



Local Plan 2020-2036: St Albans Civic Society Response to Consultation

Introduction: The St.Albans Civic Society recognises the importance of a new Local Plan (LP). This LP is needed, in order to update the previous LP, drafted in 1994. This is, not only to ensure that the authority's LP is compatible with latest edition of the National Planning Policy Framework (NPPF), published in July 2018, but also that St Albans District Council (SADC) will not have to relinquish its control, over planning in the district, to Government, because there has been a failure to produce an approved, up-to-date LP.

Policy S1: The Society is able to endorse the development of urban and brown field sites, with higher density and taller buildings (this has been achieved in the past with great quality and style: for example, Georgian terraces).

However, as a matter of long-established policy, the Society resists all encroachment upon the Green Belt.

S2: The Society understands that, given the scale of the government's housing target for St Albans of 14,608 homes, SADC argues it has little option but to consider Broad Locations, within the Green Belt. Even though this position can be accepted, nevertheless, the major concern remains that the planned developments in the Green Belt, which nibble away at the edges, could lead to urban sprawl, or the merging of communities, based upon a precedent that has been established by these developments. This is, in fact, in apparent contradiction to the five stated purposes of the Green Belt:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other land.

(NPPF, para,134, July 2018)

It is, therefore, only through the application of "exceptional circumstances" (NPPF, para 135) that building housing on the Green Belt can be justified; in SADC's case, the scale of the housing target and the lack of suitable non-Green Belt land available can be described as

'exceptional'. However strong the arguments are for releasing Green Belt for housing development, the Society believes a dangerous precedent has been set.

S3: The Society also endorses the importance of protecting the Metropolitan Green Belt and welcomes the statement that it will be “proactively managed”. At the same time, it is very important that any developments within the Green Belt are “greened”, with landscaping an integral element in their planning, as well as environmentally friendly and sustainable housing, schools and general infrastructure.

S4: The strategy of splitting the 16 year target over three periods is recognised as a practical approach. The placements of the housing developments, though regrettable, seem appropriate in the constrained circumstances. It is noted that some sites are only viable, provided the duty to co-operate with neighbouring authorities has been fulfilled.

S5: Although provision is made for a new development for employment, citing circa 10,000 new jobs, it is very unclear how this figure is to be achieved. Apart from aspirations, mentioning the enviro-tech sector, it seems a vague promise, without a clear strategy, relating to concrete commitments of investment, etc.

S6: The Society understands the need for all Broad Locations to meet LP Policies but see comments above (S2) .

S6 i: The Society accepts the indicative metrics. There is some unhelpful jargon: for example, "links to a community food zone retained in the Green Belt." What this precisely means needs spelling out. There is the statement that 3% of homes provided will be self-build but there appears to be no strategy as to how this will be achieved.

S6 ii: See comments above (S5). There are further aspirations, relating to "environmental opportunities" without any clear proposals - presumably the master plan developed with Dacorum will address this lack of substance?

S 6 iii, iv, v, vi, vii, viii. ix & x : The Society accepts the metrics but notes, “ Excellence in design, energy efficiency and water management” is required for all Broad Locations. The Society has a Design Advisory Group, made up of experienced and renowned architects and planners, and argues it is extremely important that this group should be consulted in any pre-planning consultation.

S6 xi: The Society has reluctantly given its support for a housing development on this particular site as it thinks the proposed, and authorised by government, Strategic Rail Freight Interchange (SRFI) is unworkable - the evidence is clear from its members meeting with Network Rail that timetables and infrastructure would not be able to cope with an SRFI at the Park Street site and, therefore, it would become a lorry freight interchange which would cause massive congestion and damage to the community on all the connecting roads. It agrees with the LP that a better use would be to develop the site for much needed homes.

The Society does believe that there must be a commitment from Hertfordshire County Council (HCC) to improve the Abbey Railway Line: for example, as has been achieved on the single track Maritime Line (Truro to Falmouth). The LP needs a stronger statement about the future of the Abbey Line, including the installation of a passing loop. As regards the Midland Mainline there would be serious capacity issues about a new station, so this aspiration is probably too ambitious for the time period.

L1: The Society is nervous that the declared aim of the new housing being “developed at a density that is consistent with achieving high quality sustainable design...” will be met. The fine words must not be empty rhetoric. The Society commends the housing development at Trumpington on the outskirts of Cambridge, as an example of what can be achieved. The Cambridge City Council’s Local Plan of 2006 released a large area of Green Belt for a new housing development, along with the appropriate community facilities. The new homes were designed in a wide variety of modern architectural urban styles, recognising the distinctive character of the area whilst being sustainable and environmentally engineered.

L2: The Society approves of the provision for older people but concerns have been raised as to whether there is enough hospital capacity as the average age of the population inexorably grows older.

There is little in the LP about the health needs of the growing population and this should be addressed.

L 3: The principles outlined and the metrics are accepted.

L4: It has been pointed out that this could allow 'carte blanche' building across the Green Belt, if the housing is designated as affordable. In theory it suggests that a developer could put their entire affordable housing quota for a scheme on the Green Belt, leaving any urban brown field site to be developed exclusively for private housing. This would be unacceptable and the policy needs to guard against such a possibility.

L 5, L6, L7& L8: Are acceptable.

L9: There are concerns relating to retail that could undermine shopping in the 'high street': for example, the former British Gas land on Griffiths Way.

L 10: The Society has long held a position that objects to the loss of office space and the damage that can do to the local economy – local shops and businesses that service those working in offices and commercial premises. The Society takes pride in the fact that it advised SADC to take out Article 4 Directions in order to protect office and commercial accommodation (which, otherwise, under government legislation could be converted to residential use without planning permission). Of course there are cases when it is sensible to convert empty premises to residential, given the shortage of urban housing in St Albans, but this must be in the control of the local authority and in accordance with the LP, rather than in the demise of the developer.

L11: It is accepted that Master-plans must be agreed with Local Planning Authority.

L 12: While welcoming the aim “for the vitality and viability of town, district and local centres to be enhanced and protected,” there is a lack of strategy, as to how this is to be achieved In the Town Centre. The statement that, “The loss of existing Uses Classes Order Class A 1 uses will be refused”, seems to be flying in the face of reality. Retail in its traditional form has suffered a dramatic decline and as Grimsey (*Review 2: an Alternative Future for the High Street*) points out there needs to be a more flexible approach, allowing other uses. In mitigation the LP states, “Exceptionally, new service uses that contribute positively ... maybe permitted” but this seems far too vague and depends on interpretation. The Society argues that SADC, if it is to save its 'high street', must take a more radical and flexible approach and develop a new way of thinking that brings energy and activity into community "centres".

Though L12 policy claims, “in particular the Council will support the delivery of ... Additional and improved hotel provision”, the recent refusal of the planning application for a hotel on the BHS site, with one of the grounds for refusal being a loss of retail space, reveals confused thinking and a lack of a coherent strategy towards the evolving future of retail.

While giving a nod to “environmental enhancements” for the public realm, the street scene, it is disappointing there is not a more positive policy: for example, St Albans must be almost unique for a city of its size, in having no public sculpture of its famous citizens. The Society supports the need for public art and a ‘blue plaque’ scheme, that will celebrate, both for its residents and visitors, its eminent citizens and places of interests. Such an active policy chimes well with what has been achieved with the new museum and gallery (which itself highlights on its staircase the significant people connected to St. Albans).

L14 & 15: The Society supports these policies but again emphasizes the need to ensure that facilities, serving communities in these locations are appropriately 'green' and landscaped. The Society would wish to contribute to any development scheme through its Design Advisory Group.

L16:The Society welcomes the planned development of Civic Centre Opportunity South (CCOS) and is making its contribution through dialogue with the architects commissioned by SADC. It endorses the mix of residential and office space but this must be attractive to pedestrians so that there is “a strong flow of life” through CCOS.

The Society does, however, have concerns that developments at Colney Fields Retail Centre and Griffiths Way Should not be to the detriment of city centre retail and well-being of the 'high street'.

L 17: Members have voiced their anxiety to the Society that the district's infrastructure, whether utilities or community facilities, will keep pace with the increased housing. It is crucial that the proposed developments in the Broad Locations, outlined In the LP, are served with an adequate investment in infrastructure.

L18: A coherent policy and coordinated strategy is very important but the proof will be in the delivery, which will need to be consistent, and must not be contradictory: for example, "Encouragement for use of electric/hybrid vehicles, including through provision of public recharge facilities...", yet it has been recently reported that no more charge points are to be installed in St Albans. If this is true, it speaks of confusion and needs to be clarified.

L 19: The policy looks appropriate but questions can be asked about its implementation and enforcement: for example, "provision for the setting down and picking up of pupils... in a safe and acceptable manner." There are still existing issues over the safety relating to schools and transport: for example, the school coaches travelling down George Street and Fishpool Street. The LP cannot just be empty aspirations but sensible provisions must be made and enforced.

L20: Where it defines the size of car parking bays, the policy should take account of the fact that cars have got larger over the years and the old standards are inadequate.

L21: While the Society recognises the need for more schools, it is concerned about encroachment, especially of ancillary facilities upon the Green Belt, which, as outlined above (S2) could set dangerous precedents.

L22: The Society fully endorses the policy to protect Public Houses which are such an important part of St Albans' heritage - it does require active measures, like help with business rates, and not just good words.

It does appear this policy gives the green light to a football stadium and enabling development in the Green Belt. While understanding the need for a new stadium, it will be most important that it, and "the enabling development", conforms to the policies set out in the NPPF, in particular with regard to housing, etc and access. The move of St Albans Football Club to a Green Belt site must not become a Trojan Horse for further developments, like large housing estates.

When the football club does move from Clarence Park there must be guarantees that the land is returned to the park for the enjoyment of the public.

L23: The Society points out that the LP is a legal document and in this critical section, relating to design, conservation and historic environment, a distinction must be drawn between 'should' and 'must'- if the document has not been looked at by a planning lawyer, it needs to be.

It is disappointing under viii) "contemporary styles" is put in brackets, as if it is an apology. Modern architecture of good design and construction should be welcomed as the norm. There is not necessarily a conflict between more historic and modern architecture. The Society strongly believes it is the quality of design and finish that is important and this can be found in much modern architecture.

It is important that the elements that comprise a "green roof" should be spelt out to avoid confusion, lest it is thought to be just a lick of green paint.

In the context of 'design review' the Society, which is dedicated to quality of design in the built environment, and has a wealth of expert resources, should play an important part in planning and be asked to contribute an independent opinion both at a pre-planning stage and a review - such consultations can be both on a formal and informal. It is the Society's view that there must be a recognition that new developments should be flexible, sensitive and harmonised; sympathetic to its environment whilst avoiding banal pastiche (again a good reference point is the developments at Trumpington, Cambridge, which also shows how shared use is both environmentally and ergonomically sound).

The Society will also be seeking to comment on the Design Leaflets 1 and 2 (mentioned in the LP)

L 24: iv) The statement "There is no minimum requirement for internal space" is unclear as to what it exactly means, so it needs clarification ?

L25: The Society fully supports this policy.

L26: The Society has not seen the Neighbour Plans referred to in the text but presume they support the significance given to Green Spaces.

L27: As the urban population increases the importance of non-designated green space increases and needs to be protected. The issue that has arisen over public access to Gabriel Square must be avoided in the future and the policy against gated communities must be fully enforced.

The Society strongly supports the protection of allotments, which, of course, not only produce natural and healthy food but it has also been demonstrated that allotments have a positive effect upon the health of their holders (see University of Newcastle *GURU Electronic Working paper 47*).

L 28: The Society accepts the definitions and standards of this policy, but once more emphasises that developers' provision of green space "must be secured by planning obligations" (see L27).

L29: The Society has long been a leader in preserving and the planting of trees (see its Tree Sponsorship scheme ,which, over the years, has raised over £25, 000). Linked to the planting and preservation of trees is the importance of sustaining the landscape and green infrastructure, especially when siting the proposed new developments in the Green Belt.

L30: St Albans has a special heritage, with a continuity from the Iron Age and the Romans right up to modern times. The policy is correct in stating, "Long views are particularly important in conservation...", This is not only preserving historical assets for the future generations but also as significant attractions to encourage tourism, which is likely to be a growing percentage of the city's economy. It is disappointing when parts of St Albans

heritage are damaged or lost: for example, the Roman Wall along the Causeway and the Pemberton Building; and recently, the planning decision concerning 1 Mount Pleasant. This last threatens the locally listed, Civic Trust Award Old Garden Court housing, the existing landscape and views of the Cathedral from within the conservation area. Therefore, there needs to be a serious commitment to this policy by SADC and not just empty statements.

It should be noted that in 2019 St Albans will be celebrating 50 years of its first conservation area and the Society, along with residents associations, will be holding a conference and an exhibition in the Museum and Gallery, along with a social gathering, to mark the anniversary. It is hoped that concrete outcomes from these events will be a Conservation Area Advisory Committee (CAAC) and the launching of a 'Blue Plaque' scheme. Both are designed to preserve and highlight St Albans magnificent heritage.

Conclusion: The St Albans Civic Society, although it has serious fears over the loss of Green Belt, recognises SADC's problem in providing homes on the scale of the Government's targets. It is also seen as very important that the local council should hold on to control of planning in the district, as this could be lost if the Local Plan is not accepted – but there are still worries over the Duty to Co-operate with neighbouring authorities, which, if not resolved, could result in Government enforcing its own plan on the District.

Through the consultation, the Society offers its views and concerns in a genuinely positive and constructive manner in its attempt to improve the Local Plan.

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Chairman

15th October, 2018