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Date: 16<sup>th</sup> September 2009

Dear Mr Young,

**Shaping Our Community: Planning Consultation – Emerging Core Strategy  
Local Development Framework**

Thank you for consulting the County Council in relation to the above. This response relates to the County Council's functions and services provided by the Environment Department as coordinated by the Forward Planning Unit and includes a preliminary response of the Transportation Planning and Policy Unit. It is an officer response only and as yet has no political clearance.

The Council's Corporate Services Department will be making separate responses on behalf of other County Councils service providers such as Children Schools and Families and Adult Care Services where appropriate.

**1. Environmental Sustainability Policies**

The emerging strategy recognises the need to address climate change through both mitigation and adaptation as identified in SO12. The local planning authority has been proactive in its approach to addressing environmental sustainability and it is encouraging to see an ambitious target for new development to meet higher levels of sustainability than those required under statutory regulations.

The emerging policies refer to the Government's ambition for zero carbon homes by 2016 and identify how the Code for Sustainable Homes programme will contribute towards this target being met. However, no reference is made to Government aspirations for all non-residential development to be zero carbon by 2019, local government buildings to be zero carbon by 2018 and schools and colleges by 2016.

The emerging environmental and sustainability policies do not refer to the generation of stand alone renewable technologies. Both the PPS1: addendum and PPS22 require local development documents to provide guidance on the location of stand alone

renewable energy generation. PPS1: addendum states that during the plan preparation, planning authorities should consider identifying suitable areas for renewable and low carbon technology sources whilst PPS22 requires planning policy at the local level to provide guidance in relation to stand alone renewable energy schemes and the accompanying practice guidance states that it is likely there will be “two different policy areas in a local plan to cover these”.

## **2. Longer term growth requirements/Green Belt Reviews**

The existing RSS runs to 2021, but has policy guidance for local authorities in providing for housing beyond that timeframe in order to meet 15-year land supply requirements of PPS3. This essentially requires the LDF process in St Albans to look to 2026 (on the assumption the approval of this core strategy document is the correct LDD from which to calculate the 15 years, not the site allocations LDD). There is therefore a national and regional policy requirement for the LDF to look to 2026 in terms of planning for housing provision and the Green Belt implications of that provision.

The East of England Plan requires strategic Green Belt Reviews (Policy SS7) in the Region to look to 2031. There is no such requirement for non-strategic non-regionally significant Green Belt Reviews, which is the position in the City and District of St Albans. The consultation document states that GOEast has advised that Policy SS7 also applies to more local reviews of the Green Belt. If this is the advice that has been received it cannot be correct. There is no wording within Policy SS7 or its supporting text applying the principles of that policy to Green Belt Reviews other than those referred to in Policy SS7. Those Reviews have no application in the City and District.

Government guidance in PPG2 does require local authorities to ensure that Green Belt Reviews will not be required again at the end of the relevant plan period – in this case 2026. Unless housing provision in the City and District were to come to a complete or near complete halt at 2026, there is every expectation that a further Green Belt Review would be required at that stage. Under these circumstances there is therefore an expectation that the LDF process should explore longer term Green Belt boundaries beyond 2026, to 2031 and potentially beyond. However, PPG2 states that regional/strategic guidance should provide a strategic framework for considering this issue. Whilst the current RSS does not the RSS Review underway is exploring longer term growth requirements for the Region which will, of course, include appropriate levels of growth for the City and District (currently ranging between 7,000 and 16,000 dwellings). The strategic guidance expected in PPG2 is therefore in preparation. Under these circumstances the view could be taken that the LDF process should be contained to the 2026 timeframe until the strategic guidance is forthcoming.

The prematurity of Green Belt releases may be an issue picked up in the sustainability appraisal/strategic environmental assessment processes running alongside the core strategy process as it progresses. The SA/SEA might, for example, come to the view that:

- the RSS Review process should be awaited to inform decisions on the scale of additional greenfield/Green Belt releases that may be required beyond 2026.
- Until that scale of development is known robust decisions on the best location(s) for post-2026 releases cannot be made. It is plausible, for example, for

sustainability conclusions based on one scale of growth requirement to be different from those at another – and this is a distinct possibility at the range of growth levels currently being considered for the City and District in the current RSS Review consultation exercise.

Were the 2026 timeframe to be taken forward through the remainder of the LDF process, this would remove the requirement for a range of proposed post-2026 Green Belt releases, including west of London Colney, North of Harpenden, East of Redbourn, Nicholas Breakspear School.

### **3. Assessment of Potential Strategic Housing and Employment Sites**

The emerging core strategy sets out the preferred strategic housing and employment sites to be taken forward over the plan period to 2026 and beyond. It would be helpful if the technical appraisal of all areas of search considered and a clear picture of how decisions have been arrived out could be brought together as a single appraisal – perhaps formally within the sustainability appraisal/strategic environmental assessment process.

### **4. Affordable Housing**

The relationship between 100 dwellings per annum and minimum 35% target for affordable housing is not clear.

### **5. Minerals and waste issues**

#### ***Site Specific Considerations***

The County Council supports the possibility of identifying Roehyde as an employment area, in order to complement and serve the needs of the District to 2026. Although the site is not identified as a current waste site or suitable area to accommodate future waste facilities within the adopted Waste Local Plan, the County Council's emerging Waste Development Framework has identified the site as a suitable location for future waste uses, and is listed as a Preferred Waste Area (HPO 036) in the Site Allocations Preferred Options document, published in January 2008. It is the County Council's intention to carry this site forward through to the next stage of the emerging Waste Development Framework.

Waste facilities are generally considered to be compatible alongside B2 and B8 uses, and whilst the District Council is considering promoting the site as a high quality, well landscaped business park, any proposals should be considered in context with the site's promotion as a preferred waste area through the County Council's Waste Development Framework. Although the site lies within the sand and gravel belt, whereby sites of this nature may provide for opportunistic extraction, the site previously formed part of Roehyde quarry, and appears to provide no further opportunity to extract primary aggregate. Extraction on this site was originally approved in June 1957, was subsequently filled, and closed in 1980.

### ***Minerals Sterilisation***

The Core Strategy Key Diagram shows a number of sites and areas of search for housing development that maybe needed to meet the future needs of the District. Of these locations, Areas of Housing Search 1, 3, and 5 appear to be within the sand and gravel belt, along with employment development areas 1 and 3, and specific housing sites 5 and 6. These locations, along with possible Mini Park and Ride locations 1-4, appear large and not clearly defined in any detail.

The County Council as mineral planning authority aims to protect minerals resources from sterilisation, and at this stage it is hard to determine if, or to what extent minerals would be sterilised, especially if these broad locations fall upon greenfield (undeveloped) sites. Regard should be given therefore to the issue of minerals sterilisation and the need to recover the mineral prior to any development when considering these broad locations for further development, either within future versions of the Core Strategy or in specific Development Briefs. Proposals that prejudice the coming forward of the Preferred Area for mineral extraction at the former British Aerospace site would be the subject of an objection by the County Council.

### ***General Core Strategy Considerations***

The County Council broadly welcomes the promotion of waste minimisation within Core Strategic Objective 12. However, this needs to be clearer as to what measures will be used to promote the minimisation of waste and to encourage re-use and recycling within the District. It is suggested that this could be strengthened by a new policy on design and sustainability that incorporates the promotion of sustainable construction methods that minimises waste generation, and the re-use, and recycling of materials as far as practicable on site. This should then be taken into consideration if any of the sites or areas or search identified within this consultation come forward for future development. Proposals for new development should also ensure that they make provision for waste arising from occupation of the development, including appropriate access for refuse collection vehicles, storage of collection bins and locality based transfer and processing facilities.

Methods of waste minimisation should be in keeping with the County Council's aims and objectives for the reduction of waste and its environmental impact, as stated in section three of the Waste Local Plan 1995-2005. The key objectives that are of particular relevance to individual Local Planning Authorities are:

- To facilitate the provision of sufficient waste management facilities in Hertfordshire to accommodate the equivalent of the County's own arisings.
- To locate waste recycling, handling and reduction facilities as close as practicable to the origin of waste.
- To promote the development of waste management facilities, which increase the proportion of waste managed further up the waste hierarchy.
- To minimise the impact of waste management development on the natural and built environment.

It is the County Council's intention to maintain this approach, when formulating the key objectives within the emerging Waste Core Strategy. These will also emphasise the need for all local planning authorities in Hertfordshire to facilitate sustainable waste management principles within their emerging LDF documents. The publication of the East of England Plan in May 2008 outlines a significant need to minimise construction and demolition waste, as this represents the largest waste stream within the region.

It should also be noted that as from 6 April 2008, a site waste management plan (SWMP) is required by law for all construction projects that are worth more than £300,000. This aims to reduce the amount of waste produced on site and should contain information including types of waste removed from the site and where that waste is being taken to. Projects over £500,000 may require further information.

## **6. Transport**

### ***Green Belt***

**A1) To help us take our vision forward we have a number of objectives. How much to you agree or disagree with each of them?**

**a) Ensuring the District is a great place to be, by:**

#### ***Providing sufficient land for development in sustainable locations***

Maximising development in areas which are already served by passenger transport is beneficial as this potentially increases its use, improves commercial viability of bus routes and provides opportunities to make improvements to existing pedestrian/cycle/bus networks. Development in less well served areas requires significant developer contributions in order to make development sustainable which may not be achievable in small scale developments.

**b) Supporting sustainable travel and reducing car usage**

This is essential in order to minimise the potential negative impact of proposed development and so current issues of congestion, air pollution, and accessibility are addressed.

A number of initiatives are suggested for further consideration in the UTPs for St Albans and Southern St Albans including cycling measures such as: signalised junction improvements in the City Centre in Victoria Street or the need to look at ways to reduce severance and improve links for cyclists along the A414.

### ***Housing***

#### ***Housing Density***

**B1) Building houses at higher density in towns can reduce the amount of green field land needed for development. Higher density can also mean reduced**

*recreational space and diversity of plant and animal life, fewer trees, more street congestion, higher building and smaller properties. On the other hand, green field development can lead to urban sprawl and less space between settlements.*

- a) Which of the following options do you prefer?**
- i) High density in built up areas and less development on green field sites**
- ii) Lower density in built up areas and some development on green field sites**

Existing built up areas are likely to already have some passenger transport provision and therefore maximising densities in such areas rather than on Greenfield sites increases the potential for the use of such services. Greenfield sites are likely to be less well served in relation to bus routes, pedestrian or cycle links and measures to improve accessibility by sustainable modes of transport may need to be greater than in existing built up areas. High densities can also reduce the need to travel if the distance between destinations is reduced. Having said this, specific site characteristics need to be examined in all situations as some built up areas may be much better served than others and the need to travel can be influenced by effective land use planning (eg mixed use developments) and quality pedestrian/cycle and passenger transport links.

#### ***Housing Sites***

- B2a) The emerging strategy proposes the following main sites for housing for the period to 2021. Please say whether you support or oppose the Council allocating these sites for housing.**

- i) AOS 1: south west of St Albans, Bedmond Lane**

Following the completion of the M1 widening works the M10 (between the Park Street roundabout and the M1) has been reclassified as the A414(T). The provision of an access and link road through the site requires a junction with this section of road. The assessment of the site in Appendix 8 recognises that the A414(T) remains the responsibility of the Highway Agency and therefore it will be necessary to seek their approval.

There has been a general assumption that in the future the responsibility of the A414(T) will be transferred to HCC as the local highway authority. It is understood that at this stage the Highways Agency have no intention to transfer the road to HCC. However, *should* the road be transferred the road will form part of the county's primary strategic network. This being the case the County Council will maintain the current policy which states that the County Council as Local Highway Authority opposes new junctions on the primary road network. The County Council will only accept a deviation from this policy where very special circumstances exist.

An initial study into the overall impact of the site and link road has been carried out by representatives of AOS1. The results indicate that a significant amount of traffic is likely to divert to the new route relieving some of the congestion the southern approaches to the city, in particular, at the King Harry Lane junction with St Stephens Hill. The diverted traffic will lead to a significant increase in traffic on the A4147 Bluehouse Hill and Batchwood Drive. The study goes on to investigate localised junction improvements necessary at several junctions along the route to accommodate the additional demand.

The results of the study also show that there is only a relatively small impact on the amount of traffic in the centre of St Albans. This outcome is obviously in conflict the aspiration of the Emerging Core Strategy to reduce the amount traffic in the town centre leading to the possibility of traffic restrictions.

However, the traffic modelling work uses updated versions of an old model. Unfortunately, the new modelling has not been fully validated and concentrates attention to a localised area. Although the modelling has provided an indication about the affect of the link road the results cannot be considered as a robust evidence base. The impact of the link road with direct access to the A414(T) is likely to have wider reaching implications and further investigations will need to be carried out before the local highway authority is in a position to agree with the conclusions reached by the current report that states that the route would result in major transport benefits for the city.

The introduction of a development of this scale in this location would require an extensive sustainable transport strategy. The initial work that has been carried out to date has identified several bus services in the area and suggests that it will be possible to divert them into the site. There does not appear to be any evidence in the initial transport report that takes this theory any further. The cycling strategy appears to rely on a network of cycling routes that would link to a formal off carriageway core facility that would run parallel to Bedmond Lane. At this stage it would be useful to carry out further work to establish the feasibility of linking the new cycle route to the existing road network to the east and the town centre.

Appendix 8 makes reference to the opportunity of the inclusion of mini park and ride close to the junction with the A414. The subject of Park and Ride in St Albans is covered in section E1a iii.

***ii) AOS 5 (south west part): east of St Albans at Beaumont School playing fields/Winches Farm Drive***

It is assumed that the access to this site will be taken from a new signalised junction from the A1057 Hatfield Road to the east of Oakwood Drive. The junction has been previously assessed and approved in principle when submitted with a recent application to develop the smaller area of land within the same area of search.

There are regular bus services along Hatfield Road with evening and Sunday provision. Good pedestrian/cycle links will need to be provided through the site to the Hatfield Road in order to access these services. It is important that further development of this site does not worsen the existing congestion on Hatfield Rd as this is an important bus route. Other measures to improve and encourage sustainable transport should be an integral part of a future development.

***iii) AOS 5 (north part): east of St Albans at Oaklands Campus south of Sandpit Lane.***

Paragraph 13.19 refers to an eastern distributor route that would run from London Road (via Highfield Park Drive) to Hatfield Road and through the Oaklands Smallford Campus site to Sandpit Lane.

It is not clear from the information provided how/where the site will connect to the existing network or whether all or part of the eastern distributor route is to be provided as part of this proposal. Clearly, a development of this scale (up to 1000 homes) will require major road and junction improvements. There are significant traffic implications associated with the proposal and the introduction of any sections of a link road between London Road, Hatfield Road and Sandpit Lane. To date the local highway authority are not aware of any feasibility work that has been carried out to predict how the proposal or the links will impact on the existing road network.

For a proposal of this size a thorough sustainable transport strategy is required. This area (Sandpit Lane) is not well served in relation to bus services. Most of the site falls outside the 400 metre catchment for existing services but a development of this size should be designed to accommodate passenger transport.

Bearing in mind the scale of the proposal and the lack of any information associated with sustainability and access arrangement it is difficult for the local highway authority to comment in any more detail.

#### **Possible Long Term Housing Needs**

***B3a) The emerging strategy identifies the following sites for possible long-term housing needs (mostly post 2026) for safeguarded land (land reserved for future development). Please say whether you support or oppose the Council allocating these sites for housing.***

**i) AOS 3: west of London Colney**

A proposal of this scale is likely to lead to improvement works to Shenley Lane to accommodate the additional traffic. There is also likely to be a requirement to upgrade the roundabout junction at Bell Lane/Harper Lane. However, limited available highway land may restrict improvements. To the north the Shenley Road junction with the A414 will also need to be tested in terms of capacity and the safety/accident history.

The area is currently served by one bus route, the 602, with operation hourly Monday to Saturday with no evening or Sunday provision. Bus service provision would need to be improved should this still be the case when the site comes forward. Further bus services are available from London Colney High St but this is over 400m from the site. Enhanced facilities as suggested within Appendix 8 such as shops/school would be beneficial in order to reduce the need to travel.

Only limited discussions have taken place with representatives of AOS3, without any additional information available regarding the proposed access arrangement, mitigation measures and sustainable transport strategy it is difficult for the highway authority to provide any further detailed comments.

**ii) AOS 8: (south west part): north of Harpenden, Luton Rd/Ambrose Lane**

Appendix 8 states that the A1081 Luton Road is a congested road. This observation is reinforced in the County Council's 'Tackling Congestion in Hertfordshire' document that

identifies this section of the A1081 as a congestion hotspot. Without any additional measures to ease the existing congestion any additional traffic is likely to make the situation worse. Careful consideration of measures to deter the use of residential streets as alternatives to Luton Road will be required should this proposal be progressed.

It should also be noted that the A1081 Luton Road forms part of the county's primary distributor network and the average week day traffic flow is in the region of 18,000 vehicles. This being the case the County Council as the highway authority will maintain the current policy which states that new junctions on the primary road network will be opposed and that a deviation from this policy will only be possible where very special circumstances exist. However, without any obvious points of access from Bloomfield Road (as it is residential without an access point to the site) and the predominately rural nature of both Cooters End Lane and Ambrose Lane there may be a case for introducing another arm to the existing junction with Roundwood Lane and thereby turning the existing three arm signal controlled junction into a four arm cross road junction (also controlled with traffic signals).

An access to a development of this scale from either Cooters End Lane or Ambrose Lane is likely to change the character of the roads if sections are upgraded in terms of road width and the provision of footways

It should be noted that as a general design principle, a development of approximately 300 dwellings will require at least one more access for emergency use.

For a proposal of this size a significant sustainable transport strategy is required. Currently there are several bus routes that run along Luton Rd, with regular services Mon-Fri including evenings, although less frequent at weekends. Good pedestrian/cycle links will need to be provided through the site to the Luton Road in order to access these services. Developer contributions from this site could be used towards improving evening and weekend service provision and other sustainable transport links to the town centre.

This area of search represents a large site that will have a significant impact on the road network in the area. Issues surrounding network capacity, access and sustainability must be fully investigated at the earliest opportunity. To date the highway authority are not aware of any work that has taken place to support this proposal.

*iii) AOS 7: north of St Albans at Harpenden Rd/Sandridgebury*

The County Council's 'Tackling Congestion in Hertfordshire' document identifies this section of the A1081 as a congestion hotspot. The introduction of a development consisting of 1,000 dwellings will generate in the region of 500 additional vehicle movements in the morning peak period. Without any additional measures to ease the existing congestion any additional traffic is likely to make the situation worse.

It should also be noted that the A1081 Luton Road forms part of the county's primary distributor network and the average week day traffic flow is in the region of 18,000 vehicles. This being the case the County Council as the highway authority will maintain the current policy which states that new junctions on the primary road network will be opposed and that a deviation from this policy will only be possible where very special circumstances exist.

The introduction of a development of this scale in this location would require an extensive sustainable transport strategy and designed to accommodate a public transport. There appears to be evidence of a shared use cycle path on the A1081 Harpenden Road. A sustainable transport strategy for the site is likely to include upgrading this facility. At this stage it would be useful to carry out further work to establish the feasibility of linking the new cycle route to the existing road network and the town centre and expand it to other facilities in the area. The site is somewhat remote from shops/services, therefore improved bus service provision to the site is required in order to encourage sustainability.

This AOS represents a large site that will have a significant impact on the road network in the area. Issues surrounding network capacity, access and sustainability must be fully investigated at the earliest opportunity. To date the highway authority are not aware of any work that has taken place to support this proposal.

***Strategic Housing sites no longer proposed***

***B4a) The emerging strategy no longer proposes the following as main housing sites. Please say whether you agree or disagree with the Council's decision to reject these sites for housing.***

***i) AOS 4: South of London Colney***

This site is remote from existing bus services. There are bus stops within the local retail park but these would be over 400m from the site. Significant developer contributions would be required to improve bus services in order to enhance accessibility.

***ii) AOS 6: Smallford***

Smallford has relatively limited services and residents would likely need to travel to either Hatfield or St Albans for daily needs. Whilst this is possible by bus due to the bus services which run along Hatfield Rd, the lack of local facilities increases the need to travel and so this would not make this site very sustainable. Extra vehicle trips generated by the development may also have a significant negative impact on Hatfield Rd which is already congested.

***iii) AOS 2: South east of St Albans (south west part)***

Bus services are available from London Rd but stops would be outside the 400m distance criteria for most of the site. Significant developer contributions would need to be sought in order to improve pedestrian/cycle/bus accessibility. The south western part of this site is remote from local services, and the major roads that surround the site may create barriers to movement.

***iv) AOS 8: North of Harpenden (north west part)***

Several bus routes are available from Luton Rd but this part of the site is less well located for development than its south-western part due to the increased distance from the town centre and other local services.

## **Employment**

### **Strategic Employment Sites**

**C1a) The emerging strategy proposes the following main employment sites. Please say whether you support or oppose the Council allocating these sites for employment.**

**i) E1 & Area of Search 2 (north east part): London Rd (adjacent to cemetery), St Albans for professional jobs.**

A proposed access arrangement to the site has not been included with the consultation information. Following a brief discussion with AOS2 representatives it is assumed that the access for the southern site will be taken directly from the London Road and the northern section of the site will be served from Highfield Park Drive.

It should also be noted that the A1081 London Road forms part of the county's primary distributor network. This being the case the County Council as the highway authority will maintain the current policy which states that new junctions on the primary road network will be opposed and that a deviation from this policy will only be possible where very special circumstances exist.

The site is close to the London Colney roundabout junction on the A414 and it is generally accepted that the junction can become congested at peak times. Therefore, there are concerns that an additional junction serving the southern site will delay traffic exiting the London Colney roundabout and interfere with the safe operation of the junction. There are also concerns that the any additional traffic generated by this proposal will have a direct impact on junctions operation in terms of capacity and safety.

Several bus routes are available from London Rd and frequencies are good. Pedestrian/cycle access onto London Rd is important in order to facilitate access to bus stops. The site appears somewhat remote from local services, facilities and residential areas, however, it is understood that there is opportunity to provide links to existing rights of way routes and upgrade where required.

The introduction of a development of this scale in this location will require an extensive sustainable transport strategy. At this stage it would be useful to carry out further work to establish the feasibility of linking the site to the existing road network and the town centre and expand on other facilities in the area. The site is somewhat remote from shops/services, therefore improved bus service provision to the site is required in order to encourage sustainability.

This AOS represents a large site that will have a significant impact on the road network in the area. Issues surrounding network capacity, access and sustainability must be fully investigated at the earliest opportunity. To date the highway authority are not aware of any work that has taken place to support proposal.

**ii) E2: Rothamsted Research, West Common, Harpenden – extension for Rothamsted and related firms for professional jobs.**

Appendix 9 makes reference to frequent bus services along the A1081 but there are no bus stops on this road in the vicinity of the site. As the crow flies, stops in Southdown Rd are geographically the closest, but this would not be an obvious route to go and the busy A1081 presents a barrier to their access. Other bus stops on Redbourn Rd and within the town centre are not within the recommended 400m distance criteria. The site is however within walking distance of the town centre.

***iii) E3: Building Research Establishment (part) at Garston – redevelopment for BRE and related activities for professional jobs.***

This site is not well served in relation to bus services, with no bus stops within 400m. The site is also close to major roads which may create barriers to movement into Watford and the surrounding area. As stated in appendix 9, the site is remote from local services/facilities and therefore this site scores particularly poorly in terms of sustainability. A significant sustainable transport strategy for the site will be required and is likely to require equally significant developer contributions in order to improve and support accessibility.

***iv) E4 Roehyde: south west of A1(M) junction 3, Colney Heath (west of Hatfield) – possible alternative to London Rd, St Albans for a high quality business park or in addition to it.***

This site is well situated in relation to access to major roads but is not in a location that would encourage the use of sustainable modes of travel. The co-location of hotel with a business park may be effective if there is a need for accommodation for business travellers. Access to the site or travel further afield by sustainable modes would currently be problematic for this site as the nearest bus stops are the other side of major roads and a roundabout. Such major roads also do not present an environment that is pedestrian and cycle friendly. Should this site be developed, developer contributions would need to be sought towards improving accessibility of the site by sustainable modes.

The site requires an access on to the A414. The principle of the access serving a development of the scale described has not been agreed (not as stated in appendix 9). Previous planning applications on this site have been refused. The reasons included the long term policy that restricts the introduction of new accesses on to the county's principle road network. In recent years the use of the site has become more established. Following the last planning application a proportion of the site continues to be used for temporary construction plant storage another part of the site is being used for the storage of bus/coaches. As a result of the continuing use of the existing access in recent years, albeit predominately temporary, the site has become more established. However, the amount of vehicles using the access remains relatively small.

It should be noted that another reason for refusal was the design and safety of an access in this location. The vehicle speeds on the A414 in this location are increased as drivers accelerate away from the roundabout, lane changing is also taking place as three lanes exiting the roundabout reduces to two on the A414.

Due to the close proximately of Junction 3 of the A1(M) any proposals for this site should also include consultation with the highways agency.

v) ***E5 & Area of Search 7: Employment area extension EMP8 (Porters Wood) St Albans – for long term needs probably post 2026.***

The nearest bus stops are on Valley Rd but are not within the recommended 400m distance criteria and are served by local routes only. Access through to Harpenden Rd, from where the 321 Rickmansworth/Watford-Luton bus route is available, is poor due to the narrowness of Valley Rd as it runs behind St Albans Girls School. The site is remote from local facilities – the shops in Marshalswick are not within easy walking distance. Currently this site does not score highly in terms of accessibility by bus/pedestrians/cyclists.

### ***Shopping***

#### ***Harpenden Town Centre and St Albans City Centre***

##### ***D1a) How much do you agree or disagree with the following statements?***

i) ***Proposals for shopping, culture and related facilities should be concentrated in St Albans city centre.***

ii) ***Improvements in shopping in Harpenden should be concentrated in the town centre.***

Town centres are sustainable locations for such developments as they add to existing facilities, maintain vitality of existing town centres, and are where there are most options in relation to sustainable modes of transport. Development needs to be designed in conjunction with passenger transport, pedestrian/cycle network improvements and an effective parking strategy in order that sustainable modes of travel are encouraged and new development doesn't simply attract new car trips, adding to congestion. If town centres are to be further developed it is important that this is not to the detriment of local centres which may be more commercially marginal and play an important role in reducing the need to travel, particularly for residential areas further from town centres. For instance the supermarket and associated shops in Southdown in Harpenden play an important role for the residents of the Southdown/Batford area and reduces the need for these residents to travel to the town centre.

#### ***Shopping Developments in St Albans City Centre***

D2) ***A development which might include a food supermarket, large shops units and a department store is proposed for St Albans city centre.***

a) ***Where would you prefer to see this kind of development?***

***SH1: West of St Peter's St (Drovers Way)***

***SH2: East of St Peter's Street (Civic Centre area)***

***Both/Neither***

Either option is acceptable provided that the development is well connected to St Peter's Street, does not compromise the existing passenger transport network, reduce the capacity of the road network, fully considers sustainable transport (including car parking) and is safe.

***Griffiths Way and Colney Fields (Former Savacentre)***

***D3a) Please say whether you support or oppose the following possible sites for retailing?***

***i) SH3: Griffiths Way, St Albans (former gas holders site) possible retail warehousing.***

There are two bus stops on Griffiths Way within 400m of the gas holders site and two further stops on Holywell Hill by the Abbey Rail Station. There are a variety of routes available, both local and inter-urban. The site is therefore relatively well served in relation to buses despite being separate from the town centre. The proximity of the Abbey Station also provides the opportunity for visitors to come by rail. In terms of pedestrian and cycle access, this may be somewhat limited due to local topography, although there are residential areas within walking/cycling distance. The impact of any further development in this location may have an adverse effect on congestion along St Stephens Hill on the approach to the King Harry Lane junction.

***ii) SH4: Colney Fields, London Colney: possible expansion of retail park.***

Colney Fields is an important retail facility for residents of London Colney, but also attracts visitors from further afield due to the size of stores. There are several bus routes that call at the stops for the retail park. In order to encourage the use of sustainable modes of transport, any further development of this site should include measures to promote bus use and improve information provision and signage. Recent alterations to the car park have improved pedestrian routes within the site. Future development would give the opportunity to examine whether improvements could be made to pedestrian and cycle access from a wider area.

***Transport***

***E1a) To what extent do you support or oppose the following transport measures:***

***i) St Albans City Centre – reduce traffic and improve the facilities for bus, cycling and walking.***

As overall aims these are very positive but it is the means by which they are achieved that is important. At the moment central St Albans is a traffic dominated environment and traffic is not free-flowing, which impacts upon bus services and is not pedestrian and cycle friendly, although pedestrian/cycle improvements have recently been made to St Peter's St. If consideration is to be given to making St Peter's St for the use of sustainable modes of transport only, improvements need to be balanced with improved bus services, bus priority measures, information provision/ticketing initiatives/marketing. Cycle route improvements should link into the wider cycle network to enable people to come from further afield. Pedestrian routes should be of a high quality and enable

effective access to key destinations. In order to make sustainable modes of transport attractive, measures to improve facilities need to be combined with an effective parking strategy which discourages the use of the private car combined with enforcement. Improved accessibility is key to achieving social inclusion and enabling access to health, education, jobs, shopping, leisure and other community facilities.

It should be noted that initiatives proposed in the consultation do not provide evidence of their feasibility. The city vision work did not include modelling to justify its aspirations.

Whilst HCC are hoping to undertake modelling for central St Albans in the near future this may not be in time to inform the final LDF submission.

***ii) Increase the bus use, cycling and walking in the whole District.***

This is essential in order to enable anticipated development within the District to take place in a sustainable way. Effective land use planning, in which development is designed in conjunction with passenger transport, helps to make sustainable modes of transport more attractive. Factors to consider include the design of new development so as to be conducive for bus access, location of bus stops within reasonable walking distance, high quality pedestrian and cycle routes to key destinations, appropriate levels of parking and measures to discourage rat running. Mixed use developments can assist in reducing the need to travel and consideration should be given to the location of any new development in relation to local services and accessibility by passenger transport, on foot/bicycle.

Bus services operate within a commercial environment and therefore available routes and their frequencies are determined by commercial viability. Whilst developer contributions can be used to improve services this is usually for a limited time only and so measures to increase patronage, which may lead to service improvements long term, are important. Bus services within St Albans are currently adversely affected by levels of congestion and whilst this may be improved short term by diverting traffic onto orbital routes, measures need to be in place to lock in the benefits of extra capacity such as bus priority measures, quality interchanges, pedestrian/cycle routes, coupled with an effective parking strategy. The proposed park and ride using local bus services will, if successful, encourage bus use. Other measures that should be considered are improvements to bus stop infrastructure and passenger waiting facilities, information provision/marketing/ticketing initiatives.

Tackling congestion is important in order to provide an environment that is more attractive for cyclists, along with priority measures, the provision of a network of high quality routes, and cycle parking at key destinations. Accessibility of services on foot is also important for short distances and therefore also essential is an effective pedestrian network which promotes safe, direct access to key destinations, crossing points and access to passenger transport (bus stops/rail stations).

Improvements to rail services into London as part of the Thameslink programme and those to the Abbey Line will also play an important role in improving the attractiveness of sustainable modes of transport.

The suggestions of the City Vision are referred to within Chapter 13 (13.25, 13.30). There are already several bus routes that operate between the station and town centre. Careful consideration should be given as to the viability of another route and demand for bus access to the cathedral/Verulamium Park. Bus services operate within a commercial environment. If developer or other sources of funding are used to support bus services, these are often of a limited time span and so assessment of the likely long term viability of a route is important. In relation to east-west links, a number of routes already run between the town centre and Hatfield along Hatfield Rd. Paragraph 13.11 makes reference to the Rural Vision, which identifies a need for improved bus links between rural areas and towns. Such routes may be commercially marginal and therefore not attractive to bus operators. Increased numbers of bus routes/service frequencies in themselves may lead to some increased patronage, but given the commercial nature of bus operation and in order to maximise the usage of sustainable modes of travel on a long term basis, other measures need to be developed in tandem to make their use more attractive – eg infrastructure/information/bus priority provision and quality pedestrian and cycle links. In rural areas, more innovative solutions may be required such as demand responsive or community based transport schemes.

*iii) Mini park and ride (PR 1-4)*

In principle, park and ride can be an effective means of encouraging people to access town centres by bus. In order to be effective, there needs to be frequent, reliable, low cost buses available coupled with further measures to encourage its use such as a parking strategy which manages parking within the town centre, improvements to bus infrastructure including passenger waiting facilities, bus priority measures, as well as improvements to pedestrian and cycle access around the town.

Whilst the proposal to use local bus services is positive in that this may lead to enhanced patronage and therefore commercial viability, such services may be more subject to delays if they have come from further afield and would also presumably lack the branding and marketability of a dedicated park and ride bus service. The size of car parks provided also determines the numbers of people able to use the park and ride, and a small car park may therefore limit commercial viability. Careful consideration should also be given to the location of the park and ride sites. The proposal for a site on London Rd may be effective as there are already bus routes using this route into the town centre. The other proposed sites are not so well served by existing services and so thought would need to be given as to how to fund improvements. It is important that park and ride is placed where there will be highest demand and potential use, if existing bus services are used, where these are with highest frequencies, and land available for the facility. A robust business case will need to be made, combined with high quality facilities, and so potential users are offered a saving in time and cost over the car.

Reference is made to the potential for 'park and walk' (paragraph 13.30) car parks. If these are proposed along with park and ride, one might compete with the other, and the provision of car parks in themselves may give further encouragement to cars, although it would displace them from the central area.

Comments as above, the need for the Parking Strategy and the outcomes of the city vision work is paramount for the case of park and ride to be tested.

Paras 13.27 and 13.28 cannot be proven - evidence is needed.

**iv) *Western orbital route (a new link road from the A414 [former M10] to the A4147 Hemel Hempstead Road plus junction improvements.***

Whilst the orbital route is likely to divert vehicles, particularly through traffic, the provision of extra road capacity may simply attract extra vehicle trips and not tackle issues of congestion and increasing car use long term. It is important that there is a balance between road/junction improvements and sufficient and effective measures to encourage the use of alternatives to the car to ensure the long term sustainability of development. An effective routing strategy is needed to ensure vehicles use roads appropriate to their journey purpose and which will act with other measures to discourage the use of cars in the area. If the new route is developed it should be designed so as to be conducive for bus use, and consideration should be given to bus priority measures and pedestrian and cycle routes. The need for such a route and the impact on traffic flows should be assessed through modelling (see previous comments B2a)i).

Para 13.7 of the core strategy should not make reference to the St Albans UTP supporting the construction of an orbital route. This was a proposal in the earlier SADC 2007 core strategy document that the UTP considered as part of its development and recommended that the feasibility be considered prior to any further commitment.

**Community**

**Education facilities**

**F1a) *How much do you agree or disagree with the following educational proposals?***

**i) *New secondary school on the north side of St Albans***

This site would be very close to St Albans Girls School and presumably access may also be along Sandridgebury Lane. If this is the case, this would add to current congestion in the area around school start/finish times. The site is also close to other schools such as Townsend and Margaret Wix Schools. It would be beneficial if schools within St Albans are located where pupils can walk/cycle to them and are also accessible by local bus services. There are regular bus services along the A1081 although this may be outside the recommended distance criteria for a school (200m).

**ii) *New primary school west of St Albans city centre***

As above, the location of a school needs to take into account where pupils are going to be coming from so that the majority can be within walking/cycling distance. Large areas of housing development may justify a new school as well as other community facilities. Should a new school be within AOS1, this area currently has limited bus services which would need to be improved. The provision of quality pedestrian and cycle routes are important to encourage the use of sustainable modes of transport.

**Recreation**

### ***Hotels***

***G2a) The emerging strategy proposes possible new hotel accommodation in sites located along the A414 corridor. Please say whether you support or oppose the Council allocating these sites for hotels***

***i) HT1: The City Centre and other built up areas for budget and boutique hotels***

The city centre is well served in relation to bus services and so would be a sustainable location for a hotel. If other built up areas are proposed, accessibility of the site by bus, rail, pedestrian and cycle networks needs to be assessed in order that sustainable modes of transport are encouraged and deficiencies addressed through the planning process and developer contributions.

***ii) HT2: London Rd, St Albans (adjacent to the cemetery) for a 4 star hotel with conference facilities.***

In relation to bus services, a number of routes are available from London Rd and stops would likely be within 400m of most of the site. Good pedestrian/cycle access onto London Rd is important as this is the main route for buses and into the town centre. The co-location with employment uses may be effective if there is a need for business traveller accommodation (also see comments c1ai).

***iii) HT3: Roehyde (A414/A1[M]) linked to business park.***

This site is well situated in relation to access to major roads but is not in a location that would encourage the use of sustainable modes of travel. The co-location of hotel with a business park may be effective if there is a need for accommodation for business travellers. Access to the site or travel further afield by sustainable modes would currently be problematic for this site as the nearest bus stops are the other side of major roads and a roundabout. Such major roads also do not present an environment that is pedestrian and cycle friendly (also see comments C1ai).

## **7. Green Infrastructure, Natural Environment and Countryside Policies**

The emerging policies on green infrastructure, the natural environment and countryside do not fully address Landscape objectives set out in the East of England Plan and emerging national guidance. It is suggested that in the revised document, SADC signpost within the document towards a fuller set of objectives for landscape policy than currently suggested.

SADC and their partners should recognise and aim to protect and enhance the diversity and local distinctiveness of the countryside character areas identified in the emerging document by:

- developing area-wide strategies, based on landscape character assessments, setting long-term goals for landscape change, targeting planning and land

management tools and resources to influence that change, and giving priority to those areas subject to most growth and change;

- developing criteria-based policies, informed by the area-wide strategies and landscape character assessments, to ensure all development respects and enhances local landscape character; and
- securing mitigation measures where, in exceptional circumstances, damage to local landscape character is unavoidable.

In addition Natural England is in the process of promoting a number of landscape policies (e.g. all landscapes Matter) which would merit a mention

Yours Sincerely

[REDACTED]  
Forward Planning Unit  
Hertfordshire County Council