affordable".

Make sure housing is mixed, so as not to create a "ghetto" of the cheaper houses. Everyone should live together, social housing, rented housing, owner occupiers of all types.

More social housing needed

Once again, more affordable housing is desperately needed.

Planning permission should only be granted for genuinely affordable housing

Do you agree with Policy H5 - Affordable Housing?

sounds like a lot for this area frankly

The location of affordable housing should be considered

The need for affordable housing for younger people is acute in this area.

The question everyone asks is 'what is affordable'. In 2017, no houses or apartments in Harpenden (newly-built or existing) are affordable for typical first-time buyers.

The viability test is being criticised in the press at the moment. Get rid of it and change to "Proposals for major housing developments are expected to provide 40% of affordable housing until such time as a new St Albans Local Plan is adopted with a revised target for affordable housing."

Too prescriptive

What constitutes "affordable" in Harpenden??

Why does every part of the country have to meet the same proportion of affordable housing?

Would love to see the Harpenden definition of affordable against housing in the real world!

Agree that affordable homes need to be catered for and having developments of huge six bed houses isn't right but is there evidence that there is a need for 25% social housing? I understood from the presentation it was more affordable houses for people to buy not rent was the need?

Developers seem to find ways to avoid providing an appropriate 'affordable quota' or as with the Harpenden House Hotel development providing NO affordable housing on site which is very disappointing.

This doesn't seem consistent with what was spoken about at the presentation at the town hall. There is was described that there was a need for small family homes or people to downsize to buy not to rent. These figures suggest that 25% of all significant developments will be available for rentable social housing. Is there a need for this/waiting list for social housing in the area to meet this level of provision? (E.g. if 500 were built in north Harpenden does the town need 125 social housing?) - not a problem if it does but this seems a lot and inconsistent with what was previously described as the need. How has the need been identified, have there been polls or is it the views of the individuals in the Neighbourhood Plan pools (apologies I can't remember the name given to the teams who have worked on the Plan.

Whilst we agree with the general thrust of the policy, it should make reference to affordable rent/starter homes in addition to social rent and intermediate housing, and should provide sufficient flexibility.

Would agree strongly if half of affordable housing was prioritised for local residents as a neighbourhood plan is allowed to do (See SADC Head of Planning Tracy Harvey).

Do you agree with Policy H6 - Advertisement of Market Housing?

although a fairly trivial issue

I moved into the are 124 years ago , this shows I would not be welcome now .

Is there a way to ban "outsiders" buying homes, as per the action in St Ives Cornwall? See report in Daily Mail online 14 November 2017.

The proposed policy seeks for market housing to be advertised locally in the first instance. Whilst this is the ambition of the NP, the supporting text recognises that there is no mechanism to support this. Consequently, the policy could not be applied effectively and there would be limited measures to enforce. There is no definition of 'locally' or 'first instance' leaving both terms open to interpretation. Notwithstanding lack of definition, it is not considered reasonable or appropriate to restrict the selling or purchasing of new homes with the method. The policy should be deleted from the NP.

The use of the word "should" makes this policy ignorable and hence pointless. Either change the word to "must" or delete the policy.

Do you agree with Policy H6 - Advertisement of Market Housing?

Too many of the local estate agents openly advertise the fact that X% of their customers come from London. I'm not against people coming from London, so many of us do and it's not fair to discriminate as we make our homes here, invest in the community and our children are born and bred here. But for the estate agents to blatantly be targeting London buyers and making a point of advertising it is a bit much. Trying to move within Harpenden seems to have a lot to do with being on the radar of the Estate Agent and hoping they favour you as a local buyer and tell you about new properties first before they tell potential buyers from out of town. You state that there is no mechanism to enforce this. Could some sort of incentive be put in place?

Unenforceable therefore pointless

You've admitted it - it's regrettably unenforceable.

Replace "should" with "must".

Seems again to lack practicality - difficult to perceive how it would genuinely fulfill local need in a town that has grown through significant inbound migration from other parts of UK.

The draft HNP states at Policy H6: "Developers of market housing in the Neighbourhood Plan Area should seek to advertise locally in the first instance." However, the draft Plan notes in the supporting text at paragraph 7.13 that this is only a request: "We ask developers to advertise locally in support of the ambition to provide housing to meet local needs, while recognising there is no mechanism to enforce this." CEG appreciates that the draft HNP is seeking to prioritise the delivery of homes to meet local needs, but considers that draft Policy H6 is too restrictive and does not meet the requirements of national policy and guidance. The Planning Practice Guidance (PPG) states that in preparing neighbourhood plans (ID: 41-040-20160211): "Proportionate, robust evidence should support the choices made and the approach taken." CEG notes that "proportionate, robust evidence" has not been provided to support the approach taken in draft Policy H6. Furthermore, CEG considers that, if the draft policy were to be retained, there is no available policy-compliant and lawful mechanism (i.e. planning condition or obligation) for its application. Overall, CEG therefore considers that draft Policy H6 should be deleted from the emerging HNP.

Though not sure how this can be enforced

Do you agree with Policy H7 - Lifetime Homes?

100% of housing should be wheelchair adaptable. If you are looking at lifetimes homes then this should be mandatory.

I don't know why 10% is selected. If this is in-line with national trends. Great. If not I'd want to know why that number was chosen.

It's a nice pipe dream but not one that has been achievable for most of us in recent years

The idea of 10% wheel chair homes is old hat and unworkable as a solution to what is a clear need. Although well intentioned it is no longer pursued as a viable option.

There is a need for accessible accommodation. Many former bungalows which might have fulfilled this purpose have been transformed in to two story homes.

To create 'all things for all men' for every house built - alternative is a degree of adaptability and then built specific houses that are fully adaptable, ie, move house.

Too prescriptive

where is 10% arrived at ie does 10% of UK population use wheelchairs?

Replace "should" with "must".

This policy could prove quite cumbersome I would have thought.

This should be the full Lifetime Homes definition not the watered down one from the SADC plan

Where has the 10% figure come from? Where quotas and %s have been included in the Plan please could the Plan explain how these have been derived and on what basis.

Do you agree with Policy H8 - Specialist Accommodation?

Far too many new apartments and so on designed for elderly or disabled have too many slopes and steps to negotiate - places like The Foresters

Generally, agree with this policy statement, however, point a) needs to be reassessed as there are a very poor choice of public travel options for movement around the town. The main one is run by a local charity.

sounds a great concept but very expensive - prime location close to shops/transport/local amenities

SPECIALISED HOUSING SHOULD BE PRIORITIZED AND OTHER TYPES OF HOUSING IN SUITABLE LOCATIONS

Too prescriptive

what is stimulating design? I work with senior citizens and I feel any requiring specialist accommodation will not be walking/ using buses so walking routes/ access is not so important for them , however it maybe for any workers at their homes eg if a care home

You've got to love a "stimulating" old people's home.

if required as national policy then no argument

Do you agree with Policy H9 - Higher Density Development?

Again a get out clause, 'exceptional development'. This offers to open the floodgate. This again runs against what I understand the HCA is about and which I understood to be incorporated into the HLP. It will also not help the town centre as regards traffic..

Apart from the bad English (mixing singular and plural in the same sentence), why restrict buildings to 3 storeys? If allowing 4 or even 5 stores, particularly in the town centre, will save Green Belt land then it should be allowed.

Assuming this would essentially be 'town house' height? As per some buildings already in the town centre. If this is not the case and it would be higher then I would disagree.

Harpenden's townscape (including in its surrounds) has been purposefully kept low-rise as part of its heritage and attraction. Density should therefore not be increased by building upwards.

I don't have a problem of buildings over 3 stories

I feel this policy needs to be more specific. I can see unscrupulous developers seeing this as a loop hole allowing '3 storey developments' in areas of low rise development - on the basis that higher density is needed and is in close proximity to the local centres. Further 'in exceptional circumstances' allows a considerable amount of latitude and will be used by developers to push boundaries - noting the Redclyffe development (5/2017/1731) , recently refused but the developer is clearly seeking to maximise the use of the site up to boundaries and force a huge 3 storey block of flats on local residents; in an area of largely 2 storey houses. Not to say increased density should be discouraged in this site but it should be proportionate with the local area - which no doubt will conflict with the commerciality & profitability of the developers plans - something that the local plan needs to recognise. Policies are good but how do you enforce without creating loopholes?

I only disagree in as much as these higher densities only fit into certain urban landscapes and cannot be applied on a broad brush basis.

I think the policy should be tighter on development height. I don't think there should be an exceptional circumstances get out clause to allow over 3 storeys, it's bound to get used. High rise would be totally out of character in southdown which has a more villagey feel

New Developments in Southdown should be in keeping in terms of appearance and height

not in town centres unless alongside existing high buildings

Do you agree with Policy H9 - Higher Density Development?

options for increasing housing units are up, green belt of infill. Building up seems best, but good sound insulation and parking become essential

Subject to adequate parking provision for residents and visitors.

Subject to good design

There are lots of examples of good developments of higher housing density in the town. Best designs and features of the small blocks of flats around the Milton Road area could be re-used in new developments. The Stonehurst Court development on the former Rose and Crown pub site in Southdown has greatly improved the area and provided more affordable, quality accommodation of a suitable size which is desperately needed. There is a high demand much greater than the supply of flats and smaller houses for people wishing to downsize in the town.

there are problems with safe cycle access to Southdown so this would need to be addressed

4 stories should be acceptable in the right circumstances

Three storey may be appropriate within the town but maybe not any greenfield developments

Do you agree with Policy H10 - Housing Site Allocations?

Personally I am not in favour of 500+ dwellings in and around Harpenden. However the sites in table 7.1 could be improved visually with good looking dwellings. Except former Westfield allotments. That should remain as a designated green space.

As previously stated I feel Jewsons and Pan Autos are valuable local services and employment generators

Find Pan Autos useful, can this be moved to Southdown industrial estate please? And Jewsons? Sad that allotments are being used.

Green belt development must be permitted

I find Pan Autos very convenient for servicing my car, and would be saddened to see it move to the far side of Harpenden, where I couldn't walk home after dropping off my car.

I notice that the current Public Halls might be given over to housing. Is that the right thing to do? With such a prime site close to the middle of town I wonder if it could be used for something for the whole community rather than housing?

if you build on all the industrial sites where will the industries & employment go?

I'm not sure of the bigger picture to understand if the 128 units provides a "meaningful" contribution to the St Albans local plan. Seems very low to me. It would also be sad to see employment use at Pan Autos and Jewsons go forever if this was allocated for housing. Both sites are not particularly appealing contributions visually but they are a place of employment. One of the sites is adjacent to the tip which isn't particularly a desirable place to build flats.

It is acknowledged that Neighbourhood Plans are unable to amend the Green Belt boundaries and any amendments will need to wait for the next review of the Local Plan.

We consider that Harpenden is a highly sustainable location and that it has a key role to play in meeting housing needs and supporting the local economy and as a result there is likely to be a number of sites released from the Green Belt and allocated through the next local plan. The withdrawn local plan proposed a number of strategic sites and proposed that small sites (delivering fewer than 30 dwellings) be identified through the neighbourhood plan process. Given the nature of Harpenden we consider that there are sites on the edge of Harpenden in the range of 30 to c75 homes which could accommodate new homes in a sensitive manner and could be delivered early in the plan period, making a meaningful contribution to land supply and delivering needed affordable and market housing. The Site Assessment Summary Paper, published as a supporting document, explains that the draft NP originally considered Green Belt sites due to an ambition to potentially align with the (then draft) St Albans City and District Council Detailed Local Plan (DLP), considering potential small development sites to release from the Green Belt in that document. However, following the failure of the DLP to proceed to examination, it

Do you agree with Policy H10 - Housing Site Allocations?

was determined that this approach was no longer viable due to the likely time delay between the NP being adopted, which would result in a lag between sites being identified and released for allocation, during which circumstances may change. It explains that the approach was discussed with SADC and Locality, with both understanding the approach. In total, 29 sites were removed from the site assessment process, assessments were not finalised for these sites and there is no further reference to Green Belt sites in the Site Assessment Summary Paper. We understand, and are sympathetic to, the situation in which the Neighbourhood Plan finds itself. We suggest that consideration is given to including an assessment of sites in the Green Belt and the NP setting out preferred Green Belt sites, subject to SADC's ongoing review of the Green Belt boundaries. These do not necessarily need to be included in policies, but could form an appendix.

This would avoid the NP not expressing a view of the matter and would enable the Town Council's views to be a material consideration in future decisions.

it is difficult to see how HA1 and HA2 would not exacerbate existing traffic problems

List should not be regarded as the only sites

Looks like the Southdown options were supposed to be part of the employment are assessment.

Provided there is adequate parking provision for residents and visitors at HA1, HA2, HA5.

RIDICULOUS TO BUILD IN THESE DENSELY POPULATED AREAS

Significant infrastructure including sewage disposal, Doctors, Dentist, are needed

The numbers of dwellings indicated for HA1 Pan Autos and HA2 Jewsons are an over development of both sites when adequate levels of on site car parking are provided.

The proposed developments site ref HA1 and HA2 will put unsustainable pressure on local infrastructure (esp roads, parking and education) and remove sites that offer useful services and create employment.

These allocated sites are fine however much more land will be required to meet demand. It is time now to accept appropriate development in the north Harpenden area and control it before it is decided for us without our input. Where will Jewsons and Pan Auto be relocated? and will this reduce the number of jobs currently provided by these two very significant employers?

Too subjective!

Very concerned about the density of housing on Sites 1, 2 and 6 with implied traffic congestion on Grove road, Southdown and lack of schools in Southdown area. Access to proposed new school at Batford would be difficult

We need lots more houses than 128!

What happened to green belt sites listed in first Neighbourhood Plan survey? It would be wonderful if those were now off the agenda. But we know from latest draft SADC Local Plan they are very much still there.

Where will the businesses in these sites move to? Only using brownfield or infill development is unsustainable

HA3 should be removed.

Have further call for sites been performed since these locations were identified? Could the plan include how the council will continue to seek to meet as much of the housing need as possible within the town's existing development boundary.

Ideally 'affordable housing' should not be restricted to the edge of town!

These sites do not appear to be sufficient to meet demand and also will result in loss of local services such as Pan and Jewson

Do you agree with Policy H11 - Private Amenity Space for Residential Development?

agree with private and amenity space. However the exceptional circumstances creates a loop hole that will be exploited and potentially makes the policy meaningless

Children's playgrounds are important

I don't really know what this means

I look forward to seeing that lovely shared amenity space next to the tip.

No amenity space could be acceptable

Not clear what PRIVATE outdoor amenity space means.

Outdoor amenity space should always be provided to all flat developments.

Do you agree with Policy SI1 - School Development?

Agree with the general policy, but this plan cannot be allowed to affect the process of the planning application for the new secondary school. It has taken long enough and jumped through enough hoops to get the planning to where it currently is. Too many people are dependent on it to get their children into a Harpenden school in the coming years. For this plan to disrupt that process further or hold it up would be a travesty.

Any new schools must be built in the right place i.e. where the need is greatest and where the potential students live nearby if the council really wants to encourage walking to school

As long as they are built in the area of need

Children of Southdown need considering during secondary school place allocation, they must be schooled in Harpenden, it's not fair otherwise!

Does projections show any shortfall in the plan area

However I do not the Secondary school places for the Cross farm estate pupils have not been available for the past 2 to 3 years.

I strongly agree that the chosen site should be located in context of pupil intake and minimise traffic impact. The proposed site at Batford is totally unsuitable. Traffic along the LLR Is heavy, with proposed housing at Southdown how are children expected to access the school except travelling through the centre of Harpenden

Is there any evidence that travel plans have any practical effect, other than making some money for the consultants who draw them up? They boil down to making statements encouraging people to cycle, walk or take the bus. And everyone ignores them.

No increase in residential development should be accepted without appropriate levels of school places already being guaranteed. "Proposals must incorporate travel plans that encourage a reduction in the use of private cars for school journeys." This phrase should be more specific in terms of specifying levels and stipulating investment in infrastructure to increase safe cycling.

not convinced the new school is in the are of greatest need. Considerable traffic impact

Note the impact of additional housing on school capacity e.g Southdown

Schools already in the area should be extended either permanently or preferably as a temp measure the local infrastructure for many of the existing school sites cannot cope with the volume of traffic at school opening/ closing times and further expansion would clearly make this worse unless steps are take to discourage (eg) parents driving children to and from school , often for journeys of less than 1 mile. Greater focus on walking/cycling is needed

The residents of Southdown need secondary school provision, so their teenagers don't have to travel to St Albans!

This policy must state Proposals must incorporate travel plans that encourage, **THOUGH DO NOT PREVENT** a reduction in the use of private cars for school journeys.

We are very concerned at the traffic impact of the proposed new school at Batford

We need more school places for both secondary and primary education

Space should be appropriate for the style/size of house in order to ensure efficient use of development space but also suitable provision of space.

Complete absence of any supporting information on local demand. There are two issues - how much is locally needed (truly local) and where provision is for outside the boundaries of the Neighbourhood Plan area what are the views of those who have to travel in as well as those who will be most affected by that travel. HCC has published admissions figures for schools and over 10 years data is available - this clearly shows applications are around the lower 400s from the Town - in essence the Town provides 5 Primary places for every 4 children and historically these have been taken by children who want to or are obliged to travel in. In practice there is little excuse for this at Primary level and it leads to viability issues for all but the most popular of schools - one such school is already operating at under half capacity - others are subject to a snobbery factor where parents only wish to see capacity added at favoured schools. At Secondary level scale has necessitated a situation in which Harpenden has assumed the sole provision of this level of education following decisions to close provision (on grounds of economic scale) in nearest villages. Nonetheless Harpenden has had provision for approx. 50% more than Town residents, but with incoming pupils split between east and west of the town there was limited justification for another school. As demand has grown however it is clear that a substantial volume of children - nearly the full school quota - would be required to travel in from the East. This basic statistic should have been at the fingertips of the compilers of the Plan and the logical conclusion about sustainability followed - the statistic is nowhere to be seen and the sustainability argument is at best glossed over, at worst ignored.

Would Strongly agree if the phrase "sustainably located in the context of its expected pupil intake, in order to minimise any traffic impact." could be changed to "in order to ensure schools are sustainably located (ie walkable and cyclable) it must demonstrated that the maximum number of pupils for the school intake are within 2km of the school to minimise school traffic"

Yes agree but am really concerned about the traffic impact on the Lower Luton Road if the new School gets the green light. I don't live in that area but have regularly travelled through at peak times over the last 10-20 years. It is so much busier now than even 5 years ago. If a major new housing development is also to take place to the north of this proposed school I can't see how the current road infrastructure could cope.

Do you agree with the Policy S12 - Protection of Community Uses?

Agreed provided the words "encourage a reduction in the use of private cars" is never interpreted as a need to take measures to "discourage the use of private cars".

Community uses must be protected. The move of the Post Office to WH Smith has been a disaster which should not have been allowed. Pharmacies are now under threat - the impact of southdown pharmacy closing would be devastating. There is also a shortage of disabled accessible dentists - the majority of which are located on upper floors of buildings with no lift.

Faith building should be a private not a community matter. Their preservation belongs with the practitioners only. They should be deleted from the list.

Harpenden schools should be for residents of Harpenden and not used to encourage pupils from out of town (as in Harpenden Academy which advertises for non Harpenden pupils resulting in excessive car traffic in Vaughan Road at peak times)

not enough information

Town Council has I think done nothing to address the current threat to the future of the pharmacy at Southdown, suggesting that Policy S12 is an empty aspiration.

Do you agree with Policy S13 - Venues Community Use?

any planning application must address traffic/ parking issues

Support dual use

This policy is written in an ambiguous way. Is it: encouraging the building of new "faith buildings" (definitely wrong, since faith should be a private matter not considered by planners) or encouraging the use of "faith buildings" for other means, eg for club meeting (acceptable) or encouraging the enhancement of existing or development of new building that can have multiple uses, including for faith meetings. (acceptable, but faith should not be singled out). The policy should be clarified and I strongly suggest that the reference to "faith" be removed.

Do you agree with Policy SI4 - Provision of Sports and Leisure Facilities?

Again we would be interested in consultation regarding community leisure facilities as this would be one of the functions of a church/community hub we are interested in providing

At last! A policy that recognises the car as a legitimate form of transport. All policies in this section should consider the inclusion of a) b) and c).

I do not believe residents of Harpenden have been sufficiently consulted on the needs or requirements for the proposed new development. Refurbishment of existing facilities require further examination.

no need for additional provision

One trusts that all those support measures have been applied in respect of the new sports/leisure centre planned in Rothamsted Park.

provision of good quality cycle parking needed

The new leisure centre is a white elephant and should not go ahead.

The swimming pool is adequate as it is

THERE IS A SHORTAGE OF PLACES FOR TEENAGERS TO GO SAFELY PARTICULARLY IN THE WINTER MONTHS. WHY AREN'T YOU ACQUIRING LAND FOR TEENAGERS TO MEET AND LET OFF STEAM INSTEAD OF GETTING UP TO NO GOOD IN ROTHAMSTED PARK

Should include reasonable consideration for amenity of residents when located in purely residential areas.

We support the desire for new leisure facilities to be accessible by public transport, cycling and walking.

Do you agree with Policy SI5 - Provision of Arts and Cultural Facilities?

As long as the existing Harpenden Public halls are reuse appropriately and not demolished for housing not needed

provision of good quality cycling parking needed

See our previous comments

Should go further and say where in residential location ALL parking should be on site if out of hours use is expected.

Where is the provision for equestrians

The new leisure centre is a white elephant and should not go ahead.

Do you agree with Policy SI6 - New Sports Centre and Cultural Venue?

"The new venues should improve upon the current offering" How is this going to be measured? For example quality of the user experience (audience and performers) in the new theatre? Providing a nice cafe area isn't enough.

Do you agree with Policy SI6 - New Sports Centre and Cultural Venue?

Agreed it is needed and will be a great addition to our community. MUST MUST MUST have improved parking. Current facilities already fill the current car park - in spite of exorbitant charges putting off those not using the centres from parking there.

But please can we have a hall that will have the facilities to put on shows like the Gang Show, Operatic Society, plays and concerts. The current plans fall badly short of providing these amenities

Could the swimming pool have more baby changing, and have three pools like St Albans?

How big would this be... too much?

I AGREE THAT THE SPORTS FACILITIES NEED UPDATING BUT IN THE AGE OF OBESITY THE COUNCIL NEED TO MAKE IT MORE ACCESSIBLE AND FUN FOR EVERYONE. AS BEFORE THERE NEED TO BE REGULAR DISCOS FOR TEENAGEERS, ROLLER SKATING, SATURDAY AFTERNOON TEEN CINEMA. THE RUGBY CLUB IS STRONG BUT LITTLE FOR CHILDREN NOT INTERESTED IN RUGBY

I am still not clear how much local taxpayers on the hook for this or how much prices are set to be hiked. I asked for verbal statements that neither were the case to be confirmed in writing - oddly enough this has not been forthcoming. I have not seen any viability analysis that supports this development and ths statements on costs and pricing that were made to me.

I am very happy for refurbishment of current sports facilities including a small extension of the sports centre if necessary but not the proposal of new buildings taking up so much more of Rothamsted park. The park is a very important green space which must not be built on. We already have a nice swimming pool - who remembers the former open air swimming pool we had before the present facility was built? - we should think ourselves lucky. We have a lovely public hall/ theatre which should be refurbished and retained not replaced with some hideous modern monstrosity. We allowed the Embassy cinema to be demolished in favour of a petrol station - what a terrible mistake - let's not repeat the same mistake with the public halls. The public halls are a beautiful art deco style building of unique character with the rest of the town in an extremely sensitive location regarding the view of the town. The building is also the memorial of the much loved late Eric Morcambe and was built by public subscription.

Sports Centre - yes but no need for a Cultural Venue

Swimming pool should be enlarged

To include exhibition space and heritage centre

waste of public money

We definitely need it.

Do you agree with Policy SI7 - Accessible GP Practices?

Commendable but not realistic, in light of NHS shortages of GPs and nursing staff.

cycle / walking access important

Fully disabled accessible with all facility's including lifting and transferring facility's

Southdown needs a GP.

This must be done before building has started so once new residents are in situ there is no issue re GPS. Funding supplied must be a sensible amount that makes a difference. Not just reklying on the council tax payers to cover this

We need more GP practices to support Harpenden if any future development is planned - we already have to wait days to get a GP appointment as the existing practices are over-stretched.

what is deemed a sufficient development to warrant a provision of services by a developer? continual infill / brownfield sites over the years hasn't led to any more GP facilities. I don't see this changing as all development is piecemeal and restricted to infill

Which would include parking. If one is ill it is not always possible to park a distance away and walk, particularly with sick children or the elderly.

Replace "should" with "must".

Should go further than saying it looks for funding - concentrations of population warrant greater local provision and surgeries should be encouraged to provide some facilities other than in town centre for sustainable transport consideration - this may be feasible with shared use of community facilities.

Do you agree with Policy SI8 - Harpenden Memorial Hospital?

1 agree, 2 3 disagree

Again the proposals are limited, it is not our loved hospital which we used to have. We need amenity beds and care for those coming out of hospital. Provision must be made to retain enough land to be able to expand the facilities in the future - very important this.

Can the children's centre still have a base here too? And can the building be preserved? It's beautiful and I worry it will be knocked down in favour of new purpose built ugly flats.

I think there should be a commitment to retain the visual character of the building, it's lovely.

Plans already well advanced which, as I understand it, make no reference to 'increased GP provision'.

Replacement facilities should be relocated in the town centre

The building's facades should enjoy protection as it is a lovely piece of architecture.

The new facility should provide the same equivalent services Harpenden Memorial Hospital provided before services were stripped away. What about re-using the old building as a new hotel for the town since we have lost both Glen Eagles and Harpenden House hotels leaving very little provision?

There MUST be access to hospital in Harpenden with A&E facilities

There should be NO housing build on or near this site.

This is a site we would be interested in considering as health and residential care for the elderly is one of our dreams. We would be interested in consulting regarding this site with the idea of making it a multi-user community care hub, with both a local care hub and residential elderly care facilities, based around a communal meeting place with various facilities for the wider community.

Too prescriptive

Agree in principle but loss of what went before is greater concern

When viewing the plans proposed for this much concern was expressed about the level of car parking availability given that an ageing population would be regular users

Do you agree with Policy SI9 - Visitor Accommodation including Hotels?

Bit late on this one since our last hotel is now houses. change of use should never have been given.

Closure of Glen Eagle and Harpenden House hotels shows this is a hopeless aspiration.

Council may have to create incentive to attract hotels - 2 have closed in my memory

Fully endorse plans for the red house site

Given that 2 hotels closed why encourage another. Plenty of options at Luton.

Harpenden should encourage local B&Bs and other non-hotel accommodation options such as air b n b.

Having destroyed the two hotels in Harpenden I fail to see why we need another one built

Hotels also provide facilities for local groups to meet for lunch etc. as well as providing accommodation.

Is there real demand for a hotel in Harpenden? The Harpenden House hotel could not be sold as a going concern

Leave it to the market. Or let people stay in St Albans, there are more important things to do.

needs to be accessible by public transport

not needed

Do you agree with Policy S19 - Visitor Accommodation including Hotels?

problem of commercial viability - perhaps smaller scale guest houses

The growth of Air BnB makes this less important I think and I'd rather see farm stay / farm B&B promoted over town centre hotels to support our wonderful rural businesses.

THE HOTELS HAVE CLOSED DOWN AND BEEN TURNED INTO HOUSING AS IT IS NOT VIABLE IN HARPENDEN. HOTELS AT LUTON AIRPORT ARE ACCESSIBLE

Too little too late for this one I fear! Where is an alternative hotel going to be located now? More importantly, should we ever have another hotel, where is the provision in the plan to prevent what happened to Harpenden House and Gleneagles happening again? There's nothing about change from class C usage in the rest of the document and neither of these were located in DEL or DRA so wouldn't have been covered by any policies protecting business premises in those locations.

Two hotels have been demolished and re-developed providing top end residential dwellings over the last 5 years. This must bring into question the both the need and feasibility of such a new development?

Two hotels have recently not proved to be viable! Harpenden has significant accommodation at no great distance (Luton, St Albans and Redbourn).

What about re-using the old Harpenden Memorial Hospital building as a new hotel for the town since we have lost both Glen Eagles and Harpenden House hotels leaving very little provision?

why not build a hotel with land on the old Memorial Hall when the new facilities are opened

Strong need for visitor accommodation - doesn't necessarily have to be Town Centre and outskirts development could be encouraged if it added to woefully inadequate provision in the area

Would Strongly agree if this included a statement concerning using the Public Halls site in conjunction with a large underground car park

Do you agree with Policy T1 - Transport Assessments?

Can't see how many of these improvements can be made in an already crowded situation without demolishing existing homes

As I said earlier the move away from car use is a naive aspiration, with more development will come more people and more cars. As a cyclist myself I do not cycle into the town for most of my visits eg shopping, I am lucky that I can walk into town but most of Harpenden residents are too far away to walk home carrying shopping. Currently the town is not suitably sized to have a separate cycle lane & the town centre is a very dangerous place to cycle through with all the traffic lights, roundabouts and car parking spaces. How many of you on the committee plan to swap your car for the bus or cycle?

Car usage must be discouraged

Concerned that pressure of requirement for additional housing will push it through regardless of detrimental affect on traffic etc

For all major developments proposals the developers should be required to give financial support to improvements in the local road infrastructure that aids traffic flow. This funding should be ring fenced such that it cannot be used for any measures that impede traffic flow. Specifically it should not be allowed to be used for: any form of traffic calming measure or enforcement of a lower speed limit provision of further pedestrian crossings on trunk routes, because there are sufficient of these already. A suitable use for these monies would be to implement my proposal to re-open Cross Lane, one way for East-bound car traffic only, which would provide a means for residents of the South-East Infrastructure Zone to access Harpenden and St Albans without using the Southdown roundabout, thus relieving congestion in Southdown.

High Street in rush hour is impossible to move

I actually believe that a general transport consultation should be proactively undertaken by the council now, to look at specific things that can be done to improve the current situation.

Do you agree with Policy T1 - Transport Assessments?

If St Albans and Harpenden did their job to stop necessary over development at Luton Airport there would be no need for dual carriageways/trunking of Lower Luton Rd and A1081. By the way i didn't read anything about efforts to reduce aircraft noise over South West Harpenden. I expect our local representatives "forgot" about this conveniently again...

It must go beyond "key roads" to look at the town holistically. Smaller roads not referred to within the plan are heavily used and can easily become badly congested even at present - Top Street, Cherry Tree Lane, Ferrers Lane etc. The impact on these and the roads around key roads need to be assessed.

Residents will seek assurance that major development proposals will be blocked until 'proportionate improvements' to the adjacent road network are completed.

The cycle route to St Albans is rubbish - great idea to do something better/different (the Sustrans route to Luton is very good). I like the idea of the hopper.

There should be a by-pass to relieve traffic around all of Harpenden. Especially around grove road, piggotshill. There should be more prominent cycle lanes.

These assessments must be carried out properly at peak times not just middle of the day during half term. The required funding must be of an appropriate amount and must be a condition of planning and paid up front.

they need to be realistic and not underestimate impact

Too much concentration on cycles/walkways etc. The car will not disappear and people will always want to drive so provision needs to be made for this instead of idealistic ideas. People in Harpenden will always use their cars

Traffic already terrible without new developments, needs sorting out before we start building more homes.

We suggest also adding that developers should consider the impact on air quality at key junctions due to their proposals.

you cannot build you way out of congestion without trashing the town

"Demonstrate" is not a strong enough term for dealing with the actual outcome of a development should the assumptions discussed and agreed in the demonstration beforehand turn out to be wildly incorrect. Some outcomes may be better or worse than assumed due to matters under or partly under the control of the developer – or on the other hand the approving authority. Why not have a risk/reward arrangement whereby the developer is required to post an upfront Bond supported by a reputable finance house which would pay out to the approving authority in given circumstances under the control of the developer. Likewise, the approving authority would repay some or all of the Section 106 monies in the event they were responsible for the incorrect assumption.

what ability does the town council have to challenge assumptions used in proposals. I understand from a comment on the facebook pages that the last survey showed a reduction in traffic since 2007 but the survey was completed at a time when road diversions and works were taking place! Need to make sure that developers can't manipulate statistics to their advantage to reduce costs.

Do you agree with Policy T2 - Proposals Affecting the A1081, B653 and B652?

agree for eg houses. disagree for eg schools

Applicants must demonstrate that measures are incorporated that will ensure the proposals do not further inhibit the free flow of traffic on those road. As with comments above I suspect that any major development will have negative effects including extra traffic. From reading the local press I've been lead to believe that the world will end if another car uses the Lower Luton Road. I can recall this from development at Luton Airport and residential development on the Lea Valley Estate. Although the world hasn't ended. I'm all for applications being tested for impacts and making sure suitable mitigation is required or development refused for unacceptable impacts but I am concerned

Do you agree with Policy T2 - Proposals Affecting the A1081, B653 and B652?

about phrases such as "do not further inhibit" as just one extra car journey will "further inhibit" traffic so if the wording could be tailored to planning terms or significant tests that would be good.

But this should not be used an excuse to put entrances / exits for developments onto other inappropriate local roads like e.g. Ambrose Lane. The mitigation must work for everyone. No good avoiding the A1081 or B653 and clogging up all the roads around them. That doesn't help anyone.

Developments along LLR already cause congestion, impact of a new school not sustainable

Harpenden needs a by-pass which will never happen of course

It's general chaos along the 1081 - living in Kinsbourne Green it feels like we're a million miles away from the town centre because of the time it takes to get there when the traffic is bad

really difficult to see how measures to ease traffic congestion would work in practice

Should not be allowed!!

The council could assist in easing congest on the B652 by removing the traffic calming measures. These are inappropriate for what is the only viable route between Harpenden Town Centre and Batford

The impact of nearby street should extend to station road

There should be a by-pass to relieve traffic around all of Harpenden. Especially around grove road, piggotshill. There should be more prominent cycle lanes.

This is fine but, although this may not be a responsibility of the HLP, the key has to be recognise the traffic inevitably imposed on Harpenden by the M1 and Luton Airport. Relief from through traffic should be a longer term consideration/requirement, which will then create capacity on the A1081, B653 and B652.

To make this policy more effective it must deny support to any proposals that would further inhibit the free flow of traffic on these roads. It must also include Grove Road, which is currently the only reasonable route for traffic from the South East Infrastructure Zone to Harpenden. Specifically the policy should deny support to: - Traffic calming measures - Further pedestrian crossings controlled by lights (there are enough already) - Reduction in speed limits

Yes agree but not sure if enough research has been done to assess the proposed school's traffic effects upon LLR.

"Demonstrate" is not a strong enough term for dealing with the actual outcome of a development should the assumptions discussed and agreed in the demonstration beforehand turn out to be wildly incorrect. Some outcomes may be better or worse than assumed due to matters under or partly under the control of the developer – or on the other hand the approving authority. Why not have a risk/reward arrangement whereby the developer is required to post an upfront Bond supported by a reputable finance house which would pay out to the approving authority in given circumstances under the control of the developer. Likewise, the approving authority would repay some or all of the Section 106 monies in the event they were responsible for the incorrect assumption.

Not strong enough

The draft HNP states at Policy T2: "Major development proposals for development that directly accesses onto the A1081, B653 (Lower Luton Road), B652 (Station Road) or Redbourn Road that would involve an increase in traffic on those roads (as demonstrated by a Transport Assessment) will be required to make provision for, and contribute to, appropriate measures to ease traffic congestion on those roads. Applicants must demonstrate that measures are incorporated that will ensure the proposals do not further inhibit the free flow of traffic on those roads or, in the case of the A1081 and its nearby streets, increase parking stress." CEG suggests that draft Policy T2 should be clarified to focus on a requirement for major development proposals likely to affect these roads to appropriately mitigate the effects on these roads. As drafted, CEG observes that the policy focuses only on proposals that directly access these routes, whilst some schemes in the wider area will create additional traffic movements that may affect these routes. Further, CEG suggests that,

Do you agree with Policy T2 - Proposals Affecting the A1081, B653 and B652?

whilst it is recognised that mitigation measures could also serve to ease existing traffic congestion, this should not be a policy requirement. CEG therefore proposes that draft Policy T2 is amended as follows: "Major development proposals for development that may result in a material increase in traffic on the A1081, B653 (Lower Luton Road), B652 (Station Road) or Redbourn Road (as demonstrated by a Transport Assessment) will be required to make provision for, or contribute to, appropriate measures to mitigate the impact of any additional traffic on these roads arising from the development, including in relation to traffic flow and on-street parking pressure."

Whilst we agree with the general thrust of the policy - that major development proposals accessing the A1081 that involve an increase in traffic will be required to make provision for and contribute to appropriate measures to ease traffic congestion - we do not agree with the detailed wording including the requirement to 'demonstrate that measures are incorporated that will ensure the proposals do not further inhibit the free flow of traffic'. Our concerns also include that the wording is potentially too vague and imprecise and is too focused on 'the free flow of vehicular traffic'. We suggest that the wording more closely reflects the requirement of NPPF para 32 namely that mitigation options should include the full range of sustainable transport modes, and that mitigation is required when there is a 'severe' highway impact.

Do you agree with Policy T3 - Travel Plans?

But T3 provision lacks specifics and, as such, cannot readily be policed or enforced.

impractical

Laudable aim but challenge to change behaviour

Plans must be meaningful

There should be a by-pass to relieve traffic around all of Harpenden. Especially around grove road, piggotshill. There should be more prominent cycle lanes.

This needs to be examined by the town council and challenged as well. For example, I was told at a past consultation, that development on the Luton Road, approaching Thrales End, would not impact transport congestion/parking, as many people would walk into town.... this is clearly not a realistic expectation nowadays (unfortunately!).

Travel plans must also be realistic, saying all the kids will walk to school is not realistic if they're small, it's a mile away and Mum has to go to work. Also walking to the town centre is probably not feasible if you have shopping to do and children to take with you.

Practicality issues

Whilst it's unlikely to fall to developers to do this, what is being done to assess to impact of major and significant developments on the rail network. It is highly likely that a significant number of the new residents will work in and commute to London. The trains (and car park) are already at breaking point with crammed trains (never mind frequent delays which I realise is not the councils problem!!) I don't think the rail network can support such an increase in development (500+) in its current state.

Do you agree with Policy T4 School Travel Plans?

All Harpenden pupils should walk to school, certainly at secondary school. We should be reducing the traffic at school start/end times. For safety and for the health of all children. It's a small town - they should walk. Accompanied or otherwise.

Buses and bikes preferable to cars. School buses should replace cars, no-one should need to drive to school

CHILDREN SHOULD ALL BE ABLE TO WALK TO SCHOOL. THIS WILL REDUCE CONGESTION IN TOWN

Do you agree with Policy T4 School Travel Plans?

Given that any development of a new school would in theory mean that more children are able to go to a school near their home this policy should have an emphasis, first and foremost, of encouraging walking and cycling.

If a new secondary school is built in Batford, the routes by which children from Southdown can access the school by foot or by bike must be considered.

Improving the number children travelling to/from school by cycle should be mandated not simply encouraged in any plan.

Measures aimed at easing 'school run' congestion and chaos by encouraging children to walk or cycle, especially in bad weather, have so far proved largely unsuccessful. Something more powerful than mere encouragement of parents is required. KWS school at Batford will provide the acid test.

Omit car

Parents continue to park dangerously on pavements and make highly dangerous moves thereby endangering children (example Harpenden Academy)

Parents of most primary aged children are dashing off to work or from work at the end of the day, walking or cycling is not practical. Secondary school children should be encouraged to walk/bus/cycle because they should be living locally to the school

People will always want to use their cars so this needs to be accepted instead of concentrating on cycling/walking etc

their expertise is not in travel infrastructure and the end result could be disinclination to build more local schools with pupils having to travel further (and hence probably by car) to their schools with associated increased risks . anything which de motivates more local schools from being built is not what voters want

There must be a proviso that proposals that would increase traffic congestion on the A1081, B653, B652 or Grove Road will not be supported.

There should be a by-pass to relieve traffic around all of Harpenden. Especially around grove road, piggotshill. There should be more prominent cycle lanes.

This aspect has gained extra importance since cuts to county council school transport services.

Travel plan must be realistic. Siting the school in the areas where the need for places is greatest will help as most students will not live too far away to walk

The lack of consideration of this aspect by the Town Council - including impractical statements about adding a turning circle to a system which is essentially a giant turning circle itself implies a complete lack of understanding of this aspect. Couple this with an approach that condones a high proportion of distant travel over more sustainable solutions simply questions the objectives of this plan.

Why not limit support to foot, by bicycle and by bus - discourage car use.

Do you agree with Policy T5 - Road Layouts?

As long as they do not reduce road safety

Bike lanes needed too

I should like this to be reinforced by amendment as follows: On main routes, new road layouts that enhance the free flow of traffic and thus reduce pollution levels will be supported, provided it is demonstrated, in a vote, that proposals are developed in liaison with and supported by the majority of local people.

Laybys for bus stop

new road layouts must be cycle friendly to reduce risk to cyclists and encourage cycle usage

No idea how this can be achieved buit it's a good dream!

Road layouts should be adjusted to encourage safe cycling as the priority reducing local dependency on cars.

Suggest "on key roads and junctions" rather than "main routes"

Should apply to all routes not just main routes

'Sleeping policeman' humps, causing drivers to slow down and then accelerate, adding to exhaust pollution (and fuel usage). It is regrettable that roads recently resurfaced to a high standard (eg Hollybush Lane) are having their humps reinstated.

There should be a by-pass to relieve traffic around all of Harpenden. Especially around grove road, piggotshill. There should be more prominent cycle lanes.

Do you agree with Policy T6 - Improvements to the Sustainable Transport Network?

A cycle route from Southdown up into town via the common would be a good opportunity to promote cycling. It could run next to Southdown road on the common side. It could use one side of the skew bridge path, as a shared cycling/pedestrian space, as most pedestrians use the other side anyway.

sustainable routes need to be sensible, and not be via a much longer distance or up hills c.f. the alternative main road route. Dedicated cycle lanes would be better (if there's room) I regularly see traffic jams on B653 causing lots of pollution caused by 1 cyclist.

Take the cycle lane to St Albans from Southdown Road. I can't read the remainder of the comment

The bus route 266 used to run n a Saturday if I need to go shopping in WGC, I now have to go by car, can the bus be influenced to run again on a Saturday

The idea of encouraging walking is fine (we walk to the station when we go into London and into the shops), but planners need to be aware that local roads are badly maintained and the maintenance of pavements is even worse, which is hardly an encouragement for older people to walk on footpaths full of pot-holes and uneven paving.

There should be a by-pass to relieve traffic around all of Harpenden. Especially around grove road, piggotshill. There should be more prominent cycle lanes.

This needs to go a lot further - i.e. major proactive measures - if you are serious about easing traffic by getting more people cycling. Several existing key routes in Harpenden are very cyclist unfriendly: narrow lanes, lots of pot holes/debris on the edges of the road and inconsiderate driving behaviour towards cyclists. Wheathamsptead Road and Lower Luton Road are two key examples of many that meet this description.

This strikes me as lacking in any ambition or commitment. The sustainable transport network needs to be a priority not an after thought.

Practicality issues

Though please learn from St Albans' mistakes! As a motorist I do find it frustrating that there is an empty cycle path on the St Albans Road, that cyclists do not use! - as mentioned in your report...though the reason being given is that it is not wide enough. Sadly, I am not sure that widening it will encourage those who cycle on the road to use it.

Walking/cycling suggestions commendable but, in practice, there is frequently no space available. Electric car charging points becoming necessary but practicalities a major obstacle.

Do you agree with Policy T7 - Integrated Pedestrian Network?

But too vague unless minimum footpath width and distance from nearest roadway is specified.

People will always want to drive so there needs to be a concentration of making car travel easier should also include cycle needs

Yes but pavements and walk-ways need to be maintained not installed and then abandoned for years so that people can't or won't use them.

Do you agree with Policy T8 - Bus Stop Layouts?

and enforce keeping them clear of parked vehicles

What about the existing bus stops serving existing residents?

Unlikely that major housing developments will receive a bus service along new roads.

Do you agree with Policy T9 - Harpenden to St Albans Cycle Route?

A waste of money

As a keen cyclist, I fail to understand why cycles lane throughout Harpenden, and not only for West common areas of Harpenden

cycling access to station is currently unsafe and needs to be improved

Cyclists should be enforced by law to use cycle path between Harpenden and St Albans (running beside A1081 (previously A6)) and be heavily penalised for failure to do so

No need for this, if needed perhaps cyclists could pay for it by a toll road?

Of the 4 cycle routes radiating from Harpenden this is by far the worst - but a big part of which is maintenance of the path, specifically the undergrowth and surface.

People will always want to drive so there should not be too much concentration on cycling. Cyclists do not use the existing cycle paths as it is so what is the point of building more (e.g. Harpenden/St.Alban Road)

requires much better maintenance and width of Route

Support to the improvement to the Cycle Route should only be given if it is accompanied by a proposal to insist that cyclists use this route and banning them from the road.

The cycle route from st albans to harpenden needs to wide enough to allow for its use.

The route also needs to be better maintained than it is at present.

There should be a by-pass to relieve traffic around all of Harpenden. Especially around grove road, piggotshill. There should be more prominent cycle lanes.

This is a joke - the cycle route is about 1 foot wide and appears and disappears from the road and the path between the two towns. The road needs widening and a proper cycle path constructed if it is to be more widely used.

This should include making the use of cycle routes by cyclists compulsory, ie banning cyclists from using the road.

Today's route is virtually unusable.

Very excited by this proposal.

The draft HNP states at paragraph 9.13, which forms a supporting paragraph to draft Policy T9: "A key ambition of the Neighbourhood Plan is to support a modal shift away from private motor vehicles and towards more sustainable modes of transport. This approach is intended to be through positive encouragement of measures that make sustainable transport options more accessible rather than seeking to make driving less accessible. Reducing the number of vehicle trips will ease congestion and support better air quality in the Neighbourhood Plan Area." CEG supports this proposed approach, which states that the HNP aims to promote a shift towards sustainable modes of travel and away from the use of the private car.

Would also help if some form of cyclist behaviour code - unfortunately a LIMITED number of cyclists assume they have right to behave as they please (red light jumping, failing to use cycle lanes where provided, etc) and anything that encourages unchecked growth (of this aspect) is not a good move

Whilst we agree a Harpenden to St Albans cycle route would be desirable, it should be acknowledged that an 'on road' option can be attractive option to bicycle commuters that should not be ruled out.

Do you agree with Policy T10 - Parking in Harpenden Town Centre?

1. should have a multi-storey car park in Bowers Way (east side); 2. should open up pedestrian and cycle access to station car park via Aysgarth Close; 3. should open up pedestrian and cycle access to station car park via former Harpenden House Hotel site; 4. should tunnel under railway line between station car parks and implement a circulatory system around station to reduce congestion; 5. should provide 3 hours free parking in Amenbury Lane and Bowers Way east car parks to encourage off-street parking

addition of car parking in central Harpenden goes against the environmental aspirations of the neighbourhood plan. Surely it is in all Harpenden residents interests to control the level of vehicular traffic in central Harpenden ?

additional car parking spaces in the town centre will encourage car use, which is exactly the wrong response to congestion and pollution issues . Traffic chaos at the station would only get worse if multi-story parking is introduced. There will always be a negative impact on local highways, so this is an unachievable policy. A more imaginative solution to congestion around the station is needed. For example, if there is significant development in North Harpenden, consideration should be given to having a 'halt' on the Thameslink line in the vicinity of the new development so that cars would not need to travel into central Harpenden for rail transport

Additional housing should not be allowed until additional parking in harpenden agreed. Current residents can't park at the moment

Additional parking within Harpenden town centre must be affordable to prevent parking on the side streets/pavements which at the moment block access of pedestrians and prams and pushchairs, not to mention mobility scooters.

agree station disagree swimming pool

Build an additional layer of car parking behind Sainsburys, low fees here and instead of charging for parking in front of shops use for disabled parking

But also need to improve public transport to reduce the number of cars needing to drive into the town centre/station

Car usage must be discouraged

Essential that we have a second layer on the station car park and can encourage users to use it. Also that the plan supports a second level on boweres way and this would not negatively impact residents

essential to increase station parking for commuters - multi-storey at the station. Extend no parking between certain hours 10-12 to restrict al-day commuter parking on side/resi roads.

Harpenden desperately needs a large multi storage car park for out of town users of the station and shoppers and eatery users. There is insufficient cycle storage facilities, hence the large number of cycles left in Station Road blocking pedestrian passage.

I don't agree with second tier developments except at the station. Any additional levels should go down, not up.

I don't think we should be adding second tiers to car parks such as Bower's Way (West Side), Lydekker Park and the Leisure Centre where it would impact on the look of the area. Surely this goes against many of the other points in the policy? I think the parking issues in Harpenden are mainly at street-level because people don't want to pay for the car parks and want the free on-street parking, which is limited. I've never not found a parking space in a car park in Harpenden. Sort out the high car park charges first!

I would oppose second tier / multi storey car parking except at the station or where the second tier goes underground rather than upwards. It's really unattractive.

Improved cycle routes around Harpenden would also help to reduce the amount of parking needed.

it would be better if cycles came before cares

Do you agree with Policy T10 - Parking in Harpenden Town Centre?

It would be good to restrict the number of premium car parking spaces at the station car park as many of them are empty when the current car park is full.

More needed now, especially at station

more parking at the station, another tier - get Network Rail on board

Multi level car park at station especially important!

Multi story car park at the station is long overdue

Network Rail has intimated in the past that it's not willing or able to finance double-deck parking at Harpenden Station. Proposed additional parking to west of swimming pool (in leisure centre plans) of about 100 spaces will be welcomed but inadequate.

No to increased parking in Harpenden town. A multi storey anywhere even the station would be ugly and out of character

ok here are the problems with this 1. The resident parking schemes have been, and continue to be proposed inappropriately. What is needed is restrictions for an hour, say 10am to 11am weekdays rather than 8.30am to 6pm 6 days a week as is usually done. Otherwise you are not dealing with commuter traffic you are stopping local residents parking and thereby not supporting local/high St shops and 'gifting' windfall house price gains to residents who bought their houses without such schemes. Take a walk around Leyton Road/Silver Cup/Rothamstead any day of the week and see why the resident spaces are totally empty... 2. Taxi drivers are currently parking on double yellow lines and one hour bays all the time - take a walk around the Fire Station, outside Rothamsted park etc.. The traffic wardens don't give them tickets. St Albans/Herts Taxi authorities say it is not their concern.

Parking in Harpenden Town Centre is currently inadequate most of the time. It is urgent that additional spaces are provided now before any further development.

Parking is serious issue for the town. The upper deck on the station car park is the obvious best solution in the place where it is most needed. We must not allow this scheme to be dropped again like it was previously. This upper deck solution could also be applied to the bowers way public car park if further town centre capacity is needed.

The parking time limit needs to be increased to a minimum 2 hours as 1 hour as at present is not sufficient for shopping/dining etc

This has to be considered in the context of charging and day-by-day on road restrictions.

To increase the parking at the station is to invite more traffic into a congested area of the town. Without major changes to the roads serving the car parks adjoining the station this policy is contradictory to other aspirations regarding the environment, congestion and pollution.

Two tier car parks at the Station and Harpenden Swimming Pool Complex is essential.

We agree with the need for cycle storage, and would also support additional parking specifically for electric cars.

Yes, yes, yes. This is so critical to all development. I believe this should be a top priority for the town council - it is an issue that is only going to get worse. Also take a look at how the new 7-days-a-week parking charges have driven atrocious parking behaviour! Because on-road parking restrictions (the yellow lines in town) are just Mon-Sat, people abandon their cars on the roads to avoid paying a car park fee. This looks terrible and is dangerous.

Also disabled parking suitable for wheelchair drivers/passengers should be increased if additional housing is built

Multi storey car park at the station is essential. Based on current population this is needed but the need will be exacerbated by increased housing. I completely get that the aim is to encourage walking etc but parking provision in the town (especially considering there are three supermarkets when it is unlikely that people can shop without a car) is poor which doesn't encourage the use of the high street. Could more spaces be identified at the new leisure centre

Do you agree with Policy T10 - Parking in Harpenden Town Centre?

development? Appreciate an increase is planned but with better facilities more people will be attracted there and there the requirement further increases.

What about provision of additional, and redesigned existing, access routes to the station car parks to relieve congestion on Station Road?

Do you agree with Policy T11 - Residential Parking Standards?

Agree, but who needs a garage these days?

But also there should be a cycling parking standard of 1 secure and covered cycling storage area per bedroom if we are serious about sustainable transport

but size garage unknown

Conversion of offices to accommodation in the town centre rarely has sufficient parking facility.

Garages need to be fit for purpose, though oversized family vehicles are part of the problem

how to encourage house holders to put cars in garages

However, and we have seen this on Bowers Way, it is not enhancing the character of Harpenden to see whole house frontages converted into one long parking bay. There should be a requirement, where the nature of the house supports this, to maintain some garden or hedge space and not allow a complete conversion to in-front-of-house parking.

I strongly agree with this, though I ask you to look at and push for a review of standards currently employed by St Albans council. I will give you an example from a new build house on our road. Plans were initially rejected for the build, because the developer had not provided enough parking spaces for the amount of bedrooms in the house. (One and a half off road spaces (I say half because one space only just fits a small mini on it and nothing more) that the developer had classed as two spaces). To get around this issue, the developer resubmitted plans, redesignating one bedroom as a study. So plans were approved with no change to the parking required. Now that the house has been built, the owner has proven the initial planning decision correct - they permanently park one of their cars outside a neighbour's house because...there is not enough room to park all of their cars on the off road parking spaces in front of their house.

I THINK THAT ONLY ONE RESIDENTS PERMIT SHOULD BE ISSUED PER RESIDENCE TO REDUCE THE NUBER OF CARS ON THE STREETS-OUR NEIGHBOUR HAS 6 CARS -4 PERMINANTLY ON THE STREET

Ideally, we would prefer new developments did not have parking, to discourage car ownership.

It is imperative these parking standards upheld for new developments to avoid further congestion resulting from road parking

Needs to be more specific. Area of off-street residential parking should be related to size of dwelling: say one space for 1- and 2-bedroom houses/apartments; two spaces for 3- and 4-bedroom properties and at least three spaces for bigger houses. Electric car charging points to be made mandatory for new housing.

New houses MUST have enough space to park at least two cars off the street.

Proposal to provide parking in excess of the standard should not be opposed, especially as a significant proportion of buyers of new houses convert garages into living or storage accommodation, effectively reducing the amount of off-street parking.

The last sentence "Where parking includes a garage, the minimum dimensions should be 6m long by 3m wide and have an appropriate height to allow most vehicles to be parked" should be removed. A smaller garage is better than no garage and owners may well convert garages to rooms anyway, so this caveat is pointless.

We need more traffic wardens to force un thinking drivers to park correctly. see corners near Engineer Pub where at times the parking is all over the junction, despite the double yellow lines

Do you agree with Policy T11 - Residential Parking Standards?

apply 24 hours a day. An accident waiting to happen! In correct parking in the town centre is just as bad.

Yes, all garages should be large enough for modern cars. Extension plans in established streets should also take car parking spaces into consideration. We are all suffering from lots of bedrooms but no extra parking situations.

Do you agree with Policy T12 - Access for All?

Access for wheelchairs into some of the shops on the high street should be improved - many are currently too difficult to get into.

One of the issues with town centre congestion is the number of times a car has to stop for roundabouts & crossing lights in the town. If this is increased or the time of the lights lengthened then congestion will increase.

Those with limited mobility (and who do not qualify for a blue badge) need urgent help in view of the hill/valley nature of Harpenden. At present the Town actually seems to target them in terms of making the town centre available to them

With more traffic envisaged provide more safe crossings

Do you have any further comments on the draft Neighbourhood Plan?

1. It should prohibit any building on Green Belt Land. 2. It should protect another Key View- West Common/Rothamstead Resaexh/ Hammonds End Golf Course. 3. It should not allocate any additional green belt land for house building. 4. The infrastructure zones and employment zones ideas should be scrapped - Rothamsted Research should not be permitted to expand/build/develop/change any of its undeveloped site/green belt. 5. Residents parking schemes should be changed and only implemented so that restrictions apply for one hour per day during week. 6. The plans should seek to reduce the aircraft noise from Luton Airport affecting residents in West Common

A good document - good luck with its progress,

A lot of work has clearly gone into the plan, however there is an issue with the base assumption. With what seems an inevitably a new secondary school will be built that doesn't fit the plan and in any respects undermines it. I would have thought this would have been taken into account as it impacts and contradicts many of the statements made. If the school doesn't proceed the plan may work - but if not an extra school we beyond current needs will attract substantial inward influx which the town can't support from housing / infrastructure. Note you say schools for additional and existing residents = far too many commute in so a straight contravention of the plan. I fear for Harpenden as a good place to live

A very positive document. Thank you

Engagement with those in the 20-40 age bracket is very important. These people have the least free time generally, due to work and family commitments. This group was very poorly represented in the last set of feedback for the neighbourhood plan, so care should be taken not to listen only to the majority of respondents to this survey, as they will most likely be 50+. Re thinking this survey would also help so it is easy to fill in on a smartphone. Currently this survey requires multiple windows to be open to refer back to the neighbourhood plan itself, which is not easy on a phone. A phone will be the main device in use for the 20-40 age bracket, so careful thought about survey format will increase participation from this group.

Excellent document - thanks to everyone involved in putting it together!

Do you have any further comments on the draft Neighbourhood Plan?

Fine, as far as it goes, but the proposal will fall far short of the requirements of Westminster and their trolls at St Albans DC who will simply jackboot their way in irrespectively. Not to mention adjacent authorities with expansionist plans. That will be when the fight (and fun) starts in earnest!

Full of very worthy aims which will require rigorous scrutiny of future planning applications and prosecutions for infringement when necessary. Some very inappropriate redevelopment has already taken place which should not create a precedent for further inappropriate development

Good progress. Would be great to take a look also at efforts made by smart cities such as Cambridge and also Amsterdam in terms of infrastructure and cycling. Much more to do and need to be more innovative.

harpenden is still a lovely place in which to live and bring up children

Harpenden's road network is already under extreme pressure along multiple routes, a number of which have not been identified in this document. Education provision is already stretched beyond breaking point. These issues need to be addressed before any further expansion of the town.

I agree with the majority of its sentiments (except in the few cases indicated in my comments) but am worried that it's all words and in practice there will be too many exceptions etc. I would like to see firmer wording to protect Harpenden's nature and character and keep it a nice place to live. I worry that increased residential development is simply incompatible with retaining the lovely character of Harpenden and will result in more conflict between residents through traffic and pressure on local facilities and this really worries me. I also think making harpenden more sustainable and energy efficient requires more proactive policies rather than just the 'support' mentioned in the plan.

I am very concerned that proposed considerations re new developments ,associated parking with affects on traffic and housing are followed through and pressure of needing extra housing doesn't allow inappropriate developments excessive to available space with nit enough parking causing additional traffic issues

I have participated in each stage of the consultation and having done so, I question whether it has made any difference. With regards to the various surveys, future surveys should Be limited to agree or disagree, as no answers appear to distort the results

I just hope St Albans don't over ride anything with their plan! This looks great, and I hope Harpenden continues to be a desirable place to live

I THINK THAT THE PLAN HAS SOME GOOD POINTS BUT IS NOT RESTRICTIVE ENOUGH ON THE REASONS IT WOULD APPROVE PLANNING ON GREEN BELT. HAVING HAD RECENT DEALINGS WITH COUNCIL ON OBTAINING PLANNING PERMISSION IT IS NOT ABOUT WHAT YOU ASK FOR BUT WHO YOU ARE AND HOW YOU ASK FOR IT. FOR EXAMPLE JARVIS ARE ABLE TO BUILD DEVELOPMENTS WITH FEATURES THAT ARE REFUSED BY THE PLANERS FOR OTHER DEVELOPERS. THERE NEEDS TO BE A CLEAR POLICY ON WHAT IS PERMITTED IN HARPENDEN REGARDING DORMER WINDOWS, FLAT ROOVES BUILDING ON BOUNDARIES AND EACH BUILDING

Is it really necessary to develop Harpenden so much? It used to be a very pleasant place to live in. Village will lose a lot of what little character it still has if more developed

It is acknowledged that, unlike a development plan document, the examination of a Neighbourhood Plan does not include any requirement to consider whether the plan is 'sound' and so the requirement of soundness in paragraph 182 of the NPPF do not apply. However, prior to the Neighbourhood Plan referendum, the draft plan will need to meet all seven basic conditions, as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. While the Neighbourhood Plan is at an early stage, the plan does not at present refer to all seven basic conditions. These basic conditions include: a) Having regard to national policies and advice contained in guidance issued by the SoS it is appropriate to make the Neighbourhood Plan. b) Having special regard to the desirability of preserving any listed building or its setting or any

Do you have any further comments on the draft Neighbourhood Plan?

feature of special architectural or historic interest that it possesses. c) Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area. d) The making of the order or neighbourhood plan contributed to the achievement of sustainable development. e) The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority. f) The making of the neighbourhood plan does not breach and is otherwise compatible with EU obligations g) Prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for the other. At this stage of the Neighbourhood Plan's production, whilst some of the above are covered by the proposed policies, there appears to be no direct confirmation or cross-referencing evidencing that the seven conditions set out above have been met. We consider it would be helpful if Neighbourhood Plan Forum were to set out how the basic conditions have been taken into consideration and demonstrate how the plan complies with the Schedule 4B of the Town and Country Planning Act 1990.

It is an excellent plan

It is hard to fault all recommendations, Its a pity to new st albans plan couldn't be incorporated especially the strategic site release from green belt

It is well researched and almost there.

It looks sensible and balanced.

It's all a bit generic - I hope that each proposal is taken on it's own merits, with it's own specific issues

More parking provision is a priority before any further development is allowed.

My suggestion is that Cross Lane be cleared and reopened to light vehicular traffic, one way for its entire length, in the direction from Cross Farm Roundabout to the A1081. The priorities of traffic on to Welbeck Rise would be altered to make it a right turn off Cross Lane. Cross Lane would start at the roundabout. The lane would need to be cleared and a footpath installed. This is possible because it would be one-way, so only needs to be a single lane. A mini roundabout should be introduced where Cross Lane meets the A1081 to help traffic get on to the main road. This relief road would put the traffic on the A1081, which is a main road designed to take it. It also provides an alternative to using the lanes, which can only be good.

New schools and traffic management are critical to the amenity and character of Harpenden.

Over the last five years Bethany Community church has grown to around 200+ members. We are seeking to be as active in the community through various projects as we possibly can, but as indicated in an earlier comment we are now hampered by a lack of suitable facilities. We currently have a small church office on Coldharbour Lane and rent St Georges school hall for Sunday services. Our weekday projects operate out of several rented facilities, limiting our effectiveness in what we are able to achieve. We would like to feel that as we are seeking to serve the Harpenden neighbourhood and be a positive force for good in the community, someplace could be found for us to have a permanent community facility for us to develop and work alongside the local services to provide a valuable service to the community. I think that generally the Harpenden Neighbourhood Plan has been well thought through and obviously, some good consultation has already taken place. We would be grateful if we were kept "in the loop" of the consultation as we, like yourselves, have a desire to see Harpenden move forward and develop into a town that we can be proud of and that brings honour and renown to our nation.

Overall I am very supportive of this well thought out plan - I hope that it will be accepted with the tweaking from feedback received.

Overall I think the plan is excellent and had really listened to and taken into consideration the views of residents. It needs to preserve the character of the village which is what older and long standing residents still call Harpenden town

Please do something different

Do you have any further comments on the draft Neighbourhood Plan?

Please stop trying to reduce car usage. People will always want to drive and so the right infrastructure for car use/ parking in town needs to be in place instead of creating a scenario making car use more difficult/expensive in the name of ideology

reduce charity shops Encourage iron mongers Reduce rates on shops Stop opening so many restaurants Encourage a builders supply merchants Encourage a mens clothes shop Where will we get our cars repaired Will there be a new road as a bypass to Harpenden

The Council must state whether they want more housing and whether they want more or less car usage in central harpenden. Encouraging brownfield development with insufficient parking will only make traffic congestion worse.

The forward gives the impression of being authored by a nimby.

The vast majority of proposals are sound common sense. We have previously seen developers get round planning requirements and the plan will only be successful if this is stopped.

There seems very little link between change of use of town centre shops and restaurants with delivery and parking facilities. An example is the new restaurant in Station Road (the old post office) means we have (up to 6) waste bins (*including smelly food) left on the pavement meaning pavement users having to walk in a busy road, plus delivery lorries parking on the pavement. Similarly with Harpenden Academy has delivery lorries and parents parking illegally despite assurances when planning permission was granted.

There should be more quantification to better inform decisions and monitoring. 3 areas in particular. 1. demographics - this is not about allocating land rather providing an expectation about the levels to populations and its natural increase over the plan period. 2. Carbon and other pollutants, what are the current levels, where are the monitoring sites. Reduction should be in line with national obligations. 3. Traffic movements, current rates of flow on major routes should be set out. How will you tell otherwise whether this plan is achieving its vision/objectives. What are your criteria for success?

This is a highly worthwhile exercise, Thanks

this is a lengthy document & survey .those voters with limited time, or reading ability will not be able to comment . I feel respondents will not represent the inhabitants of the town ie there will be increased nos of retired, and non employed residents replying. also there is cost involved, there is no way to know if those replying pay into council / parish tax or are voters

This survey accomplishes one thing only. It serves to show those in office that they have complied in asking the populace what they think. However (and pardon my jaundiced view) it doesn't matter what we think. What has been decided as been decided. But, I have given my views. That's it.

Too many questions. To fill this in properly would take hours with a printed copy of the Plan to consider each question.

Transition St Albans are delighted at the prominence that environmental sustainability is given within the draft Harpenden Neighbourhood Plan and that these critical, but often neglected, issues are being taken so seriously. We commend this approach. We suggest that during Sustainable St Albans Week, Harpenden Town Council could hold open meetings to speak to residents about the environmental parts of the neighbourhood plan and further raise community awareness, since we are conscious that not all residents will be supportive.

Thanks to all the work done by the contributors

Unfortunately it reads as a lovely wish list. Given the cart and horses I have observed being driven through the HCA by owners/developers I will not expect too much.

Very well written document. Was there any mention of the library? I don't recall it. Opening hours should be extended back to full time.

WELL DONE

Well thought out plan. Seems to cover all aspects of town life. It would be wonderful if it all goes through the developer / planning committees

Do you have any further comments on the draft Neighbourhood Plan?

With more houses being proposed and built and the expansion of Luton Airport we need a substantial increase in the road infrastructure and not the present attitude of 'none at all'. Those who commute from outside Harpenden and park in the streets to obtain free commuter parking and with it a cheaper season ticket should be prevented from doing so without any solution being imposed that effectively requires the residents rather than the transgressors having to pay or be inconvenienced. An Act of Parliament akin to that taken out by Exeter would solve this problem. The same applies to those who park in Harpenden's streets and thereafter using the bus as a way of getting cheap airport parking. Harpenden also needs greater provision for parking than is suggested in this plan. All existing car parks should be considered for multi tiers - including that at Waitrose. The eventual conversion of the Morecambe Hall to multi-story parking should be considered as should under the common parking outside the Silver Cup.

Yes. In presentational terms it's an impressive document. But in view of its subservient role to SADC's forthcoming Local Plan many, if not most of its provisions can only be pipedream aspirations.

By way of background, and as context for all of our comments (in response to questions 1, 2, 8, 11, 30, 32, 33, 35, 41, 51, 58 and 62), CEG has an interest in land at Ambrose Lane, north-west of Harpenden town centre which is owned by Action for Children. The site comprises approximately two-thirds of the NW Harpenden Broad Location which was identified in the submitted Strategic Local Plan (SLP) for green belt release and the delivery of approximately 500 dwellings, a primary school, community facilities, recreation and open space. CEG is working with L&G and St Albans City & District Council (SACDC) to bring forward a range of new homes and local facilities in this location. CEG has been working with SACDC for a number of years to support the plan making process and ensure the range of benefits which could arise from this development for current and future residents are realised. Working with communities is an important part of this process, and CEG would like to contribute to the Harpenden Neighbourhood Plan as it evolves and to work with the Town Council during its preparation. CEG welcomes the direction of the draft HNP and considers that this emerging Plan represents a positive step for planning in Harpenden. The observations and comments provided in this form are provided within this context, in order to assist the Town Council in finalising the draft HNP. Local Planning Issues At paragraph 2.13, the draft HNP lists several local planning-related issues which are understood to be important to local people in Harpenden. CEG supports the recognition of these issues but considers that the draft HNP should provide clarity as to the purpose of identifying these issues and their treatment within the emerging Plan. CEG therefore considers that the following sentence (or a similar explanation) should be added at the end of draft paragraph 2.13: "The Neighbourhood Plan has regard to and seeks not to prejudice future outcomes in relation to these issues but recognises that they cannot be directly addressed within the HNP." Current Planning Policy Framework The draft HNP sets out the District-wide planning context for the Neighbourhood Plan at paragraphs 3.1 and 3.2. CEG understands why an explanation of the context has been included and supports the focus within the draft HNP on the context of the emerging single Local Plan, rather than the saved policies within the current statutory development plan. CEG considers that this focus on the emerging Local Plan is the most appropriate approach, given that, once adopted, the new Local Plan will provide the most up-to-date basis for decision-making across St Albans District. CEG supports the acknowledgement of the need for the new District-level Plan to allocate land for a substantial of homes across the District, including in Harpenden. CEG does, however, note that the emerging housing requirement figure for the emerging Local Plan suggested by the draft HNP at paragraph 3.2 (800dpa between 2020 and 2036) is lower than that contained within the most recent draft Local Plan document (the draft Issues and Options consultation document presented to SACDC Cabinet on 23 November 2017: 913dpa between 2020 and 2036). CEG therefore suggests that the draft HNP is amended to include a general reference

Do you have any further comments on the draft Neighbourhood Plan?

to the emerging District-wide housing requirement figure and a broad quantum/range but does not specify an exact figure as this is still uncertain and may be subject to change.

It's great if you want to ruin Harpenden more than it's be ruined already

Some of these questions (eg 41, 46) allowed me to give a rating or make a comment but not both. There were a number earlier which also had that characteristics which I think is an artefact of the survey webform.

There has been very little advertisement about the referendum - and also the implications if this Neighbourhood Plan fails. I attended one of the presentations, I am 37 and was probably one of the few people there in 30s. My friends are interested but for some reason the notifications aren't getting to people. A few people have been sharing via facebook onto the various parents' network sites but perhaps more of this (or more use of the council's page) could be considered. Whilst the Plan will never be perfect I think more needs to be said about what happens if it fails - i.e. decisions are taken out of our hands, developers get more of a free for all in their plans and proposals etc. So whilst we may not agree with all of it I think the messages need to be given that this is the best way of the town keeping some level of influence and control over the development activities. At the presentation I attended most of the questions were about the land potentially coming out of green belt and the opposition to that. What plans does the town council have to discuss alternative solutions with SADC and support/oppose their plans. It feels that Harpenden is at breaking point (I'm currently trying and failing to find a suitable full time place for my son in nursery, GP appointments are so hard to obtain, my neighbour is having to travel from north to south Harpenden for a school, trains and car parks at breaking point etc etc). More information about the town's role in this and what is going to happen when would be useful. Plans to reduce car use etc. need to be done in hand with improving pavements - both from a quality of surface/level surface perspective but also wet leaves/grass cuttings. Appreciate this may be county not town responsibilities but all needs to be done alongside each other. Pedestrian crossing by the BP garage. A lot of work has clearly gone in to this and it's a difficult position given the state of the SADC plans so the efforts of the volunteers is appreciated. I also think the gentlemen from the consultancy did a decent job of fielding questions at the presentation.

G All independent submissions



Harpenden Town Council
Town Hall
Leyton Road
Harpenden
Hertfordshire
AL5 2LX

Hertfordshire County Council
County Hall
Hertford
Hertfordshire
SG13 8DN

01992 556289

paul.donovan@hertfordshire.gov.uk

6th December 2017

Dear Sir/Madam,

**HARPENDEN NEIGHBOURHOOD PLAN
Regulation 14 Pre-submission draft, October 2017**

Thank you for the opportunity to comment on the above. The following represents the services, functions and interests of the Environment Department of the County Council and are the views of officers only. You will receive comments separately from other services.

Transport

The County Council's aim is to provide a safe, efficient and resilient transport system that serves the needs of businesses and residents across Hertfordshire and minimises impact on the environment. The County Council has currently consulting on a Local Transport Strategy (LTP4) setting out the long-term transport strategy for the County to accommodate the levels of housing and employment growth being identified by borough and district councils in their emerging Local Plans. It will provide a framework to guide all future transport planning and investment and highlights both existing and future transport problems and issues and identifies ways we can deal with them.

The County Council is also currently developing a number of Growth and Transport Plans (GTPs) which will sit as daughter documents to LTP4. These are strategic spatial transport plans for the purpose of applying the LTP policies and objectives to a growth-focused area. Each GTP will focus on a different area and consider growth and transport challenges in order to improve accessibility to jobs, to key local services and to enhance quality of life. They aim to facilitate sustainable economic growth and positive change to local communities and their well-being through transport-led improvements. A GTP will identify multi-modal interventions which address transport issues affecting urban areas or inter-urban corridors and will develop and justify packages of transport-led improvement schemes and priority actions. Harpenden will be covered in the South West Growth and Transport Plan.



The development and encouragement of sustainable modes and improved accessibility is key to existing and emerging transport policy and opportunities to develop a multi-modal approach towards sustainable transport is something that needs to be progressed through other plans, including Local Plans and Neighbourhood Plans, and when planning applications are submitted and determined. Emerging developments will be determined in accordance with the National Planning Policy Framework (NPPF) and other applicable policies.

As you will be aware, as Highway Authority the County Council is a statutory consultee to planning applications submitted to St Albans City and District Council. These are assessed and considered in the context of the current legislation and national and local policies, particularly in relation to sustainable transport and the need for developers to articulate the business case for ensuring their development sites support their share of the required infrastructure and service improvements, and are accessible by all transport modes. Any new design/any associated off-site highway infrastructure will have to undergo appropriate scrutiny that promotes highway safety. Given this, it is important that the Neighbourhood Plan is consistent with emerging transport strategies and policies.

Within this context the overall vision of the Plan is broadly supported, although it would benefit from the development of a sustainable transport network being more readily linked to reduced need for car use for short journeys.

Policy specific Comments

Policy ER6 - Supporting Local Centres. The supporting text states that proposals should increase parking at convenience shops at Local Centres. Increased parking appears contrary to the aims of local centres which is provide local facilities for local people reducing their need to travel further and use the car.

Objective ED08 supports the aims of LTP4 user hierarchy.

Policy ESD19 - Pollution. Street Lighting is maintained by the County Council to appropriate standards and any departures from these standards would have to be discussed with the Highway Authority.

Policy T1 - Transport Assessments. Greater alignment with NPPF and Roads in Hertfordshire guidance is recommended – the NPPF (para 32 states) ‘All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment’, which is more specific than “Major Development”.

Policy T2 - Proposals affecting the A1081, B653 and B652. This should be revised to say that development in these locations should ensure that it does not have a severe impact on the free flow of traffic in accordance with NPPF. There is potential to align this with LTP4 further, and developments should be required to provide towards improving and encouraging opportunities for non-car modes of travel. As written, the Plan could be seen to preclude any and all development within the area, as there are



limited opportunities to improve conditions or inhibit the free flow of traffic. Sites in these locations have been identified in the SACDC Local Plan Process and the Highway Authority has a duty to work with developers to ensure adequate mitigation proposals for the developments are identified. Identified mitigation measures could be fed into the 123 list and the CIL mechanism will be the most appropriate means by which improvements are secured.

Policy T3 - Travel Plans. The Highway Authority would recommend greater alignment with NPPF which states 'All developments which generate significant amounts of movement should be required to provide a Travel Plan'.

Policy T5 - Road Layouts. Reference should be made to the Hertfordshire Design guide for new developments Roads in Hertfordshire.

Policy T6 - Improvements to the Sustainable Transport Network. Consideration could be given to the inclusion of reference to the provision of secure cycle parking/showers/storage facilities within new development to accord with the minimum standards of the 2002 St Albans City and District Council Revised Parking Policies and Standards (or the most up to date parking standards). Without this provision within new development, the improvement of existing routes, and creation of new routes are likely to be underutilised as absence of cycle parking would cause a barrier to usage.

Policy T8 - bus stop layouts. Putting bus stops in laybys in 30mph and town locations is not the recommended guidance in 'Quality bus infrastructure in Hertfordshire'. It should be noted that improvements to Bus Stops will benefit those already living within the Plan area.

Policy T9 - Harpenden to St Albans Cycle Route. Improved cycling provision to St Albans is supported. Preferred routes will need to be discussed with the County Council.

Policy T10 - Parking in Harpenden Town Centre. Chapter 9 on Transport and Movement identifies parking, particularly in the town centre, as a key concern. The County Council is aware of proposal to increase town centre parking as part of the redevelopment of the leisure facilities and the plans to increase parking at the station. To ensure that increased levels of parking do not just encourage increased car journeys around the town the Town Council could work with SACDC on developing a town wide car parking strategy encompassing both on and off street parking. Consideration will be needed of the potential for wider impacts from parking outside of controlled parking zones exacerbating existing parking stress, but it should not solely be a case of providing more and more parking locally as this could negate the policies within the Plan to promote sustainable journeys. Such a strategy should make reference to the setting of appropriate parking charges that support and encourage a shift away the use of the private car for short distance and commuter parking.

It would be preferable to refer to 'no severe impact on local highways' to align with the NPPF rather than 'no negative impact'.



Paragraph 9.16 is confusing and seems to imply that congestion is caused by sustainable modes of transport particularly on the A1081 and can be seen as contrary to Policy 1 of the emerging LTP4 sets out the County Council's Transport User Hierarchy. This states that 'To support the creation of built environments that encourage greater and safer use of sustainable transport modes, the county council will in the design of any scheme and development of any transport strategy consider in the following order:

- Opportunities to reduce travel demand and the need to travel
- Vulnerable road user needs (such as pedestrians and cyclists)
- Passenger transport user needs
- Powered two wheeler (mopeds and motorbikes) user needs
- Other motor vehicle user needs'

Glossary p67 provides a definition of significant development, and major development, while Policies T1 and T2 refer to Major Development. These definitions should be their requirements for Transport assessments for planning applications as set out in Roads in Hertfordshire Section 1 Chapter 7.

Landscape

6 Environment and Sustainable Design

ESD1 Design Strategy

A Design Brief (DB) should include a site survey and analysis to identify existing important landscape features and key views to provide the framework for the development of a landscape strategy and mitigation measures. It may be appropriate to have a separate policy setting out the requirements for a landscape strategy that includes reference to the mitigation hierarchy and the requirement to avoid and reduce the negative effects of development as far as possible.

There should be a clear policy objective requiring high quality landscape design and planting schemes.

Point v. Reference the industry good practice approach to assessing 'landscape value' might be useful, as set out within the 'Guidelines for Landscape and Visual Impact Assessment Third edition, Landscape Institute and Institute of Environmental Management and Assessment, 2013.' (GLVIA3)

Point vi. Visual appraisals should also be carried out in line with industry good practice guidance GLVIA3.

Point viii. With regards to DBs that relate to sites outside the main urban area of Harpenden, there should be reference to the South Hertfordshire and Dacorum Landscape Character Assessments (where relevant). Proposals should demonstrate how they meet the strategy and guidelines for managing change as set out within the relevant landscape character area statement(s).



ESD2 Local Character and Heritage

With regards to the areas outside the main urban area of Harpenden, there should be reference to the South Hertfordshire and Dacorum Landscape Character Assessments (where relevant). The historic landscape characterisation is embedded within the landscape character assessment and provides a useful description of historic and cultural influences and guidelines for managing positive landscape change.

6.11 The proposed SPG should make reference to the existing landscape character assessments for South Hertfordshire and Dacorum as a baseline for the areas outside the main urban area of Harpenden.

ESD7 Green and Open Spaces and Areas of Ecological and Landscape Value

This policy makes reference to key green and blue infrastructure assets such as open spaces and rivers. There is an opportunity to emphasise the delivery of green infrastructure (GI) that should be conserved and enhanced, and the key principles of GI to create locally distinct and high quality places, be multifunctional, provide connectivity for people and wildlife, and deliver multiple environmental, social and economic benefits (e.g. improved health and wellbeing/security, ecosystem services, biodiversity, effective natural resource management (e.g. air/water/soil regulation)).

Reference the industry good practice approach to assessing 'landscape value' might be useful, as set out within the 'Guidelines for Landscape and Visual Impact Assessment Third edition, Landscape Institute and Institute of Environmental management and Assessment, 2013.' (GLVIA3).

ESD13 Tree and Hedges

In addition to arboricultural or amenity value, trees and hedgerows can also be of landscape value, for example where they contribute to a distinct historic field pattern.

Where proposals affect trees, tree surveys, impact assessments and method statements should be required in line with BS5837:2012 'Trees in relation to design, demolition and construction – recommendations.'

Countryside hedgerows should be protected in line with the Hedgerow Regulations (1997).

Historic Environment

Design Objective EDO6 states that any development should 'conserve and enhance local character and heritage'. Heritage is also mentioned in Design Policy ESD2, which addresses the potential effect of any development on local historic character, including the fabric or setting of statutory or locally listed buildings. The County Council supports the necessity for submission of a comprehensive Heritage Statement



with any planning applications, and the undertaking to preserve as much historic fabric as possible in repairs to listed buildings.

The Plan does not at present contain any mention of the potential presence of unknown buried heritage assets or archaeological interest and the limitations that this may put on development as per NPPF paras 126-141 and St Albans Local Plan (1994) Saved Policies 109, 110 & 111.

Harpenden has significant Roman archaeology within its parish boundaries, including one Scheduled Monument – the mausoleum and cemetery at Rothamsted. This monument is protected under the Ancient Monuments and Archaeological Areas Act (1979), and written permission must be received from the Secretary of State for Culture, Media and Sport before any development work is carried out within the boundaries of the Scheduled area. Development in close proximity to a Scheduled Monument that may adversely affect its setting is also a material consideration in the planning system.

There is also a significant area of Roman settlement near Annables Farm/Verlam End, including two Romano-Celtic temples, several Roman buildings and associated enclosures, just inside the western boundary of the parish. A cremation cemetery was discovered at Cross Farm, to the south of the town, with the known remains of 42 individuals dating from the later 1st to 2nd centuries AD.

Remains from other periods include a recently identified Anglo-Saxon cemetery near Batford, just inside the north eastern boundary of the parish. This is of particular significance as it is one of very few known cemeteries of that period found in Hertfordshire.

While the Plan states that the main focus for development should be the 'built up area' of Harpenden, the presence of the above archaeological assets within the parish demonstrates considerable potential for as-yet unknown below ground remains to be present, even within the built up area.

The County Council recommends that the Design Policies within chapter 6.0 should include a policy that recognises that due account should be taken of the importance of archaeological assets in the development process.

Ecology

From an ecological perspective, the County Council supports the overall aims of the Plan to protect and enhance the natural environment by helping to improve biodiversity, thereby supporting the National Planning Policy Framework (NPPF) and is in broad agreement with its package of policies.

ER2 – is supported, but the River Lea/Lee and banks, margins and associated aquatic flora and fauna should be protected from adverse effects from employment activities at DEL3 Coldharbour Lane, and DEL4 Batford Mill Industrial Estate. This should include external lighting as well as direct impact. Protected and notable species



should be taken into consideration with any development proposals at DEL1 Rothamsted Research.

ER3 – is supported, however protected and notable species should be taken into consideration with any re-development or expansion proposals at DEL1 Rothamsted Research.

H10 – is supported, however consideration should be given to:

HA1 – the lake and surrounding trees and scrub to the east of Pan Autos should be protected from adverse effects. There is potential for nesting birds (and roosting bats?).

HA2 – bordering trees should be retained if possible; potential for nesting birds (and roosting bats?).

HA3 – adequate mitigation of protected species (notably Roman snails) needed; and consideration of adjacent wooded railway banks with regard to bats and birds needed.

HA4 - bordering trees should be retained if possible; potential for nesting birds.

HA5 – (no obvious ecological constraints).

HA6 - bordering trees should be retained if possible; potential for nesting birds.

HA7 - bordering trees should be retained if possible; potential for nesting birds; boundary trees form part of green corridor to the rear linking gardens trees to north and allotments to south-east.

Specifically, Policies ESD7, ESD12 and ESD13 acknowledge the importance of ecology/biodiversity and recognise that development proposals should consider the natural environment.

There is no mention of statutory and non-statutory nature sites within the Plan area. For information, there is 1 statutory site - Batford Springs Local Nature Reserve (LNR); 13 non-statutory Local Wildlife Sites (LWS); and 3 non-statutory Ancient Woodland Inventory sites.

Access and Rights of Way

It would be helpful if the Plan could refer to the Rights of Way Improvement Plan and address the needs of equestrians where appropriate.

Minerals and Waste



The County Council as Minerals and Waste Planning Authority provided comments (8th February 2016) in response to the consultation on the proposed area designation for the Plan.

In this letter, the following points were raised in respect of minerals and waste matters:

- Minerals and Waste Local Plans form part of the Development Plan.
- the proposed Neighbourhood Plan Area does not encompass any of the County Council's allocated waste sites as shown in Hertfordshire County Council's adopted Waste Site Allocations Development Plan Document 2011-2026.
- a small part of the eastern edge of the proposed area designation falls within the Sand and Gravel Belt, as identified in the County Council's adopted Minerals Local Plan 2002-2016.
- a number of permitted 'county matter' planning applications for minerals and waste development fall within the proposed Neighbourhood Plan area.
- the proposed Neighbourhood Plan area contains the Household Waste Recycling Centre (HWRC) located on Dark Lane and the Sewage Treatment Works Harpenden (west). Both sites are safeguarded under Policy 5: Safeguarding of Sites of the Waste Core Strategy and Development Management Policies document (WCS) 2011-2016.
- records show a number of historic landfills at Aldwickbury Crescent, Ladybray Farm and Dell Hole. (This is historic information previously provided by Environment Agency and therefore the County Council holds limited information in respect of these records)

Paragraph 1.4 states that the Plan forms part of the Development Plan and for Harpenden, the Development Plan comprises of the saved policies of the 1994 St Albans District Local Plan review. The Minerals and Waste Local Plans form part of the Development Plan and paragraph 1.4 wording should be revised accordingly.

Waste

Policy SS1 - 'The Spatial Strategy', states that the 'Built up Area' of Harpenden should be the priority for new development in the Harpenden Neighbourhood Plan Area. The Household Waste Recycling Centre (located on Dark Lane), falls within the 'built up area' as defined in figure 4.1. As previously outlined, this facility (and the Sewage Treatment Works Harpenden West) is safeguarded by the County Council under WCS Policy 5: Safeguarding of Sites as it contributes towards the strategic network of waste management provision within the county.

Development proposals which are likely to prevent or prejudice the use of land identified or safeguarded for waste management purposes would be opposed, unless alternative or enhanced provision is made for a facility dealing with the equivalent waste capacity, or where it can be demonstrated that the need for those facilities can no longer be justified.



The approach to encouraging the use of the existing built up areas to designate new developments is supported but care needs to be taken when designating development in the 'built up area', within the vicinity of the HWRC on Dark Lane.

Policy H10 - 'Housing Site Allocations' is supported by table 7.1, which sets out seven housing allocations across the Plan area. Paragraph 7.17 states that these allocations 'seek to make a meaningful contribution to meet housing need in Harpenden during the interim period prior to a new St Albans Local Plan.'

Housing Allocation HA1 adjoins the HWRC on Dark Lane. The County Council has previously provided comments (to St Albans District Council, 4th August 2017) on the outline planning application at this location, raising concerns over proximity to the HWRC, outlining how implications could arise due to issues such as noise arising from the HWRC and the lack of visual screening between it and the proposed developments. The design properties of the proposed developments, nearest to the HWRC, would need to be given careful consideration so as to mitigate these likely impacts at the earliest stage possible.

Further comments with regards to the proposed developments (that are situated on Housing Allocation HA1), were submitted to St Albans District Council (7th September 2017) in response to the consultation for St Albans Draft Brownfield Land Register (as this site had been included on the draft Brownfield Land Register), advising that a 'buffer zone' of at least 100m be incorporated into the design, to further alleviate potential disturbance from noise and odour issues between the HWRC and the proposed developments.

Minerals

As previously outlined, a small part of the eastern boundary of the Plan area falls within the 'Sand and Gravel Belt', as identified in the County Council's adopted Minerals Local Plan 2002-2016. Unnecessary sterilisation of minerals as a result of non-mineral developments being designated in the Sand and Gravel Belt should be avoided. At this stage the Plan does not propose designation for any uses/development on the Belt.

Please do not hesitate to contact me in the first instance if you wish to follow up any of the above and I can liaise with appropriate colleagues to assist.

Yours sincerely,

Paul Donovan
Hertfordshire County Council

From: Ailsa Davis [<mailto:Ailsa.Davis@hertfordshire.gov.uk>]

Sent: 06 December 2017 15:46

To: Harpenden Town Council <Harpenden.Town.Council@harpenden.gov.uk>

Subject: Harpenden Neighbourhood Plan

PUBLICATION OF THE HARPENDEN NEIGHBOURHOOD PLAN - TOWN AND COUNTRY PLANNING ACT 1990; PLANNING AND COMPULSORY PURCHASE ACT 2004; LOCALISM ACT 2011, REGULATION 14 - THE NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012

The response is sent by Hertfordshire County Council (HCC) Property (Development Services) on behalf of HCC Services in response to the Harpenden Neighbourhood Development Plan (2011-2031) - Regulation 14 Consultation.

Policy SI1 – School Development

Whilst HCC generally agree with the policy context proposed in SI1, we would like to draw your attention to the recently submitted planning application for a new secondary school in Harpenden. Part of the secondary school site falls within the boundary identified for the Harpenden Neighbourhood Plan.

The proposed secondary school site is located to the north of Lower Luton Road, on the north eastern edge of Harpenden. The site area is 17.2ha and is of sufficient size to provide for an 8FE secondary school in the future if the school needs to expand. The current proposals are for a 6FE secondary school.

Harpenden Town Council discussed its response to the Harpenden Secondary School (the Katherine Warrington School) Planning Application at its Council meeting on Monday 27 November 2017. At this meeting the Council resolved to support the application, subject to additional mitigating measures being put in place in relation to transport infrastructure.

HCC believe that the proposal submitted is compliant with all relevant national and local planning policies and requirements. Further details, including travel plans, Green Belt statement and design and access statement can be viewed on the County Council planning portal webpage under application number 5/2733-17.

Should the application for the school be approved prior to the publication of the Regulation 16 version of the Neighbourhood Plan, HCC would recommend the Plan is updated as follows:

Paragraph 8.1 –

“Harpenden benefits from a wide network of social infrastructure and community facilities. Our town hosts 16 nurseries, 11 primary schools, three [*four*] secondary schools, three doctors surgeries, one specialist hospital (the Memorial Hospital) and a large number of faith, sports, arts and other cultural facilities and organisations.”

An update to Paragraph 2.13 and Paragraph 8.6 may also be required.

Policy T4 – School Travel Plans

HCC support the production of a detailed School Travel Plan for all school-related planning applications that are likely to impact the transport network.

Supporting Documents to the Neighbourhood Plan – Document F Site Assessment Summary Paper

HCC note that Site 9 – Land to the rear of Harpenden Fire Station, Leyton Road, a freehold site owned by HCC, has been marked as unsuitable for development. The site has been included in the SHLAA (Update 2016) published by St Albans City and District Council (SACDC). Site 9 is known as SHLAA-U-H-130 in Table 3 of the SHLAA, which provides an initial assessment of the potential suitability of sites for development. This assessment has suggested the site has an indicative capacity to accommodate 4 dwellings.

Regards

Ailsa Davis

Interim Principal Planning Officer, Development Services

Property, Resources

Postal Point CHO313

Hertfordshire County Council, County Hall, Pegs Lane, Hertford, SG13 8DN



Historic England

EAST OF ENGLAND OFFICE

Mr Philip Wright
582746

Direct Dial: 01223

Harpenden Town Council

Park Hall
PL00209002

Our ref:

Leyton Road

Harpenden

Hertfordshire

AL5 2LX
2017

6 December

Dear Mr Wright

Neighbourhood Plan for Harpenden - Regulation 14 Consultation

Thank you for consulting Historic England about your Neighbourhood Plan. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process.

As you are aware, your Neighbourhood Plan Area encompasses the Harpenden Conservation Area, and includes a number of other designated heritage assets including a large number of listed buildings, of which nine are of the highest significance and listed Grade I or II*. It will be important that the strategy you put together for this area safeguards those elements which contribute to the significance of those historic assets. This will ensure that they can be enjoyed by future generations of the area and make sure it is in line with national planning policy. Although the neighbourhood area does contain a number of designated heritage assets, at this point we don't consider there is a need for Historic England to be involved in the development of the strategy for your area, but we offer some general comments below.



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



Historic England is subject to the Freedom of Information Act, 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.



Overall, we welcome this clear and comprehensive neighbourhood plan document. We welcome the inclusion, in the Vision and Objectives on p.18, of the desire to conserve and enhance the built environment of Harpenden while supporting appropriately designed new development. We suggest that paragraph 4 of the Overall Vision statement is slightly reworded to say 'New developments that conserve and enhance the historic environment' instead of only the 'built environment'. This reflects the terminology used in the National Planning Policy Framework, and is a more holistic term that acknowledges that the heritage of Harpenden includes below ground archaeological heritage as well as the listed buildings and the Conservation Area already referred to.

We also make the general recommendation that below ground archaeological heritage could be given greater consideration in the development of your neighbourhood plan's evidence base and policy framework. You might consider contacting the staff at the Hertfordshire County Council who look after the Historic Environment Record and give advice on archaeological matters. They should be able to provide details of not only any designated heritage assets but also locally-important buildings, archaeological remains and historic landscapes. Some Historic Environment Records may also be available on-line via the Heritage Gateway (www.heritagegateway.org.uk <<http://www.heritagegateway.org.uk>>).

We welcome the identification of Infrastructure Zones in policy SS2, and in particular the emphasis on the need for major development in the South West to demonstrate how they will preserve Harpenden Common, including key views in and out of it. We also welcome the emphasis on protecting the appearance of the historic Town Centre in this policy, but we suggest the wording is altered slightly to 'protect the *character and appearance*', which would then more precisely reference the requirement of s.72 the Planning (Listed Buildings and Conservation Areas) Act 1990 with respect to conservation areas.

We are pleased to note that conserving Harpenden's local character and heritage is enshrined in Environment and Sustainable Design Objective (EDO) 6, on p.33, and we also welcome the inclusion of policy ESD2 - Local Character and Heritage. However, we have concerns with this policy as it is currently presented. The current wording of the policy is not in line with the National Planning Policy Framework, and is therefore likely to be found unsound. Specifically, this concern is related to the balancing of harm vs public benefits. Paragraphs 133-135 of the National Planning Policy Framework (NPPF) make clear that only in the case of 'substantial harm' to the significance of designated heritage assets, are the public benefits of the scheme required to 'outweigh' that harm. In the case of 'less than substantial harm', also only applicable to designated heritage assets, the harm should be 'weighed against' the public benefits.





In the case of non-designated heritage assets (e.g. locally listed buildings) a less stringent test requiring a 'balanced judgement' to be had regarding the scale of any harm or loss is used. As policy ESD2 is presently worded, it is incorrectly applying only the most stringent test found in the NPPF for all types of heritage asset, whether designated or not, and the policy is therefore not aligned with the NPPF. We would suggest that, in lieu of any other changes related to our comments below, the wording "*The Heritage Statement must then demonstrate non negative impact to those assets, or in the case of negative impact, that the public benefits of the proposal outweigh this impact*" is altered to read "*...or in the case of negative impact, that this impact is clearly and convincingly justified by the public benefits of the proposal*".

The government's National Planning Practice Guidance is clear that, where relevant, Neighbourhood Plans need to include enough information about local heritage to guide local authority planning decisions and to put broader strategic heritage policies from the district authority's local plan into action, *but at a neighbourhood scale*. While it is therefore appropriate for a Neighbourhood Plan to identify and aim to conserve designated heritage assets within the Area boundary, it is also an important opportunity for a community to develop a positive strategy for the area's locally important heritage assets that aren't necessarily recognised at a national level through listing or scheduling, and aren't afforded a high level of detail at the district level. This includes identifying any non-statutorily designated historic buildings, sites, or places of importance to the local community, and setting out what factors make them special. These elements can then be afforded a level of protection from inappropriate change through appropriately worded policies in the plan. The plan could also include consideration of any Grade II listed buildings or locally-designated heritage assets which are At Risk or in poor condition, and which could then be the focus of specific policies aimed at their enhancement. At present, we suggest that the neighbourhood plan could go further to identify and specifically protect local heritage assets, for instance showing heritage assets on a map in the appendix and in a list. At present, the proposals map does not indicate the presence of any listed buildings or indeed the conservation area.

We welcome the intention to produce a design guide to support policy ESD3 - Shopfronts. We suggest that this is based on a detailed assessment of the historic and contemporary shopfronts presently found in Harpenden, coupled with documentary/photographic evidence of the town's appearance historically, which will help to underpin the design guidance's recommendations.

We welcome policy ESD4 - Streets as Social Places and its potential to improve or conserve the character and appearance of the conservation area. For streetscape improvements we would refer you to the Streets for All East of England publication: <https://historicengland.org.uk/images-books/publications/streets-for-all-east-of-england/>; the Streets for All case studies series: <https://www.historicengland.org.uk/advice/caring-for-heritage/streets-for-all/case-studies/>; and our advice for highways engineers and designers:



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk





Historic England

EAST OF ENGLAND OFFICE

<https://www.historicengland.org.uk/advice/caring-for-heritage/streets-for-all/highway-engineers-and-designers/>. We would also refer you to Manual for Streets 2: <https://www.gov.uk/government/publications/manual-for-streets-2>, which provides the government's guidance on modifying and improving non-trunk roads and streets.

We welcome the general principle of improving sustainability and energy efficiency, as referenced in Policies ESD2 and ESD16. However, we would highlight that listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance. Special considerations under Part L are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture. In developing policy covering this area you may find the Historic England guidance Energy Efficiency and Historic Buildings - Application of Part L of the Building Regulations to historically and traditionally constructed buildings <https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/> to be helpful in understanding these special considerations.

Your neighbourhood plan is also an opportunity for the community to specifically designate Local Green Spaces <https://historicengland.org.uk/advice/hpg/has/localgreenspace/>. Green spaces are often integral to the character of place for any given area, and your plan could include policies that identify any deficiencies with existing green spaces or access to them, or are aimed at managing development around them. Although your plan identifies the importance of the common to Harpenden's sense of place and in views through the town centre, and includes policy ESD7 - Green and Open Spaces etc, it presently does not designate any Local Green Spaces. You may wish to explore this potential further, and Locality has produced helpful guidance on this, which is available here: <https://mycommunity.org.uk/resources/neighbourhood-planning-local-green-spaces.>

You can also use the neighbourhood plan process to identify any potential Assets of Community Value in the neighbourhood area. Assets of Community Value (ACV) can include things like local public houses, community facilities such as libraries and museums, or again green open spaces. Often these can be important elements of the local historic environment, and whether or not they are protected in other ways, designating them as an ACV can offer an additional level of control to the community with regard to how they are conserved. There is useful information on this process on Locality's website here: <http://mycommunity.org.uk/take-action/land-and-building-assets/assets-of-community-value-right-to-bid/> .

Communities that have a neighbourhood plan in force are entitled to claim 25% of Community Infrastructure Levy (CIL) funds raised from development in their area. The



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk





EAST OF ENGLAND OFFICE

Localism Act 2011 allows this CIL money to be used for the maintenance and on-going costs associated with a range of heritage assets including, for example, transport infrastructure such as historic bridges, green and social infrastructure such as historic parks and gardens, civic spaces, and public places. As a Qualifying Body, your neighbourhood forum can either have access to this money or influence how it is spent through the neighbourhood plan process. Historic England recommends that the community therefore identifies the ways in which CIL can be used to facilitate the conservation of the historic environment, heritage assets and their setting, and sets this out in the neighbourhood plan. More information and guidance on this is available from Locality, here: [<https://mycommunity.org.uk/resources/community-infrastructure-levy-neighbourhood-planning-toolkit/>](https://mycommunity.org.uk/resources/community-infrastructure-levy-neighbourhood-planning-toolkit/)

Further information and guidance on how heritage can best be incorporated into Neighbourhood Plans has been produced by Historic England. This signposts a number of other documents which your community might find useful in helping to identify what it is about your area which makes it distinctive and how you might go about ensuring that the character of the area is retained. These can be found here: [<http://www.historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>](http://www.historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/)

The following general guidance also published by Historic England may also be useful to the plan forum in preparing the neighbourhood plan, or considering how best to develop a strategy for the conservation and management of heritage assets in the area. It may also be useful to provide links to or reference some of these documents in the plan:

HE Advice Note 2 - making changes to heritage assets:
[<https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/>](https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/)

HE Good Practice Advice in Planning 3 - the setting of heritage assets:
[<https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/>](https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/)

HE Advice Note 3 - site allocations in local plans:
[<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>](https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/)

HE Advice Note 7 - local listing: [<https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/>](https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/)

We recommend the glossary contains the relevant terminology contained in the NPPF, in addition to details about the additional legislative and policy protections that heritage assets enjoy.





Historic England

EAST OF ENGLAND OFFICE

Finally, we should like to stress that this advice is based on the information provided by Harpenden Town Council in your correspondence of 25 October 2017. To avoid any doubt, this does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed neighbourhood plan, where we consider these would have an adverse effect on the historic environment.

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,

Yours sincerely,

Edward James
Historic Places Advisor, East of England
Edward.James@HistoricEngland.org.uk



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



From: Julia Warren [<mailto:julia.warren@wheathampstead-pc.gov.uk>]

Sent: 18 December 2017 17:01

To: Alasdair Buckle <a.buckle@nexusplanning.co.uk>

Cc: Philip Wright <Philip.Wright@harpenden.gov.uk>

Subject: RE: Regulation 14 Harpenden Neighbourhood Plan - invitation to comment

Dear Philip and Alasdair

Apologies for the delay in response to the Regulation 14 consultation.

Wheathampstead Parish Council would like a well lit cycle route included to link Wheathampstead and Harpenden.

If the route were to follow the Wheathampstead and Harpenden roads this would provide a route through to Sandridge.

Best Wishes

Julia Warren

Clerk to Wheathampstead Parish Council

From: Matt
Sent: 04 December 2017 12:07
To: Philip Wright <Philip.Wright@harpenden.gov.uk>
Subject: Suggested changes to NP

Hi Philip

I have gone through the Neighbourhood Plan and made some suggestions based on our discussion the other day. If you have any questions please just drop me a line. Changes in red below.

Best wishes

Matt

P18 section 4.

The natural environment is a key part of Harpenden and important green spaces and biodiversity within the town and across Harpenden Rural Parish will be protected. New development will incorporate highly sustainable design features, and deliver a measurable net gain in biodiversity.

P21

Significant development proposals in the North West must

- *Demonstrate a measurable net gain in biodiversity*

Significant development proposals in the North East must:

- *Demonstrate a measurable net gain in biodiversity*

Significant development proposals in the South West must:

- *Demonstrate a measurable net gain in biodiversity*

Significant development proposals in the South East must:

- *Demonstrate a measurable net gain in biodiversity*

P23

2. Environment and Sustainable Design

This chapter sets out how the Neighbourhood Plan will conserve and enhance important environmental assets and lead to quantified net gain in biodiversity. It also sets design expectations for all forms of development, including residential and other uses, ensuring design is considerate of the environment and local character.

P33

EDO4: Require that major development demonstrates a measurable net gain to biodiversity by application of the DEFRA biodiversity assessment metric.*

*(*Biodiversity Impact Calculator, Environment Bank 2014 or as amended)*

P34

v. Demonstrate how the development will conserve and enhance biodiversity leading to a measurable net gain in biodiversity value.

vi. Protection against the loss of or significant harm to landscape value;

P36

ESD7 – Green and Open Spaces and Areas of Ecological and Landscape Value

Developments must seek to maintain and enhance the quality and character of the varied open and green spaces, rivers and the natural environment within the Neighbourhood Plan area. *When required, development must result in a measurable net gain in biodiversity value by application of the DEFRA biodiversity assessment metric* and should not result in the loss of or significant harm to ecological or landscape value of the varied green spaces, rivers and natural environment. Significant developments must include proportionate new public open spaces, including linked green spaces, to ensure that development is permeable to wildlife. Integrated features for wildlife should be incorporated into the built environment when appropriate.*

Supporting text:

6.16 In order to ensure that development delivers the government's aim of net gain to biodiversity, the DEFRA biodiversity assessment metric should be employed to demonstrate objective, transparent, measureable impacts on biodiversity. Major development proposals must provide a positive ecological unit score to prove net gain and habitat enhancement or creation measures may be delivered either on or off-site. Green spaces should be linked to enable wildlife to permeate and colonise development. Ecological information should be provided by suitably qualified individuals and be consistent with BS 42020.*

P40

ESD12 – Biodiversity

The *conservation* and enhancement of urban and rural biodiversity will be supported, *major development is expected to deliver measurable net gain to biodiversity. Measures to enhance biodiversity, such as the creation of new habitats, the enhancement of existing sites and the development and implementation of ecological management plans will be supported. Green roofs and walls will be encouraged where appropriate.*

Design and landscaping of proposed developments should be formed in the context of biodiversity conservation and enhancement. Ecologically authentic native planting schemes will be required in public open spaces, consistent with the Hertfordshire Ecological Networks Mapping project. Major developments should incorporate design features in the built environment which support local wildlife such as integrated swift and bat roosting devices.*

The integrity and value of green corridors, such as watercourses, hedgerows, woodland and disused railway lines should be conserved and enhanced by the provision of buffers of complimentary habitat of appropriate width to improve ecological functionality.

(Herts ecological networks mapping, Herts Local Nature Partnership 2012-13)

6.21 The Neighbourhood Plan seeks to encourage development which results in the least possible negative impact on existing biodiversity, and delivers net ecological gain. Sites should be rigorously assessed for species and habitats, by suitably qualified individuals, with ecological information provided in accordance with BS 42020. Ecological reports in support of a planning application must describe; what is there, how it will be affected by the development, how any negative impacts can be avoided, mitigated or compensated in order that a net gain in biodiversity can be achieved. Design features that enhance biodiversity should be prioritised, particularly where these can be conveniently and cheaply provided as an alternative to a feature that has less biodiversity value, e.g. native trees rather than ornamental trees.

ESD13 – Trees and Hedges

*Development proposals should be designed to retain ancient, **veteran and mature** trees or hedgerows of **ecological**, arboricultural or amenity value and should be accompanied by a tree survey that establishes the health and longevity of any affected trees. Development proposals must not result in unacceptable loss of – or damage to – existing trees or woodlands or hedges or significant **ecological or landscaping value** during or because of development. Any trees lost as a result of development must be replaced at a ratio of at least **2:1** within the site, with a preference for native trees and for fruit and nut trees. The responsible planting of additional trees that reduce or absorb air pollution from traffic will be supported throughout the Neighbourhood Plan Area.*

Matt Dodds
Planning & Biodiversity Manager
Herts & Middlesex Wildlife Trust

From: Chris Briggs
To: philip.wright@harpenden.gov.uk
Cc: [Clr M Maynard](#); [Tracy Harvey](#); [Joanna Woof](#); [Alasdair Buckle](#); [Carl Cheevers](#); [John Hoad](#)
Subject: RE: Regulation 14 Harpenden Neighbourhood Plan - invitation to comment
Date: 05 December 2017 10:09:10
Attachments: [image001.jpg](#)
[image002.jpg](#)
[image003.jpg](#)

Dear Mr Wright

Thank you for consulting St Albans City and District Council (SADC) on the Regulation 14 Harpenden Neighbourhood Plan. We can see that a lot of work and good ideas have gone into the draft. SADC wishes Harpenden Town Council (HTC) and Harpenden Rural Parish Council (HRPC) the best of luck in moving forward and looks forward to continuing productive work between us.

As previously advised, there are a couple of key areas (detailed below) which you may wish to give further consideration to, for your submission document.

Housing Objective HO1 states "Those that grow up in Harpenden should have the capability to live here should they wish to". This however seems to be in direct conflict with the proposed number of site allocations totalling only 128 dwellings over the 15 year plan period. This equates to only approximately 9 dwellings a year for an area of roughly 12,500 existing dwellings and 30,000 residents.

With regard to the housing numbers it would also be useful to know how the indicative number of dwellings have been estimated, for example the Jewsons site with 40 dwellings is much higher than the capacity of 18 detailed in SADC's Strategic Housing Land Availability Assessment (SHLAA).

Although a number of policies contain development thresholds (e.g. H4 Residential Density and ESD2 Local Character and Heritage), you should consider adding a development threshold to ESD17 Flood Risk. This policy states "Proposals must incorporate a sustainable and integrated approach to the management of flood risk, surface water (including run off) and foul drainage" and "All development involving the loss of permeable surfaces, loss of trees, loss of soft landscaping or loss of any other feature that reduces flood risk is required to use appropriate mitigation measures to prevent an increase in flood risk within the site or elsewhere.". These requirements however refer to all developments, in all locations, not just those in areas of flood risk, or those over a certain size.

The Neighbourhood Plan does not designate Local Green Space. Open spaces that the community would like to see statutorily designated as Local Green Space will need to be included in the Neighbourhood Plan. You may find the SADC Green Spaces DLP Technical Report useful http://www.stalbans.gov.uk/Images/SP_GreenSpacesTechnicalReportPublicationDraft111016_tcm15-56020.pdf

A couple of further comments are:

With regard to the S18 it is suggested that consideration needs to be given to future proofing this policy. The policy would be in place for the whole plan period and as the site is the only significant NHS site in Harpenden you may want to be more flexible on the potential (additional) uses for the healthcare use at this site to allow for evolving uses.

As previously drawn to your attention there is the opportunity for Neighbourhood Plans to allocate Green Belt sites for SADC to consider removal from the Green Belt at a later date, however, it is noted that there are no housing allocations proposed in the Green Belt.

You will be aware of the recent DCLG consultation, "Planning for the right homes in the right places: consultation proposals". The consultation proposes a formula for determining the housing need figure for a neighbourhood planning area which is "*to take the population of the neighbourhood planning area and calculate what percentage it is of the overall population in the local planning authority area. The housing need figure in the neighbourhood planning area would then be that percentage of the local planning authority's housing need*". You will also be aware that the formula proposed to

determine the District's housing need results in a need for 14,608 over the Local Plan period. Although this is only at the consultation stage, the proposals indicate the government's direction of travel. You may therefore wish to consider increasing the number of homes that you allocate in the Neighbourhood Plan.

It is also noted that there are a particularly large number of policies in the document with 61 policies, compared to the 54 policies in the previous SADC draft SLP and DLP combined. Perhaps there are some opportunities to combine some of the policies, to check that there isn't duplication and even remove some policies.

We trust that the comments above will be of assistance as you continue with your work on your Plan. We are happy to discuss further as appropriate.

KR

Christopher Briggs

Spatial Planning Manager
Planning & Building Control

St Albans City & District Council

Direct: 01727 814600

Ext: 2600

www.stalbans.gov.uk

www.stalbans.gov.uk/contact-us

From: Alasdair Buckle [<mailto:a.buckle@nexusplanning.co.uk>]

Sent: 25 October 2017 13:55

Cc: Philip Wright

Subject: Regulation 14 Harpenden Neighbourhood Plan - invitation to comment

To whom it may concern

I am writing on behalf of Harpenden Town and Harpenden Rural Councils to inform you of the statutory consultation on the Regulation 14 Harpenden Neighbourhood Plan. The draft Neighbourhood Plan is published for a six week consultation commencing on 25th October 2017 and ending on 6th December 2017. We would appreciate your comments and views on the Plan as a statutory consultee during this period.

You can access the draft Neighbourhood Plan and supporting documents on the Harpenden Town Council website at <http://www.harpenden.gov.uk/neighbourhood-plan>. **Comments can be made using an online survey, which can be found at:** <https://www.surveymonkey.com/r/hnpe3>. Alternatively, comments may be sent to Philip Wright, Interim Projects and Community Manager, at philip.wright@harpenden.gov.uk or posted to:

Philip Wright
Harpenden Town Council
Park Hall
Leyton Road
Harpenden
AL5 2LX

Please confirm receipt of this email. Do not hesitate to get in touch with Philip Wright or myself should you have any queries.

Yours faithfully

Alasdair Buckle
Planner

M +44 (0) 7875 423 758
E a.buckle@nexusplanning.co.uk

Nexus Planning
Riverside House
2a Southwark Bridge Road
London SE1 9HA
T +44 (0) 207 261 4240

nexusplanning.co.uk



Harpenden Town Council
Town Hall
Leyton Road
Harpenden
Herts.
AL5 2LX

4th December 2017

Dear Sirs,

Harpenden Neighbourhood Plan

The British Horse Society is the largest equestrian charity in the UK: guardian of the country's horses, their heritage and their future. Enabling equestrian access is one of the Society's main charitable objectives. The Society is committed to working to change the fact that many riders have to hack along the busy road network. We aim to protect and preserve the existing network as well as obtaining new access opportunities for the safety of all riders.

We are disappointed that despite the hundreds of horses – stable-kept and grass-kept – in Harpenden and its environs, there is no reference to equestrian pursuits in the Neighbourhood Plan.

We consider that the plan needs to be strengthened in some places to give greater emphasis to the need for good access between the new developments and the existing rights of way network and an assurance that where existing quiet lanes and rural rights of way are degraded by new developments there are adequate replacements.

We make the following observations on the plan and request these matters be rectified.

Policy SS2 – Infrastructure Zones

In addition to the need to “Demonstrate sufficient recreational space within a close proximity to the development” there is a requirement to provide “effective access to the surrounding countryside.”

Continued ../

Page two ../

We are concerned that the proposed new school in the Lower Luton Road will cause significant major traffic problems at certain times of the day that will affect riding routes. Traffic levels will be further exacerbated on the Lower Luton Road with the proposed expansion of Luton Airport.

Policy ER3 – Rothamsted Research

The Rothamsted Estate is traversed by a number of definitive public rights of way. It is important that if these routes are compromised by future development, suitable equivalent alternative facilities should be provided.

ESD10 - Access to the Natural Environment

These proposals need strengthening. It should be a firm requirement that new public rights of way are created to facilitate the needs of new residents.

Special Infrastructure and Community Objectives S104

This should be expanded by adding “access to the countryside” to the desired facilities. This is an important element of informal recreation.

Policy 19 – Harpenden to St. Albans Cycle Routes

This policy is too limited. We have been trying to upgrade the pedestrian/cycleway between Harpenden and St. Albans for many years to multi-user (walkers, cyclists and horse-riders). This would give equestrians access to:

- Ayres End Lane to reach BR8/BR9 to Heartswood Forest and Sandridge
- BR1 to Batchworth
- BR2 through Chidwick Green
- BR1A/BR9 to Cheapside Farm and Sandridgebury.

rather than having to ride along the fast-moving vehicular carriageway (A1081).

Whilst we recognise that this plan is relative to Harpenden Town and Rural parishes, there has to be cross-boundary recognition to ensure that safe conjoined routes exist with neighbouring villages including Wheathampstead, Kimpton and Redbourn.

The Rights of Way Improvement Plan (ROWIP)

Every Highway Authority has a statutory duty to prepare and maintain a ROWIP. The Hertfordshire County Council has recently adopted a new edition of the ROWIP covering the period to 2027/28. The new plan and examples of the maps can be found in the rights of way section of the Hertsdirect website. This is a living document which is updated as new opportunities arise.

We are active members of the St. Albans Access Forum, along with representatives from the Ramblers, the St. Albans and District Footpaths Society, the St. Albans Cycling Campaign,

Continued ../

Page three ..

and officers from HCC Rights of Way Service and the Landscape Architects office of St. Albans District Council. For a number of years the forum has been assisting HCC in a systematic review of worthwhile improvements to rights of way in each parish in the district.

Much work has been undertaken in the south and ROWIP's have been completed for a number of parishes. Work has now started on proposals for Harpenden Town and Rural Parishes, commencing with the areas where development proposals seem most likely.

In the fullness of time we hope Harpenden Town Council will support the ROWIP recommendations

We trust the Council will give favourable consideration to our comments.

Yours faithfully,



John M. Featherstone
County Access & Bridleways Officer – Herts.

Mr Philip Wright
Project Officer
Harpenden Neighbourhood Plan
Harpenden Town Hall
Harpenden
AL5 2LX

Date: 6 December 2017
Our ref: 12860/GW/STi/15157894v3

Dear Mr Wright

Regulation 14 Pre-submission Draft Harpenden Neighbourhood Plan

On behalf of our client, CEG, please find below our representations in response to the Regulation 14 Pre-submission Draft Harpenden Neighbourhood Plan (HNP). We have also submitted these comments via the online form.

By way of background, and as context for all of our comments (in response to questions 1, 2, 8, 11, 30, 32, 33, 35, 41, 51, 58 and 62), CEG has an interest in land at Ambrose Lane, north-west of Harpenden town centre which is owned by Action for Children. The site comprises approximately two-thirds of the NW Harpenden Broad Location which was identified in the submitted Strategic Local Plan (SLP) for green belt release and the delivery of approximately 500 dwellings, a primary school, community facilities, recreation and open space. CEG is working with L&G and St Albans City & District Council (SACDC) to bring forward a range of new homes and local facilities in this location.

CEG has been working with SACDC for a number of years to support the plan making process and ensure the range of benefits which could arise from this development for current and future residents are realised. Working with communities is an important part of this process, and CEG would like to contribute to the HNP as it evolves and to work with the Town Council during its preparation.

CEG welcomes the direction of the draft HNP and considers that this emerging Plan represents a positive step for planning in Harpenden. The observations and comments provided in this form are provided within this context, in order to assist the Town Council in finalising the draft HNP.

1. Do you agree with the Policy SS1 - The Spatial Strategy?

Disagree

The draft Harpenden Neighbourhood Plan (HNP) states at Strategic Policy SS1:

"1. The Built up Area of Harpenden should be the priority for new development in the Harpenden Neighbourhood Plan Area. The Built up Area Boundary of Harpenden is shown in Figure 4.1. Planning applications for new development proposals outside the Built up Area Boundary must either:

- Be an exception to inappropriate development in the Green Belt; or*

• *In the case of what would normally be deemed inappropriate development in the Green Belt, must demonstrate:*

o Very special circumstances for development in the Green Belt; and

o Why the proposal cannot be located within the Built up Area Boundary of Harpenden.”

As an observation, CEG notes that draft Strategic Policy SS1 does not make provision for any strategic allocations outside the identified Built up Area which may emerge within the new District Local Plan, including by the release of land from the Green Belt. This includes the land at North West Harpenden which was identified in the previous Strategic and Detailed Local Plans.

CEG suggests that, in order to ensure a reasonable prospect of alignment between the emerging HNP and the new Local Plan, establish a neighbourhood plan with sufficient flexibility to address changing circumstances, and avoid prejudicing opportunities for strategic development, draft Strategic Policy SS1 should also refer to development on land within the Green Belt/outside the current Built up Area (where this is allocated through the new Local Plan).

CEG therefore suggests that draft Strategic Policy SS1 should be amended as follows:

“1. The Built up Area of Harpenden should be the priority for new development in the Harpenden Neighbourhood Plan Area. The Built up Area Boundary of Harpenden is shown in Figure 4.1. Planning applications for new development proposals outside the Built up Area Boundary must either:

• Be an exception to inappropriate development in the Green Belt; or

• In the case of what would normally be deemed inappropriate development in the Green Belt, must demonstrate:

o Very special circumstances for development in the Green Belt; and

o Why the proposal cannot be located within the Built up Area Boundary of Harpenden-; or

• Be located on land identified for release from the Green Belt and allocated for development through the emerging Local Plan preparation process.” (proposed amendments underlined)

2. Do you agree with the Policy SS2 - Infrastructure Zones?

Neither agree nor disagree

The draft HNP states at Strategic Policy SS2 that significant proposals within the North West zone defined at Figure 4.2 must meet the following criteria:

“• Demonstrate how impact of new development on the A1081 and local roads will be mitigated;

• Demonstrate adequate provision for appropriate education facilities in close proximity to new development or proposed additional capacity;*

• Demonstrate sufficient convenience shopping within a close proximity to new development; and*

• Demonstrate sufficient recreational space within a close proximity to new development.”*

** Residential proposals only*

CEG broadly supports the proposed approach in draft Strategic Policy SS2, which allows proposals to be assessed on a case-by-case basis on their merits.

However, CEG considers that the wording of the draft policy is currently unclear in relation to the need to demonstrate the availability of education facilities, convenience shopping and recreational space. In particular, CEG suggests the terms “adequate” and “sufficient” are not precise, clear or capable of objective assessment.

CEG therefore suggests that draft Strategic Policy SS2 should be amended as follows:

- *Demonstrate how impact of new development on the A1081 and local roads will be mitigated;*
- *Demonstrate ~~adequate~~ provision for appropriate education facilities in close proximity to new development to meet the need for school places resulting from the proposed development, or that proposed additional capacity to meet the needs arising will be provided ;*
- *Demonstrate ~~that sufficient~~ convenience shopping facilities to meet day-to-day needs are available within a reasonable walking distance of the a close proximity to new development*; and*
- *Demonstrate that the proposals meet any adopted local open space standards sufficient recreational space within a close proximity to new development*.” (proposed amendments underlined)*

** Residential proposals only*

8. Do you agree with the Policy ER6 - Supporting Local Centres?

Agree

The draft HNP states at Policy ER6:

“In local centres, appropriate and proportionate proposals for local retail facilities and service development will be supported. Proposals involving the loss of a convenience shop without re-provision in the same local centre will not be supported.”

The draft Plan lists four Local Centres, including at North Harpenden (ref DRA3).

CEG endorses the proposed requirement to support and retain the provision of local retail facilities and services at Local Centres, including at North Harpenden. It is considered that these facilities provide an important function for existing and potential new residents and can help to reduce the need to travel to meet basic day-to-day needs.

11. Do you agree with the Policy ESD1 - Design Strategy?

Neither agree nor disagree

ESD1 - Introductory statement

The draft HNP provides a number of design criteria for new development. It begins with the following introductory statement:

“All developments must be visually appealing, designed to a high quality; they must also maintain or enhance the character of the area and support Harpenden as a low carbon place to live and work.”

CEG suggests that the phrase “visually appealing” should be deleted because it is subjective. CEG therefore proposes that this phrase is deleted and the introductory sentence amended at draft Policy ES1 as follows:

*“All developments must be visually appealing, designed to a high quality; ~~they must also~~, maintain or enhance the character of the area and support Harpenden as a low carbon place to live and work.”
(proposed amendments underlined)*

ESD1 - Criteria

Draft criteria v and ix within draft Policy ESD1 state that a Design Brief must be produced for major developments in the HNP area. Further, the Design Brief is expected to demonstrate the consideration of a number of criteria, including the following:

“v. Protection against the loss of or significant harm to ecological or landscape value;

ix. How permeability of land surface has been maintained and / or enhanced in the development and how the development is using sustainable solutions to reduce flood risk.”

CEG suggests that draft Policy ESD1 should recognise that it may be appropriate to mitigate adverse impacts where this would make a proposed development acceptable, particularly in relation to the loss of, or significant harm, to ecological or landscape value (draft criterion v) and the permeability of land (draft criterion ix). This approach would provide flexibility for developers to address issues arising on sites and ensure appropriate development can come forward.

CEG therefore proposes that draft Policy ES1 criteria v and ix (in particular) are amended as follows:

“v. Protection against the loss of, or significant harm to ecological or landscape value, or demonstrate the provision of appropriate mitigation or compensatory measures;

ix. How permeability of land surface has been maintained and / or enhanced in the development and how the development is using sustainable solutions to reduce flood risk, or the provision of appropriate management or mitigation measures to address potential impacts.” (proposed amendments underlined)

30. Do you agree with Policy H1 - Housing Strategy?**Disagree****Paragraph 7.8**

The draft HNP states at paragraph 7.8, which forms supporting text to Policy H1:

“The Neighbourhood Plan also recognises the role of the Green Belt and supports the prioritisation of its protection. Therefore, the Neighbourhood Plan proposes that the ability of the Built up Area of Harpenden to provide appropriate new housing is exhausted prior to delivery of new housing in the Green Belt. In accordance with this approach, a number of housing site allocations are proposed in the Built up Area of Harpenden.”

CEG appreciates that the draft HNP seeks to support the role and purposes of the Green Belt. However, CEG considers that draft paragraph 7.8 is overly restrictive, particularly in the context of the established level of local housing need. It should not be necessary to “exhaust” all sites within the Built up Area before allowing any new development outside of this area. Some sites within the Built up Area may be unlikely to come forward in the short term, and the provision of urgently needed new homes should not be delayed as a result of needing to wait for all capacity in the Built up Area – which is very difficult to define – to be used up.

Furthermore, and as noted in relation to Policy SS1, CEG considers that draft paragraph 7.8 should recognise that SACDC may release land from the Green Belt to accommodate strategic housing sites through the emerging Local Plan preparation process.

CEG therefore suggests that draft paragraph 7.8 should be amended as follows:

“The Neighbourhood Plan also recognises the role of the Green Belt and supports the prioritisation of its protection. Therefore, the Neighbourhood Plan proposes that the ability of the Built up Area of Harpenden

to provide appropriate new housing is exhausted prior to delivery of new housing in the Green Belt. In accordance with this approach, a number of housing site allocations are therefore proposed in the Built up Area of Harpenden. The Neighbourhood Plan also recognises that the District Council may release land from the Green Belt to provide land to help meet the need for new housing.” (proposed amendments underlined)

32. Do you agree with Policy H3 - Dwelling Size and Type?

Agree

The draft HNP states at Policy H3:

“Major residential developments are required to submit a Dwellings Mix Strategy as part of the Design and Access Statement with any planning application. The strategy must clearly demonstrate how the proposed development addresses the objectively identified need for different sized and types of housing as set out in the latest assessment of housing need carried out by St Albans City and District Council.

Proposals that are not considered to meet an identified size/type need will not be supported.”

CEG supports the proposed approach within draft Policy H3 which requires major residential developments to provide an appropriate mix of homes to reflect the objectively identified need for different sizes and types of dwelling, including for affordable housing, within the latest assessment of housing need prepared by SACDC. This approach provides the flexibility for each proposed development to include an appropriate dwelling mix based upon the specifics of the scheme but serving to meet the overall identified need for each size and type of home as identified by SACDC.

33. Do you agree with Policy H4 - Residential Density?

Neither agree nor disagree

The draft HNP states at Policy H4:

“New major residential development must be at an appropriate density subject to local character and in accordance with the desire to protect the Green Belt insofar as possible. A minimum density of 40 dwellings per hectare must be met unless an applicant can demonstrate doing so would have a negative impact on local character, a designated heritage asset, biodiversity, trees or flood risk. Higher density developments may be acceptable in Harpenden Town Centre subject to design considerations.”

CEG considers that draft Policy H4 should provide greater flexibility, recognising that different density levels will be appropriate at different sites, depending on their character and context. CEG therefore suggests that the proposed minimum density of 40 dwellings per hectare should be deleted from draft Policy H4, as follows:

“New major residential development must be at an appropriate density subject to local character and in accordance with the desire to protect the Green Belt insofar as possible, taking into account A minimum density of 40 dwellings per hectare must be met unless an applicant can demonstrate doing so would have a negative impact on local character, a designated heritage assets, biodiversity, trees, and or flood risk. Higher density developments may be acceptable in Harpenden Town Centre subject to design considerations.” (proposed amendments underlined)

35. Do you agree with Policy H6 - Advertisement of Market Housing?

Neither agree nor disagree

The draft HNP states at Policy H6:

“Developers of market housing in the Neighbourhood Plan Area should seek to advertise locally in the first instance.”

However, the draft Plan notes in the supporting text at paragraph 7.13 that this is only a request:

“We ask developers to advertise locally in support of the ambition to provide housing to meet local needs, while recognising there is no mechanism to enforce this.”

CEG appreciates that the draft HNP is seeking to prioritise the delivery of homes to meet local needs, but considers that draft Policy H6 is too restrictive and does not meet the requirements of national policy and guidance. The Planning Practice Guidance (PPG) states that in preparing neighbourhood plans (ID: 41-040-20160211):

“Proportionate, robust evidence should support the choices made and the approach taken.”

CEG notes that “proportionate, robust evidence” has not been provided to support the approach taken in draft Policy H6.

Furthermore, CEG considers that, if the draft policy were to be retained, there is no available policy-compliant and lawful mechanism (i.e. planning condition or obligation) for its application.

Overall, CEG therefore considers that draft Policy H6 should be deleted from the emerging HNP.

41. Do you agree with Policy SI1 - School Development?

Neither agree nor disagree

The draft HNP states at paragraph 8.7, which forms part of the supporting text for Policy SI1:

“Appropriate enlargement of existing school facilities is the most desirable way to accommodate an increase in demand. However, this Neighbourhood Plan recognises that major strategic sites are likely to benefit from on-site primary school provision where a sufficient amount of housing is provided to sustain a primary school.”

CEG suggests that the focus of draft paragraph 8.7 should be amended to state that enlarging existing school facilities can be a desirable way to accommodate increase in demand, but that it will not be the most desirable option in all cases. CEG also considers that the text could be clarified to note that major strategic sites can often deliver the benefit of a new school to meet the need generated by the new development close to where this need arises as well as providing opportunities to accommodate any existing shortfall deriving from neighbouring areas.

CEG therefore suggests that draft Policy SI1 should be amended as follows:

“Appropriate enlargement of existing school facilities ~~is the most~~ can be a desirable way to accommodate an increase in demand. However, this Neighbourhood Plan recognises that major strategic sites can deliver the benefit to benefit ~~from~~ of new primary school provision, which can meet the need generated by new development as well as providing opportunities to accommodate wider local needs where a sufficient amount of housing is provided to sustain a primary school.” (proposed amendments underlined)

51. Do you agree with Policy T2 - Proposals Affecting the A1081, B653 and B652?

Neither agree nor disagree

The draft HNP states at Policy T2:

“Major development proposals for development that directly accesses onto the A1081, B653 (Lower Luton Road), B652 (Station Road) or Redbourn Road that would involve an increase in traffic on those roads (as demonstrated by a Transport Assessment) will be required to make provision for, and contribute to, appropriate measures to ease traffic congestion on those roads. Applicants must demonstrate that measures are incorporated that will ensure the proposals do not further inhibit the free flow of traffic on those roads or, in the case of the A1081 and its nearby streets, increase parking stress.”

CEG suggests that draft Policy T2 should be clarified to focus on a requirement for major development proposals likely to affect these roads to appropriately mitigate the effects on these roads. As drafted, CEG observes that the policy focuses only on proposals that directly access these routes, whilst some schemes in the wider area will create additional traffic movements that may affect these routes. Further, CEG suggests that, whilst it is recognised that mitigation measures could also serve to ease existing traffic congestion, this should not be a policy requirement.

CEG therefore proposes that draft Policy T2 is amended as follows:

“Major development proposals for development that directly accesses onto the may result in a material increase in traffic on the A1081, B653 (Lower Luton Road), B652 (Station Road) or Redbourn Road (as demonstrated by a Transport Assessment) will be required to make provision for, or contribute to, appropriate measures to mitigate the impact of any additional traffic on these roads arising from the development, including in relation to traffic flow and on-street parking pressure.” (proposed amendments underlined)

58. Do you agree with Policy T9 - Harpenden to St Albans Cycle Route?

Agree

The draft HNP states at paragraph 9.13, which forms a supporting paragraph to draft Policy T9:

“A key ambition of the Neighbourhood Plan is to support a modal shift away from private motor vehicles and towards more sustainable modes of transport. This approach is intended to be through positive encouragement of measures that make sustainable transport options more accessible rather than seeking to make driving less accessible. Reducing the number of vehicle trips will ease congestion and support better air quality in the Neighbourhood Plan Area.”

CEG supports this proposed approach, which states that the HNP aims to promote a shift towards sustainable modes of travel and away from the use of the private car.

62. Do you have any further comments on the draft Neighbourhood Plan?

By way of background, and as context for all of our comments (in response to questions 1, 2, 8, 11, 30, 32, 33, 35, 41, 51, 58 and 62), CEG has an interest in land at Ambrose Lane, north-west of Harpenden town centre which is owned by Action for Children. The site comprises approximately two-thirds of the NW Harpenden Broad Location which was identified in the submitted Strategic Local Plan (SLP) for green belt release and the delivery of approximately 500 dwellings, a primary school, community facilities, recreation and open space.

CEG has been working with SACDC for a number of years to support the plan making process and ensure the range of benefits which could arise from this development for current and future residents are realised. Working with communities is an important part of this process, and CEG would like to contribute to the Harpenden Neighbourhood Plan as it evolves and to work with the Town Council during its preparation.

CEG welcomes the direction of the draft HNP and considers that this emerging Plan represents a positive step for planning in Harpenden. The observations and comments provided in this form are provided within this context, in order to assist the Town Council in finalising the draft HNP.

Local Planning Issues

At paragraph 2.13, the draft HNP lists several local planning-related issues which are understood to be important to local people in Harpenden.

CEG supports the recognition of these issues but considers that the draft HNP should provide clarity as to the purpose of identifying these issues and their treatment within the emerging Plan.

CEG therefore considers that the following sentence (or a similar explanation) should be added at the end of draft paragraph 2.13:

“The Neighbourhood Plan has regard to and seeks not to prejudice future outcomes in relation to these issues but recognises that they cannot be directly addressed within the HNP.”

Current Planning Policy Framework

The draft HNP sets out the District-wide planning context for the Neighbourhood Plan at paragraphs 3.1 and 3.2.

CEG understands why an explanation of the context has been included and supports the focus within the draft HNP on the context of the emerging single Local Plan, rather than the saved policies within the current statutory development plan. CEG considers that this focus on the emerging Local Plan is the most appropriate approach, given that, once adopted, the new Local Plan will provide the most up-to-date basis for decision-making across St Albans District.

CEG supports the acknowledgement of the need for the new District-level Plan to allocate land for a substantial of homes across the District, including in Harpenden. CEG does, however, note that the emerging housing requirement figure for the emerging Local Plan suggested by the draft HNP at paragraph 3.2 (800dpa between 2020 and 2036) is lower than that contained within the most recent draft Local Plan document (the draft Issues and Options consultation document presented to SACDC Cabinet on 23 November 2017: 913dpa between 2020 and 2036).

CEG therefore suggests that the draft HNP is amended to include a general reference to the emerging District-wide housing requirement figure and a broad quantum/range but does not specify an exact figure as this is still uncertain and may be subject to change.

We trust that these representations are clear and will assist in finalising the draft HNP. Please do not hesitate to contact either my colleague Nick Baker or me, should you require any clarification of any of the points made. We would also be grateful if you would keep us informed of progress on the development of the HNP.

Yours sincerely



Gareth Williams
Senior Director



Copy Charlotte Robinson, CEG

6 December 2017

To Philip Wright, Project Officer

Harpenden Neighbourhood Plan Consultation

Thank you for making the process to develop and pass the Harpenden Neighbourhood Plan, transparent and democratic. It is great to be able to engage in this way.

Christchurch Harpenden is a classical Christian church of over 300 people, led by two ordained ministers and a total staff of seven. The church is a member of the UK's Evangelical Alliance and we enjoy good relations with neighbouring churches and the town. We are a thriving church which can trace its roots back to the 1950s. Having outgrown five venues since forming, we are acutely aware of the need for community premises in Harpenden as we continue to grow with the town.

SI2: Protection of Community Uses

In Section 8, we entirely support your position that protects buildings or facilities for community uses:

"Development proposals that would lead to the loss of buildings or facilities used, or last used, for community uses, will not be granted planning permission unless the use is suitably re-provided elsewhere..." (SI2, p.56).

We would further like the Council to consider the specific community use of a building. "Community uses" is a very broad category covering sport, arts, special interest and faith groups. Where there is local support to maintain a building's current use (for example, as a church), we would urge the Council to favour such development. It would be short-sighted if every community building was redeveloped as a gym (to take an arbitrary example). The town thrives on a variety of community-based activities, and we are keen to see that diversity maintained.

SI3: Venues for Community Use

Also in Section 8, we are pleased to read that you support:

"...the enhancement of existing and development of new community uses, including faith buildings, community halls and school dual use facilities" (SI3 p.56)

Given the town's rich Christian heritage, we are keen to play our part in maintaining a Christian witness in Harpenden. We do this today using our modest premises on Vaughan Road and through the kind co-operation of Roundwood Park School on Sunday mornings. We greatly appreciate use of their facilities which work very well. However, we are conscious that a larger facility in Harpenden would place our current work on a secure foundation for future generations. I have attached brief details of our activities on the following page.

Many thanks again for running the process: we look forward to engaging in years ahead.

Simon Anderson
simonjanderson@outlook.com

On behalf of the Leadership of Christchurch Harpenden
<http://www.christchurchharpenden.org.uk/>

Current Ministries of Christchurch Harpenden

We are a busy community of people of all ages, from all walks of life and all neighbourhoods in the town. More than 300 people gather each Sunday to learn from the Bible, sing, pray and encourage each other. Our aim is to be a church for others, reaching out in meaningful ways to friends, colleagues and neighbours with the good news of Jesus Christ. We aim to be a growing church, making and maturing disciples equipped to serve Christ, each other and the world. We aim to be a church in the world, working out a biblical perspective on issues of the day and supporting those Christians whose mission is far from Harpenden and the UK. Whether Christian or seeker, we want to reach everybody in Harpenden; and welcome them into the church.

During the week, different groups meet including 3 different teenage groups; a primary school-age group, at which our teenagers help; bible study groups for over 150 people; our monthly Senior Citizen's Tea Party; a regular worship service in the Willow Court Care Home; a café run from our building on Vaughan Road for visitors and stall-holders at the monthly Farmers' Market; two weekly mother and toddler groups with over 70 registered families; and a father and toddler group on Saturdays.

Throughout the year, we arrange various events open to the whole town. On Sunday, we hosted the town's largest Christmas carol services in the Public Halls. In order to tackle issues of the day, we run topical events, open to everyone in the town. In September 2016, we booked the main Lecture Theatre at Rothamsted for an open seminar on Beginning and End of Life ethical issues with Professor John Wyatt from University College, London. In February, we arranged a sell-out event at the Slug and Lettuce on the topic of Trusting the Bible as History. This coming March, we have booked the Public Halls for 4 evenings to answer *Harpenden's Big Questions* – an initiative to bring a Christian perspective on life's big questions.

Each Sunday morning we meet as a church, with younger members (up to school year 9) meeting in age-specific groups. There are 6 such groups with the registered members per group in brackets:

1. Crèche (variable)
2. Reception (19)
3. Year 1-2 (25)
4. Year 3-4 (30)
5. Year 5-6 (20)
6. Year 7-9 (15)

Neighbourhood Plan Steering Group
Harpenden Town Council
Town Hall
Harpenden
AL5 2LX

BY EMAIL AND POST

24101/A3/DM/MH/kf

06 December 2017

Dear Sir/Madam

**HARPENDEN TOWN COUNCIL – PRE-SUBMISSION DRAFT NEIGHBOURHOOD PLAN
REGULATION 14 CONSULTATION (25 OCT – 06 DEC 2017)**

These representations have been prepared on behalf of our client, Crest Strategic Projects, who are promoting comprehensive mixed-use development proposals at land known as "North-East Harpenden" (hereby referred to as 'the Site').

Representations were submitted, on behalf of Crest, to the Neighbourhood Plan "call for sites" (April 2017) and the proposals for the Site were then presented to the NP "Steering Group" on 31 July 2017. Further extensive representations were submitted to HTC on 01 September 2017.

The National Planning Policy Framework sets out that neighbourhood planning gives communities the opportunity to develop a shared vision for their neighbourhood and deliver the sustainable development they require. In this context, Crest supports the development of a Neighbourhood Plan for Harpenden, provided that the ambition of the Plan is aligned with the strategic needs and priorities of the wider City and District area, and is in compliance with National planning policy.

These representations comprise the following:

- Section 1 – Planning Policy Context;
- Section 2 – Representations to Reg 14 Pre-submission Draft Harpenden Neighbourhood Plan;
- Section 3 – Development Opportunity at "North-East Harpenden"; and
- Section 4 – Conclusion.

1.0 Planning Policy Context

The National Planning Policy Guidance (para 065 reference ID: 41-065-20140306) requires that for a Neighbourhood Plan to be considered sound, it must be in conformity with the Basic Conditions. These are as follows:

- i) Having regard to national policies and advice contained in guidance issued by the Secretary of State;
- ii) The making of the Neighbourhood Plan contributes to the achievement of sustainable development;
- iii) The making of the Neighbourhood Plan is in general conformity with the strategic policies contained in the development plan for the area of the authority;



FS 29637

Registered in England
Number: 0C342692

Barton Willmore LLP
Registered Office:
The Blade
Abbey Square
Reading
RG1 3BE
E/ +44 (0)118 943 0001

- iv) The making of the Neighbourhood Plan does not breach, and is otherwise compatible with EU obligations; and
- v) Prescribed conditions are met in relation to the Neighbourhood Plan and prescribed matters have been complied with, in connection with the proposal for the Neighbourhood Plan.

The NPPF (para 16) states that the application of the presumption in favour of sustainable development will have implications for how communities engage in neighbourhood planning. Critically, it will mean that neighbourhoods should:

- Develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development.

St Albans Local Plan (1994)

The Development Plan for the area comprises the "saved" policies of the St Albans Local Plan (1994). In terms of housing provision, the Plan relates to the period up to 2001 and is therefore well out-of-date, in this regard. It is therefore important to consider the emerging Local Plan for St Albans, as addressed below.

Emerging Local Plan

The St Albans Strategic Local Plan (SLP - 2016) was submitted to the Secretary of State for Examination and it sought to deliver 450 dwellings per annum during the period 2011 - 2031 (9,000 total). As part of the evidence base to the Plan, 8No. Broad Locations in the Green Belt (inc. 'the Site' at North-East Harpenden) were assessed by St Albans City and District Council (SACDC) and the proposed SLP earmarked four of these to deliver the scope of development as below:

- East of Hemel Hempstead (North) – c. 1,500 dwellings;
- East of Hemel Hempstead (South) – c. 1,000 dwellings;
- North-West Harpenden – c. 500 dwellings; and
- East of St Albans – c. 1,000 dwellings.

An "Initial Hearing Session" (26 October 2016) was undertaken concerning the legal requirement for the SLP to meet the Duty to Co-operate (DtC). Central issues to the Hearing Session concerned the extent of collaboration and engagement SACDC undertook with neighbouring authority areas on housing and economic matters and, in particular, this included the failure to engage with the four "South-West-Herts" authorities (Dacorum BC, Hertsmere BC, Three Rivers DC and Watford BC).

SACDC subsequently applied for judicial review to quash the decision of the Secretary of State on the DtC (*St Albans City and District Council v. Secretary of State for Communities and Local Government [2017] EWHC 1751 (Admin)*) and the judgment handed down (13 July 2017) confirms the dismissal of the challenge on the basis that "the Inspector did not reach an illogical or irrational conclusion as regard the Duty to Co-operate".

SACDC has since recommenced work of the Local Plan and the Local Development Scheme (Nov 2017) confirms the timetable for the Plan as follows:

STAGE	DATE
Draft Local Plan "Issues and Options" (Reg 18 Consultation)	Jan/Feb 2018
Pre-Submission Draft Plan (Reg 19 Consultation)	Sept 2018
Submission to Secretary of State (Reg 22)	March 2019
Examination (Reg 24)	Summer 2019
Adoption (Reg 26)	Spring 2020

A Committee Draft Local Plan ("Issues and Options") was presented to SACDC's Planning Policy Committee meeting (07 Nov 2017) and Cabinet meeting (23 Nov 2017) at which it was agreed that consultation on the document (subject to a number of minor amendments) would occur in Jan/Feb 2018.

The document identifies the Government's proposed standardised methodology for assessing housing needs and which concludes that SACDC may be expected to deliver in the region of 913dpa (double that previously proposed in the SLP). The document indicates that this will relate to the Plan period 2020 - 2036 during which 14,608 dwellings will be required to be delivered.

SACDC is therefore proposing options to deliver the identified growth for the District and this includes the 8No. Broad Locations previously assessed for the SLP. At Harpenden, this includes the Site (North-East Harpenden) as well as North-West Harpenden.

As one of three "Main Settlements" (incl. St Albans and London Colney), it is anticipated that significant levels of growth will be earmarked to Harpenden (along with St Albans and London Colney) in order to meet identified housing needs. As set out in the NPPF, forthcoming Neighbourhood Plans for such areas should support the strategic development needs of the Local Plan and this is addressed further below.

2.0 Representations to Reg 14 Pre-Submission Draft Harpenden Neighbourhood Plan

The Reg 14 "Draft Neighbourhood Plan" (para 1.4) makes reference to the "current" Development Plan, i.e. the "saved" policies of the 1994 District Local Plan. As addressed earlier, in terms of housing provision, the Local Plan secures such up to 2001 and is therefore a long time out-of-date.

It is therefore important for the Neighbourhood Plan to have regard to the emerging Local Plan and the growth to be earmarked therein. In order to meet the Basic Conditions, in particular no. (iii) above, it is recommended that the Neighbourhood Plan affords flexibility and aligns with the strategy for Harpenden to be pursued in the emerging Local Plan.

Spatial Strategy

Policy H1 (Housing Strategy) of the Reg 14 NP sets out that:

New residential development will be supported as long as it meets the requirements set out in the latest housing need assessment prepared by St Albans City and District Council subject to compliance with other Development Plan Policies. Such housing should firstly come forward through sites identified in the Neighbourhood Plan and then through infill and brownfield development wherever possible.

The NP includes a "Proposals Map" (figure 4.1) and which includes a Built Area Boundary (BAB) for the Town - this would appear to be based upon the 1994 Local Plan map.

Policy H10 (Housing Site Allocations) seeks to identify development of 128No. dwellings within the BAB, by means of allocations at 7No. sites (HA1 – HA7). This level of development is clearly not going to meet the housing needs of Harpenden and the wider District area and it is thus recommended that the Neighbourhood Plan supports and provides the flexibility for the requisite growth for Harpenden to come forward through the Local Plan.

Policy H1, as above, appears to be seeking to meet this objective, by supporting residential development that complies with Development Plan Policies. Notwithstanding this, it is unclear as to what is intended by the obligation to "meet the requirements set out in the latest housing need assessment prepared by SACDC" and it is considered that this matter requires further clarity.

Moreover, Policy H1 above is considered "unsound" where it requires that "such housing should firstly come forward through sites identified in the Neighbourhood Plan and then through infill and brownfield development". This element of the policy is not considered to be justified nor is it in compliance with National policy. Whilst the NPPF encourages the effective use of previously developed land (para 111), it does not require sites in the Neighbourhood Plan and infill and brownfield sites to come forward prior to other sites, as suggested by the policy, e.g. those to be identified in the Local Plan.

The issue of a NP supporting and being "flexible" to have regard to an emerging Local Plan was considered by the Examiner to the "made" East Grinstead Neighbourhood Plan. In this context, the Examiner's report (17 August 2016) confirms that the housing provision and built-up area boundary within the NP were based on the out-of-date 2004 Mid Sussex Local Plan. Rather than find the NP "unsound", the Examiner recommended a criteria based policy (Policy EG5) to assess future residential proposals that came forward outside the existing built-up area boundary.

The "made" Policy EG5 is quoted as follows:

The East Grinstead Neighbourhood Plan area is subject to significant environmental and infrastructure constraints and as a result new housing development on land defined as 'previously developed', where the site is predominantly previously developed or is green infrastructure that can be demonstrated to be surplus to requirements will be supported subject to the criteria below and in compliance with other policies within the plan.

Other proposals for new housing development will only be supported if:

- a) The proposed development contributes to sustainable development;**
- b) An application is supported by robust assessment of the environmental and visual impact of the proposal and includes as necessary appropriate mitigation measures;**
- c) An application is supported by a robust assessment of the impact of the proposal upon the local highway network and it can be demonstrated that the proposal will not cause a severe cumulative impact in terms of road safety and increased congestion after proposed mitigation is taken into account;**
- d) The proposal complies with design guidance contained in policy EG3 or a relevant Development Brief;**
- e) The proposal provides a mix of tenure types including private, social rented and shared equity (intermediate);**
- f) Contributions are made towards SANG and Strategic Access Management Measures; and**
- g) The proposal meets its own infrastructure needs.**

Where proposals comply with Policy EG5, relevant site-specific policies and mitigate their highway and other infrastructure impacts, the following sites (EG6A and EG6B) will be encouraged to come forward for residential development.

In view of this, it is considered that Policy H1 be amended/deleted to incorporate a policy akin to EG5 of the East Grinstead NP, as above. This would support and afford flexibility to future development being assessed in light of policies/proposals (for Harpenden) in the emerging St Albans Local Plan.

Policy H4 – Residential Density

It is considered that the proposed minimum density of 40 dwellings per hectare for new major residential development, as required by this policy, may be inappropriate for sites (including "Broad Location" Green Belt sites), particularly in regard to the need to address local character and context.

The proposed density does not reflect SACDC's evidence base which suggests that average densities range between 15 - 36dph with an average of 27.5dph. Moreover, there is no policy/guidance basis for such a density set out in the NPPF/NPPG and it is thus considered "unsound".

It is also advised that the requirement for higher densities to be achieved "in accordance with the desire to protect the Green Belt insofar as possible", be deleted. This is considered to be prejudicial/not supporting of the potential for Green Belt sites (such as North-East and North-West Harpenden) from coming forward through the Local Plan. The policy does not comply with the NPPF on this basis and fails the Basic Conditions.

Policy T2 – Proposals Affecting the A1081, B653 and B652

This proposed policy seeks for major development proposals that directly access on to the above roads, to make provision for measures to ease traffic congestion on these roads. Moreover, the policy states, "applicants must demonstrate that measures are incorporated that will ensure the proposals do not further inhibit the free flow of traffic on those roads".

This policy, and particularly the quoted element above, is considered overly prescriptive and is predicated on the basis of the above roads being considered to frequently experience congestion. Contrary to this, the NPPF (para 32) requires that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe and this is not considered to be reflected in the proposed policy. Whilst the roads may experience some congestion at peak times, this is certainly not considered to be approaching severe.

Notwithstanding the above, the Vectos Transport Strategy Note submitted as part of the Sept 2017 submissions demonstrates that there is sufficient capacity within the highway network (inc. B653 and B652) to accommodate the proposed development and this has regard to the potential for improved pedestrian/cycle facilities and bus services within the locality. The proposal could also include remodelling of the junction at the B653/B652 which would further improve highway capacity in the vicinity of the Site.

In light of the above, it is recommended that the policy be revised to have regard to para 32 of the NPPF.

The above suggested changes and deletions would, in our view, enable the NP to comply with Government guidance, namely Basic Conditions Nos. (i), (ii) and (iii), as set out in the NPPG.

3.0 Development Opportunity at North-East Harpenden

As set out in our previous submissions (01 Sept 2017), proposals for the Site at North-East Harpenden can deliver comprehensive mixed-use development containing c. 500-550 dwellings, including 40% affordable provision distributed throughout the Site. This scale of development would provide the critical mass for delivering many community benefits, for which numerous smaller-scale development sites may not be able to deliver.

Other facilities included as part of the proposed development scheme include:

- Land for 2-3 form of entry Primary School – potential for Sauncey Wood and Batford Nursey to be moved to improved facilities at this location;
- Provision for community centre, small shop and pharmacy;
- Potential provision for GP surgery;
- Potential for care/elderly provision;
- 14ha of public open space; and
- Sports pitches, allotments and equipped children's play facilities – the existing recreation provision (at Porters Hill Park) could be provided as part of improved facilities for the development scheme.

The above proposals would contribute towards meeting housing needs within Harpenden (and the wider District area) and would form an appropriate extension to the urban area of Town adjacent the current development edge.

Moreover, the scheme at the Site would deliver significant community benefits and accordingly can be positively addressed by SACDC to form a housing allocation in the emerging Local Plan, for which the Neighbourhood Plan should seek to support and comply with.

It is considered that the NP could promote the Site and that the Green Belt boundary would be reviewed as part of the Local Plan. This was addressed in our recent submissions and the example of the Little Aston Neighbourhood plan (2015 - Lichfield District) was considered a good example of this. As also recently addressed, the Site is "suitable", "available" and "achievable" and is therefore "deliverable" in the form of comprehensive mixed-use development and the NP should provide the appropriate support mechanism to enable it to come forward.

4.0 Conclusion

Crest supports the development of the Neighbourhood Plan for Harpenden, however, as currently drafted, the NP is not considered to meet the Basic Conditions of the NPPG, nor does it comply with the NPPF. The reasons for this stem from the identified housing needs for SACDC and the likelihood that significant levels of growth will occur at Harpenden (the second largest town in the District).

It is advised that the NP contains a "facilitating" policy, as per EG5 of the East Grinstead NP, to support/enable large scale development to come forward through the Local Plan and be subject to development control criteria, as contained in the NP. This is considered particularly important having regard to the significant uplift in housing needs for the area.

As set out in previous representations, the Site is capable of delivering much needed market and affordable housing as well as other community/retail uses. The Site is therefore "suitable", "available" and "achievable" and "deliverable" in line with para 47 of the NPPF. It is therefore proposed to form an allocation in the emerging Local Plan and for which the NP should seek to support and be in compliance with.

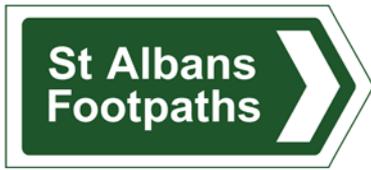
I trust these representations are of use to you and we would welcome the opportunity of meeting with you to discuss the above.

Please let me know should you have any queries and I look forward to hearing from you.

Yours faithfully



DAVID MAHER
Planning Associate



5th December 2017

Harpenden Town Council
Town Hall
Leyton Road
Harpenden
Herts
AL5 2LX

Dear Sirs,

**Harpenden Neighbourhood Plan
Regulation 14 Pre-submission draft October 2017**

The St Albans & District Footpaths Society is a charity whose main objective is to protect and preserve public rights of way, particularly footpaths, in St Albans City and surrounding areas.

We have 233 walking members who enjoy walking as part of a healthy and active sustainable lifestyle. The Society organises three walks a week around the St Albans district and further afield in the neighbouring counties. We use the many public rights of way in the area to plan our walks – including the public rights of way within Harpenden

The Society have published books of walks over the years to encourage other St Albans' residents to experience the enjoyment of walking in the countryside, including walks in the Harpenden area.

The Society is an active member of the St Albans Access Forum (SAAF) and work closely with The Ramblers to review planning matters with respect to promoting both recreational walking, as well as walking for everyday transport.

We therefore support the comments and proposals made by Mr Phil Escritt on behalf of The Ramblers Association (Hertfordshire & North Middlesex Area) in their letter to you of 5th December 2017.

We hope that the Council will be able to adopt all these proposals in its submission draft of the Harpenden Neighbourhood Plan.

Yours sincerely,

Michael Marriott
Chairman
St Albans & District Footpaths Society

Cc: Julian Thornton, Access Officer, Herts County Council Rights of Way Service
Phil Escritt, Footpaths Secretary for the St Albans District, The Ramblers Association,

Your ref: 4/26252
Our ref: DB/26252
DD: 01727 223922
E: derek.bromley@bidwells.co.uk
Date: 05/12/2017

Email philip.wright@harpenden.gov.uk

Dear Sir/Madam

REPRESENTATION - HARPENDEN NEIGHBOURHOOD PLAN REGULATION 14 – PRE-SUBMISSION DRAFT

Bidwells act on behalf of the Trustees of the G A Simons Family Trust.

There are several general points we wish to make about the Plan:

1. The NP is a missed opportunity to direct preferred locations for smaller developments in the Greenbelt. An NP can allocate development in the Greenbelt. Whilst the land remains in the Greenbelt however, any application would have to be judged against the very special circumstances test. It would be for the District Local Plan to roll the Greenbelt back at some stage in the future. The St Stephen Neighbourhood Plan Steering Group has stated that they are prepared to identify Greenbelt sites for development. It is probably correct that the NP does not seek to identify strategic development allocations in the Greenbelt as that would be more appropriate for the District-wide plan.
2. Policies which are covered by other legislation should be deleted. Examples are EDS 11, 17 and 18.
3. Policies which unnecessarily frontload the planning application requirements should be deleted, Example is EDS 1 which requires a Design Brief and ten items of matters to be covered. The Design Brief is stated to be for developments of ten or more dwellings. The government policy is to remove the difficulties for Small to Medium Enterprises, not add to the burdens. In any event, in respect of certain matters identified in the Design Brief list such as Energy Performance, these are now dealt with by the Building Regulations.
4. Many of the policies are phrased as being supportive, but do not seek to control adverse development. An example is ER 6 where there is support for local centres, then goes on 'Proposals involving the loss of a convenience shop without re-provision from the same local centre will not be supported'. Surely the purpose in such circumstances is that there would be an objection to the loss of a convenience shop without re-provision.

Policy SS1. The policy refers to land outside the built up area that development must be in compliance with the Greenbelt Exception. This policy is referred back to the built up area boundaries plan, as shown in figure 4.1, which tightly wraps around the urban area. Whilst the Plan

acknowledges that there could be Greenbelt releases in the future, the wording of the policy does not accommodate situations whereby the Greenbelt has been rolled back beyond the built area boundary. As presently worded this policy would mean, notwithstanding the District Plan had rolled back the land from the Greenbelt, that exceptional or very special circumstances would still be required as that area would be outside the built area shown in figure 4.1. It cannot be right that the policy wording requires effectively applying Greenbelt policy to land which would be outside the Greenbelt. The NP Policy would conflict with the District Plan and National Policy.

Policy ESD15 should be deleted. It is not for planning policy to determine CO2 emissions. The Government has decided to place this requirement as part of the Building Regs/Policy ESD19 – Delete “Best Practice”.

Policy H1 states that development of allocated sites should come first before other Brownfield or infill development. The Plan identifies seven proposed allocated sites. Taken literally, the policy would require all of these to come forward before any further development could take place. That cannot be correct.

Policy H3. The Strategic Housing Market Assessment undertaken by the Council was District-wide not Harpenden specific. If the NP is to seek a housing mix then it needs to produce its own evidence, not rely on a District-wide assessment which has not been the subject of an independent examination.

Policy H4. The minimum density requirement should be deleted as it is not considered that 40 dwellings per hectare would for instance, be appropriate on the edge of the urban area.

Policy H5. Any departure from the current St Albans Local Plan needs to be justified by evidence base. The NP therefore needs to produce the evidence base which supports the level of Affordable Housing and the tenure mix. It is not sufficient to rely on proposals of the District Council which has not been independently tested. In any event, the tenure mix is 60% socially rented takes no account of the Government intervention and restrictions now imposed on Social Rents. It is based on historic Social Rent levels not those provided for in a recent budget. In our discussions with local Housing Associations, they have clearly stated that Social Rent tenure is simply unviable.

In reality, the likelihood is that only HA3 will deliver any Affordable Housing in Harpenden, since HA1 and HA2 (the only allocation above 10 units) will be subject to Viability Assessments, both of which have high existing use values.

Policy H6 should be deleted. It has no relevance, since firstly it only seeks to initially advertise locally. Secondly, what does local advertising mean? Is this advertising in the local press before advertising on one of the web search engines? The policy breaks competition laws.

Policy S17 should be deleted, as this applies to developments of ten or more dwellings. It is evident that no account has been taken of the difficulties of trying to get any response from Health Authorities. To make it a requirement will only delay applications.

Whilst supporting the provision of a Neighbourhood Plan, significant editing is required.

Yours faithfully



Derek Bromley
Partner

From: Philip Waters <Philwaters7@hotmail.com>

Sent: Sunday, December 3, 2017 10:19:34 AM

To: Carl Cheevers

Cc: Bob Fletcher

Subject: Response of the Harpenden Society to the Draft of the Neighbourhood Plan

Dear Carl,

The Society has, of course, considered the draft Neighbourhood Plan which is now out for consultation. As you know the Society has engaged fully with the process for developing the Neighbourhood Plan. The Plan has formed part of our regular information exchange meetings between the Society and the Council. It has been the centrepiece of one of our Public meetings, there has been regular discussion and reference to the Plan in the society's newsletter and a number of committee members in their own capacity serve as members of the Plan themed Working Groups.

The Society's Committee discussed the Pre-submission draft at its meeting on Monday 20 November 2017. Overall the Society is impressed by the manner in which the report has come together showing an encouraging loyalty to Harpenden and its environs and found it to be clearly presented in terms of vision and spatial strategy and the themed areas of employment and retail, environment and sustainable design, housing, social infrastructure and community facilities and transport and movement.

We were particularly pleased to see how the spatial strategy has been expressed in Policy SS1 and the identification of five infrastructure zones for the town in Policy SS2. To have the key considerations of need of the various parts of the town set out clearly within policy must in our view facilitate planning decisions which help protect the character of our community. Similarly the policies associated with each one of the five themed areas are clear and must help set a sensible framework for future development in the town.

Whilst individual members of the Society will, of course, have slightly different views on emphasis and phraseology and will have submitted those views in their own right through the normal consultation mechanisms, the Society overall is pleased to support the draft being taken forward to the District Council and thence to referendum. The Society will use its good offices to campaign for the adoption of the Plan in the referendum.

The Society believes that the Plan once in place will provide a good structure on which future planning decisions in the town can be taken subject to the caveat, of course, of what might happen in relation to the Strategic local Plan.

Philip Waters Chairman Harpenden Society

Thank you for consulting us on this.

HGT are disappointed that there is no mention of historic designed landscapes within the documentation for the Harpenden Local Plan, unlike many other local neighbourhood plans where the consideration of the local historic environment (your section 11 in the draft baseline report) does include this. HGT have prepared a list of Locally Important Parks & Gardens of historic interest in St Albans DC which SADC have, and which includes sites within Harpenden. We would suggest that these are included along with listed buildings (we note that there is no mention of locally important buildings, only nationally designated, another omission), conservation areas and SAM.

Policies to conserve and enhance these, as laid out in Section 12 of the NPPF, should also be added

Hertfordshire Gardens Trust

6 December 2017

g:\jobs\legal & general\harpenden\neighbourhood plan\letter neighbourhood plan
reps 061217.docx



Mr Philip Wright
Project Officer
Harpenden Neighbourhood Plan
Harpenden Town Hall
Harpenden
AL5 2LX

Andrew Fido
E: afido@savills.com
DL: +44 (0) 1202 856835

Wessex House
Wimborne BH21 1PB
T: +44 (0) 1202 856 800
F: +44 (0) 1202 856 801
savills.com

By email to: Philip.Wright@harpenden.gov.uk

Dear Mr Wright

Introduction

These representations, comprising this covering letter and the completed and enclosed questionnaire, are submitted by Savills on behalf of L&G Capital, in response to the Harpenden Neighbourhood Plan (HNP) Regulation 14 Pre-Submission Consultation. L&G Capital welcomes the direction of the draft HNP which represents positive progress.

Background

L&G Capital are the owners of land in north Harpenden and beyond, including land between Cooters End Lane and Thrales End Lane (North of Luton Road) identified in the emerging St Albans Local Plan and the related evidence base as a sustainable location for a Green Belt release for a residential led development. L&G is working in collaboration with CEG who are the promoters of the land to the south-east of Cooters End Lane.

The combined CEG/L&G landholding forms an area known as the 'North West Harpenden Broad Location' in the emerging St Albans Local Plan and is within the HNP area.

Both L&G and CEG have worked closely with St Albans City and District Council through the Local Plan process, and have also undertaken early and active engagement with the HNP Group, including a presentation to the Harpenden Neighbourhood Plan Steering Group on 28 July 2017.

On 25 October 2017 Harpenden Town Council wrote to confirm the HNP Steering Group had changed approach such that the HNP no longer sought to allocate any sites in the Green Belt for new strategic housing, employment or other growth. This was in response to the change in policy context / revised timetable for the emerging St Albans development plan for the wider area. We note that this is clarified in NP consultation draft at para 3.3-3.4:

'There are, however, limitations as to what may be achieved through the Harpenden Neighbourhood Plan. These limitations include:

-Release of land from the Green Belt. This can only be done through a review of the Green Belt boundaries by a local planning authority (i.e. St Albans City and District Council) in its Local Plan, as established by Paragraph 83 of the NPPF. Therefore, this Neighbourhood Plan does not seek to allocate any sites in the Green Belt for new strategic housing, employment or other growth.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.
Registered office: 33 Margaret Street, London, W1G 0JD



-Identification of targets for growth. Targets for growth in the SLP were based upon a suite of evidence base documents prepared for St Albans City and District Council, including housing market assessments and employment land need assessments. As the SLP did not proceed to examination, the evidence used and the resulting targets were not tested for their accuracy.'

In light of this change in circumstances L&G and CEG continue to liaise closely with SACDC with regard to the emerging SACDC Local Plan, and look forward to consulting with Harpenden Town Council at an appropriate point in the future.

At this stage in the process the following representations are therefore not site specific, and are directed at the general policies set out in the NP given that para 3.5 of the NP states (inter alia):

' it (i.e. the HNP) also establishes policies that will shape all development in the area, including in the Green Belt. This means any new development in the Green Belt approved at a higher level will be subject to the policies we agree as a community, helping to reduce impact'.

Please do not hesitate to contact us if you require any further information.

Yours sincerely



Andrew Fido
Associate Director

cc: **Sophie Groves, LGC**
Enc: **Completed questionnaire for questions 1,2,6,8,11,12,14,24,29,30,34,51**

Representations/Response to HNP Questions

1. Do you agree with the Policy SS1 - The Spatial Strategy?

Disagree

Whilst we agree with the general thrust of the policy, the provision of a test of 'why the proposal cannot be located within the built up area boundary of Harpenden' is not appropriate for any Strategic Allocations made through the emerging St Albans Local Plan. The policy could be improved by expressly acknowledging the emerging development plan or providing a reference back to the explanatory HNP para 3.3-3.4.

2. Do you agree with the Policy SS2 - Infrastructure Zones?

Agree

We note the L&G land (NW Harpenden Broad Location) is within the north west zone in which significant developments are required by the criteria in this policy to demonstrate: how impact of new development on the A1081 and local roads can be mitigated, adequate provision for appropriate education facilities, sufficient convenience shopping and sufficient recreational space.

In that context we note that the site is located close to an existing local centre (as defined by HNP policy ER4), and can confirm that the matters of highways, education and recreational issues will be addressed as appropriate. However, as a potential Strategic Allocation, we anticipate such matters to be fully addressed directly through site specific allocations made by the emerging SACDC Local Plan.

3. Do you agree with the Policy ER1 - Supporting Harpenden's Economy?

No comment

4. Do you agree with the Policy ER2 - Designated Employment Locations?

No comment

5. Do you agree with the Policy ER3 - Rothamsted Research?

No comment

6. Do you agree with the Policy ER4 - Designated Retail Areas?

Agree

We note and support the designation of DRA3 North Harpenden Local Centre and DRA 4 Kinsbourne Green Local Centre (both small parades of shops) as local centres. We note that these are within walking distance of the L&G/CEG land at NW Harpenden, and confirm compliance with HNP Policy SS2 - Infrastructure Zones through the confirmation of access to convenience facilities.

7. Do you agree with the Policy ER5 - Supporting Harpenden Town Centre Economy?

No comment

8. Do you agree with the Policy ER6 - Supporting Local Centres?

Agree

We support the protection of the retail facilities at DRA3 North Harpenden Local Centre and DRA 4 Kinsbourne Green Local Centre (both small parades of shops) provided through this policy.

9. Do you agree with the Policy ER7 - Employment Use Above Shops?

No comment

10. Do you agree with the Policy ER8 - Adaptable, Innovative and Up to Date Retail and

No comment

11. Do you agree with the Policy ESD1 - Design Strategy?

Disagree

Whilst in support of the general thrust and objective of this policy we are concerned at the use of subjective terminology such as 'must be visually appealing' and 'a low carbon place'. Additionally, in terms of 'protecting against the loss of significant harm to landscape value' it would be beneficial if the policy recognised the exception of Strategic Allocations made through the emerging St Albans Local Plan, for example through a reference back to the explanatory HNP para 3.3-3.4.

Similarly, the requirement for a Design Brief is likely to duplicate the requirements of the emerging St Albans Local Plan and should therefore be set out in more flexible terms, including reference to the overarching role of SACDC. We are also concerned that the level of detail required by policy ESD1 goes beyond the requirements of a Design Brief and should potentially be more limited although we recognise that para 6.8 explains that 'Policy ESD1 connects with a number of the other policies in this chapter and is largely related to the communication of the design rather than the requirements of design, which are mostly detailed in the remaining policies of this chapter'.

In terms of water efficiency standards, this is a requirement under building regulations and is not therefore necessary to repeat in planning policy requirements.

12. Do you agree with the Policy ESD2 - Local Character and Heritage?

Disagree

Whilst in support of the general thrust and objective of this policy and in support of a requirement for the provision of a heritage statement to support planning applications, we are concerned that the policy potentially goes beyond the NPPF para 134 and 135 requirements by setting a test of 'no negative impact'.

13. Do you agree with the Policy ESD3 - Shopfronts?

No comment

14. Do you agree with the Policy ESD4 - Streets as Social Spaces that are Pleasant to Be In?

Disagree

Whilst in support of the general thrust and objective of this policy we are concerned at the reference of making streets 'suitable for children's play' and the implementation of a 20 mph maximum speed limit. Whilst there will be locations within strategic housing allocations where these objectives can be achieved, it will not be appropriate for all routes, for example primary routes which also need to accommodate public transport provision such as buses.

15. Do you agree with the Policy ESD5 - New Car Parking Design?

No comment

16. Do you agree with the Policy ESD6 - Refuse and Recycling?

No comment

17. Do you agree with the Policy ESD7 - Green and Open Spaces and Areas of Ecological and Landscape Value?

No comment

18. Do you agree with the Policy ESD8 - Key Views?

No comment

19. Do you agree with the following Policy ESD9 - Views in New Developments?

No comment

20. Do you agree with the Policy ESD10 - Access to the Natural Environment?

No comment

21. Do you agree with the Policy ESD11 - Allotments?

No comment

22. Do you agree with the Policy ESD12 - Biodiversity?

No comment

23. Do you agree with the Policy ESD13 - Trees and Hedges?

No comment

24. Do you agree with the Policy ESD14 - Sustainability and Energy Efficiency?

Disagree

Whilst in support of the general thrust and objective of this policy we are concerned that the requirements for major development are too specific and should rather be set out as aspirations rather than requirements.

25. Do you agree with the policy ESD15 - Carbon Dioxide Emissions?

No comment

26. Do you agree with the Policy ESD16 - Community Energy Initiatives?

No comment

27. Do you agree with Policy ESD17 - Flood Risk?

No comment

28. Do you agree with the Policy ESD18 - Water Conservation?

No comment

29. Do you agree with the Policy ESD19 - Pollution?

Disagree

Whilst in support of the general thrust and objective of this policy we are concerned that the policy is not sufficiently precise, potentially restricting any 'air pollution' rather than requiring that air pollution should not exceed recognised levels and thresholds of specific pollutants as set out in relevant guidance.

30. Do you agree with Policy H1 - Housing Strategy?

Strongly disagree

Whilst we agree with the general thrust of the policy, we do not agree with a requirement (para 7.8) that the HNP housing allocations within the built up area of Harpenden are exhausted before delivery of new housing in the Green Belt.

The policy must be revised to both expressly acknowledge the key role of Strategic Allocations for Green Belt housing made through the emerging St Albans Local Plan and that they are appropriate for early delivery. This could be achieved through a reference back to the explanatory HNP para 3.3-3.4.

31. Do you agree with Policy H2 - Housing Renewal?

No comment

32. Do you agree with Policy H3 – Dwelling type and size?

No comment

33. Do you agree with Policy H4 - Residential Density?

No comment

34. Do you agree with Policy H5 - Affordable Housing?

Disagree

Whilst we agree with the general thrust of the policy, it should make reference to affordable rent/starter homes in addition to social rent and intermediate housing, and should provide sufficient flexibility.

35. Do you agree with Policy H6 - Advertisement of Market Housing?

No comment

36. Do you agree with Policy H7 - Lifetime Homes?

No comment

37. Do you agree with Policy H8 - Specialist Accommodation?

No comment

38. Do you agree with Policy H9 - Higher Density Development?

No comment

39. Do you agree with Policy H10 - Housing Site Allocations?

No comment

40. Do you agree with Policy H11 - Private Amenity Space for Residential Development?

No comment

41. Do you agree with Policy SI1 - School Development?

No comment

42. Do you agree with the Policy SI2 - Protection of Community Uses?

No comment

43. Do you agree with Policy SI3 - Venues Community Use?

No comment

44. Do you agree with Policy SI4 - Provision of Sports and Leisure Facilities?

No comment

45. Do you agree with Policy SI5 - Provision of Arts and Cultural Facilities?

No comment

46. Do you agree with Policy SI6 - New Sports Centre and Cultural Venue?

No comment

47. Do you agree with Policy SI7 - Accessible GP Practices?

No comment

48. Do you agree with Policy SI8 - Harpenden Memorial Hospital?

No comment

49. Do you agree with Policy SI9 Visitor Accommodation including Hotels?

No comment

50. Do you agree with Policy T1 - Transport Assessments?

No comment

51. Do you agree with Policy T2 - Proposals Affecting the A1081, B653 and B652?

Disagree

Whilst we agree with the general thrust of the policy - that major development proposals accessing the A1081 that involve an increase in traffic will be required to make provision for and contribute to appropriate measures to ease traffic congestion - we do not agree with the detailed wording including the requirement to 'demonstrate that measures are incorporated that will ensure the proposals do not further inhibit the free flow of traffic'. Our concerns also include that the wording is potentially too vague and imprecise and is too focused on 'the free flow of vehicular traffic'.

We suggest that the wording more closely reflects the requirement of NPPF para 32 namely that mitigation options should include the full range of sustainable transport modes, and that mitigation is required when there is a 'severe' highway impact.

52. Do you agree with Policy T3 - Travel Plans?

No comment

53. Do you agree with Policy T4 School Travel Plans?

No comment

54. Do you agree with Policy T5 - Road Layouts?

No comment

55. Do you agree with Policy T6 - Improvements to the Sustainable Transport Network?

No comment

56. Do you agree with Policy T7 - Integrated Pedestrian Network?

No comment

57. Do you agree with Policy T8 - Bus Stop Layouts?

No comment

58. Do you agree with Policy T9 - Harpenden to St Albans Cycle Route?

Agree

Whilst we agree a Harpenden to St Albans cycle route would be desirable, it should be acknowledged that an 'on road' option can be attractive option to bicycle commuters that should not be ruled out.

59. Do you agree with Policy T10 - Parking in Harpenden Town Centre?

No comment

60. Do you agree with Policy T11 - Residential Parking Standards?

No comment

61. Do you agree with Policy T12 - Access for All?

No comment

62. Do you have any further comments on the draft Neighbourhood Plan?

Please see covering letter.

Your ref: Reg 14 Consultation
Our ref:
DD: 01727 223906
E: Richard.butler@bidwells.co.uk
Date: 5th December 2017

Harpenden Neighbourhood Plan Steering Group
By Email

Dear Sir / Madam

REPRESENTATIONS TO HARPENDEN DRAFT NEIGHBOURHOOD PLAN (REG 14) ON BEHALF OF LAWES AGRICULTURAL TRUST

Introduction

These representations are provided by Bidwells on behalf of Lawes Agricultural Trust (LAT). LAT have a landowner interest in substantial areas of land within and around Harpenden, most obviously, the Rothamsted Research Campus and associated land to the west.

Both LAT and Rothamsted Research would like to place on record its thanks to the Neighbourhood Plan Steering Group and Harpenden Town Council as a whole for their hard work in getting the Plan to this stage.

LAT have submitted sites to the previous Call for Sites and will comment on these where appropriate. Matters relating to land at Townsend Lane are being addressed by Hill Residential on behalf of LAT; however, the comments made are fully endorsed by LAT.

Review of Draft Neighbourhood Plan

SS1 – Spatial Strategy

The Neighbourhood Plan chooses not to identify land that could come out of the Green Belt and be allocated for development. Whilst LAT understand the position taken; as St Albans City and District Council (SACDC) are not in a position to direct to Harpenden the level of growth or development needs that the NP has plan for (at this time); however, the NP is an opportunity for the pattern of growth and location of development to be controlled at the local level. It is inevitable that the release of Green Belt land will be required to meet the needs of St Albans district, some of which will need to be at Harpenden.

Policy SS1 requires development to focus on the built-up area. While this is a sensible policy direction, the policy also requires development outside of the Built-Up area to be supported with very special circumstances; however, in the case that SACDC makes changes to the Green Belt boundary through the Local Plan process, there would be a situation where land is outside of the Built-Up area, but also not within Green Belt land, and would have an allocation in the Local Plan. Therefore, to avoid a contradiction between the two plans; HNP policy SS1 should have the ability to acknowledge allocated sites within the SACDC Plan, and not seek very special circumstances where land is outside of the Urban-Area but also not within Green Belt (following Adoption of Local Plan). Employment and Retail

ER3 – Rothamsted Research

The policy acknowledges support for the expansion of Rothamsted Research; LAT strongly support this and would like to ensure there is appropriate scope within the area defined on the plan (Figure 3) to allow for spatial expansion of the facilities in the long term.

The designation of the area as a major development site in the Green Belt is considered appropriate, wherein specific forms of development should be listed as suitable and very special circumstances not required to be advanced in support of development normally not appropriate in the Green Belt. This position should be confirmed in the NP.

Environmental and Sustainable Design

ESD1 – Design Strategy

LAT supports the efforts of the NP to ensure new development is of high quality and appropriate in terms of setting. Objection is noted to the term 'visually appealing' as this term is very subjective and will lead to difficulty in assessing developments against this policy.

Similarly, the term 'low carbon' should be specifically defined within the policy or removed. The requirements for low carbon should be presented in a separate policy for sustainability and not detailed within a design policy, as part of ESD14.

The requirement for all major developments to be submitted with a Design Brief is onerous and places significant burden on developers preparing planning applications. Policies should not seek to front load the planning system, and requirements should be proportionate and reasonable.

ESD14 – Sustainability and Energy Efficiency

The policy requires development to aim to be carbon neutral; LAT object to a requirement for carbon neutral and suggest the policy should be led by national planning policy; unless specific justification is provided to why a greater requirement than national policy is set. Moreover, such matters are to be addressed through Building Regulations and planning policy should not repeat matters dealt with under separate legislation.

Housing

H1 – Housing Strategy

Policy H1 states that allocated sites should be delivered before other brownfield or infill developments. There is no justification for preventing appropriate redevelopment of brownfield sites, or development at infill sites; LAT object to the principle of restricting sustainable development, and suggest the restriction should be removed.

The Housing Strategy should also consider appropriate identification and removal of land from Green Belt and allocation for housing to meet the needs of the area.

H3 - Housing Mix

LAT query the requirement for development in Harpenden to comply with the housing requirements identified in the district wide housing market assessment. Housing mix required through development in Harpenden should be adjusted to meet the specific needs of Harpenden.

H4 – Residential Density

Policy H4 sets a minimum density of 40dph. LAT support the intention to support the efficient use of land in new developments; however, such a density may not be appropriate in all locations. Considerations should be given to setting a minimum density subject to the location, and also for allocations out of the built-up areas that may come forward through the SACDC Local Plan.

H6 –Advertising of Market Housing

Policy H6 requires market housing to be advertised locally first. There are concerns with this policy as it is not clear on the justification for such a requirement, or how the policy would be enforced. There are particular concerns in how this policy may relate to internet based property advertisement.

Should the policy be retained; a specific timeframe is needed to be provided as, ‘first instance’ is not clear, and neither is the term ‘locally’.

Conclusion

LAT support Harpenden Town Council in the creation of their Neighbourhood Plan, however, respectfully ask that the points raised above are taken into account in the review of the Draft Neighbourhood Plan.

Yours sincerely



Richard Butler
Associate

Consultancy and Valuation Team
01727 519140

Our ref: P-17-RS HNP reps
5th December 2017

RUMBALL
sedgwick
Chartered Surveyors
Property Specialists

Philip Wright
Projects Officer- Harpenden Neighbourhood Plan
Harpenden Town Council
Town Hall
Leyton Road, Harpenden
Hertfordshire AL5 2LX

By email to: Philip.Wright@harpenden.gov.uk

Dear Mr Wright

**DRAFT HARPENDEN NEIGHBOURHOOD PLAN (HNP) - REGULATION 14 PRE-SUBMISSION
OCTOBER 2017**

1. INTRODUCTION

1.1. As you may know Rumball Sedgwick is instructed by the City & District of St Albans Council (SADC) in respect of its proposed new Leisure and Cultural Centres at Rothamsted Park. However, these representations are being submitted on our own account, rather than on behalf of SADC and are based upon our extensive experience of the planning and development process, including planning policy representations.

2. THE NEW COMMUNITY FACILITIES

2.1. The SADC proposals at Rothamsted Park are complex, being a series of inter-linked projects which aim to improve the provision of community facilities within Harpenden. It is essential for the future of the Town that the emerging policy document does *"everything it can"* (see paragraph 19 of the NPPF) to support these projects and not promote policies that may deter, or unduly fetter, the delivery of this infrastructure.

3. GENERAL COMMENT

3.1. **Positive growth** - The presumption in favour of sustainable development is at the heart of the NPPF and on the matter of policy formulation it states that for plan-making:

- *"local planning authorities should positively seek opportunities to meet the development needs of their area"; and*



Watford Office ■
Abbotts House
198 Lower High St
Watford
Herts WD17 2FF

St Albans Office ■
58 St Peters Street
St Albans
Herts
AL1 3HG

Mayfair Office ■
Cashel House
15 Thayer Street
London
W1V 3JT

Rumball Sedgwick Limited

Registered in England no. 8975990

Registered office address:

Egale 1, 80 St Albans Road, Watford, Herts, WD17 1DL

www.rumballsedgwick.co.uk ■

2/cont

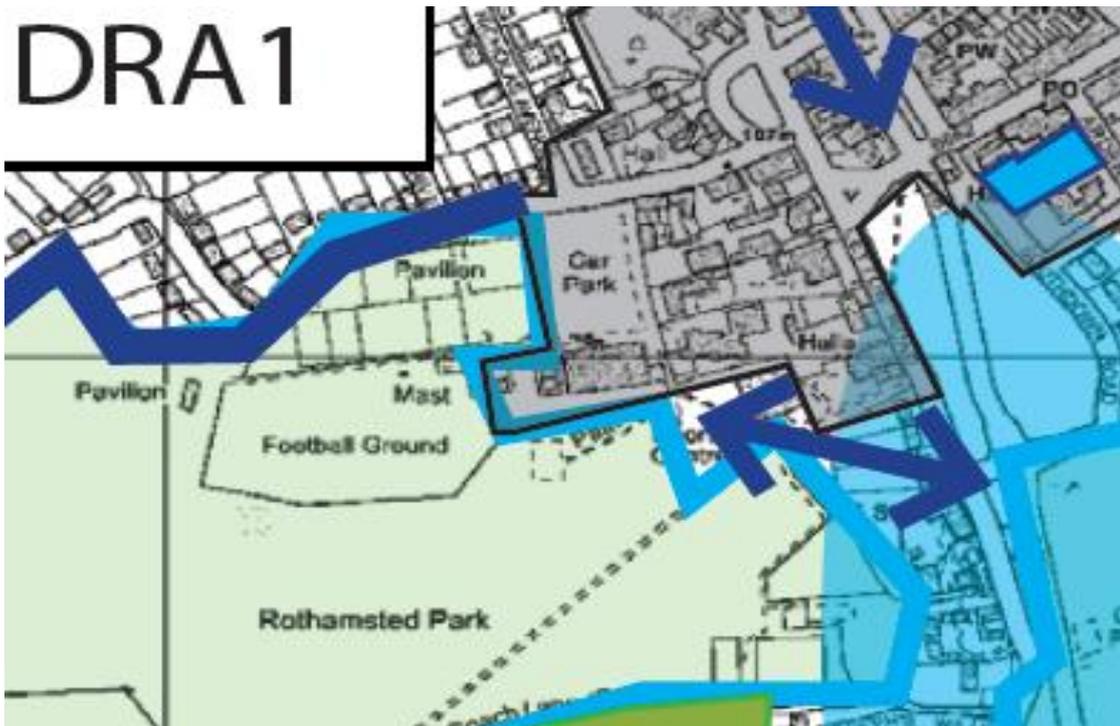
- *“Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change”* (paragraph 14).
- 3.2. The NPPF continues: *“All plans should be based on and reflect the presumption in favour of sustainable development”* (paragraph 15) and should follow a set of core planning principles set out in paragraph 17. According to paragraph 17 plans should be: *“succinct.....setting out a positive vision for the future of the area”* and provide a practical framework *“within which decisions on planning applications can be made with a high degree of predictability and efficiency”* and *“support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs”*.
- 3.3. The Government is clear that there should be a positive attitude to *“proactively drive and support sustainable economic development”* and to *“respond positively to wider opportunities for growth”*. Plans should *“take account of market signals”* and the needs of business communities.

4. THE POLICIES

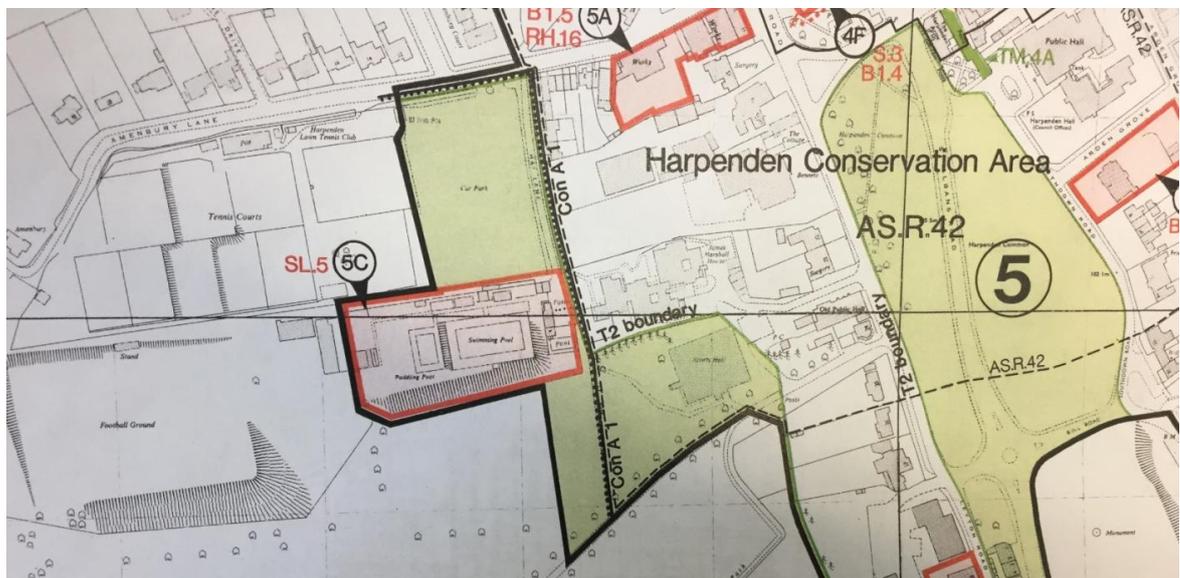
- 4.1. **General Comment** - In particular, there is no need for most of the policy in the draft HNP, as it only duplicates, or repeats those matters already covered in the NPPF/NPPG, the adopted St Albans District Local Plan Review (SADLPR), or dealt with by other legislation (such as Building Control). Examples of policies which should be struck out include all of those in the ‘Environment & Sustainable Design’ Chapter, none of which add anything Harpenden-specific to policy not already found elsewhere (if needed, there are policies about shopfronts and tree protection in the SADLPR), and the ‘Transport & Movement’ Chapter, which seeks to involve itself in County Council matters. Other policy, such as ER5 (*“Supporting Harpenden Town Centre Economy”*), seeks to impose control over matters which are pre-granted by the General Permitted Development Order and can also be deleted as being completely otiose.
- 4.2. Furthermore, there is a danger that incorporating compliance with sustainability standards into a policy means that the document becomes very quickly out of date, as legislation or technology moves on.

3/cont

- 4.3. **Proposals Map** – the Green Belt boundary is not shown correctly upon the draft HNP’s Proposals Map (or on page 20 of the draft HNP document). Bizarrely, the Amenbury Lane Car Park remains in the Green Belt (notwithstanding it performing no recognised Green Belt function), as do the substantial structures of the existing Swimming Pool and Sports Hall. The outdated Green Belt boundaries also mean that the SADC’ proposals to enhance Harpenden’s community services necessitate referral to the Secretary of State.



Above: Extract from the Draft Harpenden Neighbourhood Plan Proposals Map
Below: Extract from the St Albans District Plan Review Harpenden Town Centre Inset



4/cont

- 4.4. Whilst it is appreciated that the HNP is not proposing any changes to the Green Belt boundary, to be consistent, its 'Town Centre' designation (which does include the Green Belt Amenbury Lane Car Park and Swimming Pool sites), should also include the existing Sports Hall.
- 4.5. Finally, as a minor aside it would be less confusing if the HNP's Proposals Map adopted a different colour scheme for the 'viewing zones', as opposed to 'housing allocations'.

5. CONCLUDING COMMENTS

- 5.1. We shall be happy to discuss these comments with you, or your consultants, if that would be helpful.
- 5.2. Please continue to keep us informed of progress on all matters concerning the emerging Neighbourhood Plan.

Yours sincerely



Michael Fearn BA (Hons) DipTP(Dist) MRTPI
Consultant

On Behalf of **RUMBALL SEDGWICK**



Tel: 01727 519149
Mob: 07779 140266
www.rumballsedgwick.co.uk

58 St Peter's Street, St Albans, Hertfordshire, AL1 3HG



Harpenden Town Council
Town Hall
Leyton Road
Harpenden
Herts
AL5 2LX

6 December 2017

Dear Sirs,

**Harpenden Neighbourhood Plan
Regulation 14 Pre-submission draft October 2017**

I am writing on behalf of St Albans Cycle Campaign (STACC) to comment on the above. The objectives of STACC are:

- To encourage cycle usage in the St Albans District
- To promote cycling to play a more significant role in a balanced transport system for the St Albans District
- To support, assist and influence to local authorities responsible for managing the transport system in the St Albans District.

Although not the primary focus of STACC, we also strongly support other forms of sustainable transport, in particular the encouragement of walking for short routine journeys especially to links with public transport as part of a balanced system which reduces reliance on motor vehicles and the attendant pollution, noise and safety issues which arise. We have seen the response by Phil Escritt on behalf of the Ramblers Association and we support the comments made in that submission.

Our approach is to work co-operatively with the key bodies such as the local authorities whilst lobbying for better funding and provision for cyclists with particular regard to cycle paths & routes, lower speed limits & cycle-parking.

We welcome the establishment of the Neighbourhood Plan as it will set out clear guidelines for future developments and we are pleased to note that the need for good cycling provision

is highlighted in several sections of the document. However we believe that the Plan should go further to give greater emphasis to:

- The need for improved cycle routes to schools, retail areas and the train station
- A planning requirement for new developments to include better cycling storage provision to encourage cycle usage
- Discouraging of the use of motor vehicles for routine short journeys.

We have a number of specific comments on the draft policies as follows:

Policy SS2 –Infrastructure Zones

In each of the outer Zones, add

“Demonstrate how the proposals will encourage cycle use in particular for journeys to the town centre”

Policy ER3 – Rothamsted Research

Any expansion or redevelopment should ensure that existing walking and cycle routes are not degraded

Policy ER8 - Retail and Employment centres

The infrasture requirements should include the provision of safe cycling and walking routes and safe cycle parking.

Policy S11 - Schools development

Proposals for new schools should demonstrate safe cycling access and adequate cycle parking

Policy T5 - Road Layouts

It should be a requirement that new road layouts take into account the needs of cyclists as well as motorists

Policy T10 – Parking

The provision of a multi-storey car park at the station will exacerbate the already severe congestion in the area surrounding the station and High Street. Access to the station is already difficult (and potentially unsafe) by foot or cycle especially to the eastern (London bound) approach at peak times where cyclists and pedestrians are in conflict with motorists on a narrow and dark access. A separate pedestrian and cycle access to the station at

Aysgarth Close would relieve the pressure and make access more convenient and safer for commuters approaching the station from the Southdown area.

Policy T11 – Residential Parking standards

This should include the provision of secure, sheltered cycling storage at the rate of 1 space per bedroom

Yours faithfully

Keith Barton (on behalf of STACC)



Harpenden Neighbourhood Plan Representation

Project:	Harpenden Neighbourhood Plan	Date:	6 December 2017
Subject:	Regulation 14 Draft Harpenden Neighbourhood Plan	Reference:	239102

Copy of representations made to Harpenden Neighbourhood Plan (submitted 6 December 2017)

Representations submitted via the Harpenden Town Council website online survey response form, on behalf of Hill Residential, the selected development partner by the Lawes Agricultural Trust.

4. Do you agree with the Policy ER1 – Supporting Harpenden’s Economy?

- Strongly Agree
- **Agree**
- Neither agree or disagree
- Disagree
- Strongly disagree

Comment:

As selected development partner by the Lawes Agricultural Trust (the Trust), Hill Residential ('Hill') support this draft Neighbourhood Plan policy which seeks to support a high quality offer through improvements to existing employment areas including new and redevelopment opportunities.

It is acknowledged that the NP does not allocate sites within the Green Belt. However, as submitted in the response to Call for Sites, the Trust and Hill has identified a suitable site with development potential at Land at Townsend Lane and Hill will be pursuing its allocation through the Local Plan process.

Located on the edge of the Rothamsted estate, Land at Townsend Lane has been identified by the Trust as suitable for development given its limited ability to function for research purposes. The site is capable of assisting the Trust to provide funding towards Rothamsted Research, ensuring facilities continue to attract and retain research students in the globally competitive environment, in turn supporting Harpenden's economy.

5. Do you agree with the Policy ER2 – Designated Employment Locations?

- Strongly Agree
- **Agree**
- Neither agree or disagree
- Disagree
- Strongly disagree

Comment:

Protection of the employment area referenced as DEL1 Rothamsted Research is supported.



6. Do you agree with the Policy ER3 – Rothamstead Research?

- **Strongly Agree**
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

Comment:

The Neighbourhood Plan's support for the redevelopment or expansion of Rothamsted Research to meet Rothamsted's long-term needs and to accommodate firms carrying out complementary knowledge-based research and development activities it strongly supported.

The provision for the Neighbourhood Plan to support cases of very special circumstances for development which would not normally be considered appropriate in the Green Belt is welcomed. As currently worded, it could be read that any application would need to be made by Rothamsted Research. It may be that other parties could make an application within the Rothamsted estate for development which would support the work of Rothamsted Research and therefore we suggest that the policy is re-worded to read:

'This Neighbourhood Plan supports appropriate redevelopment or expansion of Rothamsted Research to meet Rothamsted's long-term needs and to accommodate firms carrying out complementary knowledge-based research and development activities. Subject to an appropriate proposal, the Neighbourhood Plan would support a very special circumstances case made at Rothamsted Research for development not normally considered appropriate in the Green Belt.'

11. Do you agree with the Policy ESD1 – Design Strategy?

- Strongly Agree
- **Agree**
- Neither agree or disagree
- Disagree
- Strongly disagree

Comment:

The approach proposed by the Neighbourhood Plan towards the design is broadly supported. Notwithstanding this however, the necessity to prepare a Design Brief to establish the principles of development sites, prior to the submission of any major development application is queried. In the event of a full application, a proposal will be fully worked up in detail. Pre-application process will further assist the process to ensure the preparation accords with the LP and NP aims. Whilst a Design Brief has merit, it should not be a mandatory requirement for all major applications (e.g. 10+ units).

30. Do you agree with the Policy H1 – Housing Strategy?

- Strongly Agree
- Agree

- Neither agree or disagree
- **Disagree**
- Strongly disagree



Comment:

The NP policy proposes that the ability of the Built up Area of Harpenden to provide appropriate new housing is exhausted prior to delivery of new housing in the Green Belt.

Whilst recognising that the NP does not seek to allocate sites within the Green Belt, we do not consider it appropriate for the Neighbourhood Plan to require that sites in the Built up Area are exhausted first. This process has potential to delay the delivery of appropriate housing sites, and the testing process to evidence that all areas are exhausted would be imprecise and subjective. St Albans has a median house price to median gross annual ratio of 16.76. If the local plan determines that land needs to be released from the Green Belt to meet needs, delivery of Affordable housing should not be delayed until all urban land has been built on. If land supply is constrained it is inevitable that prices will rise and affordability will worsen.

32. Do you agree with the Policy H3 – Dwelling Size and Type?

- Strongly Agree
- **Agree**
- Neither agree or disagree
- Disagree
- Strongly disagree

Comment:

The requirement for major residential developments to submit a Dwelling Mix Strategy as part of the Design and Access Statement is supported.

33. Do you agree with the Policy H4 – Residential Density?

- Strongly Agree
- Agree
- **Neither agree or disagree**
- Disagree
- Strongly disagree

Comment:

The requirement for residential development to have a minimum density of 40 dwellings per hectare is noted and the desire to maximise the potential of sites is welcomed and encouraged to boost the number of residential unit numbers on a site.

Given the nature of existing neighbourhoods in Harpenden, with its varied densities, the policy will need to be applied with care to ensure new development balances the need to make efficient use of sites with the need to respect the character of existing areas and the relationship of the town with the countryside/Green Belt. The density of residential

developments should not be subject to a 'one size fits all' approach and individual sites should be considered on a site by site basis, in line with the site's context and surrounding area.



35. Do you agree with Policy H6 - Advertisement of Market Housing?

- Strongly Agree
- Agree
- Neither agree or disagree
- Disagree
- **Strongly disagree**

The proposed policy seeks for market housing to be advertised locally in the first instance. Whilst this is the ambition of the NP, the supporting text recognises that there is no mechanism to support this. Consequently, the policy could not be applied effectively and there would be limited measures to enforce. There is no definition of 'locally' or 'first instance' leaving both terms open to interpretation. Notwithstanding lack of definition, it is not considered reasonable or appropriate to restrict the selling or purchasing of new homes with the method. The policy should be deleted from the NP.

39. Do you agree with the Policy H10 – Housing Site Allocations?

- Strongly Agree
- Agree
- **Neither agree or disagree**
- Disagree
- Strongly disagree

Comment:

It is acknowledged that Neighbourhood Plans are unable to amend the Green Belt boundaries and any amendments will need to wait for the next review of the Local Plan.

We consider that Harpenden is a highly sustainable location and that it has a key role to play in meeting housing needs and supporting the local economy and as a result there is likely to be a number of sites released from the Green Belt and allocated through the next local plan. The withdrawn local plan proposed a number of strategic sites and proposed that small sites (delivering fewer than 30 dwellings) be identified through the neighbourhood plan process. Given the nature of Harpenden we consider that there are sites on the edge of Harpenden in the range of 30 to c75 homes which could accommodate new homes in a sensitive manner and could be delivered early in the plan period, making a meaningful contribution to land supply and delivering needed affordable and market housing.

The Site Assessment Summary Paper, published as a supporting document, explains that the draft NP originally considered Green Belt sites due to an ambition to potentially align with the (then draft) St Albans City and District Council Detailed Local Plan (DLP), considering potential small development sites to release from the Green Belt in that document. However, following the failure of the DLP to proceed to examination, it was determined that this approach was no longer viable due to the likely time delay between the NP being adopted, which would result in a lag between sites being identified and released for allocation, during which circumstances may change. It explains that the approach was discussed with SADC and Locality, with both understanding the approach. In total, 29 sites were removed from the site assessment

process, assessments were not finalised for these sites and there is no further reference to Green Belt sites in the Site Assessment Summary Paper.



We understand, and are sympathetic to, the situation in which the Neighbourhood Plan finds itself. We suggest that consideration is given to including an assessment of sites in the Green Belt and the NP setting out preferred Green Belt sites, subject to SADC's ongoing review of the Green Belt boundaries. These do not necessarily need to be included in policies, but could form an appendix.

This would avoid the NP not expressing a view of the matter and would enable the Town Council's views to be a material consideration in future decisions.

Any other comment:

It is acknowledged that, unlike a development plan document, the examination of a Neighbourhood Plan does not include any requirement to consider whether the plan is 'sound' and so the requirement of soundness in paragraph 182 of the NPPF do not apply. However, prior to the Neighbourhood Plan referendum, the draft plan will need to meet all seven basic conditions, as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004.

While the Neighbourhood Plan is at an early stage, the plan does not at present refer to all seven basic conditions. These basic conditions include:

- a) Having regard to national policies and advice contained in guidance issued by the SoS it is appropriate to make the Neighbourhood Plan.
- b) Having special regard to the desirability of preserving any listed building or its setting or any feature of special architectural or historic interest that it possesses.
- c) Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area.
- d) The making of the order or neighbourhood plan contributed to the achievement of sustainable development.
- e) The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority.
- f) The making of the neighbourhood plan does not breach and is otherwise compatible with EU obligations
- g) Prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for the other.

At this stage of the Neighbourhood Plan's production, whilst some of the above are covered by the proposed policies, there appears to be no direct confirmation or cross-referencing evidencing that the seven conditions set out above have been met. We consider it would be helpful if Neighbourhood Plan Forum were to set out how the basic conditions have been taken into consideration and demonstrate how the plan complies with the Schedule 4B of the Town and Country Planning Act 1990.



Hertfordshire & North Middlesex Area

The Ramblers' Association is a registered charity (England & Wales no 1093577) and a company limited by guarantee, registered in England & Wales (no 4458492). Reg. office: 2nd floor, Camelford House, 87-90 Albert Embankment, London SE1 7TW

Harpenden Town Council
Town Hall
Leyton Road
Harpenden
Herts
AL5 2LX

5 December 2017

Dear Sirs,

Harpenden Neighbourhood Plan Regulation 14 Pre-submission draft October 2017

The Ramblers is a registered charity and company limited by guarantee. Its objects are to promote the health, recreation and environmental benefits of walking, especially by protecting and extending the network of public paths and access in town and countryside, and by safeguarding the countryside and open spaces so that walkers can enjoy their tranquillity and beauty. Our Hertfordshire and North Middlesex Area has about 3000 members.

Our goal includes promoting walking for the purposes of everyday transport as well as recreation and the two often overlap. Encouraging people to walk for short routine journeys, including walking to reach public transport links, benefits the environment by keeping cars off the roads, and benefits individuals and the nation by keeping people fitter. Direct off-road paths encourage more people to walk, providing the incentives of convenience and the delight of not walking alongside road traffic, with its attendant noise, fumes and potential danger.

For these things, and for the public in general, good walking infrastructure is important. Hence our ambition to ensure that everywhere there are paths which encourage people to walk, that the right infrastructure is in place, and that resources are provided so that everyone can enjoy the outdoors on foot.

Starting from this point of view we have the following comments on the pre-submission draft of the Harpenden Neighbourhood Plan.

We strongly support those elements of this plan which reflect these aims. However we believe that the plan needs to be strengthened in some places by giving greater emphasis to;

- The need for sustainable transport links between facilities such as schools, shops and leisure amenities in Harpenden and the surrounding villages which use and depend on these facilities.
- The need to ensure that there is good access between any significant new development and the existing rights of way network and quiet rural lanes.
- The need to ensure that where existing quiet lanes and rural rights of way are degraded by urban developments there are adequate replacements.

This leads us to make the following concrete proposals for changes to the plan

Policy SS2 – Infrastructure Zones

In each of the four outer zones, to the sentences “Demonstrate sufficient recreational space within a close proximity to new development” add the phrase “and effective access to the surrounding countryside”

Policy ER3 – Rothamsted Research

The Rothamsted grounds are crossed by several well used public rights of way. It is important to ensure that if these routes are degraded by any future development that suitable replacements are provided.

Policy ESD10 – Access to the Natural Environment.

The phrase “where practical” significantly weakens this policy and gives a developer an easy way out. We recommend that it should be deleted. The sentence would then read “Major development proposals should create new public rights of way and cycle paths”. The word “should” makes it clear that this is not a mandatory requirement but is a very strong incentive for a developer to comply.

Social Infrastructure and Community Facilities Objectives SIO4

Add “access to the countryside” to the list of facilities which are needed. It is a very important source of health and wellbeing for very many people.

Transport and Movement Objectives TM03

To the sentence “Create motor vehicle free travel plans for getting to and from all Harpenden schools from all areas of Harpenden” add “and surrounding villages”

Policy T9 – Harpenden to St Albans Cycle Routes

This policy is too limited. It is equally important to provide safe sustainable transport routes to nearby villages such as Redbourn, Wheathampstead and Kimpton.

We appreciate that this neighbourhood plan must be restricted to the area comprising the Harpenden Town and Rural parishes although we note that in places the plan does refer to “surrounding villages” e.g. in SIO2. But many of the sustainable transport and countryside access issues cross the boundaries into adjacent parishes. We recommend that this limitation should be overcome by reference to the Herts County Council’s Rights of Way Improvement Plan (ROWIP).

The Rights of Way Improvement Plan (ROWIP)

Under the Countryside and Rights of Way Act (CROW) every Highway Authority has the statutory duty to prepare and maintain a ROWIP. In Hertfordshire it is a daughter document of the Local Transport Plan (LTP) and the county council has just formally adopted a new edition of its ROWIP covering the period to 2027/28. It comprises an overarching policy document and a map based database of all the proposals. The new plan and examples of the maps may be found in the rights of way section of the Hertsdirect website. While the policy document is only updated periodically the database is regarded as a living document which is updated as new opportunities arise.

The St Albans Access Forum (SAAF) comprises representatives from the Ramblers, the St Albans and District Footpaths Society, the St Albans Cycling Campaign and the British Horse Society plus officers from HCC Rights of Way Service and the Landscape Architects office of the district council. For several years this forum has been assisting HCC in a systematic review of desirable improvements to rights of way in each parish in the district

starting with those in the south where the development pressure is most severe. We always make it clear that our proposals are to provide mitigation if a development is approved. They do not imply approval or endorsement of any development.

We have completed our work for Sandridge, Colney Heath, London Colney, St Stephens and St Michaels and are close to completing our work in Redbourn. Our proposals have been included in the ROWIP database and those for the first four parishes in this list have been presented to the appropriate parish councils where they have been very well received. The councils have provided suggestions for additions and improvements and at least two, St Stephens and Sandridge, have formally endorsed them as parish policy. Sandridge is including a direct reference to the ROWIP in its draft neighbourhood plan. We can point to several valuable new routes which have only been created as a result of being included in the ROWIP.

We have now started to work on proposals for Harpenden Town and Rural parishes beginning with the areas where development proposals seem most likely. We use the criteria shown in Attachment 1 as the basis for our proposals and have shown preliminary examples of our ideas to Councillor Linacre, Philip Wright and Julie Rees. We would be very happy to have further discussions if this would be appropriate and in due course present all our proposals more formally.

The Publication Draft St Albans Strategic Local Plan (SLP) supported implementation of the ROWIP in Policy SLP25 - Transport Strategy and in Policy SLP27 – Green Infrastructure. In the consultation draft of Detailed Local Plan (DLP), Policy DLP24 Green Infrastructure, Countryside, Landscape and Trees stated that *“Opportunities for new definitive links between existing rights of way and greater access to the countryside for all users will be encouraged particularly where identified in the Rights of Way Improvement Plan”*. The Infrastructure Delivery Plan dated June 2016 in paragraph 10.19 states that *“The implementation of the ROWIP is key to the development of a healthy multifunctional green infrastructure network”*.

Unfortunately these plans have had to be abandoned so Neighbourhood Plans in the district cannot rely on these references to the ROWIP. We therefore propose that the following explicit policy should be added at an appropriate place in the Harpenden Neighbourhood Plan.

Proposals for new definitive rights of way which improve the opportunities for sustainable transport or which give greater access to the countryside for all users will be supported particularly where they are identified in the Hertfordshire County Council’s Rights of Way Improvement Plan.

We hope that the Council will be able to adopt all these proposals in its submission draft of the Harpenden Neighbourhood Plan.

Yours sincerely,

Phil Escritt
Ramblers Association,
Footpaths Secretary for the St Albans District

Copies to: Julian Thornton, Access Officer, Herts County Council Rights of Way Service

Attachment 1

Rights of Way Improvement Plans Resulting from Housing Developments

Where there are new housing developments new paths will be needed to:

- Mitigate the effects of the developments on the safety and amenity of existing routes
- Encourage sustainable transport on foot, by cycle and by wheel chair users.
- Support the health and wellbeing of both the residents of the new houses and the general public by providing accessible leisure routes for walkers, cyclists and equestrians including those with disabilities.

Mitigation measures which may be necessary include:

- Multi-user off-carriageway routes alongside narrow lanes which will carry additional traffic
- Alternative rural routes to replace those affected by urban development
- Safe crossing points where routes for pedestrians, cyclists or horse riders cross busy roads

For Sustainable Transport direct all weather routes will be needed for pedestrians and cyclists, including those with disabilities, between:

- Houses and local shops and major retail centres
- Houses and local places of employment
- Houses and railway stations
- Houses and schools and colleges

For their health and wellbeing people must be able to get access to and enjoyment from the countryside without needing to use their cars. New developments will need permeable boundaries leading to:

- A network of routes of varying lengths suitable for equestrians, cyclists and pedestrians including dog walkers, families and those with disabilities
- Connections to longer distance routes for equestrians, cyclists and walkers

To protect the rural economy equestrian establishments need connections to the public bridleway network without the need to ride through new urban developments or along busy roads.

Since new housing developments will be permanent these new routes need to be made equally permanent by dedication as Public Rights of Way

St Albans Access Forum

January 2017

	Email response received
1	<p>Many thanks for your note. I have completed the survey, but I am not surprised that you are having to ask for buy in from the general public. I am familiar with IT and only work part time, and still struggled to complete the 60 odd questions in a meaningful and timely manner, particularly as the neighbourhood plan has multiple internal inconsistencies, and doesn't appear to have a clear theme running through the document. There is a clear paradox in wishing for more pedestrian and bicycle access to the town centre ,with less pollution and improved health for residents, with wanting the option of attracting more cars by multi-layering car parks, something never promoted or discussed until the plan was produced. The neighbourhood plan also emphasises the protection of the green belt ,but has very little about how Harpenden wishes to provide affordable housing for key workers in the future. There is a lot of comment about ensuring that all new developments have the necessary road infrastructure, but nothing about how this protects residents from vehicle pollution.</p> <p>I agree with you that the plan is an extremely important document, I do hope that you receive a sufficiently representative sample of comments</p>
2	<p>I have not been able to get to any of the sessions for the Draft Plan but have a few comments to make.</p> <p>Re the development on the Pan Autos site and possible Jewsons site.</p> <p>Point 1. It is very important that any development on either of these sites are no more than 2 storeys high so as to be inkeeping with the surrounding houses.</p> <p>Point 2. There absolutely must be sufficient parking for all residents and visitors of the units that are to be built. Southdown is an extremely busy area and there is no room for any more parking on the roads around.</p> <p>Point 3. The figures used for the number of units are out of date, they are from the withdrawn plan from Jarvis and should be completely re assessed so as to be credible.</p> <p>It is right that new units/houses are built, I am not against it at all. But just building as many units as possible on the area available is not the way to enhance a neighbourhood. It needs to be integrated into the surrounding area and thought given to facilities for the new residents.</p> <p>A holistic approach is always the best as then there is less resistance from the existing community.</p>
3	<p>I have no further comments on the draft plan – I think it is an excellent document which fairly sets out the issues.</p>
4	<p>Local plan</p> <p>This is all well and good and well intentioned.</p> <p>However the bull in the china shop is the number of potential housing sites which will be imposed on the town .</p> <p>I am not against this in principle but-</p> <p>1- large housing tracts should only be permitted if accompanied by significant infrastructure e g shopping centres, surgeries, dentists, community halls, schools plus roads and transport links. The present rules ,which if I understand the situation, is that these only need to be considered for 500 units and more. We need a major structure plan before any new housing e g bypass round the town, dedicated bus , cycle routes , upgrade of parking around the town especially at the station etc</p>

	<p>2- the housing impositions (16000 units by 2036 for the district ?) will never be build by then- the system is incapable of upping the rate of build-the planning process- lack of skilled operatives and management, the supply industry will not gear up quickly enough.</p> <p>I was in the development business for 30 years (CEO of large development groups and i know what I am talking about) .</p> <p>I was always of the view , while on the developer's side of the table, that the public sector viewed every thing piecemeal- no grand plans into which everything would fit- time and time again as soon as a new development was up and running you could see the stresses it place on existing infrastructure etc</p>
5	<p>I have now studied the Neighbourhood Plan line by line and I am most impressed. I note that there is provision for specialised housing which can include homes for the learning disabled, which was my chief concern. All other items are wholly desirable and I hope that they will guide District and the people of Harpenden for many years to come.</p> <p>The proof of the pudding will be in the eating!</p>
6	<p>Having read the draft Neighbourhood Plan, and attended a presentation evening and drop-in session, may I say how much I appreciate all the hard work that has gone into producing such a generally well drafted document that will help to preserve Harpenden as a desirable place to live despite the pressures for development.</p> <p>Having said that, I did mention at the presentation evening and drop in session that I do have concerns about the policy relating to Rothamsted Research, ER3. I understood from the discussions I had that my concerns were accepted as well-founded and that the policy required amendment to take account of them. I hope you will not mind my writing to make my concerns clear.</p> <p>I am sure that everyone in Harpenden greatly values the presence of such a prestigious institution as Rothamsted in the town and wishes it continued success. However, the defence of the Green Belt is an important objective, as the Neighbourhood Plan makes clear. Whilst, therefore, one can understand the wish to support Rothamsted, the Plan nevertheless needs to exercise great caution about giving any sort of anticipatory green light to any party, however worthy, to infringe upon the Green Belt. In that context, my concerns about policy ER3 are twofold.</p> <p>First, there is an inconsistency in the drafting on page 28 as between the policy itself and the supporting narrative (para. 5.6). The policy says the Plan "would support ..." whereas the narrative says that the Plan "would consider supporting ...". As you will appreciate, there is a world of difference between the two. The former effectively makes a firm commitment, the latter merely indicates a willingness to consider support. The second was the wording used by the lady who gave the presentation on this section at the presentation evening. It does not seem to meet to be appropriate to make any sort of firm commitment. Whether to give support should be considered in the context of an actual planning application in which the applicant would set out the "very special circumstances" it claimed applied. It is not appropriate in the Neighbourhood Plan to effectively anticipate that the mere fact that Rothamsted were the applicant would mean the "very special circumstances" test would be passed. The applicant must show that the "very special circumstances" outweigh the harm done to the Green Belt. A proper judgement on these matters cannot be made in advance of an actual application. The policy should therefore be amended to reflect the more cautious wording of paragraph 5.6.</p> <p>Secondly, the wording of the policy is very broad. I understand it is intended to relate to circumstances where Rothamsted wishes to put up buildings in relation to its work and to create employment. As it stands, it could be taken also to apply to Rothamsted wishing to sell off part of</p>

	<p>its land for housing development to raise money - as indeed it has ambitions to do. This second scenario raises quite different, wider considerations from the first. Since the policy is, I was told, meant to apply only to the first scenario, its drafting should be amended to narrow its application and accurately reflect the intention.</p> <p>I hope you will find these comments helpful.</p>
7	<p>I have over the weekend for the first time seen the draft neighbourhood plan and have the following comments:</p> <ol style="list-style-type: none"> 1. I propose that the following site is added to H10 - Land to rear of 40 Springfield Crescent - 2/3 houses. 2. I note that S17 refers to 'health authorities' and whereas as you are aware NHS Health Authorities no longer exist, I assume that you are using this as a more generic term/short cut, to avoid saying 'NHS England' or 'Local Clinical Commissioning Group.' <p>I would be grateful if you can acknowledge and let me know whether this is agreed please</p>
8	<p>Further to your email below I shall indeed respond to the consultation. However, I would like to add some further input in view of the desperately disappointing document that is currently out for review. It is no improvement on the last. My necessarily limited contact with other residents is that it is clear that Harpenden and for that matter, St Albans only want to get something out that can in some way prevent the consequences of the utterly disastrous Local Plan Saga and the risk that because of that, Harpenden might end up with an imposed Neighbourhood Plan. Accordingly few are currently interested to go to the trouble of even responding. Nothing will be done and it's not worth trying. That is a terrible indictment of the management of this process – and of the consultants who have been employed too.</p> <p>I share many of these concerns and as in my last letter to you I would like to reiterate the need for the NP to be in two parts with only the planning related aspects being passed for inspector review but with other key needs for Harpenden being properly considered in a second part which is also put out to the referendum.</p> <p>Nowhere in the present document – and despite many alerting you and St Albans to it – are the real issues in Harpenden discussed let alone solutions planned to cope with them. It is now clear from legal advice that just as Exeter has discovered, a private Act of Parliament can easily remedy the appalling problem of commuter and airport street parking yet where is it? We see nothing of this anyone. Why? Beric Reid has been thinking about these problems for ages yet we hear nothing from him either.</p> <p>Mr Wright, Harpenden has had these problems for a decade or more. Who is going to get a grip? Are there really no persons with this sort of knowledge or experience in the Town, District or County Councils? You must now be aware that the town is beginning to mobilise and I suspect that unless the outcome of this latest round of polling gets no where then a real problem will emerge with the Inspector being involved.</p> <p>Might I suggest that the next NP includes proposals for correction of all of the following as an initial step?</p> <ol style="list-style-type: none"> 1. Those who commute from outside Harpenden and park in the streets to obtain free commuter parking and with it a cheaper season ticket should be prevented from doing so without any solution being imposed that effectively requires the residents rather than the transgressors having to pay or be inconvenienced. An Act of Parliament akin to that taken out by Exeter would solve this problem. The same applies to those who park in Harpenden's streets and thereafter using the bus as a way of getting cheap airport parking.

	<p>2. Recent press comments (Just two seen this week from the Centre for Future Studies and from the John Timpson column) show that elderly shoppers are being excluded from the High Street and their inability to park near shops makes this even worse.</p> <p>3. The concept of a 'fundamental need' to reduce traffic is faulted as is the laughable one that 'building more roads will simply bring more traffic' – it does of course but that's only because the limit has not been reached. Past planning has failed to keep pace with population growth.</p> <p>4. We have to recognise that cars are NOT bad. They are necessary and need to be accommodated. Trying to apply controls on cars as we have historically simply forces the demise of the High Street and sends residents to shopping areas where parking is easy. The town suffers and we lose a thriving and attractive community. We need far more easy parking in and around towns like Harpenden with easy car and shopping access in a variety of ways.</p> <p>5. With more houses being proposed and built we need a substantial increase in the infrastructure and not the present attitude of 'none at all'.</p> <p>6. Why does Harpenden (and St Albans) persist in restricting and disadvantaging those with disabilities? Unless you are fit and strong or have a Blue Badge those with restricted mobility – and that includes many over the age of 50 – simply cannot shop in the town without the help of a car. Then when they get to the town the car parks (with the exception of Waitrose's) are far too far away from the shops. A complete rethink of needed parking in the town needs to be conducted and implemented.</p> <p>7. Why does St Albans in its planning regulations allow developers to assume that one car per household is a valid planning assumption? Clearly it can be sensible but most certainly not always. Worse, if a planning application made on such an unchallenged assumption is approved then almost in every case in Harpenden will we see further street parking. The present system is wrongly cast so that the only control is for residents to be left to object to any such proposal when more correctly this one car option per household for some new dwellings should one where the developer should be required to justify in the application.</p>
9	<p>1.1 N/C 1.2 N/C 1.3 N/C 1.4 N/C 1.5 N/C 1.6 N/C 1.7 N/C 1.8 N/C 1.9 N/C 1.10 N/C 1.11 N/C 1.12 N/C</p> <p>1.13 N/C 1.14 N/C 1.15 N/C 1.16 N/C End</p> <p>2.1 N/C 2.2 N/C 2.3 N/C 2.4 N/C 2.5 N/C 2.6 N/C 2.7 N/C 2.8 N/C 2.9 N/C 2.10 Thatched cottage and pub in Batford 2.11 Batford was part of Wheathampstead, the Wheathampstead/Batford/Pickford Mills and River Lea being key features/doomsday book 2.12 Batford and ??? lowest in SADC 2.13 This is only a proposal and is not an item that should be regarded as a definite. HCC data conclusively demonstrates that East Harpenden is not the appropriate location and any other pre-determination of published data is premature speculation. Similarly, the potential housing site in NE Harpenden was not high enough on the SADC preference list to warrant being included as a possibility in thus NP. Any other conclusion is speculation and inappropriate/not material to planning or this NP. This NE site is something that it appears HTC has 'agreed' not to contest through private meetings that do not appear in the public domain. This makes any statement that it is a potential site also inadmissible as a material consideration, especially given the current climate. Otherwise, it will look as if the council is colluding with developers by some back door arrangement, which is also inappropriate and inadmissible as a material planning consideration. These developments are also precisely the 'pepperpot development' that the SADC planning portfolio holder declared were completely unsuitable (in a recent public meeting in Harpenden). End</p> <p>3.1 N/C 3.2 N/C 3.3 N/C 3.4 N/C 3.5 N/C End</p>

4.1 N/C 4.2 N/C 4.3 N/C 4.4 Requirement also must be to demonstrate that there are no other GB sites (that would arguably be less harmful or more sustainable in terms of traffic, environmental or other material spatial planning considerations) 4.5 N/C 4.6 N/C 4.7 N/C 4.8 N/C 4.9 (3) SADC and other planning sources state that it is possible for the NP to specify what percentage of housing should be for Harpenden residents (a separate discussion from 'affordable' calculation). End

SS1: Is this wording consistent with the NPPF? There is no statement about the balance of potential development around the town – any potential GB development should potentially be balanced N/S/E/W or more appropriately be in the areas where there is most expansion space and potential for planned sensible spatial planning/infrastructure expansion. – South and West/North West. Alternative sites also must include alternative means to achieve an outcome. At present, the S/W is least impacted by inappropriate developments to date, but also therefore lends itself to appropriate development opportunities that do not result in over-cramped or dangerous infrastructure. In particular, urban planning with a wider/flatter area is far more sustainable than cramped hillside development. End

SS2: N/C End

5.1 N/C 5.2 N/C 5.3 N/C 5.4 see next section 5.5 Boundary around Batford Mill Industrial Estate is incorrect. Superfine Tapes building, for example, is an excellent location for the development of micro and incubator businesses. A large-scale development here was recently thwarted by the landlord declining to provide a formal lease, but just wanting a handshake arrangement. This cost a space opportunity to some 20 micro businesses that were looking to move out of their homes/garages/summer houses. That kind of space is essential incubator space, and that location in Batford would be an ideal location for wide-ranging reasons. 5.6 See also ER03 with good potential for secondary and post 16 education facilities 5.7 N/C 5.8 N/C 5.9 N/C 5.10 N/C 5.11 N/C 5.12 N/C

5.13 N/C 5.14 N/C End

ER01 See point 5.5 the mix at the moment is jeopardised by landlord attempting to charge high/uneconomical rentals that mean spaces are kept empty potentially to 'show' that there is no demand and that use conversion is 'ok'. There are clear examples of this in Batford. ER02 similar comments to ER01 but Coldharbour is more of a congestion bottle neck than other locations because of nearby feeder roads. Batford Mill, including the entire boundary with superfine buildings is in an excellent location for community based micro/incubator businesses and more and needs to have the same Article 4 protections as Coldharbour. ER03 An excellent location for a specialist 6th form or college that could work closely with struggling local 6th forms and provide a broader, fairer, more equalities based post 16 options in Harpenden than exist currently. ER04 Is the Batford shopping area accurately defined? Hard to see what the blue star means ER05 A significant difficulty in Harpenden is the crown estate ownership or large tracts of land, and the high rents charged that can deter a broad mix of retail occupants. Some of these proposals should also apply to the neighbourhood retail centres ER06 this does not go far enough to support Batford which is extremely isolated and has had its centre and facilities either planned out by housing conversions or objected to because of distance to town. The economic and transport isolation in Batford is often overlooked and retail/commercial opportunities need active encouragement. ER07 should apply to Batford and KG also ER08 N/C End

6.1 N/C 6.2 not just Harpenden rural – it's all around. 6.3 and in Batford 6.4 N/C 6.5 N/C 6.6 N/C 6.7 N/C 6.8 N/C 6.9 N/C 6.10 N/C 6.11 ??? How will they be determined? Who will do that? When? Surely should be in the NP? 6.12 (see 6.11) 6.13 N/C 6.14 N/C 6.15 N/C 6.16 N/C 6.17 N/C 6.18 N/C 6.19 N/C 6.20 N/C 6.21 N/C 6.22 N/C 6.23 N/C 6.24 N/C 6.25 N/C 6.26 N/C 6.27 N/C 6.28 N/C 6.29 N/C 6.30 N/C End

ED01 N/C ED02 N/C ED03 N/C ED04 N/C ED05 N/C ED06 N/C ED07 N/C ED08 N/C ED09 N/C End

ESD01 N/C ESD02 N/C ESD03 N/C ESD04 N/C ESD05 N/C ESD06 N/C ESD07 N/C ESD08 arrows at the top and bottom of Batford springs are missing – it just needs a better collection of arrows, like Kinsbourne Green! There are wide areas views in several directions, regardless of wither trees have leaves of not. ESD09 N/C ESD10 N/C ESD11 N/C ESD12 N/C ESD13 N/C ESD14 N/C ESD15 N/C ESD16 N/C ESD17 N/C ESD18 N/C ESD19 N/C End

7.1 N/C 7.2 N/C 7.3 N/C 4 N/C 7.5 N/C 7.6 N/C 7.7 N/C 7.8 N/C 7.9 – there are? Are we targeting individual owners or something, or encouraging developers to wander round and seek to make a planning as opposed to natural or real life case?? Less aggressive is there may 7.10 N/C 7.11 N/C 7.12 N/C 7.13 see note that we can specify a percentage to be available to local people in stronger terms than is stated here 7.14 N/C 7.15 N/C 7.16 N/C 7.18 Hang on, it was only 'yesterday' that local councillors were shouty about people accurately reporting as part of the leisure redevelopment discussions that the public halls would be an enabling development. How is that going to be managed? How specified? 7.19 N/C 7.20 How is that going to be managed? How specified? End

H01 N/C H02 developed in a way that prevents extension to 3, 4 or more bed properties H03 N/C H04 N/C H05 N/C End

H1 N/C H2 should be sanctions against land/building owners who allow property to degrade or attempt to charge such high prices as to encourage the vacancy or degradation. H3 N/C H4 N/C H5 N/C H6 see earlier note about houses for local people H7 N/C H8 N/C H9 N/C H10 N/C H11 N/C End

8.1 N/C 8.2 school places is not currently a rational discussion, given the evidence of shrinking roles and potential surpluses. 8.3 N/C 8.4 N/C 8.5 school place allocations and school priority areas are specified by county and now by academies. While many schools are academies, it is likely to be difficult for them to sensibly maintain separate admissions criteria without inciting really problems. Since Harpenden cannot control school place availability or allocations, it is hard to do anything other than watch County. To date they have been largely unsuccessful in policing school residence address based admissions, given the wealth factor and known problems with short term rentals that gain places prior to moving out of area. Another route is to live close to a school and then move once sibling admission gained to secondary. It is possible to see the effect this has on Harpenden schools from in-school census data. While some may say that it is miniscule, if it takes perhaps 100 places per year that is a significant proportion of existing school places. There should not be a need to build more places just to compensate for poor admissions management. 8.6 This sweeping assessment of HCC data is inaccurate, superficial and should be updated to include current forecasts – the emotional 'threats' of school place shortages are not demonstrated by HCC school figures. Even including 'potential' for future SLP developments, those are likely to lead to additional school places in the West of the education area that will remove the need for additional school builds in Harpenden. Emotional language from some areas of the population is not in fact borne out by school data. HTC should test and test again any and all material planning considerations. Statements about transport and travel are also unenforceable here - County has a history of not delivering infrastructure/bus transport requirements and placing schools far from populations in need is known to cause additional traffic and infrastructure overload. 8.7 N/C 8.8 N/C 8.9 N/C 8.10 Still not enough in the new proposal to support local arts and cultural organisations and activities – space design doesn't look like it will work that well ... ? 8.11 N/C 8.12 N/C 8.13 N/C 8.14 health provision in Harpenden needs to be far more distributed with more local centre surgeries and drop-ins to ensure equitable and non-discriminatory access to medical facilities. That in turn will support healthier lifestyles. End

SI01 This might be an aspiration but is not within Harpenden's gift in any form – HCC has a poor history of forecasting or maintaining schools that meet local needs and it could at any time change boundary, allocation or transport or other policies. The government and HCC could change school policy 'at any time'. This must include a proper spatial planning approach that includes testing all

	<p>material planning issues – to help develop a balanced spread of school locations so that particular populations are not over or under-served. Distance-based school place allocation and the current 6th form policies of existing school are clear examples of discriminatory place access to residents in and around Harpenden. SI02 N/C SI03 N/C ES04 N/C SI05 N/C SI06 N/C SI07 N/C SI08 N/C SI09 N/C End</p> <p>SI1 Key to these is detailed understanding of material and spatial planning issues, population trends and more. Monolithic schools are not sustainable or flexible and blanket reliance on HCC data has proven to be unsuccessful in the past. Locations must be sustainable, as specified by ESFA and aim to reduce traffic rather than add to infrastructure. This means that schools should be as close as possible to populations in need and therefor spread out 'evenly' around residential areas. SI2 N/C SI3 it's not just design, its location, effects on other existing facilities and communities and more. This needs some qualification. See 8.8 SI4 Hang on – is this saying another green belt development somewhere? How about repurposing the Harpenden Halls building ... SI5 N/C SI6 N/C SI7 N/C SI8 N/C SI9 N/C End</p> <p>9.1 N/C 9.2 N/C 9.3 N/C 9.4 see later sections on parking, lack of which is damaging Harpenden in far too many ways. 9.5 N/C 9.6 N/C 9.7 N/C 9.8 N/C 9.9 N/C 9.10 N/C 9.11 N/C 9.12 So closely tied to adequate parking, getting airport and other additional traffic off the LLR, and safe walking/bike routes. Some of that may be very difficult given the naturally hilly nature of parts of town and the loss of local infrastructure, health facilities or other 'essentials'.</p> <p>9.13 N/C 9.14 N/C 9.15 N/C 9.16 N/C 9.17 preferential parking for tiny cars and other novel incentives can only be a good thing. End</p> <p>TM01 Good luck with that, most of these roads are severely constrained by existing 'build' or features. A significant improvement would be if Luton Airport could join up to the A1M 'horizontally' in the same way as it has to the M1 – that would take a lot of traffic off the B roads because the motorways would be the quickest volume airport route. TM02 N/C TM03 Only viable if schools are placed very close to needy populations ... TM04 See TM03 as one example, and provide adequate in-town parking as another. Enforce the LLR lorry ban would have a significant improvement TM05 N/C TM06 N/C TM07 N/C End</p> <p>T1 N/C T2 Good luck with that – do we get sky hooks? T3 N/C T4 see other comments elsewhere – schools in the wrong places and HCC bus transport policies will all render this one very difficult T5 N/C T6 N/C T7 N/C T8 N/C T9 N/C T10 Hatfield and Hemel are good examples of effective but well-hidden car parking that would work in the conservation areas. Multiple tiers and adequate parking combined with short term encouragement incentive parking etc. will a) reduce congestion/pollution as people no longer need to circle b) reduce costs as people will be encouraged and able to pay for very short term parking c) increase the health of the town and shopping areas because people will be more inclined to visit d) potentially take cars off main routes as people will no longer be forced to travel to St Albans, Luton or Hatfield to catch trains. e) reduce lost time amongst residents and increase good will and shopping opportunities T11 N/C T12 N/C End</p>
10	<p>SS2 – Infrastructure Zones</p> <p>The requirements as regards the provision of infrastructure to support new development are very weak and likely to provide little protection, despite clear community concerns, recorded in paragraph 4.5, about infrastructure.</p> <p>For example:</p> <p><input type="checkbox"/>The policy requirement in respect of traffic that developers demonstrate how they will mitigate the impact of new development on particular named roads fails to recognise that the traffic impact</p>

of new development can be experienced at locations some distance from the sites, as well as in adjacent roads.

These policies require only that it will be demonstrated how traffic impact will be "mitigated". They do not state how far the impact must be mitigated or what residual traffic impact will be considered acceptable. "Mitigation" only means "reduction": on the basis of these policies a developer could claim it has demonstrated "mitigation" by putting in place measures which slightly reduce the traffic impact of the development from the unmitigated level, despite the fact that the impact is still severe.

Developers should also be required to demonstrate how they will significantly enhance the likelihood of journeys being made on foot, by bicycle, or by public transport, for example by the provision of new footpaths and safe (preferably off-road) cycle routes.

These policies do not address all forms of infrastructure (the list in NPPF para. 162 might assist). There is no mention, for example, of water and wastewater infrastructure, or of health and social care infrastructure, all of which are under strain in Harpenden even with the existing population.

Why is parking not an issue for all Infrastructure Zones, rather than just the SE and Town Centre?

Chapter 6 – Environment and Sustainable Design

There is no reference to the fact that parts of the NP area fall within an existing Landscape Conservation Area, meaning that they are recognised as having particularly high-quality landscape: see figure taken from SADC Local Plan Review

In addition, the Landscape Conservation Area to the north of Harpenden abuts an area designated by Central Bedfordshire as of "Outstanding Landscape Value". These areas deserve to be particularly recognised and given strong protection.

ESD1 – Design Strategy

(v) is too weak. Developers should be expected to demonstrate protection against any harm to ecological or landscape value, not just significant harm.

ESD7 – Green and Open Spaces and Areas of Ecological and Landscape Value

Again, too weak – protection is needed against all harm to ecological or landscape value, not just significant harm.

ESD13 – Trees and Hedges

This policy does not adequately reflect the need for protection of ancient woodlands, which are vitally important habitats for a variety of species of plants and animals. There are a number of ancient woodlands within the NP area, including Ambrose and Westfield Woods adjacent to the NW Harpenden Broad Location. The policy as drafted suggests that the only concern is to prevent "losing" or "damaging" individual trees, but this does not go far enough: the whole ecology and habitat of these precious woodlands needs to be conserved and protected from harm.

HO1 – "Those that grow up in Harpenden should have the capability to live here should they wish to"

This hopelessly ambiguous, unrealistic and dangerous.

It is ambiguous because the "capability" to live in any place in market housing is dependent on a person's own resources, which the NP cannot possibly influence.

It is unrealistic because there is no prospect of those who grow up in Harpenden always having the ability to live in Harpenden if they wish to. Our housing market is strongly driven by demand from outside the area, particularly London, with London buyers, with the benefit of equity from their previous homes and higher London salaries, inevitably able to outbid locals. Therefore whether or not new market housing is built for locals, it is mostly bought by outsiders. Since the NP can do nothing to stop these market forces, it is completely unrealistic to think its policies can meet this objective.

It is dangerous because developers will use this objective to overburden Harpenden with development. They will say that new development cannot be turned down because Harpenden has not yet reached the (impossible) stage where all people growing up here can afford a home here.

A more sensible objective would be

"That the housing needs of those living in, or who have grown up in, Harpenden will be prioritised over meeting demand from people who have no connection with Harpenden."

H1 – Housing Strategy

This policy and the commentary which follows it betray a failure to understand the difference between a "housing needs assessment" and a housing target figure.

For the purpose of its Local Plan, SADC will need to carry out an objective assessment of its housing "need" (really often demand). But it may set a housing target which is greater than or less than that "need" figure. In particular, because St Albans District is heavily constrained by Green Belt, it is permitted to set a housing target which is lower than the housing needs assessment figure.

	<p>If policy H1 is adopted in this form, it will have the consequence that Harpenden may be obliged in the future to take more housing than SADC considers is appropriate for the District to bear, because the NP will have committed it to meeting the housing "need" figure rather than the housing "target" figure.</p> <p>H4 – Residential density</p> <p>It is imperative that this policy makes clear that the suggested minimum density of 40 dwellings per hectare is a net density figure (i.e. it involves taking 60% of a site, the remaining 40% being for infrastructure, and applying 40 dwellings per hectare to that 60%). As drafted it implies a gross density of 40 dph.</p> <p>The policy as drafted also only allows "the applicant" to demonstrate that a density of 40 dph would have a negative impact. Why shouldn't local residents be able to object to an overly-dense development which would have a negative impact?</p> <p>Typos:</p> <p>Para. 1.1 – The policies in the NP seek to ensure...that new development...is of benefit to Harpenden..."</p> <p>Policy T2 – "Major development proposals...that provide for direct access onto..."</p>
11	<p>With regard to your message, I was away from home, hence the late reply.</p> <p>I looked at the documents on line, but did not find it easy to get a grasp of what it all is going to mean in terms of an understandable Plan. I say this as someone who for at least twelve years of my career was responsible for strategic planning for a FTSE 100 company. The plans produced had to be clear and to the point, and have clear objectives capable of being quantified and monitored. At this stage the Neighbourhood Plan is a long way short of such clarity. Indeed my feeling throughout has been that the main thrust has been a combination of wishful thinking and "motherhood and apple pie", and that is still the case. Personally I do not see how anyone could approve the Plan as it stands without a clear statement of goals, together with proposals for action and an relevant analysis of financial implications, as well as a clear statement of the benefits for the community and an analysis of risks. It all should then be rigorously tested and amended as necessary.</p>

H Post it note responses

APPENDIX A – POST IT NOTE RESPONSES

In addition to the survey undertaken, the Harpenden Neighbourhood Plan Steering Group sought the comments of local residents at the four engagement events held in the Neighbourhood Plan Area.

The text below represents the comments of local residents, as shared at the engagement events in Batford, Harpenden Town Centre, Kinsbourne Common and Southdown.

These are taken from post-it notes and the text is not altered. While the response rate was lower than the primary survey, this process allows some further understanding of residents' views.

Batford

- Water Supply
Higher ground
Park Avenue
Utilities
- Who checks that replacement drives are porous
- Any chance of a footpath / cycleway behind Harpenden House Hotel development to station, or is it too late
- Past weight restriction on B653 – reinstate?
- Why not: Upgrade Kinsbourne Green lane to a proper road; Upgrade Lower Luton Road to a better road; Upgrade Leasey Bridge lane to a proper road
- Get rid of speed bumps please! 20mph limit instead. Perhaps some one way streets where there are parallel roads? Southdown Road chicane is a nightmare for cyclist. No 20mph limit on Grove Road please!

Kinsbourne Green

- The absence in H3 (7.10) of the specific need nearer the town centre, for intermediate size accommodation for those downsizing on account of age from larger properties to say 3 bed terrace / 3 bed apartments rather than only 2 bed flats is very disappointing

Southdown

- 128 – only 24 affordable homes
- ESD 15/16 Co2/energy. Compulsory installation re photovoltaic panels or solar water heating and double glazing
- Page 47 – 40% of development to be affordable. However on page 49 of draft only 24 dwellings out of 128 proposed dwellings are designated affordable
- More swimming pools
- Minimum size for driveways would be sensible too
- After the Neighbourhood Plan I expect. 1 Fewer cars. 2 More people walking. 3 fewer motor bikes. 4 Less traffic
- Why was new Jarvis refurbishment in Arden Close allowed to put down several hundred sq. metres on concrete paving. Slope ensures discharge down Arden Close – drains already blocked.

Town Hall

- ESD10 – include horse-riding access to right of way
- Why surrender Redcliffe to housing. It used to be a special centre for care
- Work with Rothamsted to ensure there is a local hotel. They need it, we need it
- H3, H4 & H5 should red 'any' development, not major
- Red House – respite care. Very much needed in Harpenden
- T9 – Cycle path underused – how to encourage use
- T10 – no negative impact of second tier on views, but certainly something key to be done to improve and increase.
- How about Arden Grove, it is an employment centre now
- Grove Road redevelopment area. Free flowing of traffic must be assured, especially bearing in mind proximity to Grove School.

I Table of amendments to Regulation 14 Neighbourhood Plan

Table of amendments to Regulation 14 Neighbourhood Plan

Amendments
FOREWORD
Thank you for taking the time to read this draft of the Harpenden Neighbourhood Plan. This Neighbourhood Plan is prepared by local residents for local residents, so to have your views at this stage <u>support</u> is critical.
We exist in challenging times. There is a pressing need for new housing nationally but the infrastructure needed <u>required</u> to mitigate its impact on existing residents is hard to come by. The Green Belt, which has been protected closely since its creation, is now under intense pressure in the context of the need for new housing. When those homes – or indeed other types of development – are built, they are often seen by local people to be in the wrong place, unaffordable, poorly designed and not supported by appropriate infrastructure.
There are examples recently of where local residents in Harpenden have campaigned against a development only to see it be granted planning permission, sometimes through an appeal to the Planning Inspectorate overturning a refusal by St Albans City and District Council.
There are no signs of this cycle coming to an end <u>soon</u> , with St Albans City and District Council deemed to have not cooperated with other local planning authorities during the preparation of its Local Plan, it has had to start that process again and is now looking at a much higher government advised housing target of around 15,500 new homes in the District to 2036. Until it adopts a new Local Plan that allocates sites to meet that need – currently estimated for 2019 – we are at risk of “speculative” planning applications from developers taking advantage of the lack of a strategy, some of which may seek to deliver a very large number of homes.
This Neighbourhood Plan cannot provide the strategy alone, but the policies contained in the document will be vital to ensure new development in our area is appropriate to the needs of our community. In this Neighbourhood Plan, we are seeking to ensure that important employment land is protected and not lost to housing, the design of new buildings is both sustainable and attractive, shopping areas are vibrant and functional, travel is easier and more environmentally friendly and that housing is targeted as much as possible to urban and brownfield land rather than our precious Green Belt. <u>In time, the Neighbourhood Plan will work with a Local Plan to provide a comprehensive Development Plan for the area.</u>
There has never been a more important time to have a powerful strategy for the development of Harpenden, which this Neighbourhood Plan is seeking to provide. Please read this Plan, tell us what you think through our survey and events, and if you agree please lend us your support.
1. INTRODUCTION
Why has this Neighbourhood Plan been created?

- 1.1 This Neighbourhood Plan has been created to ensure residents of Harpenden have some control over what developments take place in our area over the next 15 years. We recognise the importance of Neighbourhood Planning and the need to have an up-to-date planning policy framework. The policies in the Neighbourhood Plan seek to ensure that new development over the next 15 years ~~is~~are of benefit to Harpenden and its surroundings.
- 1.2 As the Neighbourhood Plan ~~will eventually become~~is a ~~statutory-formal~~ statutory-formal planning policy document, some of it, especially later on, is written in ~~quite formal-technical~~ quite formal-technical language. We ~~cannot~~’t avoid that, and apologise if it makes it harder to read in places. Certain terms used in the text are defined in the Glossary at the back of this report. These are either statutory planning terms, such as ‘Use Classes’, or important terms defined in this Plan, such as ‘significant developments’.

What is a Neighbourhood Plan?

- 1.3 A Neighbourhood Plan is a ~~legal-statutory~~ legal-statutory planning policy document, against which applications for planning permission within its boundaries must be considered. A Neighbourhood Plan sets out a framework for development at a local scale, allowing local people to determine what type of development they would like to see in their neighbourhood and identify locations where growth should be accommodated.
- 1.4 Neighbourhood Plans form part of the Development Plan against which applications for planning permission are judged, sitting alongside Development Plan Documents prepared by St Albans City and District Council. The current Development Plan ~~comprises-is composed of~~ the saved policies of the 1994 St Albans District Local Plan Review ~~and Minerals and Waste Local Plans prepared by Hertfordshire County Council.~~ In order to pass examination, the Harpenden Neighbourhood Plan must be in general conformity with the saved strategic policies of the District Local Plan Review. It must also have regard to national planning policy and guidance, ~~and~~ uphold the principles of sustainable development ~~and conform to a number of EU Directives~~. The policies in this Neighbourhood Plan are based on robust evidence.
- 1.5 The Harpenden Neighbourhood Plan is prepared in accordance with the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The Harpenden Neighbourhood Plan Area, encompassing Harpenden Town and Rural Parishes, was formally designated by St Albans City and District Council on 17th March 201~~7~~6. The Neighbourhood Plan has a start date of 201~~8~~9 and will run for 15 years to 203~~3~~4.
- 1.6 A Neighbourhood Plan can include policies that guide development on a range of matters and may also identify certain sites for new development. Although a Neighbourhood Plan’s strength lies in its planning policies, it can also ~~provide-operate as~~ provide-operate as an informal community strategy, setting out the ambitions of a town over its next 15 years through its Vision and Objectives.
- 1.7 Neighbourhood Planning was introduced by the Localism Act, which came into force in 2011. Since its introduction over 200 Neighbourhood Plans have been adopted. The Government has regularly strengthened the role of Neighbourhood Plans since 2011 and, as a result, Neighbourhood Plans have become a key component of the planning policy framework.

What area does this Neighbourhood Plan cover?

1.8 This Neighbourhood Plan covers Harpenden Town Parish and Harpenden Rural Parish (see Figure 1.2). It comprises approximately 22 square kilometres (8.5 square miles) and is home to around 30,000 people (at the time of the 2011 Census), almost all of whom reside in Harpenden Town Parish.

Who has created the Harpenden Neighbourhood Plan?

1.9 The preparation of the Harpenden Neighbourhood Plan is coordinated by Harpenden Town Council and is overseen by a Steering Group made up of representatives from Harpenden Town Council, Harpenden Rural Parish Council and the local community. Five Themed Working Groups composed of community representatives initially developed the Vision, Objectives and Policies of the Neighbourhood Plan. In addition, the Neighbourhood Plan has benefited from Harpenden Town Council staff support and professional support from Nexus Planning.

How has the community been engaged?

1.10 In addition to being developed by community representatives, the Neighbourhood Plan has gone through an extensive community engagement process. The Steering Group has conducted ~~two~~three major rounds of engagement ~~to date~~:

1. Engagement 1: Key Issues (March-April 2017 for six weeks) – this round of engagement was conducted at the outset of the process and asked local people what they liked and disliked about Harpenden through testing a range of key issues. A paper survey was distributed to each household in the Neighbourhood Plan Area, which was also made available online. Three engagement events were held, where local residents were given an opportunity to discuss the Neighbourhood Plan with the Steering Group and staff. Around 150 people attended these events. In total, 2,162 individual responses were collected to the Survey. The results of the Engagement exercise informed the draft Vision and Objectives, which were then presented at Engagement 2.

2. Engagement 2: Vision and Objectives (June – July 2017 for six weeks) – this round of engagement tested the Vision and Objectives and some initial Policy Ideas for the Neighbourhood Plan, which were prepared by Themed Working Groups. As with Engagement 1, a paper survey was distributed to each household in the Neighbourhood Plan Area, which was also made available online. Four engagement events were held, where local people were given an opportunity to discuss the Neighbourhood Plan with the Steering Group and staff. Around 300 people attended these events. In total, 1,305 individual responses were received. The responses showed general support for the Vision and Objectives of the Neighbourhood Plan, with each proposal receiving at least 67% support and most receiving over 80% support. The results of the Engagement exercise informed the draft Neighbourhood Plan presented today.

2.3. Engagement 3: Regulation 14 Draft Neighbourhood Plan (25 October 2017 – 6 December 2017) – A full draft of the Harpenden Neighbourhood Plan was released along with a number of supporting documents. The six week formal engagement was carried out in accordance with the Neighbourhood Planning Regulations (2012). Residents were asked for their views on the Plan as a whole, with a particular focus on policies. In total six public events were held, which were well attended with around 330 people in total (250 at drop-in events and 80 at presentations). 158 responses to the detailed survey were received plus a number of representations received via email. Most policies received between 70-90% support. The least supported policy received 61% support. The Neighbourhood Plan has been adjusted in line with the Engagement 3 responses.

1.11 The surveys, event display boards and detailed Engagement Reports (published following each round of engagement) are attached at Supporting Document C.

1.12 In addition, Steering Group Meeting notes are included at Supporting Document D. These include details of how feedback at engagement has shaped the Neighbourhood Plan.

What happens next?

1.13 Figure 1.2 shows the work done to date on the Neighbourhood Plan and the work left to do. The diagram highlights future opportunities for community engagement, including this current formal Statutory Consultation (Regulation 14), which is supported by engagement events and a survey. The response to this Statutory Consultation will most likely result in some minor modifications to the Neighbourhood Plan before it is submitted to St Albans City and District Council, which will check its content before submitting it for Examination. Finally the Neighbourhood Plan will go to a referendum of local residents. Ultimately, it is success at the referendum that makes this a statutory planning policy document, sending a strong message from the people of Harpenden of what type of development we expect to see in our town

How to read this Neighbourhood Plan

1.14 This Neighbourhood Plan is broken down into a number of chapters related around Key Themes, which are:

- Employment & Retail
- Environment and Sustainable Design
- Housing
- Social Infrastructure and Community Facilities
- Transport and Movement

1.15 These chapters include Vision, Objectives and Policies for each key theme as well as supporting diagrams. In addition to the diagrams within each chapter, this Neighbourhood Plan is supported by a Proposals Map (Supporting Document B), which includes all land designations relevant to the policies of the Neighbourhood Plan, such as designated sites for housing or employment.

1.16 Prior to the themed chapters is a section setting out the overall Vision and Spatial Strategy.

2. A Portrait of Harpenden

Local Context

2.1 The Harpenden Neighbourhood Plan area is within Hertfordshire and St Albans District. It is a town built around a small historic centrecore, with much of its growth within the 20th Century. Harpenden Rural is primarily farmland, interspersed by the occasional farmhouse, or cluster of homes.

2.2 Harpenden is in close proximity to a number of towns, including St Albans, Hitchin, Luton, Welwyn Garden City, Hatfield and Hemel Hempstead. It also retains close links with London.

2.3 The town is well-connected, with regular and fast Thameslink trains to a number of central London stations as well as Luton Airport Parkway. It has close road links to the M1 and the A1(M). The A1081 runs through the centre of Harpenden and connects it to St Albans (south) and Luton (north). Luton Airport is around 7 miles from Harpenden and is connected via the Lower Luton Road (B653), which runs through Batford to the east of Harpenden.

2.4 There is a mixture of housing styles in Harpenden, although most housing is low-rise, 20th Century and detached or semi-detached.

2.5 Despite its growth over the 20th Century and emergence as a medium sized town, Harpenden retains a strong sense of community, which is cherished by residents. This is evident in the town centre's retail offer in the fact that residents feel safe in its tight knit community. Its rural connections enhance Harpenden's character, with Harpenden Common bisecting the town through to its centre and forming a clear link with the countryside.

2.6 Most undeveloped land in the Neighbourhood Plan Area is within the Metropolitan Green Belt.

2.7 The town is notable for its wide range of community assets, including a number of high quality sports and leisure facilities and primary and secondary schools, many of which serve a wider catchment than just the Neighbourhood Plan Area.

2.8 The features of Harpenden have led to it becoming a highly desirable place to live, often for people working in London and nearby towns. This is reflected in high property prices. Despite this, it is not solely a commuter town and benefits from some key employment locations, most notably Rothamsted Research ~~and also as well as~~ Southdown Industrial Estate, Coldharbour Lane, Batford Mill and some small offices in the town centre.

Historical Development of Harpenden

2.9 Harpenden has existed as a settlement in some form for a considerable amount of time, with historic evidence of the area containing a small satellite settlement to Verulamium, a major Roman city at the site of present day St Albans. However, Harpenden remained a village until the late nineteenth century, at which point it rapidly expanded to become a town.

2.10 Many of the Listed Buildings in the Neighbourhood Plan Area predate the era of rapid development. Most notable of these is Rothamsted Manor (Grade I Listed), which was mostly constructed in the 16th and 17th Centuries. Other Listed Buildings in the area include a number of historic farmhouses (Cross, Faulkners End, Harpendenbury) and a number of buildings in the centres of Harpenden and Kinsbourne Green as well as occasional buildings elsewhere in the Neighbourhood Plan Area.

2.11 Outside the centres of Harpenden, Kinsbourne Green and the historic farmhouses, most development in the Neighbourhood Plan Area is from the 1890s onwards, from which point Harpenden started to establish its role as an affluent satellite town of London. Most housing in the town was built between that period and the 1950s, generally comprising large, ornately detailed housing in a style relevant to the period, including Victorian, Edwardian, 1930s and post-war styles. The Harpenden Conservation Area encompasses a large area including much of the more historic residential areas of Harpenden (mostly pre-war). It is one of the largest Conservation Areas in the country.

Town Profile

2.12 The preparation of this Neighbourhood Plan was supported at the outset by a Baseline Report, prepared by Nexus Planning which analysed demographic data, evidence studies and other sources of information to build a profile of the Neighbourhood Plan Area. Some of the noteworthy 'headlines' of the Baseline Report (Supporting Document E), which is available on the Harpenden Town Council Website, include:

- The Neighbourhood Plan Area population grew rapidly from around 7,000 residents in 1921 to around 27,500 residents in 1981. Since then, population growth has slowed to a figure of just below 30,000 in 2011 (at the time of the most recent Census). The proportion of the population in Harpenden Rural is low, with 405 residents in 2011.
- The Harpenden population is generally well-educated and affluent, with low levels of deprivation across the town.

- In terms of age, the population is relatively balanced, however, the proportion of the population in the 18-29 age group is low compared to national figures. In addition, the proportion of residents over the age of 60 grew significantly from 2001 to 2011.
- The number of residents working in managerial or professional roles is much higher than the national average. A small number of residents work in low-skill roles.
- A significant number of Harpenden residents work in a range of nearby towns or commute to London. Few residents work in Harpenden, with the exception of those working from home (around 7% of the population). Therefore, the majority of people working in Harpenden do not reside in the town.
- The most common method of travel to work in Harpenden is by car, with around 7,300 residents commuting using this method.
- The second most significant method is train (around 3,700). Other methods such as on foot, cycling and bus are less frequently used.
- Housing stock in the Neighbourhood Plan Area is mostly detached and semi-detached housing, with fewer terraces and flatted developments.
- Harpenden town centre is the primary retail and services centre in the Neighbourhood Plan Area. In addition, a reasonably large local centre exists in Southdown and smaller clusters are located in Batford, North Harpenden and Kinsbourne Green.

Local Planning Issues

2.13 The following planning-related issues are important to local people in Harpenden, as evidenced by discussions during engagement and local media:

- The redevelopment plans for the Harpenden Sports Centre, Swimming Pool and potential relocation of cultural facilities from the Harpenden Public Halls;
- A proposed new secondary school in East Harpenden;
- The future of NHS Services at the Harpenden Memorial Hospital (also known as The Red House);
- The potential allocation of land at “North West Harpenden” by St Albans City and District Council for circa 500 homes;
- The failure of the St Albans City and District Council’s Strategic Local Plan (SLP) to proceed to Examination, the implications for this on North West Harpenden and other policies in that Plan and the supporting Detailed Local Plan (DLP); and
- The proposed new St Albans Local Plan, which is expected to include a housing target of 14,450 new dwellings between 2018 and 2036, up from the proposed target of 8,720 new dwellings between 2011 and 2031 in the SLP. This could result in a need to look at other potential housing sites, including “North East Harpenden”, a promoted site around Batford.

Planning Policy Context

Current Planning Policy Framework

3.1 The Harpenden Neighbourhood Plan has regard to the current planning policy context at St Albans City and District Council, which it will sit alongside as a Development Plan Document. The current adopted Local Plan governing the area is the saved policies of the 1994 District Local Plan Review. While ~~the 1994 District Local Plan Review that planning policy document~~ contains some policies of relevance to the determination of planning applications, ~~the saved policies of the District Local Plan Review~~ it does not cover all issues relevant to development in the Harpenden Neighbourhood Plan area. In addition, the saved policies respond to a 1994 context, which may not be of relevance to the key issues of today.

3.2 St Albans City and District Council was recently in the advanced stages of preparing a new Development Plan, which was to comprise of a Strategic Local Plan (SLP) and a Detailed Local Plan (DLP). The DLP would follow and complement the strategic policies set in the SLP. The initial approach to preparing the Harpenden Neighbourhood Plan was to seek to “fit” within that framework, adding local context to policies within those plans and filling any gaps as necessary. On 28th November 2016, the Inspector appointed to examine the SLP deemed that St Albans City and District Council had not fulfilled its legal Duty to Cooperate with neighbouring planning authorities in the preparation of the SLP. St Albans City and District Council commenced legal proceedings to challenge that decision, but was ultimately unsuccessful, with a High Court Judgement upholding the decision issued on 13th July 2017. At Planning Policy Committee on 12th September 2017 members resolved to prepare a new single Local Plan with a revised “base date” (i.e. start date for monitoring) of 2018, running to 2036. The new Local Plan is to be prepared in line with new national housing need assessment standards and is expected to seek to allocate a substantially higher amount of housing than the SLP, totalling around 146,500 homes at circa 800 per annum compared to 9,000 at 450 per annum in the SLP. The new Local Plan is targeted for adoption in 2019, however, this is a positive estimation and its reality it could take longer due to a range of influencing factors.

Response of the Harpenden Neighbourhood Plan

3.3 In response to the change in policy context, the Harpenden Neighbourhood Plan has adapted its approach. It seeks to incorporate issues addressed in the SLP and the DLP where relevant to the Neighbourhood Plan Area, ~~adapting relating~~ content to the local context. This strengthens the policy framework for Harpenden and seeks to ensure that the impact of the decision not to allow the SLP to proceed to Examination is lessened.

3.4 There are, however, limitations as to what may be achieved through the Harpenden Neighbourhood Plan. These limitations include:

- Release of land from the Green Belt. This can only be done through a review of the Green Belt boundaries by a local planning authority (i.e. St Albans City and District Council) in its Local Plan, as established by Paragraph 83 of the NPPF. Therefore, this Neighbourhood Plan does not seek to allocate any sites in the Green Belt for new strategic housing, employment or other growth.

- Identification of targets for growth. Targets for growth in the SLP were based upon a suite of evidence base documents prepared for St Albans City and District Council, including housing market assessments and employment land need assessments. As the SLP did not proceed to examination, the evidence used and the resulting targets were not tested for their accuracy. St Albans City and District Council is now considering new targets in its revised Local Plan. The Harpenden Neighbourhood Plan does not have the duty to prepare its own assessments of need for housing, employment land or other types of development and therefore seeks to provide an appropriate amount of growth, while seeking to protect the Green Belt and the character of Harpenden.

3.5 The Neighbourhood Plan identifies some growth opportunities on urban sites not in the Green Belt. It also establishes policies that will shape all development in the area, including in the Green Belt. This means any new development in the Green Belt approved at a higher level will be subject to the policies we agree as a community, helping to reduce impact. It does not mean that as a community we are supporting growth in the Green Belt.

Overall Vision and the Spatial Strategy

Overall Vision

Harpenden has a strong sense of community that is treasured by local residents. The Neighbourhood Plan will provide the foundations for Harpenden to grow sustainably for the benefit of those that live and work here.

The town centre and our other important local centres will continue to meet local residents' needs, ensuring that local shopkeepers and other business owners can continue to trade in a prospering environment.

Harpenden is home to many important local businesses, as well as being considered a commuter town. The Neighbourhood Plan will promote Harpenden as an attractive place for businesses to locate and for people to work. Improvements to facilities in the town will be promoted, including provisions for small businesses and our growing number of home workers.

Harpenden has a vibrant voluntary sector that provides invaluable services across the local community. We have an active community that benefits from a number of popular sporting, recreation and community groups that contribute positively to the health and wellbeing of local people.

Where new housing is to be provided within Harpenden, the Neighbourhood Plan seeks to ensure the right mix of sizes in the right location, including developments that prioritise housing for residents through their life from first time buyers to older residents seeking to downsize. New developments that conserve and enhance the existing ~~built~~-historic environment, including listed buildings and the Harpenden Conservation Area, will be supported and will continue the tradition of the high quality architecture seen throughout Harpenden and the Harpenden Rural Parish.

We will encourage the development of a sustainable transport network that will support the growth of the town. Investment in local schools, GP surgeries and other social infrastructure will accommodate new development to retain the quality of provision.

The natural environment is a key part of Harpenden and important green spaces and biodiversity within the town and across Harpenden Rural Parish will be protected. New development will incorporate highly sustainable design features.

4.1 The Overall Vision captures the unique character of Harpenden while providing a future-facing and aspirational vision for the development of Harpenden over the next 15 years.

The Spatial Strategy

4.2 The following policies outline the strategic approach to all development in the Harpenden Neighbourhood Plan Area. Almost all residents in the Neighbourhood Plan Area reside in Harpenden, which had a population of around 30,000 at the time of the 2011 Census. Land outside Harpenden is designated as part of the Green Belt and therefore has a small population with most land used for agriculture or recreation.

SS1 – The Spatial Strategy

1. The Built up Area of Harpenden ~~should be~~ is the priority for new development in the Harpenden Neighbourhood Plan Area. The Built up Area Boundary of Harpenden is shown in Figure 4.1. In the event that St Albans City and District Council releases land in the Green Belt adjacent to the current Built up Area Boundary of Harpenden for residential development in a future Local Plan, that land is considered by this Policy to be within the Built up Area Boundary of Harpenden. Planning applications for new development proposals outside the Built up Area Boundary must either:

- **Be an exception to inappropriate development in the Green Belt; or**
- **In the case of what would normally be deemed inappropriate development in the Green Belt, must demonstrate:**
 - **Very special circumstances for development in the Green Belt; and**
 - **Why the proposal cannot be located within the Built up Area Boundary of Harpenden.**

2. Development proposals in Harpenden Town Centre, as shown on Figure 4.1 must have regard to the special characteristics of the town centre, in accordance with the policies of this Neighbourhood Plan.

4.3 The Built up Area Boundary has been chosen to directly align with the Green Belt boundary around Harpenden. The Neighbourhood Plan supports the utmost protection of the Green Belt from inappropriate development and Policy SS1 seeks to ensure development is prioritised within Harpenden and outside the Green Belt. In addition, protecting the Green Belt by locating development within urban areas brings a number of advantages, including reducing the need to travel by car. This Policy is realistic to the likelihood of SADC releasing land from the Green Belt adjacent to Harpenden for housing delivery.

4.4 The requirements set out in Policy SS1 are consistent with the requirements of the National Planning Policy Framework. The National Planning Policy Framework defines exceptions to inappropriate development in the Green Belt (Paragraph 89) and sets the need for development proposals considered inappropriate in the Green Belt to demonstrate very special circumstances (Paragraph 87). Policy SS1 adds an additional requirement to demonstrate why a proposal for inappropriate development cannot be located within the Built up Area Boundary of Harpenden. In order to meet this criteria, development proposals must demonstrate that there are no suitable alternative sites within the Built up Area Boundary the can be used.

4.5 An issue that is frequently raised during community engagement is infrastructure, and in particular many residents want the Neighbourhood Plan to ensure enough infrastructure is provided alongside new development to mitigate impact on existing residents. In response, we have identified five Infrastructure Zones in Harpenden, which community consultation and our evidence base has shown have specific infrastructure requirements should any future development take place. Inclusion of Infrastructure Zones in the Neighbourhood Plan does not provide endorsement for new development proposals outside the Built Up Area Boundary of Harpenden, but it does provide some protection should these be approved.

SS2 – Infrastructure Zones

The five Infrastructure Zones are shown in Figure 4.2. In order to mitigate the impact of new development, certain proposals in each zone must meet the following criteria as well as satisfying the policies of this Neighbourhood Plan.

<p>Significant development proposals in the North West must:</p> <ul style="list-style-type: none"> • Demonstrate how impact of new development on the A1081 and local roads will be mitigated; • Demonstrate adequate provision for appropriate education facilities in close proximity to new development <u>to meet the need for school places arising from the proposed development* or proposed additional capacity*</u>; 	<p>Significant development proposals in the North East must:</p> <ul style="list-style-type: none"> • Demonstrate how impact of new development on the Lower Luton Road and Station Road will be mitigated; • Incorporate a proportionate amount of public open space, preferably sports and recreational space*; • Demonstrate adequate provision for appropriate education facilities in close proximity to new development <u>to meet the need for school places arising from the proposed development* or proposed additional capacity*</u>;
---	--

<ul style="list-style-type: none"> • Demonstrate sufficient convenience shopping within a close proximity to new development*; and • Demonstrate sufficient recreational space within a close proximity to new development*. 	<ul style="list-style-type: none"> • Demonstrate sufficient convenience shopping within a close proximity to new development*; and • Demonstrate sufficient recreational space within a close proximity to new development*. 	
<p>Significant development proposals in the South West must:</p> <ul style="list-style-type: none"> • Demonstrate how impact of new development on the A1081 and Redbourn Road will be mitigated; • Demonstrate how Harpenden Common will not be negatively impacted by new development, including key views in to and from the Common; • Demonstrate adequate convenience shopping provision in close proximity to new development*; • Demonstrate adequate provision for appropriate education facilities in close proximity to new development <u>to meet the need for school places arising from the proposed development*</u> or proposed additional capacity*; and • Demonstrate sufficient recreational space within a close proximity to new development*. 	<p>Significant development proposals in the South East must:</p> <ul style="list-style-type: none"> • Demonstrate how impact on key routes such as Southdown Road, Grove Road, Wheathampstead Road and Piggotshill Lane will be mitigated; • Demonstrate adequate provision for appropriate education facilities in close proximity to new development <u>to meet the need for school places arising from the proposed development</u> or proposed additional capacity*; • Demonstrate sufficient recreational space within a close proximity to new development*; and • Demonstrate how pressure on parking will not significantly increase as a result of the proposed development. 	
<p>Major development proposals in Harpenden Town Centre must:</p> <ul style="list-style-type: none"> • Demonstrate how road congestion will be mitigated or reduced as a result of the proposed development; 		

- Demonstrate how the proposed development will protect the **character and** appearance of the historic town centre; and
- Demonstrate how pressure on parking will not significantly increase as a result of the proposed development.

4.6 The Infrastructure Zones cover the entire Neighbourhood Plan Area, but relate primarily to any future greenfield development adjacent to the Built Up Area Boundary of Harpenden, or major redevelopment within the town centre. The Neighbourhood Plan is aware that there will be considerable growth in St Albans District over the Neighbourhood Plan Period, including in Harpenden. St Albans City and District Council is preparing a new Local Plan, which is expected to identify a number of large housing sites for release from the Green Belt in order to meet the requirements set by central government. Policy SS2 seeks to be pragmatic and ensure that any development outside of the Built up Area Boundary addresses infrastructure deficiencies in each part of Harpenden.

4.7 The boundaries of the four Infrastructure Zones other than the Town Centre have been chosen based on physical boundaries within the Neighbourhood Plan Area. The east-west boundary is established by the railway line. The north-south boundary is more complex, following field boundaries in the west and then heading along the settlement boundary. To the east, this boundary follows Station Road until it reaches the Lower Luton Road, at which point it heads south. The town centre boundary is in line with the boundary detailed further in to this Neighbourhood Plan.

4.8 The themed policies of this Neighbourhood Plan add detail to the requirements of Policy SS2.

Key Themes

4.9 To support the delivery of the Overall Vision, the content of this Neighbourhood Plan is guided by five Key Themes, which form the following chapters of the Neighbourhood Plan. The themes are detailed below with some brief information on the content of each chapter.

1. Employment and Retail

This chapter outlines the approach to employment and retail growth in Harpenden.

It considers how best to protect important employment and retail uses in the Neighbourhood Plan Area and sets out policies for the management of that growth.

2. Environment and Sustainable Design

This chapter sets out how the Neighbourhood Plan will protect important environmental assets. It also sets design expectations for all forms of development, including residential and other uses, ensuring design is considerate of the environment and local character.

3. Housing

This chapter details the type, tenure and size of housing expected to be delivered in Harpenden. It also identifies some sites for residential development, which are within the built up area of Harpenden.

4. Social Infrastructure and Community Facilities

This chapter sets out how important community assets will be protected and enhanced. It also outlines a framework for the provision of new social infrastructure to be provided as the town grows.

5. Transport and Movement

This chapter puts forward measures to reduce congestion and increase sustainable travel in Harpenden. It also details expectations of new development, including the amount of parking to be provided.

5. EMPLOYMENT AND RETAIL

Introduction

5.1 This Chapter sets out the approach to developing existing and new retail and employment uses. Harpenden Town Centre functions as a destination for residents of surrounding villages as well as Harpenden and incorporates a wide ranging retail offer. Within the Neighbourhood Plan area, Harpenden Town Centre is supported by a cluster of shops in Southdown and smaller parades of shops in North Harpenden, Kinsbourne Green and Batford. Despite its image as a commuter town, Harpenden has a number of important employment locations, which this Neighbourhood Plan seeks to protect and enhance, and a significant number of home workers, whom the Neighbourhood Plan seeks to support.

Community Feedback

Engagement 1 - Issues

5.2 At this stage, residents were asked to share their views on a number of statements about employment and retail. Respondents overwhelmingly supported the protection of existing shopping areas (88%) and many supported the need for a greater range of shops. A number of people commented

about particular types of shops that they perceive to be needed, in oversupply, or important to retain. While a small number of people supported an increase in industrial or business space, some shared concern around the loss of employment land to residential due to 'market forces'.

Engagement 2 – Vision, Objectives and Policy Ideas

5.3 86% of respondents agreed with the Vision and all seven objectives presented at engagement received over 70% support. This draft Neighbourhood Plan reflects those objectives presented at engagement.

Engagement 3 – Regulation 14 Draft Neighbourhood Plan

5.4 All proposed policies presented in the draft were well supported, with each gaining at least 80% approval. Following specific feedback received, Policy ER3 (Rothamsted Research) has been updated to prescribe more clearly what type of development at that site would be supported.

Employment and Retail Vision

That Harpenden has accessible, thriving and flexible retail areas, with a vibrant, attractive Town Centre that encourages people to spend time there, by offering a diverse range of quality retail and other Town Centre uses. To create a sustainable economy that protects existing, and supports new employment use where appropriate, making Harpenden an attractive and accessible place for both employers and employees to work.

Employment and Retail Objectives

ERO1: Support a high quality offer through improvements to existing employment and retail areas including new and redevelopment opportunities.

ERO2: Maintain retail and employment centres that are adaptable and able to keep pace with technological development and other innovations.

ERO3: Provide a community 'village' atmosphere for the Town Centre where residents, visitors and those employed in local businesses can relax and socialise, at all times taking in to account the viability of the surrounding retail units.

ERO4: Promote easy access to and increase footfall to the Town Centre, Southdown and Batford.

ERO5: Manage an attractive eating, drinking and entertainment scene that transitions through the day into a thriving evening economy (including the pubs and restaurants).

ERO6: Support the principle of residents having easy access to small local convenience shops.

ERO7: Protect existing employment and retail sites, encourage full usage and support new employment developments.

ERO8: Support small and medium enterprises including business start-ups and homeworking, through encouraging flexible working practices, shared offices and workshops.

Employment and Retail Facilities Policies

ER1 - Supporting Harpenden's Economy

In order to support the Harpenden economy, the following proposals will be supported in suitable locations:

- 1. Appropriate improvement, enhancement and redevelopment of existing employment and retail sites for such uses.**
- 2. Provision of smaller commercial units suitable for use by local businesses.**
- 3. Appropriate facilities for the use of flexible workers**

5.54 The Neighbourhood Plan is committed to supporting the improvement of Harpenden's employment and retail sites. Many employment locations designated in this Neighbourhood Plan are historic areas, which are increasingly occupied by companies requiring the provision of modern technology. It is important to allow these sites to be redeveloped appropriately to meet the needs of those companies, without negatively impacting local character or amenity. Retail units benefit from regular adaptation and modernisation to allow retailers to remain viable. The Neighbourhood Plan is supportive of local small and medium sized enterprises and seeks to ensure local people starting up companies are able to find local premises. The Neighbourhood Plan also recognises the significant proportion of the population that works at or primarily from home and encourages development that would support these residents.

ER2 – Designated Employment Locations

The locations set out in Table 5.1 and shown at Figure 5.1 are designated as protected employment locations. At these locations, change of use to a non-B Class use will not be supported unless it can be demonstrated that the premises are no longer suitable for business use or there is clear evidence that there is no prospect of a new commercial occupier being found.

DEL 1 – Rothamsted Research

DEL 2 – Southdown Industrial Estate

DEL 3 – Coldharbour Lane

DEL 4 – Batford Mill Industrial Estate

[Table 5.1]

5.5-6 The employment locations set out in Table 5.1 provide almost all employment (B Class) floorspace in the Neighbourhood Plan Area, with the exception of small offices in Harpenden Town Centre. Their continued protection will ensure that Harpenden retains a small but productive amount of employment floorspace. All four of these employment areas are protected in the current adopted Development Plan at St Albans City and District Council, the 1994 District Local Plan Review. In addition, Southdown Industrial Estate and Coldharbour Lane are protected with Article 4 Directions preventing the loss of employment land to residential use without planning permission. The Neighbourhood Plan would support the introduction of further Article 4 Directions protecting employment locations in the Batford Mill Industrial Estate and Harpenden Town Centre.

ER3 – Rothamsted Research

This Neighbourhood Plan supports appropriate redevelopment or expansion of Rothamsted Research to meet Rothamsted’s long-term agro-tech research needs and to accommodate firms carrying out complementary knowledge-based research and development activities. ~~Subject to an appropriate proposal, the Neighbourhood Plan would support a very special circumstances case made by Rothamsted Research for development not normally considered appropriate in the Green Belt.~~

5.6-7 Rothamsted Research is a world leader in its field and a key local business ~~locally~~. Its ~~history and~~ success as an agricultural research centre ~~has seen it is sufficient to be~~ regarded by the Hertfordshire Local Enterprise Partnership as part of the Hertfordshire “Green Triangle”, alongside BRE in Bricket Wood and the University of Hertfordshire in Hatfield. ~~This Neighbourhood Plan supports the continued development of Rothamsted Research to the extent that it would consider supporting a very special circumstances case for future development in the Green Belt provided it is of an appropriate scale, minimises impact on the Green Belt purposes (as defined in the National Planning Policy Framework) and protects the amenity of neighbours.~~

ER4 – Designated Retail Areas

Table 5.2 identifies the designated retail areas within the Harpenden Neighbourhood Plan Area, which are identified at Figure 5.2.

DRA1 – Harpenden Town Centre – Large Retail Area

DRA2 – Southdown Local Centre – Large Local Centre

DRA3 – North Harpenden Local Centre – Small parade of shops

DRA4 – Kinsbourne Green Local Centre – Small parade of shops

DRA5 – Batford Local Centre – Small parade of shops

ER5 – Supporting Harpenden Town Centre Economy

In Harpenden Town Centre, as identified at Figure 5.2, proposals will be supported that:

- **Provide an appropriate mix and balance of retail units, as follows:**

- **In the Primary Shopping Areas, as identified at Figure 5.2, at least 60% of shopfronts (by length) should remain in Use Class A1 and 90% of shopfronts should remain in A-Class uses.**
- **In the Secondary Shopping Areas, as identified at Figure 5.2, at least 50% of shopfronts (by length) should remain in Use Class A1 and 90% of shopfronts should remain in A-Class use.**

Proposals that would place the overall percentage of units below these figures will not be supported unless in exceptional circumstances where the community benefit of doing so outweighs the loss of an important retail unit;

- **Provide important social infrastructure including community facilities, particularly where there is no negative impact to retail uses;**
- **Provide ground floor active frontages. It will not be acceptable to have new ground floor residential uses on Primary or Secondary frontages in Harpenden Town Centre;**
- **Support the regeneration of Arden Grove, Station Approach and Harding Parade, developing an attractive gateway into Harpenden;**
- **Promote the enhancement of the public realm in Harding Parade, Thompsons Close and North High Street; and**
- **Proposals that would result in the loss of employment floorspace in the town centre will not be supported unless in exceptional circumstances where the community benefit of doing so outweighs the loss of an employment site.**

5.78 Harpenden Town Centre is an important and vibrant town centre serving the entire Harpenden Neighbourhood Plan Area and a network of surrounding villages. The Neighbourhood

Plan seeks to protect the role and function of Harpenden town centre by ensuring ground floor space is used for shop frontages, major social infrastructure and community facilities

5.98 The targets for shopfront length in ‘uses’ is derived from the 2016 St Albans City and District Council Authority’s Monitoring Report, which established that 61% of Primary Shopping Frontages are in A1 Use and 94% are in A Class Use, and 55% of Secondary Shopping Frontages are in A1 Use

and 93% are in A Class Use. The Neighbourhood Plan recognises the role that retail uses play in ensuring a vibrant and viable town centre and therefore seek to protect the retention of those uses.

5.109 The following addresses appear as Primary Shopping Frontages at Figure 5.2, in accordance with current designations:

- 1-3 Church Green/2b-10 Leyton Road;
- 1-31 High Street;
- 18-50 High Street;
- The Leys;
- 1-11 Leyton Road/ 12-18 Church Green Row; and
- 2-16 High Street & 1-3 Leyton Green Road.

5.110 The following addresses appear as Secondary Shopping Frontages at Figure 5.2, in accordance with current designations:

- 4-6 Church Green & 52-104 High Street;
- 33-61 High Street;
- 12-14 Leyton Road;
- 2a-34 Station Road; and
- 1-17 Station Road.

ER6 – Supporting Local Centres

In local centres, appropriate and proportionate proposals for local retail facilities and service development will be supported. Proposals involving the loss of a convenience shop without re-provision in the same local centre will not be supported.

5.121 New convenience shop proposals in local centres must demonstrate adequate servicing arrangements and on site parking. Appropriate proposals to improve servicing and increase parking at convenience shops in Local Centres will be supported.

5.132 Southdown Local Centre provides an important range of shops and services and the three small Local Centres each contain a convenience store for use by local residents. This network of local centres provides accessible day-to-day shopping opportunities to local residents, preventing the need to travel to Harpenden Town Centre by car. This is particularly valuable to local residents with reduced mobility. The retention of a convenience shopping offer in these small centres is therefore important to the future of the Harpenden Neighbourhood Plan Area.

ER7 - Employment Uses above Shops

In Harpenden Town Centre and Southdown Local Centre, employment uses above shops will be encouraged, ~~to enhance the vibrancy and vitality of the local economy~~, provided any alteration to the premises does not impact on the viability of the commercial use below, does not reduce the existing commercial floor space for that business below and is consistent with the other policies of the Neighbourhood Plan.

5.1~~43~~ The Neighbourhood Plan supports the development of more office use in Harpenden Town Centre and Southdown Local Centre where there is no negative impact on retail and social infrastructure uses. The utilisation of upper floors allows the densification of these accessible locations without harming the vitality of the centres. Furthermore, the densification of these locations to meet need for employment ~~use and housing uses~~ supports the protection of the Green Belt from new development.

ER8 – Adaptable, Innovative and Up to Date Retail and Employment Centres

Major retail and employment proposals must demonstrate that sufficient infrastructure is in place to meet an increase in demand and must utilise latest technologies wherever possible.

5.1~~54~~ While the Neighbourhood Plan supports the development of retail and employment locations, it seeks to ensure that this does not negatively affect existing occupiers or nearby residents. Therefore, it is important that infrastructure can accommodate any growth in employment or retail facilities. The flexibility of retail and employment centres to adapt to new technology is important and the Neighbourhood Plan seeks to ensure new developments are technologically advanced enough to remain in use and to remain successful for a considerable period of time.

6. ENVIRONMENTAL AND SUSTAINABLE DESIGN

Introduction

6.1 This Chapter relates to the natural and built environment of the Harpenden Neighbourhood Plan Area. It transcends the other Chapters of this Plan and ensures that new development in the Neighbourhood Plan Area protects the ~~health of residents and the~~ natural environment, including biodiversity, watercourses and trees from potential harm arising from pollution, carbon emissions and flood risk. It also seeks to ensure new development complements established character in the Neighbourhood Plan Area, particularly heritage assets and key views, harmoniously bringing together the built and natural environments.

6.2 Harpenden is a town that embraces its natural environment, most notably in the presence of The Common, which provides protected and undeveloped green space directly to the heart of the Town. In addition, the town includes Batford Springs, a Nature Reserve, and is known for its abundance of trees and generous gardens. The agricultural land of ~~Harpenden Rural~~ the Neighbourhood Plan Area provides biodiversity and also has landscape value, with some parts of the Neighbourhood Plan Area identified as within an existing Landscape Conservation Area by SADC (1994 District Local Plan). In addition, the Neighbourhood Plan Area abuts an area of Outstanding Landscape Value within Central Bedfordshire.

6.3 The Harpenden Neighbourhood Plan Area includes a significant number of Listed Buildings. The most protected of these is Rothamsted Manor (Grade I Listed). In addition, a number of farmhouses are Grade II* Listed and there are clusters of Listed Buildings (including Grade II* Listed Buildings) in Harpenden Town Centre and Kinsbourne Green. The Harpenden Conservation Area is one of the largest in the country and covers much of Harpenden, including the entire town centre.

Community Feedback

Engagement 1 – Issues

6.4 ~~In Engagement 1, r~~Residents showed a clear level of support for a number of statements regarding sustainability, including the need for new development to be modern and sustainable (75% support). However, many residents also felt that new housing design should reflect Harpenden’s historic character and be appropriate to its location in the town. There was strong support for shared green space as part of new residential developments, but there was little appetite for more public green space, given the prevalence in the town.

~~6.5 In terms of comments, t~~The most popular issues raised included a need to provide enough parking for new housing (covered in the Transport Chapter), to retain the “village feel” of Harpenden and to protect green spaces.

Engagement 2 – Vision, Objectives and Policy Ideas

6.56 The proposed Vision received 88% support and the objectives were also well received, particularly those that sought to protect green spaces and key views in Harpenden. Objectives relating to low-carbon and sustainable development received at least 74% support, showing a clear view in favour of pursuing these matters.

~~6.7 Many comments received related to transport, but of those relating to the environment and sustainable design, In terms of comments,~~ respondents were keen to show support for the protection of green spaces. Some people felt that the appearance of renewable energy features was important to consider and that it was important not to lose the character of Harpenden as a result of inappropriate developments.

Engagement 3 – Regulation 14 Draft Neighbourhood Plan

6.6 The proposed policies were broadly supported, with between 72 and 93% agreement. Some amendments are made in response to statutory responses and a new policy, relating to Local Green Spaces, is added following feedback received.

Environment and Sustainable Design Vision

Maintain and enhance the character of Harpenden, its neighbourhoods, communities and green spaces. Develop Harpenden as a sustainable and low carbon town.

Environment and Sustainable Design Objectives

EDO1: Maintain and enhance the quality and character of all the varied green spaces including but not limited to Harpenden Common, Batford Springs, Rothamsted Park, Kinsbourne Green Common and Lydekker Park.

EDO2: Protect Harpenden's key views and outlooks ensuring the visual impact of development is minimised.

EDO3: Improve and develop public access to green spaces, to rivers and to the natural environment, including developing and enhancing green chains and corridors.

EDO4: Encourage and enhance biodiversity.

EDO5: Require developments to promote sustainable living, be of sustainable and energy efficient design including incorporating green technologies.

EDO6: Conserve and enhance local character and heritage.

EDO7: Require development to reduce flood risk through sustainable solutions.

EDO8: Require development to design streets as communities giving prime consideration to the needs of pedestrians and cyclists and to encourage initiatives to adapt streets which will prioritise pedestrians and cyclists.

EDO9: Encourage and support renewable energy generation and storage projects and initiatives that develop Harpenden's environs as a low carbon area.

Environment and Sustainable Design Policies

ESD1 – Design Strategy

All developments must be visually appealing, designed to a high quality; ~~they must also,~~ maintain or enhance the character of the area and support Harpenden as a low carbon place to live and work.

For major developments in the Neighbourhood Plan Area, a Design Brief must be produced for the whole site, setting out the principles for development prior to the submission of a planning application. The Design Brief should demonstrate consideration of the following (where applicable) in addition to the requirements of the other policies of this Neighbourhood Plan:

- i. Promotion of sustainable development, sustainable use of resources, green technologies and high levels of energy efficiency in order to minimise the impact on the environment of delivering the development and of the residents or users of the developments thereafter;
- ii. How the development will promote sustainable living for housing developments and sustainable use for non-residential developments;
- iii. Facilities made available for pedestrians and cyclists;
- iv. Location, type and management of open space, leisure and recreation facilities;
- v. Protection against the loss of or significant harm to ecological or landscape value without appropriate mitigation that outweighs the loss or harm;
- vi. A proportionate assessment of views to and from the proposed development and key views of townscape, including how views of landmark and gateway buildings, and important landscape features will be retained or enhanced. Visual impact should be minimised through the design of the site layout, buildings and landscape;
- vii. Materials palette (if it is not possible to indicate exact materials then a broad type should be specified);
- viii. How the development is sensitive to and makes a positive contribution to the local character of the area;
- ix. How permeability of land surface has been maintained and / or enhanced in the development and how the development is using sustainable solutions to reduce flood risk;
- x. How the water efficiency standard for housing has been applied;
- xi. How best practice measures have been used to avoid pollution to air, water and soil; and;
- xii. Environmental performance. An environmental performance and sustainability statement (demonstrating how environmental issues have been fully considered in the location, site layout, general design, building design and construction and future use of the development) is required. This should be related to advice provided by the Hertfordshire Building Futures Design Toolkit.

Developments must be implemented in accordance with the principles set out in the Design Brief. Applicants are encouraged to engage with Harpenden Town Council / Rural Parish Council (whichever is applicable) to discuss the contents of the Design Brief.

6.87 Design Briefs enable local planning authorities to better understand the contribution of major development to local character and the development of a sustainable town. Policy ESD1 connects with a number of the other policies in this chapter and is largely related to the communication of the design rather than the requirements of design, which are mostly detailed in the remaining policies of this chapter.

ESD2 – Local Character and Heritage

i. The height, scale and design of all developments must be considerate of and make a positive contribution to local character and heritage, maintaining or enhancing positive elements and seeking to address negative elements.

~~ii. In particular, p~~Proposed developments involving or in the setting of statutory ~~or locally~~ listed buildings, structure, park or garden or the Harpenden Conservation Area (major developments only) must provide a Heritage Statement that assesses and outlines the significance of those heritage assets affected. ~~The Heritage Statement must then demonstrate no negative impact to those assets or, in the case of negative impact, Where a development would result in substantial harm to a heritage asset, that~~ the public benefits of the proposals must outweigh the ~~is impact~~ level of harm. Where a development would result in less than substantial harm, this must be balanced against the public benefits. In the case of development in the Conservation Area, Statements must demonstrate how the character of the Identity Area it sits within, as set out in the Harpenden Conservation Area Statement, is retained.

~~iii.ii.~~ Necessary repairs to listed buildings should preserve as much historic fabric as possible using proven techniques (normally traditional and natural methods and materials, carried out sensitively). Reinstatement of traditional and natural materials, where doing so will not cause undue harm, will be encouraged.

~~The sensitive retrofitting of energy efficiency measures and the appropriate use of micro-renewables in historic buildings will be encouraged, while safeguarding the special characteristics of these heritage assets for the future.~~

~~iii. Where development affects an undesignated heritage asset, such as a locally listed building, structure, park or garden or an alternative undesignated heritage asset outside of the Conservation Area, a proportionate assessment of impact should be provided by the applicant, in order to assist an assessment of the benefits of the scheme against its heritage impact. Proposals that would result in a negative impact to an undesignated heritage asset without an adequate public benefit would not be supported.~~

~~iv. The sensitive retrofitting of energy efficiency measures and the appropriate use of micro-renewables in all historic buildings (whether designated or not) will be encouraged, while safeguarding the special characteristics of these heritage assets for the future.~~

6.9-8 The Harpenden Neighbourhood Plan Area includes a vast range of designated and undesignated heritage assets and the protection and enhancement of those assets and their settings through carefully prepared planning applications is important to the Neighbourhood Plan. Harpenden's character is of a low-rise town with building designs that are modest and considerate to heritage assets. While the Neighbourhood Plan does not seek to be prescriptive on design, it is important that new developments seek to approach design formulation from a heritage-led perspective.

6.10-9 The approach set out in Policy ESD2 about Heritage Statements is consistent with the National Planning Policy Framework. Proposed developments should not cause any harm to heritage assets and where a proposed development could be redesigned in such a way that retains its public benefits and reduces harm to heritage assets the Town Council will push for this approach.

6.11-10 Harpenden Town Council intends to prepare Supplementary Planning Guidance setting out Areas of Local Character outside of the Conservation Area, which will guide applicants towards meeting the requirements of Policy ESD2.

ESD3 – Shopfronts

Proposals to create new or alter existing shopfronts will be welcomed where the design contributes to the attractiveness of the shopping area.

Traditional timber shopfronts with large unobstructed windows are favoured. Any advertisements in or on shopfronts should be modest, particularly in the Conservation Area or where the proposal will affect a Listed Building.

6.12-11 Harpenden Town Council intends to prepare Supplementary Planning Guidance that will add detail to Policy ESD3.

6.13-12 Shopfronts make an important contribution to character in Local Centres and particularly in Harpenden Town Centre. While the Neighbourhood Plan does not seek to be too prescriptive on the design of shopfronts, Policy ESD3 and future guidance seeks to set some acceptable parameters for shop front design.

ESD4 – Streets as Social Spaces that are Pleasant to Be In

Improvements to the public realm should be designed to encourage the activities intended to take place within it. Streets should be designed to accommodate a range of users, create visual interest and amenity, and encourage social interaction.

New residential streets (not including main routes in new residential developments) must be designed in a way that encourages and prioritises pedestrians and cyclists rather than vehicle traffic. These streets should be suitable for a range of social activities, such as children’s play, with 20mph generally being the maximum speed limit. Oppressive or divisive boundary markers will not be permitted.

ESD5 – New Car Parking Design

Parking, garages and servicing/ delivery yards for new development must be visually attractive or concealed by attractive design features. Cars must not dominate public areas and pedestrian and vehicular conflict must be minimised.

6.14-13 A key ambition of the Harpenden Neighbourhood Plan is to create an environment where residents choose to use sustainable and healthy forms of travel over the use of private vehicles. Policy ESD4 links with those policies in the Transport and Movement Chapter that seek to encourage a modal shift away from using private motor vehicles.

6.15-14 Policy ESD5 seeks to ensure that new developments are not visually dominated by car parking. This can be achieved through a number of design features including careful siting and orientation of buildings and open spaces as well as planting of trees, hedgerows and other vegetation.

ESD6 – Refuse and Recycling

All proposals involving the creation of new residential units or non-residential floorspace must ensure sufficient bin capacity for waste and recycling is provided. Applicants must engage with St Albans City and District Council to confirm this. Storage must be incorporated, which should obscure views of bins from the public realm. Bins should be stored in a location where collection can take place conveniently without causing unacceptable disruption to road users and, where possible, should be secure.

6.15 It is important for the cleanliness and appearance of Harpenden to ensure that all developments incorporate a sufficient capacity for waste in consultation with St Albans City and District Council and provide space for the concealed storage of waste. For non-residential and flatted developments we expect secure waste stores that are convenient to occupiers and collectors. For developments involving new homes, each individual home should have its own bin store with sufficient capacity for all bins provided by St Albans City and District Council.

ESD7 – Local Green Spaces

The following sites are designated as Local Green Spaces:

- X
- X
- X
- X
- X
- X
- X
- X
- X
- X
- X
- X
- X
- X

On these Local Green Space there should be no permanent development unless the Applicant can demonstrate very special circumstances to justify a development.

6.16 Supporting Document I details the selection process for the Local Green Spaces listed in ESD7 for the designation of each Local Green Space in accordance with Paragraph 77 of the National Planning Policy Framework. The Local Green Spaces are identified at Figure 6.1 and each are shown in more detail in Supporting Document I.

ESD87 – Green and Open Spaces and Areas of Ecological and Landscape Value

Developments must seek to maintain and enhance the quality and character of the varied open and green spaces, rivers and the natural environment within the Neighbourhood Plan area. Development should not result in the loss of or significant harm to ecological or landscape value of the varied green spaces, rivers and natural environment.

Significant developments must include proportionate new public open spaces, including green spaces [\(linked where feasible\)](#).

~~6.16 It is important for the cleanliness and appearance of Harpenden to ensure that all developments incorporate a sufficient capacity for waste in consultation with St Albans City and District Council and provide space for the concealed storage of waste. For non-residential and flatted developments we expect secure waste stores that are convenient to occupiers and collectors. For developments involving new homes, each individual home should have its own bin store with sufficient capacity for all bins provided by St Albans City and District Council.~~^[AB1]

ESD8-ESD9 – Key Views

The Harpenden Neighbourhood Plan area includes the following Key Views, which are shown in Figure 6.1:

1. The Common
2. The High Street
3. Batford Springs
4. Kinsbourne Green Common

Development proposals must include evidence that detail protection or enhancement of key views to and from these locations, including attractive green spaces and important townscape features, such as landmark and gateway buildings.

ESD9-ESD10 – Views in New Developments

Views along streets and/or open spaces to the surrounding countryside must be created within new developments where there are opportunities to do so. Development should not have a harmful visual impact on the townscape or landscape.

ESD10-ESD11 – Access to the Natural Environment

Proposals should retain and enhance public rights of way. ~~Where practical, in~~ Major development proposals on sites currently outside of the Built up Area Boundary of Harpenden (including Green Belt land released in a future St Albans Local Plan) should create new public rights of way and cycle paths. These should act as green links, improving accessibility and connectivity between the town and green spaces including open countryside and should connect to the existing network of public rights of way, including footpaths, cycle lanes and bridleways.

The integrity and value of green corridors such as watercourses and disused railway lines should be maintained and opportunities to strengthen such green links are not to be unacceptably compromised.

Proposals for new definitive rights of way which improve the opportunities for sustainable transport or which give greater access to the countryside for all users will be supported particularly where they are identified in the Hertfordshire County Council's Rights of Way Improvement Plan.

6.~~17-17~~ The key views have been chosen as they include important natural and built features:

- Harpenden Common is a key open space in Harpenden, forming a green wedge that bisects the southern part of Harpenden up to the town centre. It is vital that views both in to and from the Common are protected, given the rural character it brings to the town and the concentration of heritage assets at its boundary;
- The linear High Street of Harpenden forms the majority of its historic core and long-distance views are present along it. A number of Harpenden's precious heritage assets as well as small green spaces that offshoot from the Common can be seen along it;
- Batford Springs is a nature reserve with biodiversity value. There are many views in to Batford Springs and views from within the site are usually restricted by greenery, giving a rural feel to the area; and
- Kinsbourne Green Common is a key parcel of land in Harpenden Rural Parish. Much like Harpenden Common, it provides a visual openness to nearby properties and is regularly used for recreation. The protection of views to and from the Common is therefore very important.

6.~~18-18~~ In order to demonstrate protection of the above views, applicants will need to provide some evidence proportionate to the scale and likely impact of the proposal, which must accurately detail the anticipated impact of the proposed development on the key view.

6.~~19-19~~ The principle of supporting key views also applies to Policy ESD9 in the case of new development. This requirement shares a connection with Policy ESD10, which supports the provision of green links alongside new development in support of a connectivity between Harpenden and its surrounding countryside, for the enjoyment of residents and visitors, whether walking, cycling or horse riding.

ESD11-ESD12 – Allotments

Allotment sites that are registered as statutory allotments will be protected, and enhanced where possible as defined in the Town Council's statutory duty. Requests to develop additional allotments will be supported should there be demand for them.

6.~~20~~20 Allotments fulfil an important role in recreation, food production, socialisation and biodiversity. The protection of valued and well-used allotments is important for the sustainability of Harpenden. In addition, the creation of new allotments, particularly alongside new development, would be welcomed provided demand is anticipated.

ESD12-ESD13 – Biodiversity

The protection and enhancement of urban and rural biodiversity will be supported. Efforts to enhance biodiversity, such as through the creation of new habitats, the enhancement of existing sites and the development and implementation of ecological management plans will be supported. Green roofs and walls will be encouraged where appropriate.

Design and landscaping of proposed developments should be formed in the context of biodiversity conservation. Major developments should incorporate design features which support local wildlife such as incorporating swift bricks and swift or bat boxes in developments.

~~The integrity and value of green corridors such as watercourses and disused railway lines should be maintained and opportunities to strengthen such green links are not to be unacceptably compromised.~~

6.~~21~~21 The Neighbourhood Plan seeks to encourage development that has the least possible negative impact on biodiversity. Sites should be rigorously assessed for species present on-site and design features that enhance biodiversity should be prioritised, particularly where these can be conveniently and cheaply provided as an alternative to a feature that has less biodiversity value.

ESD13-ESD14 – Trees and Hedges

Development proposals should be designed to retain ancient, **veteran and mature** trees (**particularly in ancient woodland**) or trees or hedgerows of **ecological**, arboricultural or amenity value and should be accompanied by a tree survey that establishes the health and longevity of any affected trees. Development proposals must not result in unacceptable loss of – or damage to – existing trees or woodlands or hedges or significant landscaping during or because of development.

Any-Where trees must be lost as a result of development, ~~must these must~~ be replaced at a ratio of at least 12:1 within the site, with a preference for native trees and for fruit and nut trees. The responsible planting of additional trees that reduce or absorb air pollution from traffic will be supported throughout the Neighbourhood Plan Area.

6.22-22 Tree Preservation Order trees and trees in the Conservation Area are already closely protected in planning law. It is important that all valuable trees and hedgerows in the Neighbourhood Plan area are protected and only replaced with robust justification, supported by a tree survey that clearly details the significance of the valuable tree.

6.23-23 It is important that there is no net loss of trees in the Neighbourhood Plan Area, with any loss counterbalanced with at least an equal number of appropriate replacement trees. Preferably these should be native or fruit/nut trees due to the biodiversity value brought by these trees.

~~ESD14-ESD15~~ – Sustainability and Energy Efficiency

All development must support the objectives of making the Neighbourhood Plan Area a low carbon area, supporting sustainable living, sustainable working and sustainable leisure and mitigating the impacts of climate change. Developments should be designed to minimise energy consumption including through the use of sustainable materials, high-energy efficiency levels, the incorporation of renewable energy initiatives and the efficient design of the building. Developments should aim to be carbon neutral.

Major developments are required to support sustainable living and utilise best practice in the use of sustainable resources, green technologies and sustainable transport infrastructure such as renewable energy and storage, decentralized heating systems, heat from waste systems, rainwater harvesting and electric car charging points.

~~ESD15-ESD16~~ – Carbon Dioxide Emissions

Major developments must demonstrate an improvement to the baseline Target Emission Rate for carbon dioxide emissions as set out in Building Regulations.

To reduce carbon dioxide emissions from developments, energy use should be reduced by sustainable use of energy in accordance with the following energy hierarchy:

- 1. Reduce energy usage. This can be achieved through adopting sustainable design principles that reduce the amount of energy needed;**
- 2. Supply energy efficiently. This can be achieved for example by using decentralised energy systems/combined heat and power; and**
- 3. 3. To use renewable energy.**

Carbon neutral developments would be welcome and the requirements of ESD15 do not apply to designated heritage assets should the applicant robustly demonstrate that meeting the requirements would have a negative impact on the heritage asset in accordance with relevant Historic England Guidance.

ESD16-ESD17 - Community Energy Initiatives

Community energy initiatives will be encouraged. In particular, the Neighbourhood Plan supports renewable energy schemes that demonstrate evidence of community consultation at early stages in the development, especially when this leads to a tangible benefit to the community. This could, for example, be in the form of allowing community investment in the scheme or developer investment in other low carbon initiatives in Harpenden. However, any community energy initiatives must not have a negative impact on the amenity of local residents or the appearance and character of the surrounding area.

6.24-24 Planning Policy fulfils an important role in bringing about a move towards a reduction in energy consumption, reduced emissions, cleaner energy and a low carbon future. The expectations of new developments in this area must be proportionate and therefore a threshold of major developments is chosen for Target Emission Rate reductions to prevent small projects from becoming unviable. However, all proposals are expected to choose environmentally friendly features wherever possible, as set out in ESD14.

6.25-25 In 2007, the World Wildlife Fund identified St Albans District as having the second largest ecological footprint in the UK. This position may have changed somewhat since, however, efforts to reduce carbon dioxide emissions through sustainable design are important to redress the impact of this area on the environment. Therefore, Policy ESD15 expects an improvement on the baseline Target Emission Rate as set out in Building Regulations.

6.26-26 Community energy initiatives are an effective way to reduce carbon dioxide emissions across a number of properties and therefore the Neighbourhood Plan supports these schemes when they are sensitive and attract community support.

ESD17-ESD18 – Flood Risk

Proposals must incorporate a sustainable and integrated approach to the management of flood risk, surface water (including run off) and foul drainage. These proposals should be robust to the expected impacts of climate change.

Developments over one hectare or all developments in Flood Zone 2 or 3 must be supported by a Flood Risk Assessment.

All development involving the loss of permeable surfaces, loss of trees, loss of soft landscaping or loss of any other feature that reduces flood risk is required to use appropriate mitigation measures to prevent an increase in flood risk within the site or elsewhere. This should be proportionate to the

scale of the proposal, with small interventions (such as planting or use of impermeable surfaces) acceptable for minor developments in areas of low flood risk.

Sustainable Drainage Systems (SuDS) should be used proportionately to mitigate any predicted increase in flood risk. These may include:

- i. Planting, particularly trees;**
- ii. Introduction of permeable driveways, parking or other ‘hardstanding’ areas;**
- iii. Rainwater water harvesting and storage features (including butts);**
- iv. Green roofs;**
- v. Attenuation tanks;**
- vi. Soakaways;**
- vii. Attenuation ponds.**

SuDS must be designed as an integral part of the green infrastructure and street network. The system should effectively mitigate any adverse effects from surface water run-off and flooding on people, property and the ecological value of the local environment. A surface water sewer should be seen as a last resort and no surface water will be permitted to enter the public foul sewage network.

Major developments must provide a SuDS Strategy and drawings showing all SuDS features. This must be supported with calculations showing how surface water flood risk will not increase.

6.~~27-27~~ Without appropriate mitigation, new development can increase flood risk within its site or in surrounding areas. Harpenden has few areas within Flood Zone 2 or 3, however, pockets of this land exist in Batford. Development proposals in these areas should provide detailed flood risk assessments and are highly unlikely to be acceptable except in exceptional circumstances, given the wide availability of Flood Zone 1 land.

6.~~28-28~~ SuDS are important across the Neighbourhood Plan Area to reduce surface water flood risk arising from new development. SuDS range from inexpensive and simple interventions such as use of gravel and planting to more complex engineered solutions such as attenuation tanks. It is realistic for all developments that have the potential to increase flood risk to mitigate that risk to an acceptable level through the use of SuDS. For major developments, it is important that a SuDS Strategy is provided with appropriate drawings.

ESD18-ESD19 – Water Conservation

All developments must be designed taking into account best practice in water efficiency, such as water efficient fittings and appliances, water harvesting and storage features, and green roofs. All major developments must provide evidence of anticipated internal water use at or below 120 litres per person per day.

6.~~29~~29 Policy ESD18 is consistent with Building Regulations. Evidence may be provided in the form of simple calculations that can be easily understood from a non-technical perspective.

~~ESD19~~ESD20– Pollution

Appropriate best practice measures should be incorporated into developments to avoid pollution to air, water and soil both during construction and in the operation of the completed development.

Developments should not increase air pollution levels in the area and actions should be taken to mitigate this such as planting, appropriate siting of air outlets, and designing to ensure any air pollution can dissipate.

Developments should be designed to minimise light pollution for example by appropriate siting of lights, appropriate light fittings, and management of external lighting.

6.~~30~~30 The Harpenden Neighbourhood Plan is not in an Air Quality Management Area, but community consultation suggested that there are some pockets of poor air quality, particularly within the vicinity of Harpenden’s more congested highways. Measures to reduce or protect against poor air quality within the Neighbourhood Plan Area will be encouraged for the health of residents.

7. HOUSING

Introduction

7.1 Housing is a key issue locally. We anticipate that the newly emerging St Albans Local Plan will seek to provide a significant amount of new housing in the Harpenden Neighbourhood Plan Area, including through the release of strategic sites from the Green Belt for significant housing developments. This Neighbourhood Plan recognises the need for housing, particularly housing that is genuinely affordable and suitable starter homes for those who grew up in Harpenden and suitable homes for older people to downsize into without having to leave the area. However, it is important that housing is in the right place and is supported by the correct improvements to local infrastructure to mitigate impact on existing residents.

7.2 The Neighbourhood Plan does not have the power to release Green Belt land and does not allocate strategic sites. These will come forward in the new St Albans Local Plan. However, there are a number of small to medium sized urban sites that are allocated in this chapter, which together will reduce some pressure on greenfield land and the Green Belt. A key ambition is to try to increase delivery within the Built up Area of Harpenden as much as possible to protect the Green Belt.

7.3 While the Neighbourhood Plan cannot control the amount of housing required in Harpenden over the next 15 years, it can have a say on the type, size, design and affordability of housing, ensuring it meets the needs of the whole community.

Community Feedback

Engagement 1 – Issues

7.4 ~~At this stage, residents were asked to share their views on a number of statements about housing.~~ Generally, residents felt it was more important to protect green spaces than to provide housing, which is something this Neighbourhood Plan is seeking to enable by allocating urban housing sites, reducing the burden on a future St Albans Local Plan. In addition, residents felt that new housing was not necessary to ensure shops and facilities remain viable. In terms of the location of housing, many respondents did not feel housing needed to be within walking distance of Harpenden Town Centre.

~~7.5 Broadly,~~ there was support for prioritising housing for first time buyers, young families and older people. In addition, there was some support for affordable housing, particularly intermediate forms but also a slight support for more socially rented housing. Respondents saw a need for one and two bedroom flats and two to three bedroom family homes, but were generally against or neutral to the idea of 4+ bedroom larger family homes.

Engagement 2 – Vision, Objectives and Policy Ideas

~~7.6~~ 77% of respondents agreed with the Vision and all five objectives presented at engagement 2 received over 70% support. ~~Therefore, these have remained materially unaltered since Engagement 2 and the policies included in this draft Neighbourhood Plan reflect those objectives.~~ The individual comments received highlighted some similar themes to Engagement 1, including that affordable housing should be prioritised ahead of luxury housing. In addition, there was a clear concern about the need to provide infrastructure alongside new housing developments, particularly to ease highways congestion.

Engagement 3 – Regulation 14 Draft Neighbourhood Plan

7.6

Housing Vision

~~Those that grow up in Harpenden should have the capability to live here should they wish to. We wish to have a mixed housing offer that is well located and designed and that has the ability to meet the aspirations of different ages and demographic groups and the flexibility to integrate and accommodate people throughout their lifetime.~~

Housing Objectives

~~H01: Those that grow up in Harpenden should have the capability to live here should they wish to.~~

~~H02H01: Provide a mix of housing that meets current gaps in housing market specifically 1 to 2 bed flats/bungalows and 2 to 3 bedroom family homes.~~

~~H03H02: Encourage starter homes and intermediate housing including support for key workers.~~

~~H04H03: Support the ability for older people to downsize should they wish to.~~

~~H05H04: Support the redevelopment of housing stock that is coming to the end of its lifespan.~~

Housing Policies

H1 – Housing Strategy

~~New residential development will be supported as long as it meets the requirements set out in the latest housing need assessment prepared by St Albans City and District Council subject to compliance with other Development Plan Policies. Such housing should firstly come forward through be delivered on sites identified-allocated in the Neighbourhood Plan (and subsequently a future St Albans Local Plan) and then through-infill and brownfield development-wherever possible.~~

7.7 The Harpenden Neighbourhood Plan recognises the need for housing in its area, appreciating that while there is a shortfall in delivery across St Albans District, new housing will be developed regardless of whether there is local support or not, in line with a number of recent Planning Appeal decisions locally and nationally. The Neighbourhood Plan does not support delivery over and above the latest assessment of housing need except where a proposal includes a targeted type of housing (such as for First Time Buyers), which benefits from considerable local support. It also seeks to ensure that Harpenden takes no more than its “fair share” of housing in comparison to other parts of St Albans District.

7.8 The Neighbourhood Plan also recognises the role of the Green Belt and supports the prioritisation of its protection. Therefore, the Neighbourhood Plan proposes that the ability of the current Built up Area of Harpenden to provide appropriate new housing is ~~maximised-exhausted-prior~~ to minimise the amount of delivery-of new housing delivered on land that is currently in the Green Belt. In accordance with this approach, a number of housing site allocations are proposed in the Built up Area of Harpenden.

7.9 We ask developers to advertise locally in support of the ambition to provide housing to meet local needs, while recognising there is no ability to enforce this through policy.

H2 – Housing Renewal

The redevelopment of existing residential properties that are **robustly demonstrated to be** no longer fit for purpose will be supported. The Neighbourhood Plan defines a property as no longer fit for purpose if it meets one or more of the following criteria: unsafe, in disrepair, unsustainable, or makes inefficient use of its site.

Redevelopment must be of a high quality design **that is acceptable in terms of scale and massing with neighbouring properties** and conform to all other relevant policies in the Neighbourhood Plan.

7.9-10 Harpenden benefits from a generally high quality stock of housing. However, there are some isolated examples of housing that would benefit from replacement. Where an applicant can demonstrate a proposal meets one or more of the fit for purpose criteria included in Policy H2, this Neighbourhood Plan will support appropriate replacement, taking in to account other policies in this Plan.

H3 – Dwelling Size and Type

Major residential developments are required to submit a Dwellings Mix Strategy as part of the Design and Access Statement with any planning application. The strategy must clearly demonstrate how the proposed development addresses the objectively identified need for different sized and types of housing as set out in the latest assessment of housing need carried out by St Albans City and District Council. Proposals that are not considered to meet an identified size/type need will not be supported.

7.10-11 It is important that new housing in Harpenden meets local needs. Need is regularly assessed by St Albans City and District Council, currently in Strategic Housing Market Assessments, which consistently show there is a need for smaller one and two bedroom flats and two to three bedroom family houses. There is also a clear local support for smaller functional dwellings rather than larger and luxury family houses and flats. Policy H3 is intended to be flexible, allowing some sites to deliver, for example, ten one-bedroom flats for over 55s or housing for first time buyers, while other sites may prioritise family housing. Sites of more than 100 homes, however, should seek to be closely aligned to the latest assessment of need and provide a range of housing types, in order to prevent any further imbalances of need.

H4 – Residential Density

New major residential development must be at an appropriate density subject to local character and in accordance with the desire to protect the Green Belt insofar as possible. A minimum **net** density of 40 dwellings per hectare **must-should** be met unless an applicant can demonstrate doing so would have a negative impact on local character, a designated heritage asset, biodiversity, trees or flood risk. ~~Higher density developments may be acceptable in Harpenden Town Centre subject to design considerations.~~

7.11-12 A key principle of the Harpenden Neighbourhood Plan is to seek to protect the Green Belt. Therefore, it is important that sites are used efficiently while not adversely impacting local character.

In particular, the Neighbourhood Plan considers appropriate higher density development to be acceptable in Harpenden Town Centre, provided the Conservation Area and key views from the Common are not negatively impacted (i.e. buildings should not breach established ridge heights unless in exceptional circumstances). A minimum density of 40 dwellings per hectare elsewhere is considered to be an appropriate medium-density, which reflects local circumstances while increasing the prevailing density somewhat to account for the ambition to protect the Green Belt in the context of a pressing need for housing.

H5 – Higher Density Residential Development

Subject to compliance with other policies in this Plan, residential or mixed-use residential proposals that look to build upwards as a way of increasing density will be supported as long as it meets the following criteria:

- a) Situated in an appropriate accessible location, such as Harpenden Town Centre or Southdown Local Centre**
- b) No taller than three stories in height unless in exceptional circumstances.**

7.13 Harpenden is predominantly a low-rise town with only a small number of properties over three storeys in height and most areas limited to two storeys in height. Exceptional circumstances will exist where it can be robustly demonstrated that no harm will arise to the character of the surrounding area or amenity of neighbouring occupiers.^[AB2]

H5-H6 – Affordable Housing

Proposals for major housing developments are expected to provide 40% of affordable housing subject to viability until such time as a new St Albans Local Plan is adopted with a revised target for affordable housing.

On all such schemes, affordable housing will be provided on-site as part of the residential development and will be fully integrated within it, other than in exceptional circumstances. Affordable housing should ~~usually be approximately 60% socially rented and 40% intermediate.~~ **be provided as both socially rented and intermediate housing in line with the latest assessment of needs undertaken by St Albans City and District Council or a future St Albans Local Plan target.**

7.12-14 The target amount of affordable housing is derived using data produced by St Albans City and District Council, including its assessment of the number of people on its housing register. There is a clear need for affordable housing in the District, which justifies the 40% target rate. Where 40% affordable housing is proven to be unviable, the Neighbourhood Plan supports St Albans City and District Council to ensure a maximum viable amount of affordable housing is delivered.

H6 – Advertisement of Market Housing

~~Developers of market housing in the Neighbourhood Plan Area should seek to advertise locally in the first instance.~~

~~7.13 We ask developers to advertise locally in support of the ambition to provide housing to meet local needs, while recognising there is no mechanism to enforce this.~~

H7 – Lifetime Homes

New housing should be capable of meeting the changing needs of residents over their lifetimes. It should be accessible to those with limited mobility and capable of adaptation for residents who are wheelchair users.

On major housing developments, at least 10% of homes shall be built to be ‘Wheelchair Adaptable’ as defined by Building Regulations M(2) or whatever standard supersedes it.

7.14-15 It is important that a reasonable amount of housing stock is provided to meet the needs to those with disabilities and for an ageing population. Ensuring 10% of units can be easily adapted for wheelchair users will reduce the need for those residents to make excessive alterations to properties that are not fit for wheelchair use.

H8 – Specialist Accommodation

Proposals for specialist accommodation and residential care will be supported where they are:

- a) **Within easy access to a choice of sustainable travel options.**
- b) **Within walking distance, on a safe route to the town centre ~~and-or~~ local centre shops and services.**
- c) **Well integrated with existing communities.**
- d) **Of a safe and stimulating design.**

7.15-16 Specialist housing should be well integrated with Harpenden rather than detached from the town. It is important that residents are able to conveniently access the range of shops and services in the Town Centre or its Local Centres. In the case of residential care, it is important that accommodation is accessible to staff and visitors.

H9 – Higher Density Development

~~Subject to compliance with other policies in this Plan, residential or mixed-use residential proposals that look to build upwards as a way of increasing density will be supported as long as it meets the following criteria:~~

- ~~a) Situated in an appropriate location, either in Harpenden Town Centre or Southdown Local Centre~~
- ~~b) No taller than three stories in height unless in exceptional circumstances.~~

7.16 Harpenden is predominantly a low rise town with only a small number of properties over three storeys in height and most areas limited to two storeys in height. Exceptional circumstances will exist where it can be robustly demonstrated that no harm will arise to the character of the surrounding area or amenity of neighbouring occupiers.

H9 – Private Outdoor Space for Residential Development

~~Appropriate private outdoor space must be provided for all new dwellings. In exceptional circumstances in the case of flats, it may be acceptable to provide this as shared amenity space.~~^[AB3]

H10-H10 – Housing Site Allocations^[AB4]

Proposals for residential development will be supported on the sites set out in Table 7.1 below, provided the proposed development is in accordance with the special conditions set out in Table 7.1 and the other policies of this Neighbourhood Plan and the Development Plan. The sites in Table 7.1 are identified at Figure 7.1. Indicative numbers of dwellings are subject to design considerations.

7.17 The housing site allocations in Table 7.1 seek to make a meaningful contribution to meet housing need in Harpenden during the interim period prior to a new St Albans Local Plan.

H11 – Private Amenity Space for Residential Development

~~Appropriate private outdoor amenity space must be provided for all new dwellings. In exceptional circumstances in the case of flats, it may be acceptable to provide this as shared amenity space.~~

<u>Site Ref</u>	<u>Site Name</u>	<u>Site area (hectares)</u>	<u>Minimum number of dwellings</u>	<u>Special conditions</u>

<u>HA1</u>	<u>Harpenden Memorial Hospital</u>	<u>1.62</u> <u>(0.84*)</u>	<u>34</u>	<u>Retention of healthcare use on remainder of site in accordance with Policy SI8</u>
<u>HA2</u>	<u>Former Westfield Allotments</u>	<u>0.57</u>	<u>23</u>	<u>100% affordable housing</u>
<u>HA3</u>	<u>Pan Autos, Grove Road</u>	<u>0.33</u>	<u>14</u>	
<u>HA4</u>	<u>Jewsons, Grove Road</u>	<u>0.34</u>	<u>14</u>	
<u>HA5</u>	<u>Garages at Noke Shot</u>	<u>0.19</u>	<u>7</u>	
<u>HA6</u>	<u>Land at 63 High Street</u>	<u>0.21</u>	<u>5</u>	
<u>HA7</u>	<u>Victoria, Alexandra, Littleport and Collingham Houses, Marlborough Park</u>	<u>0.33</u>	<u>5</u>	<u>Requirement to re-provide the same amount of employment floorspace as currently provided on site.</u>
<u>HA8</u>	<u>Land and Garages at Longfield Road</u>	<u>0.12</u>	<u>4</u>	
<u>TOTAL</u>			<u>106</u>	

*Approximated residential area (excluding land to be retained as healthcare)

** Reduced target due to site specific considerations

***See Paragraph 7.18

~~7.17-18 The A minimum indicative number of dwellings for each site set out in Table 7.1 is provided based on the findings of the site assessment process application of the minimum density target of 40 dwellings per hectare in Policy H4 of this Neighbourhood Plan. This is with the exception of sites HA6, HA7 and HA8, which have reduced minimum figures due to site-specific considerations. HA6 and HA8 have reduced minimum figures due to uncertainty of the amount of each site that could be developed, which is brought about by the irregular site layouts. HA7 has a reduced minimum figure due to the requirement to at least retain the amount of employment floorspace on site.~~

~~7.19 The actual number of dwellings that would be suitable on each site may be higher than the minimum numbers set out in Table 7.1 vary subject to detailed design proposals. Applicants are expected to make good use of sites, providing an appropriate number of dwellings in the context of local character and the ambition to protect the Green Belt. In particular, HA3 and HA4 may be suitable for a greater number of dwellings given the accessible location of these sites and the possibility of combining the two sites into one proposed development. Given the proximity of the two sites, a combined proposal for HA1 and HA2 is encouraged and may allow a greater number of dwellings across the site.~~

~~7.18 In addition to the proposed site allocations in this draft Neighbourhood Plan, two other sites are currently being considered as additional housing site allocations:~~

- ~~• Harpenden Memorial Hospital; and~~
- ~~• Harpenden Public Halls~~

~~7.19 There are current plans to redevelop the Harpenden Memorial Hospital Policy S18 concerns the healthcare aspect of that development. Subject to further discussions, the Neighbourhood Plan may support the introduction of new residential use at the site, provided this does not have a negative impact on the healthcare use. The Neighbourhood Plan would like to explore the possibility including specialist accommodation in the proposals.~~

~~7.20 The proposed new Cultural Venue in Rothamsted Park may allow the potential re-use or redevelopment of the Harpenden Public Halls. The Neighbourhood Plan may allocate future residential use at that site, subject to consideration of an appropriate ground floor use.~~

8. SOCIAL INFRASTRUCTURE AND COMMUNITY FACILITIES

Introduction

8.1 Harpenden benefits from a wide network of social infrastructure and community facilities. Our town hosts 16 nurseries, 11 primary schools, three secondary schools, three doctors surgeries, one specialist hospital (the Memorial Hospital) and a large number of faith, sports, arts and other cultural facilities and organisations. We recognise the role this network of social infrastructure performs locally and the need to continually improve and enlarge our social infrastructure alongside population growth.

Community Feedback

Engagement 1 (Key Issues)

8.2 Residents were asked for their views on a number of key issues. Residents overwhelmingly felt that it was important to protect and retain community facilities (86%) and that it was important to ensure infrastructure is improved alongside new development, in order to mitigate any impact (85%). There was support for the range of schools in Harpenden but a desire for better healthcare, sports and leisure and arts and cultural facilities. However, a reasonable number of respondents remained neutral on this matter.

~~8.3 In terms of individual comments, a~~ A large number of people stated a need for more school places in Harpenden. In addition, there were comments supporting better healthcare access and better use of the Harpenden Memorial Hospital.

Engagement 2 (Vision and Objectives)

~~8.4~~ 3 90% of respondents agreed with the proposed Vision for social infrastructure and community facilities. The objectives were also firmly supported, with only two receiving less than 80% support and the lowest receiving 69% support. Therefore, the objectives have been largely retained as presented in this draft Neighbourhood Plan.

~~8.5~~ 4 Individual comments received revolved around the proposal of a hotel (this objective received 69% support), some respondents commented that hotels had been lost recently and other people questioned the need for a hotel. In addition, a number of people mentioned that school places should be for local residents only.

Engagement 3 (Regulation 14 Draft Neighbourhood Plan)

8.5 Each proposed policy received over 70% support at engagement 3. Following engagement 3, some minor updates to policies were made and two additional policies were added. Policy SI9 regards the future redevelopment of Harpenden Public Halls (which was alternatively referenced in the residential section in the Regulation 14 draft) and the Policy SI11 concerns the provision of utilities infrastructure.

Social Infrastructure and Community Facilities Vision

Maintain and enhance a vibrant cultural and community life through excellent school and health care provision, high quality sports, leisure and community facilities and accessible social infrastructure.

Social Infrastructure and Community Facilities Objectives

SIO1: An accessible place, at a good school, for every local child whose parents want to see them educated in the town.

SIO2: Ensure that the health and wellbeing needs of the population of Harpenden and surrounding villages are met and plan for the future provision of services to accommodate an expanding and aging population.

SIO3: Ensure development includes appropriate provision of utilities infrastructure and contributes to the quality of services infrastructure throughout the Neighbourhood Plan area.

SIO4: Enhance the provision of sports, leisure and cultural facilities and play areas to meet the needs of all age groups, including recreation in the open countryside.

SIO5: Support the aspirations of Harpenden's sports clubs to deliver excellent facilities.

SIO6: Support the provision and enhancement of facilities for voluntary and community organisations, faith groups and schools, that are easily available for community use.

SIO7: Support the development of additional overnight accommodation in appropriate locations, including hotels, to address the needs of visitors to the town.

Social Infrastructure and Community Facilities Policies

SI1

Proposals to address any shortfall of accessible school places within Harpenden through temporary or permanent expansion of existing schools will be supported. Where expansion is not feasible or appropriate, we would support appropriate proposals for:

- a) New secondary schools to serve additional and existing residents**
- b) New primary schools to serve additional and existing residents**
- c) Pre-school and/or early years' places**

Proposals for new schools must demonstrate that the chosen site is sustainably located in the context of its expected pupil intake, in order to minimise any traffic impact. Proposals must incorporate travel plans that encourage a reduction in the use of private cars for school journeys.

8.6 Harpenden has a large number of primary and secondary schools. The latest forecasting from Hertfordshire County Council states that there is adequate primary school provision in Harpenden to 2020 and an emerging deficiency in Secondary School places. To address this deficiency, there are plans in place to deliver a fourth secondary school in Harpenden. Should that planning application be determined following the adoption of this Neighbourhood Plan, the proposals will need to be in accordance with its policies.

8.7 Appropriate enlargement of existing school facilities is the most desirable way to accommodate an increase in demand. However, this Neighbourhood Plan recognises that major strategic sites are likely to benefit from on-site primary school provision where a sufficient amount of housing is provided to sustain a primary school.

S12 – Protection of Community Uses

Development proposals that would lead to the loss of buildings or facilities used, or last used, for community uses¹, will not be granted planning permission unless the use is suitably re-provided elsewhere or it can be clearly demonstrated that the building or facility is no longer required.

1 Including dental practices, doctors surgeries, medical centres, faith buildings, public halls, nurseries, schools, indoor and outdoor sports facilities, Public Houses, Post Offices, hospitals, town halls/parish offices, children's and family centres, public open spaces, allotments/community orchards

The protection of community uses is vital to ensure a range of accessible services and support is available to local residents. While the loss of community uses may be financially advantageous, it is important to protect a network of facilities that supports the network of voluntary organisations in Harpenden. Therefore, this Neighbourhood Plan seeks to ensure valued community uses are retained.

S13 – Venues for Community Use

Subject to compliance with other policies in this Neighbourhood Plan, the enhancement of existing and development of new community uses, including faith buildings, community halls and school dual use facilities is supported providing that they comply with the latest design guidance set by the relevant regulatory authority.

Any planning application proposal involving the creation of a new school must:

- a) Set out how, and to what extent, the facilities will be made available for sports and arts community use; and**
- b) Set out how, and to what extent, the facilities will be made available to providers of adult health and wellbeing activities.**

8.9 Many of Harpenden's existing schools make facilities available to the community outside of school hours. This approach increases the volume of community facilities and ensures that school facilities are well used at all times. Harpenden has a vibrant network of voluntary groups and the continued success of these groups is reliant on the availability of a range of functional venues. The improvement and enlargement of community venues is important to support the growth of the voluntary sector.

SI4 – Provision of Sports and Leisure Facilities

Proposals that enhance or provide new community sports and leisure facilities are supported, in particular where they are:

- a) Inclusive and suitable for residents with disabilities**
- b) Accessible to users by public transport, walking and cycling**
- c) Accompanied by an adequately-sized car park having regard to the likely modes of transport to and from the venue as well as nearby parking availability**
- d) Including a mix of facilities that have been determined in consultation with the local planning authority, Town Council, local sports clubs and other stakeholders.**

In particular, appropriate proposals that would provide a permanent venues local sports clubs without a permanent venue, such as Harpenden Hockey Club and the Harpenden Colts Football Club, would be supported.

SI5 – Provision of Arts and Cultural Facilities

Proposals that enhance or provide new arts and cultural facilities will be welcomed in particular where they are:

- a) Inclusive and suitable for residents with disabilities**
- b) Accessible to users by public transport, walking and cycling**
- c) Accompanied by an adequately-sized car park having regard to the likely modes of transport to and from the venue as well as nearby parking availability**
- d) Including a mix of facilities that reflect a range of cultural pastimes that have been determined in consultation with the local planning authority, Town Council and other stakeholders.**

8.10 Sports and leisure and arts and cultural facilities in Harpenden need to be accessible to all potential users. Therefore, it is important to seek to provide facilities in convenient locations, with ample car parking. This is likely to be in or within close proximity of Harpenden Town Centre. It is also important to ensure the design of new facilities and venues prioritises accessibility, for disabled and elderly residents.

SI6 – New Sports Centre and Cultural Venue

The Neighbourhood Plan supports the development of a new Sports Centre and Cultural Venue at the current site of Harpenden Swimming Pool and Sports Centre. The new venues should improve upon the current offer provided by the Swimming Pool, Sports Centre and Public Halls.

8.11 St Albans City and District Council is in the process of formulating proposals for a new sports and cultural complex at the site of the current Swimming Pool and Sports Centre in Rothamsted Park. This would allow for the disposal of the Public Halls. The Neighbourhood Plan supports the redevelopment of the site in principle and expects new facilities to include the treasured elements of the current facilities, including a theatre, studios, a swimming pool and various other sports facilities.

SI7 – Accessible GP Practices

New major residential developments should make appropriate funding towards GP provision where pressure on services is increased. Applicants should engage with the relevant health authorities at the earliest possible stage to agree the increase in capacity required to facilitate the proposed development. Developers of significant residential developments, should include on-site provision if preferred by the health authorities.

8.12 It is important that population growth in Harpenden does not negatively impact local residents ability to access GP services. Therefore, applicants of major residential developments must liaise with the Herts Valley Clinical Commissioning Group or other relevant healthcare providers at the earliest possible opportunity to ensure capacity is available for that development. Where there is a lack of capacity, contributions towards improving facilities should be made through Section 106 Agreements or, once adopted, CIL contributions. Developers of significant residential developments should consider on-site provision if preferred by the health authorities. Significant residential developments may merit on site provision, particularly when located in areas that are a considerable distance from existing healthcare facilities.

SI8 – Harpenden Memorial Hospital

Proposals to redevelop the Harpenden Memorial Hospital are supported, provided that they include-retain a healthcare use, preferably a Health and Wellbeing hub, of equivalent floorspace to the existing healthcare use at the site, which:

- 1. enables residents to access a wide range of health services and support in one place**
- 2. includes an increased GP provision**
- 3. provides specialist care for the elderly and those with physical and learning disabilities.**

8.13 The Harpenden Memorial Hospital is a key part of the social infrastructure network, having played a historic role in Harpenden for a number of years. The Herts Valley Clinical Commissioning Group is seeking to provide a local care hub in Harpenden, as set out in its 2016/17 Operational Plan. The Harpenden Memorial Hospital is preferred location for this use. Policy SI8 seeks to ensure that any plans that come forward at the Harpenden Memorial Hospital support a broad range of local residents.

SI9 – Harpenden Public Halls

Appropriate proposals for the redevelopment of Harpenden Public Halls into a residential use would be supported subject to the following criteria:

- **That development would not commence until the completion of a new Cultural Venue that accommodates the current functions of the Public Halls;**
- **That special consideration is given to the Grade II* Listed status of the building and that in the event of substantial harm to the significance of the Listed Building, such as through demolition, demonstrable public benefits outweigh its demolition; and**
- **That the design of a new development takes account of the prominent position as a gateway site. An element of ground floor active use befitting the gateway location would be preferred.**

8.14 The Harpenden Public Halls were assessed as part of the site assessment process. However, it was considered that the site could not be allocated due to uncertainty of a development proposal coming forward for the site and the detail of such a proposal. The Harpenden Public Halls is an important cultural venue and it should not be lost unless a new theatre and community venue is provided elsewhere in Harpenden. We anticipate this will happen in the near future due to the proposals for a new facility at the current leisure complex site in Rothamsted Park. The Harpenden Public Halls forms part of a Grade II* Listed building and therefore any redevelopment proposals must be considered acceptable in line with the test established in the NPPF, namely that the harm to the heritage asset is outweighed by the public benefits of the scheme. The Public Halls are located in the town centre and therefore the Neighbourhood Plan would prefer a ground floor active frontage appropriate to the location. This could include flexible workspace for home-workers or a destination retail use such as a restaurant. It may also comprise an appropriate community use.

SI9-SI10 – Visitor Accommodation including Hotels

Proposals for new visitor accommodation, including hotels, are encouraged in appropriate locations that are in close proximity to Town and Local Centres.

8.1415 In recent years, Harpenden has lost hotels to other uses, most recently Harpenden House Hotel. Hotels are vital for businesses, notably those with a wide reach such as Rothamsted Research, as well as residents for overspill accommodation. In addition, hotels support the growth of a visitor economy.

Should a hotel be considered viable at a site within close proximity to the town and local centres, Policy SI9 provides support subject to compliance with other policies in this Plan.

SI11 – Utilities Infrastructure

Major development proposals should be supported by robust evidence of capacity within the existing utilities network (for water, sewage, electricity, gas and broadband) to accommodate the proposed development without a negative impact on existing residents and users. This should be in the form of confirmation from the relevant authority. Where providers are unable to provide such confirmation, applicants must provide impact studies of the extent, cost and timescale for any required upgrade works.

8.16 Utilities infrastructure is crucial to the quality of life of new and existing residents. It is an issue that was regularly mentioned during engagement exercises. SI11 puts a reasonable expectation on developers to engage with the relevant authorities at the outset of a planning application, ensuring that capacity is not adversely impacted.

9. TRANSPORT AND MOVEMENT

Introduction

9.1 This Chapter sets out a number of policies in relation to transport and movement within the Harpenden Neighbourhood Plan Area. Located just east of the M1, near Luton Airport and within close proximity of a number of medium-large towns and cities, including Hemel Hempstead, St Albans, Welwyn Garden City, Stevenage and Luton, congestion is frequently experienced in the area. In particular, Main Roads through Harpenden such as the A1081 (which runs from St Albans to Luton via Harpenden Town Centre), the B653 (which runs from Luton to the A1(M) near Welwyn Garden City/Hatfield), B652 (Station Road), which runs from Harpenden Town Centre to the B653 and Redbourn Lane (which connects with the M1 via Redbourn) experience congestion regularly.

9.2 Many of Harpenden's residents in employment travel a significant distance to work. At the time of the 2011 Census, the average travel to work distance was 13.5 miles. The most common travel to work range for residents is 19-30 miles (3,295 persons in 2011), which includes the Central Activities Zone of London, including the City of London and the West End. Accordingly, a significant number of local residents (around 29% in 2011) take advantage of the regular Thameslink services to London, stopping at St Albans or heading further north to Luton or Bedford. However, drivers (59% in 2011) still outnumber the number of residents commuting by train.

9.3 In recent years, a number of small improvements to the sustainable transport network have been made and there is now an opportunity locally to reduce vehicle usage by encouraging local people to walk, cycle or catch a bus around town. An example of a local improvement is the new community bus scheme, the Harpenden Hopper, which is a volunteer led service, running a hail-and-ride circular route.

9.4 Parking is another key issue in Harpenden, particularly in the town centre, where residents feel car parks are often congested. There is concern about commuters parking on streets within walking distance of the station.

Community Feedback

Engagement 1 – Issues

9.5 Residents overwhelmingly agreed (95%) that new development should consider the impact on existing roads. In addition, 72% of respondents agreed that more town centre car parking is needed, with general support for improvements to walking and cycle infrastructure, including providing access to schools. Around half of respondents supported measures for traffic calming in favour of pedestrians and a similar number supported improvements to the public transport network. A significant number of people remained neutral on both of those matters. The only statement that received more negative than positive responses was the idea of a new Transport Hub in Harpenden Town Centre.

Engagement 2 – Vision, Objectives and Policy Ideas

9.67 At Engagement 2, there was a broad level of support for the proposed Vision and Objectives. 82% of residents agreed with the Vision and all but one Objective received over 75% support. The wording of that Objective, which received 67% support, related to a cycle hub in Harpenden Town Centre. As with Engagement 1, residents generally commented on issues of parking and congestion. In addition, some residents felt that the Neighbourhood Plan needs to be realistic in that private vehicles are still needed and that people would continue to use them. A significant amount of people supported the introduction of a multi-storey car park at the Station and better provision for people with impaired mobility.

Engagement 3 – Regulation 14 Draft Neighbourhood Plan

9.7 Each policy received at least 70% support. Some amendments to policies were made in response to the feedback received, including from the Highways Authorities and other transport stakeholders.

Transport and Movement Vision

That Harpenden residents are able to walk and cycle around safely and comfortably, and travel is managed via predominantly environmentally friendly, interchangeable methods, with the appropriate quantity and quality of cycle storage and parking provision, in an atmosphere of sustainable growth and significantly reduced pollution.

Transport and Movement Objectives

TMO1: Create an environment that promotes walking, cycling and community public transport as first choice modes for all residents and ensure that the services supporting these modes are in place, from high quality safe routes to reliable and sustainable transport services.

TMO2: Integrate modes of transport, for example through strategically located cycle storage.

TMO3: Create ~~motor vehicle~~ car free travel plans for getting to and from all Harpenden schools from all areas of Harpenden and surrounding villages.

TMO4: Reduce road traffic pollution and improve air quality.

TMO5: Ensure new developments include proportionate to scale transport infrastructure including sufficiently wide roads and pavements, cycle lanes, cycle parking, bus laybys, and other transport infrastructure with sufficient public transport and parking provision.

TMO6: Ensure new developments increase the density of walking and cycling routes and provide new crossings where appropriate.

TMO7: Ensure car parking within the town and transport to the town supports the viability of the town centre.

Transport and Movement Policies

T1 – Transport Assessments

Major development proposals or other -proposals that would cause a significant amount of transport movement will be supported by a Transport Assessment, which must demonstrate predicted levels of traffic generated from the proposed development and the impacts of this additional traffic on key roads and junctions within the town Harpenden Neighbourhood Plan Area. Transport assessments must identify areas of established traffic congestion. Where severe negative impacts on the network are identified developers will be expected to fund proportionate improvements to mitigate this impact in order to make the planning application acceptable.

T2 – Proposals Affecting the A1081, B653 and B652

~~Major development proposals~~ Proposals for development that directly accesses on that provide for direct access or indirect access (such as via a side street) onto to the A1081, B653 (Lower Luton Road), B652 (Station Road) or Redbourn Road that would ~~involve~~ cause a significant increase in traffic on those roads ~~(as demonstrated by a Transport Assessment)~~ will be required to make provision for, and contribute to, appropriate highways improvement measures to ease traffic congestion on those roads. Applicants must demonstrate that measures are incorporated that will ensure the

proposals do not ~~further inhibit the free flow of traffic~~ cause additional congestion on those roads or, in the case of the A1081 and its nearby streets, increase parking stress.

9.8 In order to mitigate the impact of new major development on the transport network, it is important in the first instance to assess the anticipated impact of that development. The threshold of major developments is in accordance with Paragraph 32 of the National Planning Policy Framework, which expects developments that generate significant amounts of transport movement to measure the impact of that development on the network. In the context of Harpenden, which has a significant existing pressure on the highways network, a major development threshold is considered most appropriate. In terms of the scope of transport assessments, applicants should refer to national guidance on transport assessments, currently contained in National Planning Practice Guidance (Paragraph: 015 Reference ID: 42-015-20140306).

9.9 The A1081, B653 and B652 are important local roads that frequently experience congestion. This is noted in the Harpenden Urban Transport Plan (2011), which notes in particular that congestion exists during the AM and PM peaks on these roads. The A1081 and B653 are connected by the B652, which means that congestion on each road may be conditional on the other routes. The particular issues experienced on these roads warrants the additional requirements set out in Policy T2.

T3 – Travel Plans

New ~~major~~ development proposals that are likely to generate a significant amount of traffic must provide and agree a Travel Plan setting out how opportunities for encouraging, facilitating and supporting use of and improvement to sustainable travel modes have been maximised and will be delivered with the aim of reducing pollution levels. This should be proportionate to the likely impact detailed in a Transport Assessment.

T4 – School Travel Plans

Proposals to improve the safe delivery of pupils to all Harpenden schools on foot, by bicycle, school bus or car will be supported. All school-related planning applications that are likely to impact the transport network, whether new schools or redevelopment, are required to prepare and agree ~~duce~~ a detailed School Travel Plan in support of this.

9.10 Travel Plans are key documents that help to address the potential negative highways impacts through appropriate mitigation measures of new developments on roadways as identified in a Transport Assessment. Travel Plans should also be prepared to include content suggested by national planning guidance, which is also currently contained within National Planning Practice Guidance (Paragraph: 011 Reference ID: 42-011-20140306). Schools generate a significant amount of traffic compared to other uses and local residents are keen to support sustainable travel to and from school that does not impede the transport network. The 2011 Harpenden Urban Transport Plan notes that congestion increases during the morning and evening school run periods. Ensuring schools in Harpenden develop and update a Travel Plan is a key way of managing this impact.

T5 – Road Layouts

On main routes and alongside new development, new road layouts that ~~enhance the free flow of~~ reduce congestion ~~traffic and~~ thus also reduce pollution levels will be supported, provided it is demonstrated that proposals are developed in accordance with the relevant aspect of the Hertfordshire Design Guide and in liaison with and supported by local people. Road layouts should also take into account the needs of cyclists.

9.11 The Neighbourhood Plan encourages proposals that would support clean air in and around Harpenden, particularly in areas noted for congestion. However, it also recognises that buy-in to these schemes is vital to ensure the success of new layouts. In addition, proposals must consider wider impacts on other domains of sustainability, such as economic and social matters. It is important that the transport system is optimised in a sustainable manner, including reducing poor air quality in the Neighbourhood Plan Area. As the Highways Authority, it is important that new developments take into account the guidance issued by Hertfordshire County Council on road layouts as detailed in its Design Guide.

T6 – Improvements to the Sustainable Transport Network

Appropriate provision of new and improved walking or cycling routes, improvements to the public transport network ~~and~~, the introduction of electric car charging points and the introduction of appropriate facilities for cyclists (including storage and changing facilities) are supported.

T7 – Integrated Pedestrian Network

All new housing developments must provide safe pedestrian access to link up with existing or proposed footpaths, ensuring that residents can walk safely to bus stops, schools, work and other facilities.

T8 – Bus Stop Layouts

In order to improve traffic flow and reduce congestion, proposals for significant residential development must provide appropriate road layout changes to ensure ~~existing and new~~ bus stops on main routes areas serving new residents are, where appropriate, are provided off the main highway (in a layby) to ensure traffic flow is not impeded.

T9 – ~~Harpenden to St Albans Sustainable Transport~~ Cycle Routes

~~New and improved improvement of the Harpenden to St Albans Cycle Route~~ cycle routes, pathways and bridleways within the Neighbourhood Plan Area, including those connected to nearby settlements, will be supported. In particular, improvements to the Harpenden to St Albans Cycle Route through the provision of a cycle only lane from Beesonend Lane past West Common would be supported.

9.12 A key ambition of the Neighbourhood Plan is to support a modal shift away from private motor vehicles and towards more sustainable modes of transport. This approach is intended to be through positive encouragement of measures that make sustainable transport options more accessible rather than seeking to make driving less accessible. Reducing the number of vehicle trips will ease congestion and support better air quality in the Neighbourhood Plan Area.

9.13 Currently most bus stops in the Neighbourhood Plan Area require buses to stop on the main highway, which can exacerbate problems on routes that experience regular congestion. While it would be difficult to retrospectively address this in historic and densely developed parts of Harpenden without potentially damaging local character, there are opportunities to ensure new and improved bus stops at the outskirts of Harpenden do not impede traffic flow.

9.14 St Albans City and District Council has provided a shared surface cycle and pedestrian route along the edge of the A1081. However, this route is limited in width and many cyclists use the road instead. A separate cycle route could provide a popular route in a similar style to the Nickey Line, which runs from Hemel Hempstead to Harpenden via Redbourn.

T10 – Parking in Harpenden Town Centre

Appropriate proposals to increase car parking and cycle storage capacity within Harpenden Town Centre are supported. In particular proposals for a multi-level car park at the Station and an increase in parking provision alongside the proposed redevelopment of Harpenden Sports Centre and Swimming Pool. Where appropriate in the context of local character and heritage, the Neighbourhood Plan supports proposals that seek to introduce a second tier to surface car parks, subject to appropriate traffic modelling that determines no ~~negative-severe~~ impact to local highways.

T11– Residential Parking Standards

Proposals for all new homes to be built in Harpenden should provide an appropriate level of off-street parking ~~for cars and bicycles~~, having regard to site-specific circumstances & maximum parking standards set out in the 2002 St Albans City and District Council Revised Parking Policies and Standards (or the most up to date parking standards). Should an amount of parking be proposed that exceeds or significantly falls below the maximum standards, this must be robustly justified with evidence of anticipated demand. Where parking includes a garage, the minimum dimensions should be 6m long by 3m wide and have an appropriate height to allow most vehicles to be parked.

9.15 It is important that sustainable transport options ~~make a strong contribution to improving the free flow of traffic. do not inadvertently create more road congestion.~~ Therefore, the Neighbourhood Plan seeks to ensure new and improved bus stops provided alongside strategic residential development are located in laybys off the highway, allowing the continuous flow of traffic. Policy T10 is included for a similar reason, in order to encourage more people to cycle through improving safety while preventing any road congestion caused by cyclists using the A1081. In this sense, Policies T9 and T10, are to the benefit of all road users.

9.16 Parking is a key local issue in Harpenden as evidenced by the feedback received by local people, many of whom support the idea of a new multi-storey car park serving Harpenden station. It is important that an increase in parking capacity in Harpenden Town Centre is managed and does not negatively impact ambitions to promote a modal shift away from car use and damage local character. However, it is clear that local people see a need for

an increase in parking capacity and therefore the Neighbourhood Plan supports appropriate proposals to add a parking level above surface car parks to meet this need.

9.17. In terms of residential parking standards, this Neighbourhood Plan recognises the role of the St Albans Parking Standards and continues to support their implementation. However, the time period since the adoption of those standards is significant and therefore Policy T12 will allow departures from those standards in certain situations provided it is clearly and robustly justified with evidence.

Policy T12 – Access for All

Proposals incorporating practical measures to assist residents and visitors with limited mobility will be supported. This includes careful placing of disabled car parking spaces, safer crossings giving ample time to cross and wider pathways. Proposals that would make access difficult for people with limited mobility will not be supported.

Affordable Housing: Affordable housing includes social rented, affordable rented and intermediate housing, provided to specified eligible households whose needs are not met by the market. Most affordable housing will be provided through a registered social landlord at rates substantially lower than the prevailing market rates. It does not include lower cost market housing.

Brownfield: Previously developed land which is or was occupied by a permanent structure.

Change of Use: The process of changing the use of a property from one Use Class to another, with or without the need for planning permission (see definition of Use Class).

Conservation Area: An area designated by the District Council under Section 69 of the Planning (Listed Building and Conservation Areas Act 1990) as an area of Special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance. There are additional controls over demolition, minor developments and the felling of trees. The emphasis will be on careful control, positive management of change and enhancement, to enable the area to remain alive and prosperous, but at the same time to ensure that any new development accords with the area's special architectural or historic interest. Designation as a Conservation Area puts an onus on prospective developers to produce a very high standard of design which respects or enhances the particular qualities of the area in question.

Convenience and Comparison Shops: Convenience Shops include supermarkets and convenience stores and primarily provide everyday household goods, such as food items and other essentials. Comparison shops relate to all other types of shop, such as electronics, clothing, furniture and service-orientated shops such as hairdressers.

Development Plan: The Development Plan is the collective term to refer to all statutory planning policy documents affecting a particular area. The Harpenden Neighbourhood Plan will become part of the Development Plan once adopted, sitting alongside the adopted St Albans City and District Council Development Plan.

Flood zones:

- Zone 1 (low probability) comprises land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%).
- Zone 2 (medium probability) comprises land assessed as having between a 1 in 100 and 1 in 1,000 annual probability of river flooding (1%- 0.1%).
- Zone 3a (high probability) comprises land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%).
- Zone 3b (the functional floodplain) comprises land where water has to flow or be stored in times of flood.

Green Belt: The Green Belt is a landscape designation intended to prevent the unrestricted sprawl of settlements. In the case of the Green Belt around Harpenden, it was initially laid to prevent the sprawl of London by restricting the growth of settlements within the buffer (including Harpenden). The National Planning Policy Framework gives the Green Belt the utmost protection from development.

Greenfield: Land that has not previously been developed or has returned to a natural state.

Green Infrastructure: A network of multi-functional green space, both urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.

Green Infrastructure: A network of multi-functional green space, both urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.

Intermediate Housing: Intermediate housing is a sub-type of affordable housing. Intermediate housing is available for either rent or sale at a discounted rate when compared to the open market. Intermediate housing includes shared equity housing, such as shared ownership or Help to Buy schemes. It does not include housing provided by a Registered Social Landlord (social housing) and homes marketed as “low cost” will not automatically qualify as intermediate housing.

Listed Buildings: A Listed Building is a building, object or structure that has been judged to be of national importance in terms of architectural or historic interest and included on a special register, called the List of Buildings of Special Architectural or Historic Interest. There are three gradings of Listed Buildings, Grade I (most important), II* and II. Works to a Listed Building that may affect their character require Listed Building Consent.

Locally Listed Buildings: Locally Listed Buildings are buildings identified by local planning authorities to have particular heritage importance. These are not protected in the same way as Listed Buildings, but a local planning authority may take in to account a locally listed building designation when making a decision on a planning application.

Major development: Major development is defined in the Development Management Procedure Order (2015) as development for either:

- The winning and working of minerals or the use of land for mineral-working deposits;

- Waste development;
- New housing, where the proposal includes ten or more units;
- Non-residential floorspace totalling 1,000 square metres or more; or
- Any development on a site over one hectare.

Permitted Development: Permitted Development is a term used to describe any form of development, including change of use as well as construction, that does not require planning permission and therefore is not subject to the policies of the Development Plan. Permitted Development rights are outlined in the Town and Country Planning (General Permitted Development) (England) Order 2015. Certain Permitted Development rights may be reduced or revoked in certain areas, known as Article 2(3) land (including Conservation Areas). Listed Building Consent is still required for Permitted Development works to a Listed Building. Certain types of Permitted Development require Prior Approval from the local planning authority, a process by which the impact of a proposal in line with certain criteria set out in the Order is examined.

Primary and Secondary Shopping Frontages: Primary and Secondary Shopping Frontages are located in retail centres. Primary Shopping Frontages are likely to include a high proportion of retail uses, which may include food, drinks, clothing and household goods. Secondary Shopping Frontages provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.

Public Realm: The network of publicly accessible streets and open spaces, including those between buildings.

Significant development: For the purposes of this plan, significant development represents development proposals that would have a significant impact on local infrastructure, the environment or local residents. All large-scale major developments (200+ dwellings, 10,000sqm non-residential floorspace or two hectare-plus site area) will automatically be considered significant. However, in sensitive locations or with certain high impact proposals, a lesser amount of development may be considered significant.

Specialist accommodation: Specialist accommodation is housing designed to meet the needs of particular groups, such as older people, people with disabilities or vulnerable people. It can refer to purpose-built or adapted accommodation. Specialist housing includes supported accommodation, which is accommodation with an element of care.

Sustainable Development: Development that balances social, economic and environmental needs.

TPO (Tree Preservation Order): A mechanism for securing the preservation of single or groups of trees of acknowledged amenity value. A tree subject to a tree preservation order may not normally be topped, lopped or felled without the consent of the local planning authority.

Use Classes: Use Classes are established in the Town and Country Planning (Use Classes) Order 1987. Use Classes are used to distinguish between different land uses. Planning Permission is not required for a change occupier of a premises provided the new use is within the same Use Class. Change of Use from one Use Class to another usually requires planning permission, however, certain changes of use are Permitted Development, and are therefore allowed without the need for planning permission. The Use Classes are:

- A Class – Retail Uses:
 - A1 Shops – including ordinary shops and most service-related retail (such as travel agencies, hairdressers, undertakers, dry cleaners, hire shops and showrooms);
 - A2 Financial and professional services – retail banks, building societies, professional services (other than health and medical services), estate and employment agencies;
 - A3 Restaurants and cafes – food and drink (primarily non-alcoholic) outlets selling for consumption on the premises;
 - A4 Drinking establishments – public houses and bars (not nightclubs) including those with a food offer;
 - A5 Hot food takeaways – sale of hot food for consumption off the premises.
- B Class – employment uses:
 - B1 Business – Offices (specifically B1a) (not including those covered by A2), research and development and light industry (where appropriate near residential uses);
 - B2 General industrial – industrial uses not covered in B1, including heavy industry but excluding incinerators, chemical treatment, landfill or hazardous waste sites;
 - B8 Storage and distribution – including open air and warehouse storage and logistics/distribution.
- C Class – residential uses:
 - C1 Hotels – including bed and breakfasts and guesthouses but excluding hostels;
 - C2 Residential institutions – residential care homes, hospitals, nursing homes, boarding schools/colleges and residential training centres. Secure residential institutions are C2a and include prisons, young offenders institutes and detention centres;
 - C3 Dwellinghouses – residential accommodation for single people, families and cohabiters (up to six) living as a single household. This category includes homes of up to six people living with a degree of care (such as those with learning disabilities);
 - C4 Homes in multiple occupation – shared residential units (3-6 people) for six unrelated individuals, who share basic amenities (includes much private student housing).
- D Class – institutional uses:
 - D1 Non-residential institutions – including clinics, health centres, crèches, nurseries, schools, art galleries, libraries, halls, places of worship and non-residential training centres;
 - D2 Assembly and leisure – cinemas, music/concert halls, bingo, swimming paths, gyms, sports centres (excluding motor sports).

Certain individual uses are excluded from the Use Classes set out above. These uses are collectively referred to as sui generis. It is not possible to change from a sui generis use to a different sui generis use or a A-D Class Use without planning permission. Often sui generis uses are sensitive uses; examples include betting shops, payday loan shops, theatres, petrol stations, nightclubs, launderettes and casinos.

Additional comments from Nexus:

- **We will review the Green Belt boundary on the proposals map as somebody raised this as inaccurate in one particular location by Rothamsted Park;**
- **We will add the Conservation Area to the proposals map;**
- **We can prepare a policy to identify Local Green Spaces if agreed by the Steering Group?**
- **We can agree at the Steering Group meeting appropriate allocation numbers for housing sites as a number of concerns have been detailed (particularly with reference to Jewsons and Pan Autos;**
- **We will include a list of policies at the start of the NP;**