
St Albans City & District Council Local Plan Examination

Representations on behalf of L&Q Estates
Matter 7: The Broad Locations for Development

December 2019

**St Albans City & District Council
Local Plan Examination**

**Representations on behalf of L&Q Estates
Matter 7: The Broad Locations for Development**

Project Ref:	25257/A5/P8/PD/SO	25257/A5/P8/PD/SO
Status:	Draft	Final
Issue/Rev:	01	02
Date:	December 2019	December 2019
Prepared by:	Paul Derry	Paul Derry
Checked by:	Gareth Wilson	Gareth Wilson
Authorised by:	Gareth Wilson	Gareth Wilson

Barton Willmore
St Andrews House
St Andrews Road
Cambridge
CB4 1WB

Tel: 01223 345 555

Ref: 25257/A5/P8/PD/SO
File Ref: 25257.P8.LPEM7.PD
Date: December 2019

COPYRIGHT

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Barton Willmore Planning LLP.

All Barton Willmore stationery is produced using recycled or FSC paper and vegetable oil based inks.

CONTENTS

1.0 Introduction

2.0 Matter 7 Park Street Garden Village S6: Question 2

3.0 Matter 7 Park Street Garden Village S6: Question 3

4.0 Matter 7 Park Street Garden Village S6: Question 4

5.0 Summary

1.0 INTRODUCTION

- 1.1 This statement has been prepared by Barton Willmore LLP on behalf of L&Q Estates (formerly Gallagher Estates) pursuant to Matter 7: The Broad Locations for Development. This follows representations to both the Regulation 18 and Regulation 19 Local Plan consultations in relation to L&Q Estates' land interest at Land South of London Road, St Albans (the 'Site'). It has been titled 'The Greenway' during the Local Plan consultation process.
- 1.2 The Site extends to 14.22 hectares in area and provides the opportunity to successfully accommodate a highly sustainable development of 300 residential units in this edge of town location. The Regulation 19 representations were accompanied by a Vision Document dated February 2018 and a Landscape Appraisal and Green Belt Review, which describe the site and its opportunities in more detail.

2.0 MATTER 7 PARK STREET GARDEN VILLAGE S6: QUESTION 2

What are the implications of providing a new garden village on the site of an approved Strategic Rail Freight Interchange and how have these been dealt with?

- 2.1 The Inspector will be aware of planning application 5/2009/0708 for a rail freight interchange at the Park Street site, following St Albans City & District Council's refusal of permission. The Council lodged claims in both the High Court and Court of Appeal in August 2014, challenging the Secretary of State's decision, and both claims were unsuccessful. Three subsequent reserved matters on the site were approved in May 2018. It is also understood that the works have now commenced on the site as reported locally.
- 2.2 The direct implication of allocating the site for housing development is the need to find a new site for the rail freight interchange. Such facilities require good links to the strategic road network in close proximity to the population in which it will operate. This location was considered appropriate given its links to the A414, M1 and M25, and its location on the Midland Main line, which allows railway links across the country.
- 2.3 The rail freight industry has struggled to find appropriate sites given the amount of land required in such strategic locations. The availability of land within the M25 was a significant benefit for the site. There remains a desire for the site to be a rail freight interchange, and this is demonstrated in the representations to the Regulation 19 Local Plan on behalf of Helioslough Ltd, and the recent submission and approval of reserved matters applications at the site.
- 2.4 The letters to the Regulation 19 Local Plan Pre-Submission consultation from DB Cargo, Freight in Rail and GB Railfreight dated 8, 17 and 22 October 2018 respectively are noted. These comments all promote the high demand for a rail freight interchange serving London and the wider southeast region. The GB Railfreight letter states:

"Radlett's location is, self-evidently, exceptionally good for rail freight. It is able to serve a large proportion of consumers in the region. It can potentially carry trains directly to and from Europe, delivering products to within a few miles of their destinations. The likely saving in road miles is immense."

2.5 It adds:

"Opportunities to develop SFRI's in southern England are very few; if Radlett is not delivered it will be a major setback to the industry, to government policy and to the very many people who would like to see freight moved from road to rail."

2.6 The DB Cargo letter states the following:

"It would therefore be a major failure of planning policy if the single largest concentration of population and freight activity in the UK did not have access to rail freight services and the opportunities to effect mode shift achieved by the small number of SRFI (Strategic Rail Freight Interchange) established to date."

2.7 These letters clearly show significant support within the freight industry for the rail freight interchange at the site. The Council however are not taking the benefits to industry into account when seeking to allocate the site for housing. As such, the 1,670 dwellings proposed on this site within the Plan period should be redistributed, which will require the inclusion of further sites within the Plan. The Greenway at London Road is well placed to provide approximately 300 dwellings early within the Plan period.

3.0 MATTER 7 PARK STREET GARDEN VILLAGE S6: QUESTION 3

What evidence is there to demonstrate that the garden village is capable of delivering 2,300 dwellings (including 600 beyond the plan period)?

- 3.1 The Housing Trajectory within Appendix 2 of the Local Plan as submitted shows delivery will commence with 80 dwellings in 2026/27, with 150 dwellings completed in 2027/28, and then 180 dwellings for each year of the remaining plan period.
- 3.2 The proposed delivery rates at Park Street Garden Village are overly optimistic and do not represent a real-world scenario. This is emphasised by the infrastructure requirements necessary to bring the site forward. This includes primary and secondary schools, a bypass for Park Street and improvements to the A414. These requirements will need to be delivered either ahead of any occupations or early in the process, in order to reduce the impact upon existing infrastructure. The Council must evidence fully that the site is viable and deliverable.
- 3.3 The document 'Driving housing delivery from large sites: What factors affect the build out rates of large scale housing sites' October 2018 undertaken by Lichfields suggests developments of 2000+ dwellings would take on average 8.7 years to deliver, when measured from the submission of a planning application. It also suggests an annual build-out rate of 139.2 dwellings per annum, below the anticipated 180 dwellings per annum noted within the trajectory.
- 3.4 Given the need to prepare and submit an application, complete with Environmental Statement, and the timeframe to prepare and determine subsequent reserved matters and discharge of condition applications, as well as the physical works on site, commencement of delivery by 2026/27 is a very tight timeframe. Any slippage will seriously impact upon the delivery rates, especially given the stepped trajectory seeks completion of 1,075 dwellings per annum from 2025 onwards.
- 3.5 The delivery rates also do not take into account the potential for protracted legal obstacles at the site given the history of the site and its extant consent.

4.0 MATTER 7 PARK STREET GARDEN VILLAGE S6: QUESTION 4

What further infrastructure work (including the technical and environmental studies) need to be undertaken, and is this appropriate to be left to the masterplanning stage?

- 4.1 The Local Plan (p41) notes the Broad Locations for development, which includes Park Street Garden Village, have been selected in part on the basis of their potential to offer opportunities to achieve sustainable travel outcomes.
- 4.2 However, the proposals within Policy s6 xi) Park Street Garden Village Broad Location demonstrate only the need to fully explore possibilities of direct rail services, an underground extension, an Abbey Line stop or the possibility of a Midland Mainline station. As a result, there is no commitment to any of these requirements (listed as criterion 23-25 in the policy). Rather than these be explored during the Local Plan process, these should be investigated ahead of selection of the site as an allocation within the Plan. Where feasible, these sustainability criteria should be added as specific policy requirements. 'Exploring the possibilities' is misleading and does not promote sustainable travel as required in emerging policy L18, providing a profound contradiction between policies.
- 4.3 There remains concern as to how the Park Street Garden Village would link to the Abbey railway line. Whilst this railway line is within the Broad Location, internal access to the existing Park Street location is hindered by the River Ver. This provides a physical barrier that will separate built form from the station. There is also significant land within flood zones 2 and 3, preventing the opportunity to increase housing densities by this existing station. There may be an opportunity to relocate Park Street station further north, but again, the River will hinder the ability to assimilate the station within the built form, and there may be viability implications.
- 4.4 Criterion 15 seeks to increase the frequency of services on the Abbey Line. At present there is a single track and therefore services in each direction are restricted to approximately every 50 minutes. Adding a passing loop would allow two trains to run on the line. However, in practical terms, this should be located near the centre of the line to ensure a regularity of services from both St Albans Abbey and Watford Junction. The criteria specifically recognises a passing loop may need to be offsite, and would therefore be on third party land. There are again no guarantees this would come forward, and therefore the ability to increase services on the Abbey Line would be prevented.

5.0 SUMMARY

- 5.1 There is an extant planning consent for the development of a rail freight interchange on the Park Street Garden Village site. It is understood the application has now been implemented. There is no evidence to suggest this facility is no longer required within this strategic location, and it the site has significant support within the rail freight sector.
- 5.2 By allocating the site for housing, the rail freight facility will no longer be developed and would have to find an alternative location to service the London and south east market.
- 5.3 The evidence base that underpins the draft allocation is questioned. The draft policy identifies sustainable travel opportunities. However, there is no suggestion that they are actually deliverable. The wording of the policy, which only seeks the possibilities to be explored, gives flexibility for none of these opportunities to come forward. These should have been fully assessed ahead of the Local Plan submission, with the policy providing definitive wording of delivery of these benefits.
- 5.4 The proposed trajectory relating to the garden village is overly optimistic. There are serious concerns whether delivery within 2026/27 for a scheme of this nature is justifiable and achievable given the infrastructure requirements necessary to create a sustainable garden village. Identification and allocation of small and medium sites is a more appropriate alternative.

bartonwillmore.co.uk

TOWN PLANNING
MASTERPLANNING & URBAN DESIGN
ARCHITECTURE
LANDSCAPE PLANNING & DESIGN
ENVIRONMENTAL PLANNING
HERITAGE
GRAPHIC COMMUNICATION
PUBLIC ENGAGEMENT
DEVELOPMENT ECONOMICS