

Civic Society draft response to Local Plan

Introduction

Overall we consider that this is a good and well researched plan but there are some gaps and some of the policies have imprecise language. As the final plan should be a set of instructions and safeguards for developers, etc it is important that the language and definitions are clear in order to provide the ability to reject applications that do not meet the tests. In a number of places the language is imprecise and subjective.

We do have a concern that the Vision is very generic and we would like to see it include reference to the features that make St Albans special. Overall we have concerns that there is a lack of ambition and lacks a clear aspiration for what St Albans in 2041 should look like. The importance of history, heritage and conservation should have a higher profile in a number of places, especially for tourism, retail, culture and well-being.

Whilst we accept that the Council has no option but to include the Government's Standard method for calculating local housing need we suggest that the comments could be strengthened to be clear that these numbers mean considerable incursion on the Green Belt and that we would expect updated numbers to reduce that incursion. We recognise that, with 81% of the District as Green Belt, incursion into the Green Belt is inevitable to meet the housing numbers calculated using the Standard Method. We also note the considerable analysis that has been done to identify the potential sites for development and do not feel qualified to challenge this analysis though we would make a strong plea for Bedmond Lane to be removed from the sites for development. This is a site of significant botanical and ecological importance and much loved by local residents and visitors.

Chapter 1 A Spatial Strategy for St Albans City and District

1.9 includes as a priority to enhance the district's cultural offer but this does not provide any detail of what is to be achieved and how it will be measured. There should be a commitment to the development of a Cultural Strategy. There was a commitment as part of CCOSN to develop one but what is happening to this now CCOSN paused?

1.16 Also need a Traffic Management Plan

1.23 The Historic Environment should also include History, Battles, Famous People, Culture

1.30 The vision for St Albans is generic – should it not include something about St Albans’ distinctive heritage etc. Compare with Vision for York in their draft Local Plan:

York aspires to be a city whose special qualities and distinctiveness are recognised worldwide. The Local Plan aims to deliver sustainable patterns and forms of development to support this ambition and the delivery of the city’s economic, environmental and social objectives. This will include ensuring that the city’s place making and spatial planning policies reflect its heritage and contemporary culture, contributing to the economic and social welfare of the community whilst conserving and enhancing its unique historic, cultural and natural environmental assets.

1.34 Suggest that this is amended to “There is a clear need for more new homes because of the national situation. High house prices expose a need for local people to have the opportunity to live and work where they were brought up. There is a special need for good affordable housing to provide for essential workers, such as teachers and NHS workers, in the city.”

1.37 states that development should make efficient use of land by increasing the density and height of development *where appropriate*. What guidance is there on definition of appropriate and how and by whom will decisions be made about this?

Strategic Policy SP1 We do have concerns about the spread of the Hemel Garden Communities and the potential for merging with Redbourn. Similarly we have concerns about traffic around Smallford and the potential joining with Hatfield.

We would urge that Bedmond lane is removed from the list of potential sites given its special features.

Chapter 2 Climate Emergency

Strategic Policy SP2

Para d) mentions transport but not traffic management so need something on mitigating the various pollutions (air and noise) that traffic brings to the city centre, impacting on climate.

Para h) refers to planting at scale but could more be included on urban tree planting, both new and replacement. Planning consents could and should require replacement when trees are felled in Conservation areas.

Policy CE1 –

Does desire for new buildings to ensure efficient use of energy, etc include single buildings and demolition and replacement? What does “to a degree proportionate to the proposal” mean? “Should” ought to be replaced by “required to”

 a) Residential development “must aim to meet”. How to define “aim” and should it not simply be “must meet”

- c) Does the requirement for retrofitting apply to all planning consents for change?

Would also like to see permeable driveways included in the requirements.

Policy CE2

The requirement to demonstrate use of renewables, etc (in para (a) and that proposals set out in Energy statements will be set out in conditions (in para (biii)) are both qualified by “where appropriate”. Why do the requirements require this qualification and how and by whom is appropriateness to be determined?

Requirement in 2b) should apply to all developments, not just major and include extensions, retro fitting, etc and in 2c) it should be require rather than support.

There is a commitment to supporting solar power but no proposals to define planning policy with respect to solar panels in Conservation Areas or in Article 4 areas. A possible change would be to declare a presumption of “public benefit” in assessing carbon reduction proposals. This would avoid the current impasse that solar panels in an Article 4 area may be assessed as doing little harm to the street scene but are considered to provide no public benefit to offset even that little harm, so will in many cases be refused planning permission.

Chapter 3 Sustainable Use of Land and Green Belt

Strategic Policy SP3 The view of the Green Belt is limited to the original view of limiting urban sprawl and protecting the character of communities. Later in LG5 sustainable farming is “supported” but there is no mention of amenity and public health. Though “the most effective use of land in the District” is part of the policy there is no attempt to define this – leaving it to the inspectors or lawyers to argue that housing should trump other considerations (see Bullens Green case)

3.33 on – There are concerns about both the sprawl of the Hemel Garden Communities and the risks of overlap with Redbourn and the potential with the Smallford development to join with Hatfield.

LG6 How is “required” to be enforced in practice?

In relation to the proliferation of piecemeal and individual new developments across the city centre, these developments and conversions are currently able to be built with little or no regard to the cumulative effect they will have and will have and are having on city centre amenities. The numbers involved, if built together, have the same impact of a medium or large sized housing estate. But because they are not grouped together their impact is not taken into account and this has an adverse effect on city centre residents in terms of demand on infrastructure such as health, education, transport, etc. With the proposed development on city centre brownfield sites it is essential that this is addressed and a methodology developed to ensure appropriate implementation. We understand that there is a methodology already in place to calculate the growing need but it would be helpful if that were clarified. It is

unclear whether there is any mechanism to obtain contributions from such developers or whether the costs will all fall on residents.

Chapter 4 Housing

The city centre's contribution to meeting the housing targets will be a mix of new development and adaptation of existing properties whilst retaining and enhancing the heritage. Conversion of existing properties to flats can be a helpful way of increasing available accommodation for individuals or small families but the increase in the number of Houses of Multiple Occupancy (HMO) is a concern and the absence of any policy on this is a matter of concern as an unmanaged increase of HMOs in the centre will reduce the number of properties available for families and fundamentally change the character of an area. There will also be an impact on parking. Many other Districts' Local Plans have Policies that limit the number of HMOs supported by detailed planning guidance and use of Article 4 directions where appropriate and this Plan should include a Policy supported by planning guidance that ensure a proper balance.

It will be important that new developments will provide houses of a size that residents want and not always the large houses that provide most profit for developers. The District has a reducing volume of bungalows as every time one goes on the market it is bought and then either demolished or extended to produce large houses. A supply of bungalows is necessary to allow older people to downsize and release larger properties for families so we would urge the Council to include a Policy that includes a presumption against planning applications for such adaptations.

HOU 3 Specialist Housing In para e) do the numbers given refer to individual units or housing complexes? If the former then this seems low so needs clarification.

HOU5 Self- build and Custom-built housing

Para d) requires that where the plot has not been sold within at least 12 months, the plot must either remain on the open market for self-build or custom- build or be offered to the Council or a Registered Provider before being built out by the developer for market housing but gives no time scale for this further offering. Need either a reasonably long time scale or to delete the option for developer building.

Chapter 5 Employment and Economy

EMP3

- a) "Avoid" net loss is a weak word so suggest it is strengthened.

EMP5 Employment Skills

This states that to improve employment skills within the District larger proposals must ensure the employment of a “proportion” of local people.... Can this be more accurately defined as a proportion could be as little as 0.0001%?

Chapter 6 City, Town and Village Centres and Retail

TCR4 Visitor Economy

To encourage visitors why not include a Visitor Centre?

Para 6.2 should acknowledge that most of the City Centre is Conservation Area and requires better protection from poor-quality commercial development.

St Albans City Vision

Para 6.2 refers to the Council working with local groups to develop a specific City Vision and there is a section at 6.18 onwards that is headed City Centre Vision but there is no discernible vision which is disappointing.

Para 6.19 refers to successful recent buildings that had responded positively to the local heritage whilst providing modern architectural approaches and valued new facilities. What are these buildings?

TCR 5 includes the statement “ A large number of people live within the city centre. The residential role is an important one and both residential amenity and the vibrancy of the wide mix of uses need to continue to be balanced. Development that would cause significant harm to residential amenity will not be supported”

The equivalent policy in the existing Local Plan (Policy 9 of the Local Plan(non-residential uses within residential areas)) states “small scale new non-residential redevelopment or extensions to existing sites will normally be permitted in residential areas, where they will not adversely affect their amenity, and the character, by reason of such factors as noise, smell, safety or excessive traffic”.

There therefore appears to be a significant shift from “not adversely” to “significant harm” in the current draft which is a concern and we would urge that this is reconsidered. How would significant harm be defined?

Suggest that TCR5 also needs an addition to include a cultural audit and development of a cultural strategy.

TCR 6 City Centre Public Realm and movement

In j) (i) “where possible rationalisation of bin/waste storage” is lacking ambition. Need a plan for waste and litter in the city centre with targets dates for deliverables.

TCR 7 St Albans City Centre – Vibrant and mixed City Centre Economy

The Population resident in the city centre has grown recently and is still growing. Much of this growth has happened due to offices being converted to flats through permitted development rights. As a result facilities in the city centre have not been enhanced through S106 funds and are under pressure. Para(f) contains a

commitment to support proposals that protect or enhance the amenity and wellbeing of existing and new residents in the city centre but there are no plans or proposals for the Council to do this – not even a statement of what the Council would like to see in this regard.

Chapter 7 Community Infrastructure

The principle of supporting the development of a new stadium for the Football Club is positive and Policy COM 5 sets out the requirements for any development on the Green Belt. However there is no reference to the impact of neighbours and other residents of such development and this is an important omission that needs to be included.

Chapter 8 Transport

The plan rightly references the HCC Local Transport Plan 2018-2031 (LTP4 which is under review and requires major developments to prepare their own Travel Plans. However, the HCC LPT4 is mainly about improving travel between large towns plus some active travel proposals (of which at least one aimed at St Albans was opposed by car drivers and won't be happening). Whilst understanding that HCC is the travel and transport authority surely St Albans should be applying local knowledge to develop a Travel and Traffic management Plan for the District which is linked to our Local Plan and would be delivered jointly by SADC, HCC and local transport operators.

Chapter 10 Natural Environment and Biodiversity

There is no specific reference to enhancement of green and blue in the city centre and there should be a commitment to increase trees and to provide water fountains in the centre.

NEB4 Batchwood should be added to the list of Significantly Publicly Accessible Green Areas which should be protected and enhanced. Batchwood obviously has its golf course but it is also used by families over both the open space and the woodland.

Chapter 11 Historic Environment

The objective to conserve and enhance our rich and varied historic assets and their settings is admirable but the draft plan lacks a strategy for maintenance and protection. Many of the properties in the conservation area are small and have small gardens. Increasingly these properties are bought by new owners who then proceed to increase their size, using extensions, basements and garden rooms out of keeping with the local character. It is important that the Local Plan has Policies that make clear to owners and developers what is and is not permitted and allow planning authorities to exercise control.

11.3 It is not clear how the Council, or others, will balance how the conservation of heritage assets will be balanced against facilitating development where it provides benefits which outweigh harm. It should be made clear that the benefits referred to should be public benefits.

11.7 should state where the heritage at Risk Register can be found

11.10 The Council should “require” not “seek” high quality design. At the end of this paragraph add “and will secure advice from experienced architects on design quality”

Strategic Policy SP11- Historic Environment Add g) giving due consideration to advice from experienced architects on the quality of design and the impact on nationally listed buildings in the vicinity

HE1 Designated heritage assets

cii) Add “demonstrate how the conservation area has been enhanced or preserved”

cii) Need guidance on how appropriately will be interpreted.

ciii) Dormers shall be supported is too encouraging – use “may” instead

cv) What does the balance of hard and soft landscaping mean?

11.16 Add references to battlefield recognition and collaboration with Battlefields Trust

HE2 Non-designated heritage assets

a) Proposals for alteration or demolition of non-designated heritage assets should take into account their loss or harm to the asset, including any effect on street scene and local character

bi) Need clarification of what would be sufficient evidence

bii) need to add that the design enhances the local area

HE7 Change of use and heritage assets

b) Any proposed change of use to a Listed Building *must* not *will* be consistent ...

11.30 Guidance is needed on what would be acceptable levels of intervention

HE8 Responsible retrofitting

ai) how does this fit with need to permit solar panels

aii) What does a hierarchical approach mean?

b) Last line should read “and where the removal and the method of achieving it would preserve or enhance the asset.”

Chapter 12 High Quality Design

12.5 The Society is pleased that the Council encourage innovative and contemporary styles. We are though disappointed that there is no reference in the draft plan to Design Codes.

SP12 High Quality Design

The statements here are laudable but vague so the policy needs to have some specificity and definition that would give it teeth.

DES1 Design of New Development

In b) what happens in a green field site? If greenfield development is permitted, the opportunity arises for good quality contemporary design without the need to match existing character or pattern of development in the locality. Could something of the quality of Childwick Green be achieved today?

12.11 states that higher densities can often be achieved without increasing building height. It is important that amenity space is provided otherwise where will children play?

DES2 Public Space

k) Under what circumstances would it be acceptable to enclose public space? Either the circumstances should be identified or this should read “under no circumstances should...”

DES3 Efficient use of Land

- a) This requires a density of the higher of the density of the existing site context or 40 net dwellings per hectare. Does existing site context mean the area around the development site and if so say so? Would this level of density include the possibility of 2/3 bedroomed family houses of the type most sought after by couples and young families? And would this density leave room for greenery and amenity space?

DES4 Extensions to Existing Buildings

Does this not need a comment on how these relate to permitted Development Rights?

f) should be listed as two separate policy areas

12.15 This says that new residential development should provide adequate internal living space and external amenity space. Adequate is too vague and need a design statements with definitions.

DES5 Residential Amenity Standards

- b) Agree that the provision of dual aspect dwellings should be maximised. Some flats and cluster homes do not have this and this should help to eliminate staleness of air and mould.

DES6 Building Heights

ai) This seems a bit dangerous – how will the question of whether the height, massing and design “positively responds” be determined?

- c) The Building Control Area is too tight and views from the North should also be considered. For example the view of the Abbey is now blocked by City Centre South.
- d) There should be further controls on the size and location of mechanical extract, flues and air conditioning units which are often sited at the rear of historic and listed buildings without due regard to the disfigurement of the historic structure.

DES 7 Building Servicing

- a) Refuse storage should be designed for minimal acoustic impact, especially when concerning the disposal of glass bottles. This should dovetail with Policy HW1

DES 8 Shopfronts and Advertisements

Need clarity on what constitutes an Advertisement. Advertising on 'A'Boards should be limited and restricted so that they don't cause a hazard to pedestrians, wheelchairs and baby buggies. Their proliferation is unacceptable in the City Centre and historic streets.

The updated guide on Shop Fronts is welcomed though does need to be something in the plan to ensure that this guidance is adhered to.

Newly dug basements and garden rooms are proliferating across the city centre. Some traditional garden rooms are small, discretely located and used for storage and workshop but increasingly large modern kit rooms are being installed which provide essentially an extension to the house and include gyms, offices, and additional bedrooms. These are not in keeping with the Conservation Area and have damaging social and environmental effects. There needs to be separate policies for these with clear requirements.

Chapter 14 Implementation

Strategic Policy SP14

The policy needs to give specific guidance on what will be expected

- b) The new infrastructure should be required to be in place before any of the residential properties are occupied. Otherwise there is a risk that that this provision will be delayed indefinitely. The sorry example of the development outside Cambridge which has absolutely no facilities several years after large numbers of properties occupied is a salutary lesson of what could happen without this requirement.
- g) Delete (i) and (ii)

On page 138, Residential Standards, the car parking standards are confusing and inconsistent. The draft states that flats will require 0.5 spaces per tenancy –

but if you live in a one-bed studio within a house, you get 1.5 spaces. What is the difference in the needs of a resident in a single room in a house compared to that of a resident in a flat/ And where does that leave current policy that flats currently being built or recently built in the city centre do not require parking? Also 3+ bedroom dwellings require 2.5 spaces – how does this rigid demand align with the overarching environmental objective of this plan, where reliance on cars is being discouraged, on paper at least?