

**St. Albans City and District Local Plan
Examination Hearings**

MATTER 7

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Statement By

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On Behalf of Matthew Dovey Esquire

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Introduction

1. This statement has been prepared by Jed Griffiths MA DipTP FRPPI and Chris Curtis on behalf of Mr Matthew Dovey. It has been compiled in response to an invitation by the Examination Inspectors for representors to submit further material on the matters to be considered at the hearing sessions. This statement addresses the Issues and Questions under Matter 7- The Broad Locations for Development- Specific Matters (Policy S6(vi)).
2. Earlier representations were made by Mr Dovey to the Publication Draft of the Local Plan against part (vi) of policy S6, which referred to the proposed Broad Location for Development to the North of St. Albans. The purpose of this statement is to amplify the points made at that time and to respond to the specific issues and questions set out by the Inspectors in the agenda for the hearing (Document ED26). The questions will be dealt with in the order in which they appear on the agenda. Many of the points will be illustrated by reference to the appendix which is attached to this statement.

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

3. The majority of the site is farmland, Grade 2 and 3a, which should be protected from development. In the National Planning Policy Framework (NPPF), paragraph 170 (a) states that policies should contribute and enhance the natural and local environment by protecting and enhancing soils. The following paragraph states that plans should allocate land with the least environmental or amenity value. A footnote specifically notes that “where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality should be preferred to those of a higher quality.” In view of these statements, it is clear that higher grade farmland should only be released under exceptional circumstances. All the evidence shows that the land on the site owned by the St. Albans Boys’ School has been continuously farmed until the present day.
4. Surface water flooding is an issue that has not been adequately addressed in the Local Plan. Both the Sewell Trust Field and Sandridgebury Lane are subject to regular flooding (see Appendix Figure 4). This issue is dealt with more thoroughly under question 2 below.
5. The entire site is designated as Green Belt and there are no very special circumstances to justify its release. The existing inner boundaries of the Green Belt to the north of St. Albans are well-defined. Development of the Woollam Trust Playing Fields to the north of the site was permitted as an exception to Green Belt policy, where very special circumstances were advanced for the project. This included the re-location of the Old Albanians Rugby Football Club from its former location with the city boundary. In the response to question 6 below, the list of activities regularly taking place on the site is considerable. There is frequent congestion on the local roads, and the site is essentially urban in terms of the scale of activities and frequency of use. Development of the proposed Broad Location would in effect extend the urbanisation effect well into the tract of countryside to the north.

6. Outline plans for the site have been publicised locally by the prospective developers NSA, which clearly shows the potential impact of development on the site. Apart from the structures on the Woollam Playing Fields, the area consists of farmland, with isolated farm houses, cottages, and houses. The proposed development would be incompatible with the surrounding environment. The suggested high densities have led to the conclusion that there would be much less space in which to deliver a scheme which would be sensitive to the surrounding environment.
7. It has been suggested that the site could be excavated, so as to reduce its overall visual impact. In order to achieve this, it is estimated that the site would need to be excavated from its current highest point of 119 metres OD by at least the height of a three storey building. Thus the new level would sit at the level of the nearby Valley Road industrial estate, which is currently screened from view by Long Spring Wood (see Appendix and Figure 1).
8. It is questionable what effect deep excavation would have on the surrounding land, the water table, or the environment. There appear to have been no costings for extraction levels, in order for it to deliver the 1,100 dwellings.

Q3. What evidence is there for providing 10 essential local worker houses for local teachers in this location?

9. There is no comment on this question.

Q4. What further infrastructure work needs to be undertaken, and is this appropriate to be left to the master-planning stage?

10. With respect to transport infrastructure provision, for North St Albans the Local Plan relies on the Infrastructure Delivery Plan (IDP), including Appendices 13, 14 & 15.
11. IDP Appendix 13 is a 'Technical note on capacity of the A1081 Harpenden Road corridor, and its potential to accommodate the proposed development'; a traffic assessment in all but name. The document uses 2017 traffic surveys as base data to inform a revised traffic model that includes traffic growth generated by the development. The note concludes that the traffic generated would not significantly increase congestion on the A1081 in the vicinity. This conclusion is used to justify a revision to the scoring of the "vehicular access and traffic impact" of the North St Albans site in the assessment of broad locations.
12. The traffic assessment states that the baseline traffic data was collected on a single day. The average traffic queue lengths for junctions in the area studied are significantly underestimated when compared to the normal, daily, experience of road users. For example, the stated existing morning peak average queue for the Ancient Briton junction, as depicted in the note as reproduced as Appendix Figure 6, suggests a queue length of around 200 metres from the north. In reality, the queue on a typical week day is around 1,500 metres, stretching back beyond the entrance to the Woollam Playing Fields, the proposed

main access to the development. There are similar discrepancies for other approaches to this junction, see Appendix Figure 5, and other junctions: the report suggests that there is ‘minimal queuing’ on all arms of the junctions between Harpenden Road and Sandridgebury Lane / Harpenden Road and Green Lane. In reality it is not unusual for vehicles to queue for at least five minutes to join Harpenden Road from these streets. With actual queue lengths typically five times longer than stated in the traffic assessment, it is clear that the baseline data used to create the traffic model is fundamentally incorrect. The Inspectors for the Examination may benefit from a site visit during term time peak hours to observe matters.

13. The traffic assessment includes a ‘future’ traffic model with the proposed development. However this model is based on a development of only 500 dwellings. This is less than half the actual size of development proposed, and thus the quantum of vehicular trips generated will be underestimated by a factor of at least two, all else remaining equal.
14. To provide an estimate of the rate of trips generated per dwelling for the development, the model uses ‘Method of travel to work’ data from the 2011 Census, using the dataset for the Marshalswick South ward (007A). The majority of the population of this ward live 1 - 2 km from the key work destination points of central St Albans and St Albans City station; the data set used shows that approximately 11% of trips to work are made by walking and a further 19%¹ by public transport, with the latter including those using train services, for which access to the station is first required. It is reasonable to assume that access to the station from within the ward is largely on foot given the absence of bus services to the station from this ward, a reasonable walk time (c. 10-20 minutes), and the charges for parking.
15. The proposed North St Albans development will see residents living 3 - 4km from the same destinations. For this longer journey there will be few, if any, journeys made on foot to central St Albans or the station, leading to a much higher rate of vehicular trips compared to the average for the ward. As a result, the rate of vehicular traffic generated per dwelling is underestimated, potentially by as much as 50%.²
16. Taken together with the significant underestimate of the scale of the proposed development, it is clear that the additional vehicular traffic generated by the development will be at least double, and potentially three times that suggested in the traffic assessment. The scale of the error is such that the conclusions of the traffic assessment are considered invalid. By extension, the scoring of the North St Albans site in the broad locations assessment will also be invalid in this respect.
17. The Infrastructure Delivery Plan main report, para 11.31 states:

¹ Table 2, on page 3 of the Traffic Assessment (Appendix 13), states that typical trip generation in the ward in the morning peak is 0.749 departing trips per dwelling, of which walking is 0.082 (11%), public transport is 0.145 (19%), and vehicle drivers are 0.469 (63%).

² The total morning peak trip generation by walking / public transport (0.227) is 48% of that of vehicle drivers (0.469). If all those walking to work / station chose to drive, the vehicle trips generated would rise by the same amount.

"The delivery of this site will be supported by a number of sustainable transport improvements that offer a significant opportunity to provide a step change from the existing levels of accessibility to sustainable forms of transport in the area"

This is supported by IDP Appendix 14, an extract from the North St Albans Landowner / Developer representations to SADC, whilst IDP Appendix 15 is a brief 'Preliminary Transport Strategy' prepared for the development. Both documents contain broad statements about the potential for sustainable travel at North St Albans, principally through cycling provision, travel planning, and changes to existing bus services³. However neither document gives any clear indication about the means by which these changes might be achieved or paid for.

18. IDP Appendix 14 makes reference to the current (2017) Hertfordshire County Council Local Transport Plan, 'LTP4', in the context of sustainable travel. It is important to stress that LTP4 did not identify North St Albans as a potential residential development area, (page 16, fig 3.2) and consequently did not take the development into account when making proposals for future transport provision.
19. LTP4 also contains a specific policy (Policy 2), to influence land use planning that "...will encourage the location of new development in areas served by, or with the potential to be served by, high quality passenger transport facilities so they can form a real alternative to the car...". The location of North St Albans, being on the very fringes of the city on a highway corridor that suffers extreme congestion, is unlikely to have the potential to be served by "high quality passenger transport facilities" without considerable investment in new infrastructure and new service provision. There is no mention of such investment in the Infrastructure Delivery Plan and appendices.
20. LTP4 makes clear (page 28) the difficulty in persuading residents to switch to sustainable modes even where such provision exists. Within Hertfordshire the inter-urban trip with the highest bus mode share is Hatfield – St Albans at 10%; this route directly serves St Albans station, has high usage by students, and almost three times the level of bus service compared to the Harpenden Road. Even if a substantial improvement in facilities was delivered, a bus mode share of 10% will make little difference to the highway congestion experienced on the Harpenden Road corridor.

Q5. Should the specific location for the primary school within the site be identified?

21. There is no comment on this question.

Q6. Should the policy refer specifically to the provision of sports facilities?

22. The policy must refer specifically to sports facilities, both existing and proposed, as sports are well-established in the area. The St. Albans School Woollam Trust was established to

³ The only bus service close to the site is the Arriva 321 service operating on Harpenden Road.

establish sports facilities for the community and St. Albans Boys' School. Details of the Trust are set out in the Appendix Figure 8.

23. The following extract is from the annual report from St. Albans School 2018:

"The Woollam Playing Fields and its Pavilion continue to provide an important venue for the national as well as the local community. Users include:

- Saracens training camps, covering ages 6 – 16
- Hertfordshire rugby sevens finals
- Old Albanians Rugby, including their minis and juniors, with some 400 – 500 under-18s on site on Sundays
- Harpenden Hockey, including both juniors and seniors, male and female
- County and District Cricket, including the ECB Junior Cricket Finals
- Harpenden Lacrosse
- Hertfordshire Fire and Rescue football
- Cricket academies for children 7 – 16
- Weekly dance classes
- An annual charity tennis tournament
- Charity bicycle rides, and
- District, County, and Regional Rugby, as well as football and cross-country of all levels.

The Woollams Pavilion also hosted a national seminar on groundsmanship."

24. The list clearly shows the high intensity of activity associated with the existing sports fields. Moving the St. Albans School Woollam Trust sports pitches to adjacent land has been highlighted as part of the NSA. This would have the following impacts:

- further loss of Green belt (see Appendix Figure 1)
- further loss of Grade 2 farm land (see Appendix figure 7)
- potential change of use of land within the Parish of Sandridge (see Appendix Figure 7).

25. Currently, especially at weekends, there are severe problems with car parking associated with Woollams. Overflow parking is accommodated on adjacent farmland to the east. With the possible intensification of activities, and the spread into the countryside to the north, this problem is likely to get much worse.

Q7. Has consideration been given to the linking of the ecological corridors including Heartwood, Batchwood, and Beech Bottom Dyke?

26. There is little evidence that this has been considered in the Local Plan - a number of landscape features and habitats would be affected by the proposed development. Heartwood Forest sits about 500 metres from the edge of the prosed development site, and

there would be large-scale visual impact from tow access points (see Appendix Figure 1 and 3).

27. The Hertfordshire Way long-distance footpath runs at the southern edge of Heartwood Forest and would also be subject to the large-scale visual intrusion arising from the NSA site (see appendix Figures 1,2, and 3). The Hertfordshire Way also links to Batchwood and Childwickbury (see Appendix Figure 2). Childwickbury is a country estate with farmland and private equestrian activities, all similar in character and activity to the area immediately adjacent to the NSA site. To the west is Sandridgebury, which includes Grade 2 listed buildings, public equestrian facilities and a farm. Farms at Cheapside and Sandridgebury are a mix of arable and livestock farming (see appendix 1 and 2).
28. Beech Bottom Dyke is linked on two routes to the Hertfordshire Way and Heartwood Forest. One is via Sandridgebury Lane and the other is by a public footpath through Soothouse Spring and Long Spring Woods, then along Sandridgebury Lane (see Appendix Figures 1 & 2). Sandridgebury Lane is important for its use as an access to the Green Belt countryside for walkers, riders, and runners.
29. In terms of the visual impact, it should be noted that a previous application on part of the site was refused both by the City and District Council (2011) and the Secretary of State for Communities and Local Government (2013). Part of the reason for refusal was that the proposal:
"fails to respond to the topography of the land and the section of land to the north east of the sit, if developed as proposed, would represent a built form of development of undue prominence, visible form the surrounding Green Belt land to the east and particularly the nearby footpath which passes close to the application site's boundary."
30. The NSA site is a considerably larger development than the one previously refused, and consequently have an even greater impact upon visibility form the surrounding Green Belt and Heartwood Forest.
31. At present the ancient woodland at Long Spring wood forms a natural boundary to the built-up area of St. Albans, shielding it from surrounding countryside. The proposed development would result in significant harm to the character of the surrounding countryside and the sandwiching of Long Spring between the existing Potters Wood industrial estate and the proposed NSA development. The industrial estate is set at a lower level and is screened from the Green Belt by Long Spring Wood (see Appendix Figure 1 for map details).

Q8. Has any consideration been given to air quality and any mitigation measures?

32. There is no comment on this question.

Q9. How have heritage assets been considered and is a Heritage Impact Assessment required?

33. There seems to have been very little consideration of the wider impact of the development on heritage assets. In particular the setting of Sandridgebury, the stables, the Grade 2 listed buildings, and Sandridgebury Farm has not been assessed adequately. As described above under question 7, all these features link directly to the NSA site via Sandridgebury Lane and the Hertfordshire Way.

Q10. Has regard been had to the potential for mineral extraction in this broad location?

34. There is no comment on this question.