

BATFORD COMMUNITY ACTION GROUP

HEARING STATEMENT FOR EXAMINATION IN PUBLIC OF

ST ALBANS DISTRICT LOCAL PLAN

MATTER 7 – THE BROAD LOCATIONS FOR DEVELOPMENT:

SPECIFIC MATTERS

NE Harpenden

1. I represent the Batford Community Action Group (BCAG) and would make the following points with regard to the inappropriate development of land to the north-east of Harpenden (an urban extension of Harpenden) as set out in the SLP. On behalf of BCAG, the document sets out below each of the Inspectors' questions; provides a summary answer with (where appropriate) additional explanation in numbered paragraphs.
2. The NPPF and Harpenden Neighbourhood Plan, referenced in this document are not attached as Appendices as they are too large to be practically sent as printed attachments. They are, however, large documents readily available on line.

NE Harpenden S6(vii)

Q1: Is the site suitable for housing and are there any specific constraints or requirements associated with it, or the need for mitigation measures?

1. No, it is not suitable and there are special constraints, etc. For example:
2. Para 72 of the NPPF considers that the supply of a large number of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.
3. Site S6(vii) is not such a site. Due to its location outside of the settlement boundary, it has poor connectivity with the Town Centre. Harpenden Station is not within walking distance and there are no safe designated cycle routes. Any occupiers of the site would therefore be car reliant.
4. Policy H10 of the Harpenden Neighbourhood Plan (HNP) (adopted February 2019) makes provision for a minimum of 106 dwellings within allocated housing sites. It is likely that further provision could also be obtained. These would come from other windfall sites or previously developed land/brownfield land within the built-up area of Harpenden, without the need to build on the green belt outside of the development envelope.

5. The HNP considers that within the built-up area of Harpenden, the minimum housing density target of 40 dwelling per hectare would apply.
1. Clearly, these allocated housing sites are deliverable within the plan period and would make a significant contribution to the housing land supply without the need to build as many dwellings on the greenbelt. Policy H5 of the Neighbourhood Plan goes further and states that higher density development would be supported in situations such as Harpenden Town Centre or Southdown Local Centre. However, Policy S6 of the SLP states that in the broad locations densities should be a minimum of 40dph. This is therefore an equivalent density as development within the town centre. Surely it would therefore be inappropriate to expect the same housing densities to be applied in the green belt as those used within the built-up area of Harpenden (policy H10 refers).
6. Due to the sensitive countryside location, the minimum 40dph would have significant detrimental impacts on the landscape character of the countryside, which is characterised as agricultural farm land and not the built-up settlement. The Policy is therefore not consistent with the vision of Harpenden Town Council which has been supported by residents of the town at referendum.
7. Furthermore, the policy is not compliant with the NPPF which requires authorities to identify land that is supported by the necessary infrastructure and facilities.

Q2: What evidence is there to demonstrate that the proposed broad location is capable of delivering 760 dwellings?

1. None.
2. It wouldn't be delivering 760 dwellings. In applying the policy S6(vii) there is a *minimum* of 760 dwellings. The policy is therefore fundamentally flawed in as much as no developer would build to an exact number of 760 and the policy would support in excess of 760 dwellings, in excess of 40dph (the town centre density). The Policy does not protect the site at a ceiling figure of 760 dwellings or for that matter 40dph.
3. This figure is also significantly higher than an original figure (when the site was rejected for development in a previous plan) with no justifiable differences that could make the site suitable for development, when previously it was not.

Q3: What further infrastructure work needs to be undertaken, and is this appropriate to be left to the masterplanning stage?

2. It is not appropriate to be left to masterplanning.
3. When considering that this policy will form the blue print for a future masterplan, it should be acknowledged that if an infrastructure requirement is not embedded within that policy, it could be considered unreasonable to request that developers provide it. This applies to any/all infrastructure, including transport, healthcare, water/waste, parking, and more.
4. In the interests of brevity, just the example of traffic is specifically discussed below. However, similar arguments can be made against the wide gamut of infrastructure issues. Without suitable early stage (i.e. before now) infrastructure considerations (across the wide range of infrastructure considerations), there is also no means to determine site suitability and sustainability.
5. It is necessary to consider whether the proposed development is located where the need to travel will be minimised, in order that the use of sustainable transport modes can be maximised and that safe and suitable access can be achieved. This site is, however, remote from Harpenden and access is restricted because of geography, including the limited river crossings and the Lower Luton Road.
6. The NPPF is clear when it states that applications for development should give priority first to pedestrian and cycle movements both within the scheme and with neighbouring areas; and second to facilitate access to high quality public transport with layouts that maximise the catchment area (para 108 of the NPPF refers).
7. Whilst part of the site would abut the Lower Luton Road, much of the housing would lie behind the existing housing estate, itself an urban housing extension of Harpenden built during the 1950s.
8. For example, when considering that all of the traffic generated from the new development would join existing traffic flows along the over-capacity Lower Luton Road, no provision has been made within the policy for any junction improvement or road widening works. Policy T2 of the HPN requires that “proposals that may result

in a material increase in traffic on the A1081/B653 Lower Luton Road, B652 Station Road will be required to make provision for, and contribute to, appropriate highways improvement measures to ease traffic congestion on those roads, including in relation to traffic flow and on-street parking pressure. Where creation or alteration of a junction on one of these roads is proposed, evidence must be provided that demonstrates how the proposed junction would minimise disruption to traffic flow”.

9. Policy S6(vii) makes no provision for any junction or highway improvements, whereas in the other broad locations specific reference is made to junctions and highway improvements. For example, Policy S6(vi) - North St Albans Broad Location includes off-site improvements to Harpenden Road, Sandridgebury Lane, Valley Road, Ancient Briton junction and King William IV junction.
10. The policy therefore fails to acknowledge the impact of additional traffic movements on the B653 (Lower Luton Road) and therefore it is questionable whether sufficient research has been undertaken on this highway and its carrying capacity. As the Harpenden Neighbourhood Plan forms part of the development plan, this policy is clearly at odds with Policy T2 of the Harpenden Neighbourhood Plan.

Q4: Should the policy refer specifically to the provision of sports facilities?

1. Yes
2. The policy does not refer to sports facilities and therefore when assessing an application for outline permission, any planning officer would not be able to request the provision of sports facilities. Lack of sports facilities goes against place-making, health and wellbeing requirements, amongst others.

Q5: How have heritage assets been considered and is a Heritage Impact Assessment required?

1. Heritage assets and the potential for other assets have not been properly considered – an independent Heritage Impact Assessment is required, particularly in light of the known history of the area.

Q6: Is the site suitable for development in relation to flood risk?

1. The site lies adjacent to the River Lea and within a flood plain and yet there appears to be incomplete even high-level assessment. The Lower Luton Road (and the river itself) is susceptible to flooding at all times of the year. Repeated drainage works have been carried out at the junction with Westfield Road and St Martins Close, as well as the junction with Common Lane. In severe periods of rain, the water flows like a river down Pickford Hill, Porters Hill, Southview Road, St Martins Close and Common Lane. Due to the location of the site on a steep gradient, removing existing natural drainage mitigation, combined with the increase in hard surfaced areas would exacerbate an already vulnerable and sensitive area, risking both road and river structures and the nearby rare chalk stream.

Q7: Has consideration been given to air quality and any mitigation measures?

1. It appears not.
2. The area forms a valley side that is already prone to mists/fogs and visible pollution from standing/stationary traffic on the Lower Luton Road. This new proposal will almost double the number of vehicles that would be expected to join the Lower Luton Road at any time, especially given it's distance and lack of connection to other parts of Harpenden, related services/facilities or suitable employment sites.

Q8: Should Specific Provision be made for a new Neighbourhood Centre?

1. Yes, Batford has no village centre it therefore has no nucleus.
2. A large housing estate built in the 20th century has increased the village in size but equally it has become disconnected physically from the rest of Harpenden by the Lower Luton Road and the River Lea. As mentioned before, the B653 has increased in capacity although no improvement works have been undertaken. Due to the topography of the land, there are no practical cycling links to and from Harpenden Town Centre or the station, both of which are not within walking distance.
3. Repeated attempts to secure a doctors' surgery in Batford have been unsuccessful and Batford still has no chemist, despite the area demographics with relatively low income/poor mobility. There is a heavy reliance on these facilities within Harpenden

Town Centre. In excess of 760 new dwellings would place a heavy strain on existing services and facilities and new residents would not be able to access the existing ones on foot. The site is therefore locationally unsustainable.

4. The current local supermarket has limited parking facilities and again would not be within walking distance to new residents of the development, resulting in more car trips to access higher-order services and facilities.
5. An opportunity presents itself to provide Batford with a village core that includes a range of community facilities and services, however, this opportunity has not been taken. This is possibly an oversight, but national design guidance makes great emphasis on place-making, community cohesion and local identity. However, Policy 6 (vii) makes no attempt to provide a sustainable community and this is deeply worrying. Instead, Batford is to receive an additional urban housing extension that will almost double the village size, without any of the accompanying facilities, services or infrastructure. The existing housing estate has been well laid out and provides legibility, permeability and a range of services fit for the 1950s in the form of allotments, primary school, shops and a community centre. This policy provides no added benefits just an over-reliance on existing ones.
6. In trying to understand the rationale behind the policy requirements, it is not clear at what threshold need for a local centre is identified within the broad locations. Policy 6 (vi) is a site in St Albans with a projected minimum capacity of 1100 dwellings. This broad location is to receive a new Neighbourhood Centre, including commercial development opportunities; recreation space and other community facilities, including health provision; Community Management Organisation with sufficient assets to provide sustainable management of community facilities, open spaces and parklands.
7. There does not appear to be any consistency in how the broad locations are assessed. NE and NW Harpenden will now have a combined minimum of 1340 dwellings with minimal facilities, services or infrastructure. Neither site is within walking distance to the town centre and therefore would place a heavy reliance on the fragility of existing one. This is not good planning.
8. Batford needs a heart. It needs either a neighbourhood centre or local centre.

Conclusions

1. Policy S6(vii) is unsound – it is not consistent with national policy nor the local HNP. Policy amendments will not address the fundamental problems that arise from S6(vii) having no evidence-based (nor planning framework-based) justification. Substantial work remains outstanding and is therefore essential: from assessment, through recommendations for service/infrastructure, to create a plan that conforms to NPPF, HNP and deliverable planning practice.