

24th September 2025

Community Objection:

Proposed Development of 56 Houses (St Albans Local Plan 2041: Townsend Lane site)

A. Purpose

This report is being submitted as a hearing statement by Mr Roger Senior following his submissions during the Regulation 19 stage of the independent examination of the draft St Albans Local Plan 2041 (the "**Local Plan**") as it relates to the proposed allocation M7 Townsend Lane (the "**TL Site**").

It outlines individual objections by each of residents listed in section C below, including Mr Senior, who neighbour the proposed development on the TL Site, (i) questioning the legality, methodology and appropriateness of the inclusion of the site in the Local Plan, and (ii) raising serious concerns about the development proposal by Hill.

The stage of the examination by the independent Inspectors is noted. However, we believe it is incumbent on the Inspectors to fully consider the objection raised herein in light of the serious and potentially unlawful concerns identified and the fact that a significant number of affected residents **had no notification nor knowledge** of the proposed site until this month, reflecting a clear procedural failure to provide adequate notification.

In light of our serious and legitimate concerns, we would welcome investigation by and dialogue with the Inspectors as a matter of priority.

B. Summary of Objections

1. The Residents listed below **formally object to the Local Plan in its current form with the inclusion of the TL Site.** While the ambition to address housing needs is acknowledged, we object on the basis:

- a. The inclusion of the TL Site is contrary to the methodology and requirements stipulated for the Local Plan, which have been selectively, inconsistently and inaccurately applied in the designation of the TL Site.
- b. The supporting documentation (in particular as it relates to the TL Site) is generic, lacks site-specific analysis, and fails to account for the unique constraints of Harpenden and surrounding areas.
- c. The Local Plan (in particular as it relates to the TL Site) does not adequately consider infrastructure capacity, environmental impact, nor the cumulative effect of high-density development.
- d. The consultation process has been procedurally inadequate, leaving a significant number of residents unaware of key proposals that affect their local area and unable to engage meaningfully with the planning process.
- e. The target density of new developments implied by the Local Plan is excessive and takes no regard to local situations and existing norms. A more nuanced density target is needed where developments within urban core / centre / brownfield sites have higher densities; and developments on town margins and/or greenbelt are adjusted down to match neighbouring developments and alignment with suburban margins nationally.

Accordingly, we are strongly of the view that **the TL Site should not be designated in the Local Plan**, as currently proposed.

The community stands ready to engage constructively in shaping a Local Plan that is genuinely sustainable, inclusive, and contextually appropriate.

2. In addition, the Residents listed **formally object to the Hill development proposal at the TL site** for the following reasons:

- a. The development proposal is reliant upon the generic nature of the Local Plan and does not reflect the realities of local infrastructure, traffic volumes, or community character.

- b. Hill have demonstrated a lack of transparency throughout their consultation, withholding critical information and failing to engage constructively with residents.
- c. Hill have demonstrated in their consultation with residents that they have not aligned properly with the Local Plan, including but not limited to the proposal not being in keeping with the local area.
- d. Hill's approach has undermined public trust and raises serious concerns about the integrity of the planning process.

Accordingly, we are strongly of the view that the Planning Committee should reject the Hill proposal on the grounds of: procedural failure to engage and inform affected residents in a transparent manner; infrastructure incapacity and traffic safety risks; the Hill proposal not being aligned with the requirements provided in the Local Plan; and incompatibility with local character, density norms, and housing needs. We request that this objection be formally recorded and considered in any current future planning deliberations.

C. Affected Residents

This report has been written on behalf of neighbouring residents to the TL Site ("**Residents**"), whom have given consent to have their name and address included within the report, each reflecting an individual objection. The report is being submitted by Mr Roger Senior and was collated by:

Nicola Hopkins: [REDACTED]

Fiona O'Neill: [REDACTED]

Graham McDougall: [REDACTED]

John Maloney: [REDACTED]

Names & addresses of Residents each making the objection:

Note: This list has had to be compiled rapidly due to the lack of communication from both the planning authorities and developer and is by no means exhaustive (there are affected residents who are not yet even aware of the proposals and names have been added up to the moment of sending). We are sending now in the interests of time and note that further concerns may arise as more information becomes available, and Residents reserve the right to submit additional objections.

Also note: This letter represents an individual objection from each of the Residents.

1. Nicola and Ed Hopkins, [REDACTED]
2. Dr Fiona Lewis and Graham McDougall, [REDACTED]
3. Fiona O'Neill, [REDACTED]
4. Jo Kirk and Graham Kirk, [REDACTED]
5. Paul and Sonia Stocks, [REDACTED]
6. Roger and Carol Senior, [REDACTED]
7. Sonya and Ed Fraser, [REDACTED]
8. Paul O'Neill, [REDACTED]
9. Kay and Richard Last, [REDACTED]
10. Matthew Bates, [REDACTED]
11. Brian Hocken, [REDACTED]
12. Daniel and Lucy Eckloff, [REDACTED]
13. Noah and Claire Bates, [REDACTED]
14. Mike Davis, [REDACTED]
15. Isabel Lipsett, [REDACTED]
16. Alan and Julie Bostock, [REDACTED]
17. Sue Marsden, [REDACTED]
18. John and Geetha Maloney, [REDACTED]
19. Matthew and Georgina Smith, [REDACTED]
20. Charlotte and Ian Cumming, [REDACTED]
21. Paul and Francesca Clegg, [REDACTED]
22. Julian and Jo Curtis, [REDACTED]
23. Duncan Whitaker, [REDACTED]
24. Andrew and Rachel Hoddinott, [REDACTED]
25. Vicki and Paul Cocker, [REDACTED]
26. Helen and Richard Boxhall, [REDACTED]
27. Lydia and Willem Baralt, [REDACTED]
28. Linda Binns, [REDACTED]
29. Mori and Stephanie Jenkins, [REDACTED]
30. Christina and Mike Levy, [REDACTED]

31. Peter and Marina Thompson, [REDACTED]
32. Paul and Liz Claydon, [REDACTED]
33. Sue Lee and Gary Johnson, [REDACTED]
34. Jonathan Sinfield, [REDACTED]
35. Paul and Sarah Hayward-Surry, [REDACTED]
36. Jackie Watts, [REDACTED]
37. Maggie and Peter Taylor, [REDACTED]
38. Sam and Paul Wise, [REDACTED]
39. Steve and Marian Williams, [REDACTED]
40. Shelagh Sara-Kennedy and Andrew Walker, [REDACTED]
41. Clive Berry, [REDACTED]
42. Rupert and Margaret Stocks, [REDACTED]
43. Adam and Lydia Phillips, [REDACTED]
44. Emma and Paul Taylor, [REDACTED]
45. Kevin and Suzanne Blumenthal, [REDACTED]
46. Anne and Ben Wright, [REDACTED]
47. Jill and Ralph Dawson, [REDACTED]
48. Emma Goddard, [REDACTED]
49. Justine and Clive Wright, [REDACTED]
50. Anna and Julian Batt, [REDACTED]
51. Angelo and Julie Nicoli, [REDACTED]
52. James and Jade Hollingworth, [REDACTED]
53. Ian and Sharleen Mortimer, [REDACTED]
54. Aamir and Sarah Baloch, [REDACTED]
55. Ian and Sophie Bryson, [REDACTED]
56. Bonnie and Sergei Koterov, [REDACTED]
57. Ann, Tim and James Halstead, [REDACTED]
58. Claire and Steve Smith, [REDACTED]
59. Paula and Jonathan Ferris, [REDACTED]
60. Andy and Katherine Lucas, [REDACTED]
61. Len and Sheila Clements, [REDACTED]
62. Alice Moffat, [REDACTED]
63. Mike and Carol Ryland, [REDACTED]

D. Non exhaustive List of Objections to:
(i) the Local Plan in terms of both flawed process and substance, and
(ii) the Hill development proposal at the TL Site

Set out below is a non-exhaustive list of the Residents' objections in relation to both the Local Plan and the development proposal.

1. Lack of Transparent Community Engagement

In both cases there has been a haphazard and non-transparent engagement with the local community, with most local residents only discovering the potential development at this late stage and primarily by direct community action.

- a. To this point there has been a **clear failure in communication, engagement and access to both the Local Plan and the Hill development proposal**. Notably:
 - i. None of the properties on Townsend Lane that directly front the TL Site were made aware that this TL Site had been included in the Local Plan until Hill initiated their own developer-led communication. This failure to inform affected residents undermines the integrity of the Local Plan consultation process and raises serious concerns about transparency and public engagement.
 - ii. The lack of targeted communication to residents, especially those who recently purchased homes, represents a procedural failure. The Local Plan was not disclosed in conveyancing reports, nor was it proactively issued to affected households.
 - iii. The Local Plan consultation in Harpenden consisted of only a single weekday exhibition with inadequate community notification, limiting attendance and excluding under-represented groups.

- iv. The number of consultation responses has been far below expectations, evidencing the inadequate communication and engagement.
- v. Efforts by local councillors to consult locally have until now failed to engage with the majority of the impacted community, with such efforts only involving selected groups in a partial manner.
- vi. The community has not had a fair opportunity to review or appeal the designation of the TL Site, and any development proposal citing the Local Plan as justification is therefore premature and potentially invalid.

While the developer claims alignment with the Local Plan, this assertion is both premature and misleading. As of September 2025, the Local Plan (i) has been submitted to the government for examination, following a Regulation 18 consultation in 2023 and a Regulation 19 pre-submission phase in late 2024; (ii) is under examination by the independent planning Inspectors, with stage 2 public hearings expected to begin shortly and a final decision not anticipated until early 2026; and (iii) still subject to change, pending feedback from the Inspectors and further community input.

- b. Given this status, we formally request from St Albans City and District Council:
 - i. **An update** on the current stage of the Local Plan and its implications for the TL Site.
 - ii. **Specific disclosure** of any site investigations, traffic modelling, environmental assessments, or community impact studies undertaken in relation to the proposed development at the TL Site.
 - iii. **Clarification on whether the TL Site is formally designated for development in the draft Local Plan**, and if so, under what criteria and consultation process.
 - iv. **Formal involvement** in all future considerations regarding the Local Plan as it relates to the TL Site.

2. Generic Planning Framework – Not Fit for Site-Specific Purpose

The Local Plan is a strategic document intended to guide development across the district. However:

- a. Its generic nature fails to address the unique constraints and character of Moreton End Lane, Townsend Lane and Alders End Lane as well as other surrounding roads.
- b. The developer's interpretation lacks nuance and disregards site-specific limitations, including topography, access, and existing residential density.
- c. The proposal does not reflect the spatial vision or infrastructure capacity assessments required for responsible development.

3. Infrastructure Overload and Traffic Safety Risks

- a. The Local Plan is based on outdated 2014 household growth projections. More recent forecasts indicate lower growth, meaning the scale of housing proposed is overstated.
- b. The proposed development would introduce 100+ additional vehicles, resulting in over 400 new car movements per day when accounting for school runs, commuting, deliveries, and visitor traffic. This volume is untenable for the existing infrastructure, which is already under strain.
- c. Alders End Lane and Moreton End Lane, which feed into Luton Road, are heavily congested during peak hours, particularly during school drop-off and pick-up times for Roundwood Park School and nearby primaries.



Adding 400+ daily car movements will worsen congestion and increase accident risk — no mitigation strategy provided.

- d. Current morning commutes already average 25 minutes for short local journeys. With the proposed increase in traffic, this is projected to rise to 40+ minutes, creating delays, frustration, and increased emissions.
- e. Critically, this congestion is not hypothetical. On 16th September, a road traffic collision on Luton Road caused traffic to back up for over 40 minutes, demonstrating the fragility of the local road network and its inability to absorb additional pressure.
- f. The proposal fails to account for emergency vehicle access, pedestrian safety, and road traffic accident risk, all of which will be exacerbated by the increased volume and density of vehicles.
- g. The proposal also fails to consider the development to Cooters End Lane & Ambrose Lane which is going to significantly impact infrastructure.
- h. In addition, the developer has claimed that Harpenden train station is a 12-minute walk from the proposed site. This is a misrepresentation of the actual distance and walking time (28 minutes – Google maps) and reflects a broader pattern of selective or misleading assertions made to support their appraisal. Such inaccuracies undermine the credibility of the proposal and raise serious concerns about the integrity of the supporting documentation.
- i. Traffic safety on Townsend Lane, specifically outside the site, is a significant concern for residents. The road is notably narrow and features only a single footpath, limiting safe pedestrian access and increasing the risk of vehicle-pedestrian conflict. Immediately outside the proposed development site, a blind corner, exacerbated by the lack of road width, has already proven hazardous, with numerous near misses reported by residents. This existing danger would be compounded by the additional traffic generated by the development.
- j. Furthermore, the junction at Douglas Road is already heavily congested during peak hours due to commuter traffic heading to Harpenden Station. Excessive on-street parking in the area further restricts visibility and manoeuvrability, creating a bottleneck that cannot safely accommodate increased vehicle flow.
- k. No credible traffic mitigation strategy has been presented by the developer. The absence of a Transport Impact Assessment tailored to this specific site is a glaring omission, and any approval without such analysis would be procedurally negligent.

4. Flood Risk

Concerns around flood risk are particularly pressing for residents, given the area's history and the scale of the proposed development. The following points outline key objections related to flooding and drainage:

- a. Residents have serious concerns regarding flood risk, particularly given the history of flooding affecting properties at the top of Townsend Lane and Claygate Avenue. These incidents occurred without the pressure of additional development, highlighting the vulnerability of the area.
- b. No adequate or updated Flood Risk Assessment has been made publicly available. Given the dense nature of the proposed development, the risk of surface water flooding and drainage overload is significantly increased. We request full disclosure of all flood-related assessments and modelling undertaken to date in relation to the TL Site.

5. Inappropriate Density, Housing Mix, and Design Quality

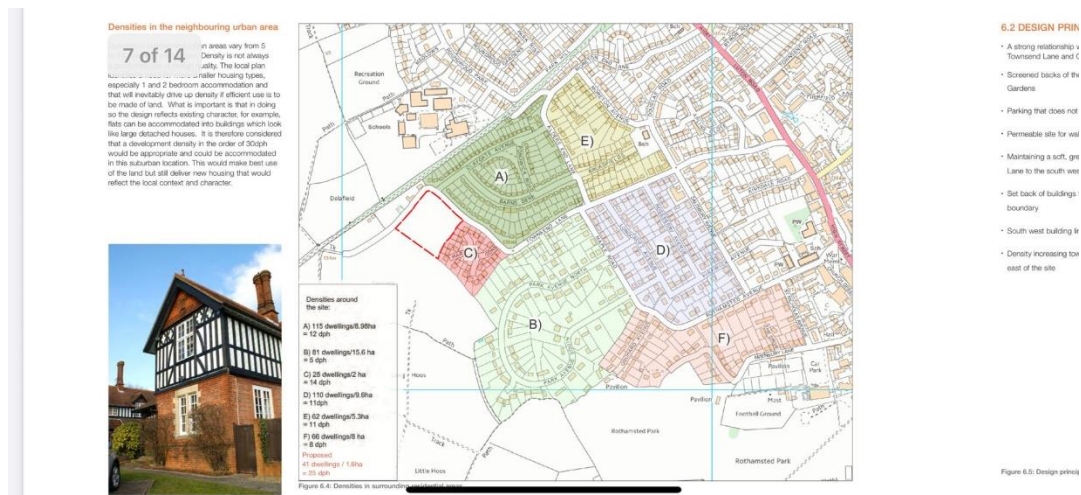
- a. The proposed development significantly deviates from the established character and planning principles of the surrounding neighbourhood.

Criteria	Existing Neighbourhood	Proposed Development	Commentary
Average Plot Density	~16 dwellings per hectare (Hartwell Gardens as a representative example)	~33 dwellings per hectare ¹	Circa 100% increase; overdevelopment relative to context
Typical Property Type	5-bed detached homes	1–3 bed mixed units incl. social housing	Typology mismatch; not reflective of local housing needs
Affordable Housing Distribution	None; all privately owned	10+ units, clustered	Segregated layout; fails tenure-blind integration standards
Property Value Range	£1.5M – £3M+	Likely £250K – £600K	Economic disparity; risks undermining local property values
Architectural Style	High-quality, bespoke detached homes	Undisclosed; likely standardised mass build	No evidence of contextual design or material quality
Local Plan Compliance	Existing homes exceed quality and sustainability	Developer claims compliance, but lacks evidence. (Note: Local Plan is also objected to)	Proposal fails to meet “beautiful, sustainable, place-enhancing” criteria

- b. Density and Overdevelopment

- i. The existing housing stock in the area is predominantly 5-bedroom detached homes, with an average density of 16 dwellings per hectare.
- ii. The developer’s proposal pushes this to 33 dwellings per hectare, representing a 100% increase in density that is incongruent with the spatial rhythm and plot sizes of the surrounding streets.
- iii. This compression appears driven by profit-maximisation, not planning integrity, and undermines the principles of sustainable, context-sensitive development.
- iv. The proposed densities are significantly higher than the national average and other developments locally. Roman Park in Tring for example has recently completed with 226 homes and a density of approx. 21dph. St Mary’s / Kings Field, Biddenham (Bedford) has similarly been developed recently with similarly low densities. Contrast these with urban developments such as Bristol Urban Living SPD with a density of 50+ or Exeter’s City Centre plans (150 dph) and it becomes ever more clear that the St Albans Local Plan is far too high and makes no sensible distinction between Urban brownfield vs Greenfield edge of town.
- v. Making this issue even more significant is comparison to the existing area and environment. The proposed density is more than double most areas on this local map (cf map below)

¹ The Local Plan's draft proposal for the TL Site deviates even more significantly, suggesting an increase of circa. 150%



Please note the references and comparisons have been compiled in haste due to the urgency of this matter and should not be viewed as exhaustive and are based on publicly available information. Nevertheless, the point stands, that this blanket target for all sites of 40dph under the Local Plan put St Alban's above the national average and out of step with best practice. And it's proposed blanket application to all sites is completely unworkable and ignores good practice elsewhere.

c. Housing Mix and Affordable Housing Segregation

- The proposal is heavily weighted toward 1-, 2-, and 3-bedroom units, including 10+ social housing & 20+ affordable units, which is not reflective of local housing needs or typology.
- Crucially, the affordable housing units have been clustered in a single area, rather than being tenure-blind and evenly distributed, which contradicts best practice and risks social segregation.
- This approach fails to meet the Local Plan's stated goal of inclusive, integrated communities.

d. Neighbourhood Compatibility and Design Quality

- The surrounding properties are valued between £1.5 million and £3 million, reflecting a high-quality, low-density residential character.
- The developer has not demonstrated how their design meets the Local Plan's standards for architectural quality, material integrity, or contextual sensitivity.
- The Local Plan explicitly states: "High quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve... New developments should help to create or enhance a sense of place... and should be tailored to the local area context."
- Hill the developer have used 20+ year old aerial photos on their leaflets and plans. These appear to deliberately misrepresent the visuals of the development. If current photos were used the disparity between the size and quality of nearby dwellings and the proposed development would be extremely clear. Nearly all the existing nearby houses have been substantially extended and improved since the photos were taken (c2003).

This proposal fails on all counts. It does not enhance the sense of place, nor does it reflect the architectural vernacular, spatial layout, or socioeconomic profile of the neighbourhood. It is not a considered or contextually appropriate scheme and should be rejected on these grounds.

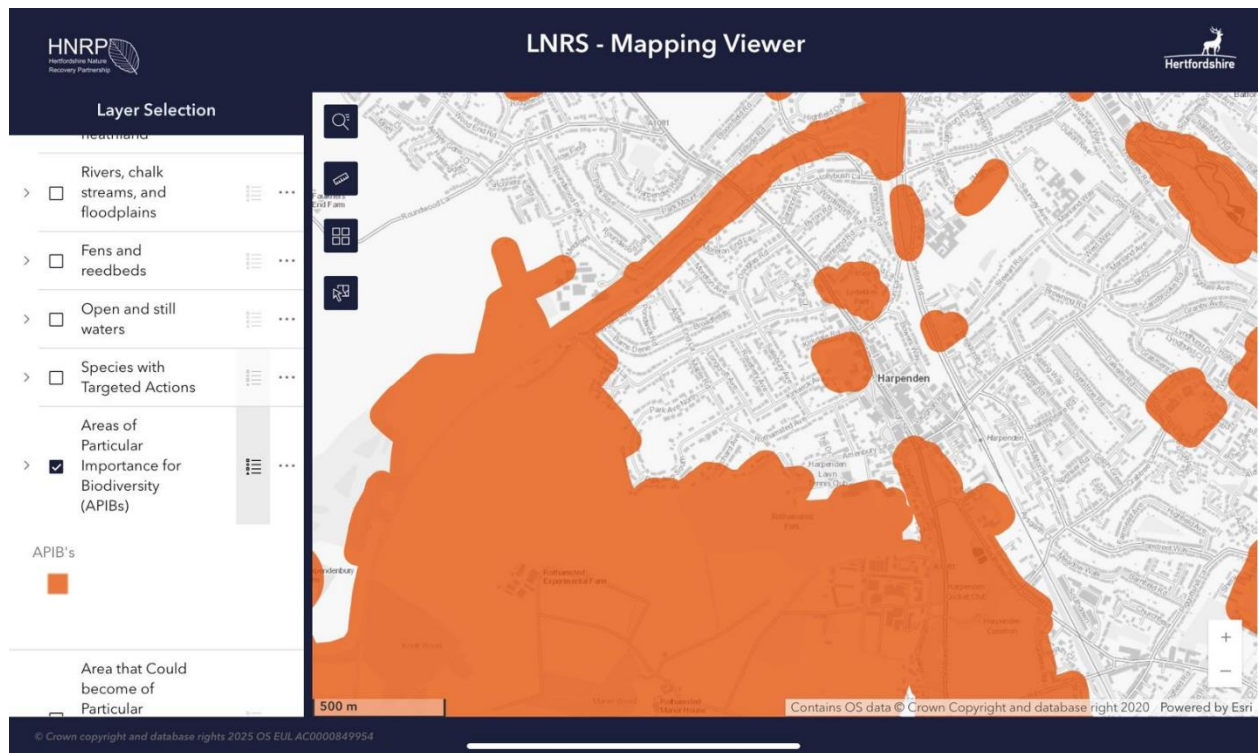
- The TL Site is not well served by public transport (13+ minutes to bus, 24+ minutes to rail). This contradicts NPPF guidance requiring Green Belt release sites to be prioritised where there is existing sustainable transport. By allocating housing here, the plan risks creating a car-dependent community, contrary to Strategic Policy SP2d. NPPF 129(b) states densities should reflect accessibility. Given poor transport links, a lower density should apply.

6. Nature, Wildlife, and Ecological Concerns

- a. The proposed development site lies within designated Green Belt land and is not an infill site, as has been misleadingly suggested by both developer and Local Plan. It is an open, ecologically rich area that forms part of a continuous green corridor supporting wildlife and contributing to the rural character of Harpenden. Developing this land would fragment habitats and permanently alter the landscape.
- b. The area is home to a rich variety of wildlife, including foxes, badgers, bats, and deer, all of which rely on the uninterrupted habitat provided by the fields and surrounding woodland. These species are protected under various conservation laws, and yet no ecological impact assessment or preservation strategy has been made publicly available.
- c. Bats are a protected species under UK law, and any disruption to their roosting or foraging grounds requires thorough investigation and mitigation. Without clear evidence of such assessments, the development risks breaching environmental regulations.
- d. The loss of green space also contributes to long-term climate and sustainability concerns. Green Belt land plays a critical role in carbon absorption, flood mitigation, and air quality, functions that will be severely compromised by dense housing construction.
- e. Residents request full disclosure of all ecological surveys, biodiversity reports, and sustainability assessments undertaken to date. In the absence of transparent and site-specific documentation, the proposal cannot be considered environmentally responsible.

7. Inappropriate Site Selection contrary to methodology

- a. The TL Site was previously rejected in the 2009 Strategic Housing Land Availability Assessment as unsuitable, due to unacceptable impact on countryside character and development pressure on adjacent land.
- b. The TL Site is neither a small site (<1 hectare) nor a strategic allocation; at circa. 60 units it falls awkwardly between categories, making it a poor fit for policy objectives.
- c. The Local Plan professes to protect Green Belt while allocating more than 10,000 homes on Green Belt land, creating a direct policy contradiction.
- d. There is a disconnect between the methodology identified to select sites under the Local Plan and the application of such methodology, with selections failing to correlate with the methodology.
- e. The TL Site lies within the Chilterns Beechwoods Special Area of Conservation Zone of Influence, yet no mitigation strategy has been presented.
- f. The TL Site forms the first section of countryside experienced by users of the Nickey Line via the Townsend Lane entrance. Development would sever this important rural gateway.
- g. The TL Site is designated within the Hertfordshire Nature Recovery Partnership as an “Area of Particular Importance for Biodiversity (APIB)”.



E. Freedom of Information Request from St Albans City & District Council

We formally request information from St Albans City & District Council under the Freedom of Information Act 2000 regarding the proposed development of the TL Site, and its relationship to the emerging Local Plan. Specifically, we request the following:

- a. Current Status of the Local Plan
 - i. Confirmation of the Local Plan's current stage (e.g. submission, examination, adoption timeline).
 - ii. Details of any changes made to site designations or development allocations since the Regulation 19 consultation.
- b. Site-Specific Investigations for the TL Site
 - i. Any traffic impact assessments, environmental studies, infrastructure capacity reviews, or community impact analyses conducted in relation to the TL Site.
 - ii. Records of internal or external correspondence regarding the suitability of the TL Site for housing development.
- c. Community Consultation Records
 - i. Evidence of targeted consultation or notification to residents of Townsend Lane and surrounding roads regarding the proposed development.
 - ii. Any documentation showing how recent purchasers were informed of the Local Plan's implications during conveyancing or property searches.
- d. Planning Justification
 - i. The rationale for including the TL Site (if applicable) in the Local Plan's development strategy.
 - ii. Any assessments comparing the TL Site's suitability against alternative locations in the district.

Please treat this request as urgent due to the active planning interest in the site. We would appreciate a response within the statutory 20 working days. It also goes without saying we wish to be represented in all public hearing.

F. Conclusion

- a. There has been procedurally inadequate communication and consultation about the Local Plan and the inclusion of the TL Site.
- b. The designation of the TL Site largely disregarded the methodology to be used, which has been used selectively and unequally on sites around Harpenden, with the selection conflicting with the methodology to be used.
- c. The Local plan is deeply flawed in relation to the TL Site – the densities proposed across the area do not take account of the difference between Urban Core and greenfield margins. 40 dwellings per hectare on a greenfield site is completely unacceptable and flies in the face of development approaches being taken elsewhere. No distinction being made between urban core and town margin is unacceptable.

Accordingly we strongly urge the Inspectors to reject the proposed inclusion of the TL Site in the Local Plan.

- d. The developer, Hill, has failed to satisfy multiple core principles of the Local Plan, and appears to be pursuing a behind-closed-doors pre-application strategy that undermines transparency, community engagement, and fair process. This approach is inconsistent with the spirit and letter of the Local Plan, which explicitly calls for inclusive, high-quality, and context-sensitive development.
- e. Inappropriate Affordable Housing Strategy
 - i. The proposal includes a high quantum of 1- and 2-bedroom flats, some with external staircases, which are not in keeping with the surrounding neighbourhood's character or housing needs.
 - ii. The affordable units are clustered, rather than tenure-blind and integrated, violating best practice and the Local Plan's requirement for inclusive, mixed communities.
- f. Lack of Infrastructure Understanding
 - i. Hill has not demonstrated a detailed understanding of local infrastructure constraints, including traffic, utilities, and school capacity.
 - ii. The proposal lacks evidence of how the development will support a high-quality living environment, as required under Chapter 7 and Chapter 8 of the Local Plan.
- g. Inadequate Public Realm Provision
 - i. The public realm element is insufficient given the scale of the development, the number of residents, and the fact that the TL Site lies within the Green Belt.
 - ii. The Local Plan mandates that new developments must enhance the quality of space and contribute positively to the surrounding environment, this proposal does not.
- h. Unclear Viability and Community Contribution
 - i. The developer has not provided a transparent viability assessment, nor have they detailed how they will contribute to the local community via Section 106 obligations.
 - ii. Without clarity on infrastructure funding, school contributions, or environmental mitigation, the proposal cannot be considered sound or sustainable.

- i. Poor Design Quality
 - i. There is no evidence of high-quality internal or external architectural detailing, nor of materials that reflect the surrounding £1.5M–£3M homes.
 - ii. Chapter 12 of the Local Plan stresses the importance of “beautiful and sustainable buildings” that enhance a sense of place, this proposal falls short.
- j. No Ecological or Sustainability Offsetting
 - i. The developer has not demonstrated how they will offset ecological loss, nor how the scheme meets the Local Plan’s requirements for climate resilience, biodiversity, and sustainable design.
 - ii. Given the Green Belt location, this omission is particularly concerning and contrary to Chapter 3 and Chapter 10 of the Plan.

The development proposal is not only incompatible with the character and infrastructure of the local area, but it also fails to meet the fundamental principles of the Local Plan. The lack of transparency, poor design standards, and disregard for sustainability and community integration are grounds for outright rejection.