

22nd August 2025

Dear Inspector Birkinshaw, Inspector Bristow

Thank you for the opportunity to comment on the additional documents provided for technical consultation by St Albans City and District Council following the Local Plan Stage 1 Hearings.

As a general comment, we strongly resist the Council's claims of its "no stone unturned" approach and "no showstopper" findings.

Transport Modelling SADC/ED76

1. We remain extremely concerned that insufficient modelling has been done to demonstrate the true impact of committed development and windfall sites on the District – on St Stephen Parish, south St Albans, in particular. Any transport modelling or assessments of the impact of the Local Plan sites can therefore only fall substantially short of realistic.

Committed development

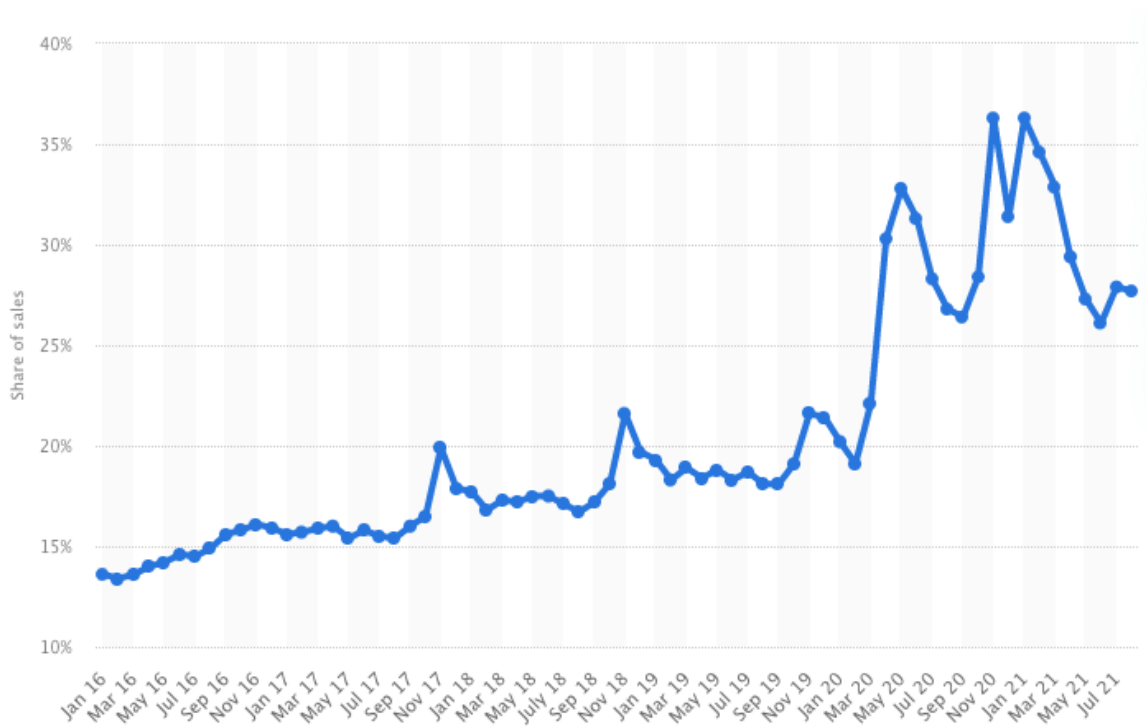
2. The SADC "Do Minimum" or "Option 0" forecasts that the total number of vehicle trips across the District will increase as a result of committed development by 10,500 (18%) in the AM peak and 7,800 (13%) in the PM peak hour. This is anticipated to have the effect of reducing average speeds by about 11%.

Strategic Rail Freight Interchange

3. However, although accurate data for the volume of traffic that will be generated by the Strategic Rail Freight Interchange is very difficult to obtain, the 2009 transport assessment for the original planning application estimated that the SRFI alone would generate an additional 10,254 vehicles a day just on the A414, an increase of 30%.
4. Evidence submitted by logistics professional Michael Sault CEng, FIET for the Chiswell Green Inquiry in April 2023 (Appendix 1) examined the forecasts of this transport assessment with reference to changes in commercial and consumer behaviours since 2009 to try to provide an updated estimate of vehicle generation from the SRFI.
5. The 2009 application anticipated that 50% of the goods coming into the site would be delivered by rail. It was expected that these goods would then leave the site in HGV's for

distribution to large retail parks. However, based on actual usage at other similar rail freight terminals, it is likely that a significantly larger proportion, even all the goods coming into the site, will be brought into the site via HGV, thereby increasing the 2009 anticipated 10,254 vehicle movement figure.

6. Since 2009 and data used for the planning application for the SRFI, there has been considerable growth in e-commerce in the UK (see graph below from SmartInsights – Appendix 2). Mr Sault says *“Although there is a range of predictions on future rates of growth, there is a consistent view that e-commerce will continue to take an increasing percentage of retail sales. This migration to e-commerce will impact how large-scale logistics infrastructure is used and will change the mix and volume of traffic. Based on my experience, the largest of the warehouses at SRFI would be capable of servicing 100,000 online orders per day.”* There are expected to be 5 warehouses on the SRFI site which – even by conservative estimates - might reasonably be expected to service 250,000 online orders per day.



7. Once ready for distribution, it is most probable that the orders will be sent out for delivery by light vehicles. Using a “light van fill rate”, Mr Sault calculates that current commercial practices will result in an additional 2,500 vehicle movements per day from the SRFI operation, giving a minimum expected vehicle generation figure of 12,754 per day.
8. Unlike HGV’s, these vehicles are not bound to stay on main roads, and the complex route planning systems employed by delivery drivers will look to minimise hold-ups and delays,

thereby pushing more vehicles onto smaller roads. The additional vehicles movements generated by the SRFI will therefore affect all roads in the area, not just the main arterial routes. As 54% of the traffic generated by the SRFI is expected to travel southwest towards the M25, there will be a significant impact of the SRFI on St Stephen Parish and Chiswell Green.

Additional vehicle generation from sites with permission

9. Evidence for the Chiswell Green Inquiry from David Walpole (BSc (Hons) CivEng MCiHT) of THaT Consultancy and by Keep Chiswell Green and corroborated by the developers' own transport assessments demonstrated that Chiswell Green is car dependent. The Watford Road, the main road through Chiswell Green is acknowledged by Hertfordshire County Council to be the busiest B-Road and the 17th busiest road overall in Hertfordshire (2019 A414 Corridor Strategy Technical Report, 2022 South Central Hertfordshire Growth and Transport Plan, 2024 Traffic Sensitive Streets) – this in a county that also hosts the M1, M25, A1M and A414.
10. Traffic in Chiswell Green will be affected by the 190 unit permission at Copsewood at the Noke roundabout, the 391 unit permission for Cala Homes and Reddington Capital on Land to the South of Chiswell Green Lane, the 330 unit permission for development of St Stephen's Green Farm to the North of Chiswell Green Lane, and the 53 unit permission for development on land to the rear of 28-74 Ragged Hall Lane. Representing a doubling of the number of houses in the village, these permissions can realistically be expected to generate at least an additional 2,176 vehicles, doubling the current number of vehicles in the village of Chiswell Green.
11. When plans were submitted for the Burston Nurseries Retirement Village, the plans included a shared car pool for the benefit of the residents of the retirement community comprising 80 assisted living apartments and 44 bungalows. The evolution of the construction of this retirement village now sees the 2-bedroomed "cottages" being sold for £1.3m with an annual service charge of £17,500 which will increase annually by the rate of inflation. The car pool now consists of only 1 car. With no realistic access for this demographic to public transport from the site, it can only be assumed that the purchasers of these exclusive properties will want their own vehicles and that the vehicle generation from this site will be substantially greater than had previously been allowed for.
12. When it is considered that the above represents only the committed development for the SRFI and Chiswell Green, it can only be concluded that SADC's Option 0 forecast (ie including all committed development in the District) of an increase of 10,500 in the AM peak and 7,800 in the PM peak is grossly inadequate.

Local Plan allocations and applications in progress

13. In addition to the committed developments detailed above, there are further applications at various stages of the process. The addition of 27 units at Noke Side and 5 units at The Croft represent a minimal increase in comparative terms. However, Local Plan allocations currently support development at the Noke Hotel for 166 houses and a 90-bed car home, and the relocation of St Albans Football Club to a new 6,000 capacity stadium. The club's current maximum attendance is in the region of 2,000, the majority of whom travel to the club by public transport, given the club's current location next to St Albans City Station, close to the town centre. For the football club relocation to be "viable", the pre-application information from the club and their development partner, Clowes, anticipates that the relocation will be to the Clowes-owned site south of Noke Lane at Chiswell Green, and the stadium will comprise a very small proportion of the development of the site – the remainder being "enabling development", potentially a business park, warehousing or a data centre.
14. These allocations indicate that the added pressures on traffic in Chiswell Green are going to be significant – we would say "severe".
15. SADC's Local Plan modelling highlights that *"improvements in infrastructure and a shift towards sustainable modes of travel are required to ensure the highway network operates effectively"* (SADC/ED76B p15 Summary and Conclusions). However, focus appears to be on major routes such as M1 rather than on all the routes around the District. The constraints of the 28 Conservation Areas in the District and existing development severely limit any options to ease traffic pressures and practical evidence demonstrates that any attempts to encourage active transport are constrained by the topography of the District, and the wealth and lifestyles of its inhabitants, many of whom depend on their cars due to their age and mobility, or because a car is a necessity for their work.

National Landscape SADC/ED80

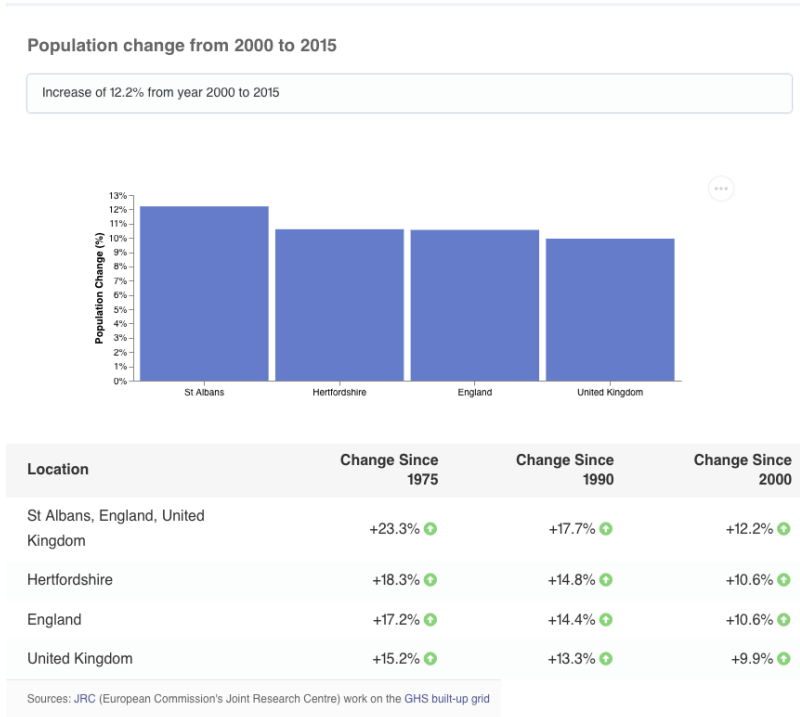
16. As the sites discussed in this additional paper are in the north of St Albans and therefore outside the specific area of interest of Keep Chiswell Green, we do not comment on sites M12, M24 and M26.
17. We would, however, like to comment on Site M14 – Beesonend Lane, Harpenden, due to the recognition in the assessment of the site of its impact on the Childwickbury Conservation Area. This is a classic example of where the Council's intention to meet the Standard Method in full will have an impact on the setting and significance of a site of known heritage importance. While we acknowledge that the assessment advises further assessment would be required at application stage of a specific proposal, the inclusion of

the site as an allocated site gives de facto permission for development of the site, despite the acknowledgement that any development close to the Conservation Area boundaries will impact the heritage value of the Conservation Area.

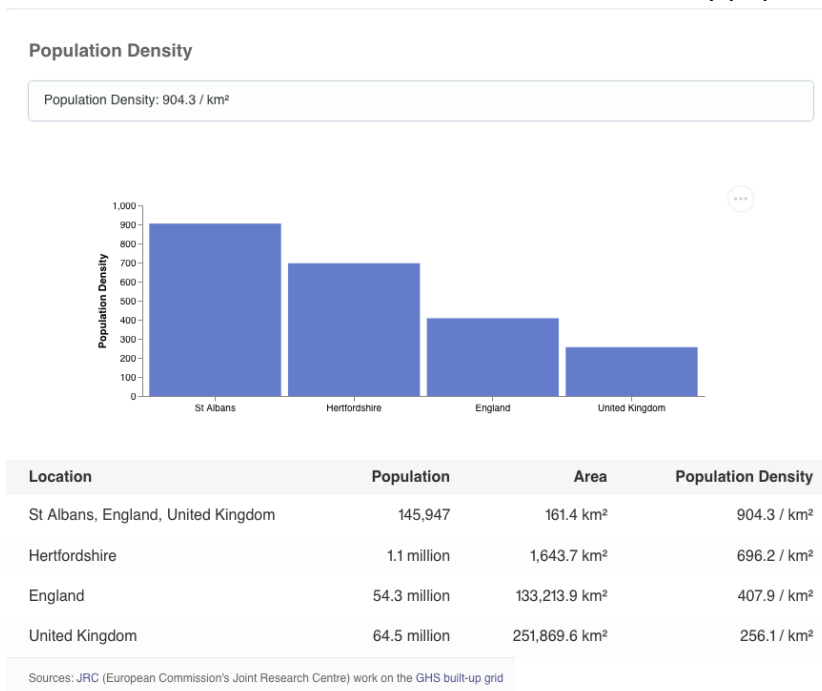
Green Belt – Previously Developed Land SADC/ED78

18. The Council states throughout the draft Local Plan documents and has reiterated frequently during Planning Policy and Climate Committee meetings that it intends “to meet the Standard Method for housing need figure in full” (SADC/ED78 page 1 para 2.2) and that it has taken a “leaving no stone unturned” approach (para 2.1).
19. Keep Chiswell Green firmly refutes this. While the NPPF is clear at paragraph 145 that “authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified”, the current practical approach to this policy is to consider that the inability to meet the full housing target figure as set by the Standard Method constitutes the “exceptional circumstances”. This is the only evidence that the Council has put forward to justify altering the District’s Green Belt boundaries.
20. KCG asserts that exceptional circumstances exist in the case of St Albans City and District for the Standard Method **not** to be met in full. We assert that there has been no exploration of the balance needed between housing development and the District’s history, heritage, tourism and economy, the need to protect the Ver River, and the needs of current residents with regard to air and noise pollution, and quality of life.
21. The NPPF (December 2024 paragraph 11) says “Plans and decisions should apply a presumption in favour of sustainable development” and defines sustainable development (paragraph 7) as “meeting the needs of the present without compromising the ability of future generations to meet their own needs.” The current draft Local Plan, in aiming to meet the Standard Method housing target in full, focuses only on housing provision and compromises this stipulation; it fails to meet the needs of the present – residents of the District living here in the present - and will significantly compromise the ability of future generations to meet their needs, other than in providing housing units.
22. During the Local Plan Examination Stage 1 Hearings, we raised the concern of local residents that proposals already in process (approved and speculative applications plus local plan allocations) would result in the merging of a corridor of settlements from Watford to Luton, and between Chiswell Green and Hemel Hempstead.

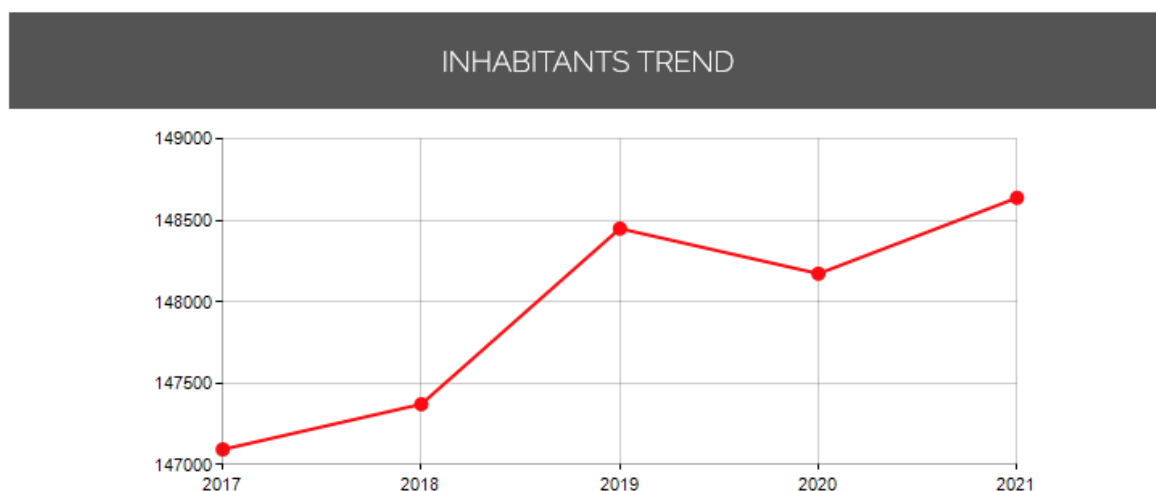
23. The population of St Albans has already had a higher rate of growth in each of the time periods 2000 to 2015, 1990 to 2015, and 1975 to 2015, compared to the respective rates of growth in Hertfordshire, England and the United Kingdom (data from City-Facts.com).



24. Its density is already 30% higher than that of Hertfordshire as a whole, 122% higher than that of England, and 253% than that of the UK. The Population Density graph and table below demonstrate that other areas of Hertfordshire are less densely populated than the St Albans area. It is not therefore unreasonable to suggest that population increases should be focussed towards areas that are less densely populated.



25. The following charts show the change in population in the District between 2017 and 2021 according to Urbistat.com (Appendix 3) :



26. The following table of ONS census data demonstrates that the St Albans District has been “importing” people over the last 30 years. It is not possible to know how many people live in the District who were born in England but outside the District, however, we do have statistics of those who were born outside England – in Scotland, Northern Ireland and in Wales, as well as overseas :

Census year	Total population	Born outside the UK	Born outside England	Total born outside the District
1991	126,202	(data not available)	(data not available)	
2001	129,005 (52%)	14,000 (10.8%)	22,000 (17.1%)	36,000 (27.9%)
2011	140,664 (59.04%)	20,000 (14.2%)	24,000 (17.1%)	44,000 (31.3%)
2021	148,200 (55.36%)	25,241 (17.0%)	29,800 (20.1%)	55,041 (37.0%)

27. The following graph and table demonstrate that the median age in St Albans is exactly comparable to the median age in Hertfordshire, England and the UK. We are not “exporting” our children as was alleged during the Stage 1 hearings :



28. The District’s actual need is for social rented, affordable and 3-bed starter properties. Over 60% (ie the majority) of the properties that will come forward under the draft Plan will not meet the District’s actual needs. The emphasis from developers on Green Belt land is for 4- and 5-bed houses. A search on *Rightmove* demonstrates that there are an average of 400 4- and 5-bed houses available to buy at any one time in the District. In permitting a glut of large detached houses, of which we have plenty, the draft Local Plan is not meeting the needs of the present, including the hundreds of local families who are currently waiting to be housed by the Council.

Heritage constraints

29. Furthermore, we also believe that the character of the St Albans District itself must be taken into account when considering Green Belt release. This is a city and district of significant historic and cultural value—home to Roman remains, the medieval cathedral, scheduled ancient monuments, 28 Conservation Areas and over 1,000 listed buildings. It has a long-standing reputation as one of England’s most historically important cities. St

Albans attracts visitors from across the UK and abroad, supporting tourism and the local economy. Its proximity to London makes it a unique heritage asset within the Green Belt, and any erosion of its setting and rural surroundings risks degrading this offer.

30. The historic character of the District is not limited to isolated sites but forms a cohesive, layered landscape that cannot accommodate the proposed levels of development without irreversible harm. The NPPF provides clear support for heritage as a material consideration in both plan-making and decision-taking. Paragraphs 11b and 60 allow for Local Planning Authorities to adjust their housing targets downward where meeting the Standard Method in full would result in “adverse impacts which would significantly and demonstrably outweigh the benefits.” Heritage is explicitly included within this balancing exercise, especially when the cumulative effects of development risk degrading irreplaceable assets of national cultural importance.
31. The ability to adjust housing targets downwards is further reinforced by paragraph 202 of the NPPF and the legal duty under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, which require that “special regard” be given to the desirability of preserving listed buildings and their settings. These obligations apply not only at the level of individual planning applications but during the preparation and examination of the Local Plan.
32. In York, the adopted Local Plan includes a target of 822 homes per annum - lower than their standard method figure - based on an “economics-led” approach that integrates heritage constraints throughout their spatial strategy. In January 2025, the Oxford Draft Local Plan 2040 was recommended for withdrawal by Inspectors, in part due to concerns about whether the district had sufficiently addressed constraints, including those related to heritage.
33. In St Albans, the extent to which heritage assets and their settings overlap with proposed site allocations is far more pronounced. Many of the proposed housing sites are immediately adjacent to or within the setting of protected assets, including areas designated for their historic significance. In this context, mitigating harm is not just a matter of “sensitive design” - it requires a thorough consideration of the District’s capacity to accommodate such a volume of development and in which locations.
34. The Planning Practice Guidance confirms that “there may be situations where it is appropriate to consider whether a higher housing requirement level would be compatible with other obligations, such as those relating to heritage assets” (PPG ID: 2a-020-20201216).
35. We therefore assert that heritage constraints in the St Albans District constitute the exceptional circumstances that justify a downward adjustment of the housing target. This

is not a matter of resisting growth in principle, but of ensuring that development is genuinely sustainable, legally compliant, and gives due consideration for the real constraints in the District. The District cannot meet its full Standard Method housing target without significant and irreversible damage to nationally significant heritage assets – assets that have protection under both national policy and planning.

36. In the St Albans District, the Green Belt serves not only to check unrestricted urban sprawl but serves to protect the setting, identity, and historic character of settlements across the wider landscape. It meets the purposes of the Green Belt - safeguarding the countryside from encroachment and preserving the special character of historic towns - both of which are acutely relevant in this District.
37. Unlike many other areas, the heritage significance of St Albans is not confined to individual sites; it is embedded in the landscape fabric, visible in ancient field patterns, open and long-range views to and from heritage assets, and in the spatial relationships between historic hamlets and villages and the city itself. The Green Belt in this context has a function in its own right, ensuring the continuity of the District's historic identity.
38. However, it must also be recognised that heritage is just one of a number of overlapping and cumulative constraints that apply across the District. The restrictions of small urban settlement areas, extensive Green Belt coverage, designated conservation areas, biodiversity assets, infrastructure limitations, and flood risk zones together form a set of physical, legal, and environmental restrictions that materially limit the capacity to deliver housing at the scale proposed without significant harm.
39. The Planning Practice Guidance (PPG ID: 2a-020-20201216) is clear that these constraints can, in combination, justify a housing requirement that is lower than the full calculated need. When such cumulative constraints apply, it is not only reasonable but necessary to adjust the housing target to avoid conflict with other important planning objectives, including the conservation and enhancement of the historic environment.
40. To proceed with a housing target that overrides these constraints - particularly when it would lead to harm to nationally significant heritage assets and irreversible loss of Green Belt openness - would directly contradict national policy as set out in the NPPF and the statutory duties placed upon the Council. A reduced housing figure, reflecting the real-world capacity of the District to accommodate sustainable growth, is both justified and required.
41. Releasing Green Belt land around historically significant areas threatens to undermine the sense of place that makes St Albans so valued—by residents, tourists, and the wider nation. Planning decisions in this District must recognise that the value of the District goes

far beyond housing numbers; its role in the UK's cultural and tourism economy should be a key consideration when assessing whether "exceptional circumstances" exist to alter Green Belt boundaries.

42. We see nothing in the Council's draft Local Plan that demonstrates exceptional circumstances to justify altering the District's Green Belt boundaries, nor do we see any real effort on the part of the Council to protect our Green Belt and our heritage to meet the needs of the present and the needs of future generations.

Thank you for your attention

All best wishes

Shirani St Ledger McCarthy
For Keep Chiswell Green

Appendix 1

Proof of Evidence of Michael Sault CEng, FIET

The impact of traffic generated by The Strategic Rail Freight Interchange

Re APP/B1930/W/22/3313110 & APP/B1930/W/22/3312277

Appendix 2

Forecast e-commerce growth in percentage of online retail/e-commerce sales 2017 to 2023

SmartInsights 01 Nov 2021

Appendix 3

<https://ugeo.urbistat.com/AdminStat/en/uk/demografia/popolazione/st-albans/283/4> -
12/5/2025