

ST ALBANS CITY AND DISTRICT LOCAL PLAN EXAMINATION

Matter 7: North St Albans Broad Location (Policy S6 vi)

Hallam Land Management and St Albans School

Main Issue: Whether the detailed policy for each broad location for development is justified, effective and consistent with national policy.

1. Hallam Land Management, St Albans School and Hunston Properties are promoting development at the North St Albans Broad Location.
2. Since the Regulation 19 Representations were submitted in September 2018, these organisations have been working with the District Council and Hertfordshire County Council firstly to prepare a Planning Performance Agreement that would relate to the preparation of the required Masterplan required by Policy S6 and secondly, the planning application itself.
3. Considerable progress has been made in preparing the Masterplan such that outline planning applications could be submitted by Hallam Land Management and St Albans School and Hunston Properties respectively in Spring 2020.

Question 1. Is the site suitable for housing and are there any specific constraints or requirements associated with it, or the need for mitigation measures?

4. Yes, the North St Albans Broad Location is suitable for housing.
5. The Local Plan's Development Strategy identifies St Albans as a Main Urban Settlement within the plan area. As discussed in Hearing Session 2, the Main Urban Settlements are the most accessible locations for development, with the widest range of services and facilities and, as such, larger scale higher density development is directed to these locations. As a matter of principle, the North St Albans Broad Location, is wholly consistent with the Local Plan's Development Strategy.
6. Situated to the north of St Albans, this Broad Location comprises circa 45 hectares located adjacent to the existing community of New Greens and the Porters Wood Employment Area, approximately 2.5km from the City Centre (to the south), 3km from Hatching Green and Harpenden (to the north). At present the Site is comprised of arable farmland classified predominantly as being of grades 3a and 3b quality with a smaller area of grade 2 farmland to the north of the Site. Isolated patches of woodland to the north and south of the Site are of note along with a small area of land to the north west currently in use as playing fields as part of the Woollam Playing Field complex. Woollam Playing Fields are community and school fields and facilities and accommodate many local sports clubs activities. The area is in close proximity to existing facilities such as shops, schools and centres for healthcare provision. Harpenden Road is a principal movement corridor connecting St Albans and Harpenden with regular bus services connecting the two settlements.

7. North St Albans was ranked 5th in the 'Development Site and Strategy Options Evaluation' Report¹, which identifies the following characteristics:
- The site benefits from a main settlement location with good access to existing infrastructure, services and facilities.
 - There is good public transport and cycle access to city centre and rail.
 - The area fits relatively well with the configuration of the existing settlement edge, thus minimising Green Belt and landscape impacts.
 - There are some difficult localised access design and traffic management issues.
 - Significant off-site transport investment will be needed.
 - The limited scale of development and the lack of any special factors or opportunities with this site mean it not likely to deliver other forms of strategic infrastructure.
 - There may be some potential to exploit links with adjoining leisure and education uses to create community facilities and improved open space.
8. In 2018, the District Council undertook a further evaluation of potential development locations² in the context of the scale of development arising from the Government's Standard Method. The May 2018 PPC Report concludes as follows:
- "The evaluation forms conclude that 8 sites have an overall evaluation of Green. These are the same 8 sites that were concluded in the [Green Belt Review] as making the least contribution towards Green Belt purposes. These sites are East Hemel Hempstead (North), East Hemel Hempstead (South), Land at Chiswell Green, North East Harpenden, North West Harpenden, North St Albans and East St Albans (para 4.11). (emphasis added)*
- The evaluation forms conclude that 4 sites have an overall evaluation of Amber. These sites are South East Hemel Hempstead, North Hemel Hempstead, the Former Radlett Aerodrome and North East Redbourn (para 412)."*
9. It is evident therefore that the conclusions of the Green Belt Review were a consideration alongside other judgements in determining the allocation of Broad Locations.
10. The Sustainability Appraisal further assesses North St Albans Broad Location. In common with each the other of each of the Broad Locations, this illustrates a tendency for negative or adverse effects on environmental objectives and positive or beneficial effects for social and economic objectives³. A more detailed narrative is provided which explains the characteristics of the site and the potential effects on the identified sustainability objectives⁴.
11. The anticipated significant adverse impact on Soils is identified through the SA as a particular factor, but loss of agricultural land is commonplace across the Broad Locations and indeed wholly necessary to meet the identified future level of development needs. As with all development

¹ SP007 (Page 21)

² Planning Policy Committee May 2018 and June 2018

³ CD009 (page 53)

⁴ Ibid (pages 64 – 65)

allocations, a balance is required between the likely adverse environmental effects and the positive social and economic benefits. In this instance, the balance must consider the need to achieve a sustainable pattern of development and the Green Belt constraint that applies more widely in the District. Mitigation measures in terms of soils resource protection through planning conditions can be used later in the planning process to minimise this adverse impact.

Question 2. What evidence is there to demonstrate that the proposed broad location is capable of delivering 1,100 dwellings?

12. Annex 1 of the Local Plan provides Area and Capacity Calculations for each of the Broad Locations. This suggests that of the Site area of approximately 47 hectares and with a 60:40 split between residential and non-residential uses, the net residential area will be 28 hectares. Developed at an average density of 40 dwellings per hectare this would provide 1120 dwellings.
13. Through the masterplanning work undertaken with the LPA, it has been possible to refine this further. At the time of writing the emerging masterplan identifies 26.59 hectares of residential land (excluding the Local Centre, Primary School, Care Accommodation, and Green Infrastructure). Reflecting individual character areas, a density range of between 35 and 55 dph has emerged which would yield 1050 new homes, added to which are the Care Accommodation elements (130 units). Together this achieves 1180 dwellings in overall terms. This illustrates that the capacity of the site expressed in Policy SA 6(vi) is achievable.

Question 3. What is the justification for providing 10 essential local worker houses for local teachers in this location?

14. Whilst Key Worker is no longer a term commonly used in planning policy, as landowners, St Albans School wish to ensure that the housing offer at North St Albans meets an identified need locally to support teachers.

Question 4. What further infrastructure work needs to be undertaken, and is this appropriate to be left to the masterplanning stage?

15. Through the masterplanning process the organisations involved have satisfactorily considered the infrastructure requirements associated with development of this Broad Location.

Question 5. Should the specific location for the primary school within the site be identified?

16. Whilst Policy SA6(vi) (criterion 10) identifies the requirement for a new primary school to be provided as part of the proposed development, it is not necessary for its location to be defined on the policies or proposals map.

17. The masterplanning process is the appropriate vehicle to determine the disposition of individual land uses across the site. This will enable key stakeholders and local communities to inform individual development schemes.
18. In this regard, Hertfordshire County Council, as Local Education Authority, are involved in the preparation of the Masterplan which is directing the location of the new primary school.

Question 6. Should the policy refer specifically to the provision of sports facilities?

19. Criterion 8 of Policy SA6(vi) states that the proposed development should include Strategic and Local Public Open Space. Criterion 14 also refers to the provision of Recreation Space as part of the development.
20. Policy L28 identifies Green Space Standards which includes an amount of amenity green space which is to include playing pitch provision. The Table on Page 62 of the Local Plan identifies the various priority provision for each of the Broad Locations, which in the case of North St Albans includes *strategic play, teenage areas, amenity green space parks and playing pitches: adult and junior football*.
21. On the basis that the Local Plan is to be read as a whole, it is not necessary to refer to sports facilities as part of the Policy. This is more appropriately considered as part of the masterplanning process.
22. As part of the development proposals, the existing playing pitches in the north west corner of the site will be reprovided. Playing fields are not considered to be 'inappropriate development' in the Green Belt⁵ and thus can be provided immediately to the north of the allocation at Longcroft Spring. In addition, discussions are on-going through the Masterplanning process local sports facilities stakeholders including Sport England, the Football Association, the Rugby Football Union and the England and Wales Cricket Board, Old Albanians Sports Association and Harpenden Hockey Club regarding the potential to improve existing community pitch provision at Woollams such that a qualitative improvement can be achieved.

Question 7. Has consideration been given to the linking of the ecological corridors including Heartwood, Batchwood, and Beech Bottom Dyke?

23. The principal ecological value within the North St Albans Broad Location is provided by its hedgerows which are part of a wider pattern across the locality. Otherwise, as arable farmland, the site's intrinsic value is limited. The extent to which ecological corridors can be created or enhanced is limited by the physical features that contain the site, namely Harpenden Road, the railway line and the extent of existing built development. That said recreational links Heartwood Forest are being considered through the masterplanning exercise which could include ecological enhancements.

⁵ Para 145 (b)

Question 8. Has consideration been given to air quality and any mitigation measures?

24. There is an Air Quality Management Area (AQMA) within St Albans centred on the junction of London Road and Holywell Hill where levels of Particulate Matter (PM10) and Nitrogen Dioxide (NO₂) exceed national air quality objectives. Increases in traffic in the City centre could have an adverse effect on air quality in the town centre. However, trips from the proposed development will only be a small proportion of City centre traffic.
25. The Access and Movement Strategy being developed for the North St Albans Broad Location draws upon the Hertfordshire Local Transport Plan and is aimed at expanding travel choices and making it practical for most daily trips to be made by walking, cycling and public transport.
26. The Environmental Impact Assessment has identified the need for an Air Quality Assessment to accompany a planning application in due course, which will consider the potential for local air quality impacts during both construction and operation phases.

Question 9. How have heritage assets been considered and is a Heritage Impact Assessment required?

27. The likely significant effects of development on cultural heritage including architectural and archaeological heritage were considered through the Sustainability Appraisal (SA) process.
28. The North St Albans Broad Location is not subject to any significant heritage or archaeological constraints⁶.
29. There are no designated heritage assets within the Site and none are immediately adjacent to it. There are no known non-designated heritage assets within or adjoining the Site.
30. Whilst there are Listed Buildings locally, at Childwickbury, west of the A1081 Harpenden Road, and at Sandridge, east of the railway line, the Site is not considered to be part of their setting and development would not have an adverse effect on these heritage assets.
31. The St Albans Conservation Area is located 1.3k south of the Site and the intervening area is suburban in character and there is no intervisibility. Two further Conservation Areas exist at Childwickbury and Sandridge to the north west and east of the Site respectively. There is significant separation between the Site and the boundaries of these Conservation Areas with intervening physical and natural features, such as the Woollams Playing Fields, the Railway Line and woodland blocks that limit any inter-relationship. Whilst the SA suggests that effects are uncertain, development at the Broad Location will not cause harm to these conservation areas.
32. Available information indicates that there is low-medium potential for prehistoric and Romano-British sub-surface archaeological evidence within the Site. There is low potential for significant remains from all other periods. Fieldwalking has recently been undertaken and did not identify any potential archaeological interest.

⁶ CD012 Sustainability Appraisal Addendum Report March 2019 (page D7)

33. Off-site junction improvements are expected to be required at the Ancient Briton junction on the A1081. This junction, situated approximately 800m to the south of the Site, is in close proximity to the Beech Bottom Dyke which is a Scheduled Monument⁷. The extent of junction improvements discussed with the Local Highway Authority is not expected to impact on this designated asset.
34. Policy L30 – *Historic Environment*⁸ as presently drafted would require all planning applications to include a Heritage Statement providing proportionate information to understand the impact of proposals on heritage assets and their significance. As part of the work undertaken to inform the Masterplanning for this Broad Location, a heritage desk-based assessment has been undertaken in accordance with the Standards and Guidance for Historic Environment Desk Based Assessments published by the Chartered Institute of Archaeologists 2017. As required by the LPA's Environmental Impact Assessment Scoping Opinion, the potential effects of the proposed development of heritage assets will be considered in due course. The Heritage Assessment has not identified any cultural heritage assets that will be negatively impacted by development at the Broad Location.

Question 10. Has regard been had to the potential for mineral extraction in this broad location?

35. The Minerals Local Plan indicates that potential sand and gravel mineral assets exist to the north of St Albans, but there are no designated Preserved or Reserve Areas that affect this site specifically or in this location generally. Initial site investigations identified limited outcrops of sands and gravels with the majority of the site underlain with clay and chalk.

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⁷ Iron Age Territorial Boundary

⁸ CD002 St Albans City and District Local Plan 2020-2036 (Page 69)