

**HARPENDEN GREEN BELT ASSOCIATION'S
REPRESENTATIONS RELATING TO ST ALBANS
DISTRICT COUNCIL'S
DETAILED LOCAL PLAN**

DECEMBER 2016

Introduction

In so far as the Detailed Local Plan (“**DLP**”) implements the Strategic Local Plan (“**SLP**”), the Harpenden Green Belt Association repeats its responses to previous consultations on the SLP.

DLP10 Education Uses in the Green Belt

HGBA repeats its representations made in relation to the SLP that a secondary school for the Harpenden School Planning Area should have been considered at the SLP stage, and not left to the DLP.

The reference in DLP10 to the Local Education Authority having identified a particular site for the proposed school is ambiguous. It implies, but does not expressly state, that the choice of location is supported by the Council.

It is inappropriate for the DLP to support any particular location for the proposed new secondary school without a proper sustainability assessment, including of traffic impacts, and identification of “very special circumstances” justifying the location of a school in the Green Belt or “exceptional circumstances” justifying the removal of land from the Green Belt for a school. As stated above, the Council should have carried out such an assessment at the SLP stage: having failed to do so it should carry out such an assessment at the DLP stage and, if appropriate, specifically identify the proposed location for the school in the DLP.

DLP13 Broad Locations Masterplanning

1. General

This draft policy is inadequate, as it gives no guidance as to the content or aims of the proposed masterplans.

The policy should make clear that the masterplans will be required, as a minimum, to meet the other policies of the DLP (for example, DLP4 on Heritage Assets, DLP5 on Design and Layout of New Development, DLP6 on Development Amenity Standards, DLP11 on Leisure Uses, DLP 14 on Primarily Business Use Areas, DLP19 Highways Considerations and Roadside Services, DLP20 on New Parking Guidance and Standards, DLP21 on Local Green Spaces, DLP 24 on Green Infrastructure, Countryside, Landscape and Trees), as well as relevant SLP policies. It is unacceptable for the broad locations to be planned to less rigorous standards than would be applied to other development in the District.

2. Maps shown for Policy DLP13

We note an omission from the keys to the maps for the North West Harpenden Broad Location (Options A and B) and the map for the East St Albans (Oaklands) Broad Location. The green colouring on these maps is clearly intended to denote Green Belt, but this is not indicated by the key (in contrast to the key for the East Hemel Hempstead (North and South) Broad Location). As these

maps set the new Green Belt boundaries at the Broad Locations, it is important that they are clear in this respect.

3. *NW Harpenden Broad Location*

As regards the North West Harpenden Broad Location:

- We strongly object to the identification of the area to be removed from the Green Belt under either Option A or Option B. The northern boundary shown on the Option A and Option B plans, approaching Central Bedfordshire, is a very weak new boundary for the Green Belt, following only an imaginary line and not any physical feature on the ground, contrary to the requirements in NPPF paragraph 85 to “*define boundaries clearly, using physical features that are readily recognisable and likely to be permanent*”. Such a weak Green Belt boundary will inevitably create pressure for further development to the north and into Central Bedfordshire. Whilst we do not support the development of any part of the NW Harpenden Broad Location, if it is to be developed, the new Green Belt boundary must be drawn at Cooters End Lane.
- We strongly object to a secondary vehicular access being created on to Ambrose Lane, which is a very constrained road. Travelling towards Harpenden, Ambrose Lane leads to a tight pattern of Victorian streets via a dangerous sharp bend over the Nickey Line. Travelling away from Harpenden, it leads to a network of very narrow country roads, including Cooters End Lane, which is part of the Chiltern Way, a long distance footpath. Further, the junction of Bloomfield Road and the A1081 Luton Road is a known danger spot, shown as a Hazardous Site in the Harpenden Urban Transport Plan, Figure 4.1. We believe that there are significant safety and congestion issues which have not been properly evaluated and which will be exacerbated by the proposed secondary access.
- No adequate work has been carried out on access, highways safety or traffic congestion, in relation to the proposed primary access route, onto the A1081 Luton Road opposite Roundwood Lane, or the proposed secondary access route onto the A1081 Luton Road at Cooters End Lane.

4. *Option A vs Option B for NW Harpenden Broad Location*

We strongly object to Option B. The proposed location for the primary school in this Option, outside the Broad Location, on Green Belt land across Ambrose Lane, is very poor indeed, for the following reasons:

- The generation of school-related traffic down Ambrose Lane, Cooters End Lane and Bloomfield Road will create yet further traffic safety and congestion issues.
- The location of the school on Green Belt is inappropriate development for the Green Belt and contrary to policy. By NPPF paragraph 87, inappropriate development is, by definition,

harmful to the Green Belt and should not be approved except in very special circumstances. No such special circumstances could possibly exist, since the existence of Option A demonstrates that the school could be located on the area to be removed from the Green Belt. Further, the Council has expressed its confidence in answers to public questions that all the requirements of Policy SLP 13c, including the new school, can be met within the area to be removed from the Green Belt. Any planning application for the school in this location would therefore have to be rejected as contrary to Policy SLP2 and the NPPF. This would leave Harpenden without the new primary school which is considered necessary for the sustainable development of the North West Harpenden Broad Location and elsewhere in the town.

- If the proposed school were to be permitted on Green Belt in this location, it would weaken Ambrose Lane as the new Green Belt boundary, creating pressure for further development to the east.
- The location of the school as in Option B is contrary to the advice given in the Green Belt Review Part 2, which at Figure 7.1 and the preceding table states that the land east of Ambrose Lane forms an area of higher landscape/visual sensitivity which *“has a very open character. Development would completely change this. Any changes to this landscape would be very conspicuous and seen over a wide area...Development would also detract from The Kings School, which forms a local focal point...development would be visually prominent from the surrounding landscape”*.
- The location of the school in Option B is at odds with the way in which the North West Harpenden Broad Location has been assessed through the Development Site and Strategy Options Evaluation (“**DSSOE**”). The Broad Location was scored on the basis that the site would not extend to the east beyond Ambrose Lane and that the school would be provided within the area identified by SKM (roughly equating to the area to be removed from the Green Belt). On that basis:
 - The Broad Location’s score for “vehicular access and traffic impact” did not take account of the potential for school-related traffic down Ambrose Lane.
 - The score for “landscape quality/surrounding area characteristics” was on the basis that *“the existing hedgerow along Ambrose Lane would help contain development”*, whereas Option B would now permit development to extend beyond the contained area.
 - The score for “environmental constraints” was on the basis that there was no ancient semi-natural woodland on site or immediately adjacent, whereas Option B places the school immediately adjacent to ancient woodland at Ambrose and Westfield Woods.

Had the area of land on which Option B locates the school been included in the DSSOE assessment, the scoring would have been considerably lower and it is likely that a different Broad Location would have been selected. It is not logically possible to change the area of land proposed for development and still maintain the same sustainability scoring.

- We consider that Appendix 1 of the SA Working Note significantly understates the negative impact in sustainability terms of Option B. For example:
 - Under “biodiversity” and “landscape and townscape”, Option B is scored as “uncertain”, it being suggested that locating the school off-site could allow for more open space on the Broad Location. A similar comment is given for “health”. But there is no basis for the assumption that if Option B is adopted, there will be increased open space at the Broad Location in comparison with Option A. On the contrary, the Developers’ presentation presented to PPC in November 2015 made clear the Developers’ intention to build more housing if the school were located off site, as it would be in their financial interests to do. There is no policy requirement in the SLP or DLP to create a greater amount of open space within the Broad Location if Option B is adopted.
 - The “landscape and townscape” assessment fails to have regard to the evidence from the Green Belt Review, referred to above, about the relative landscape and visual impacts of development of land to the east of Ambrose Lane.
 - Under “soil”, the SA Working Note suggests that there is “no difference in effects between the two options”. This position cannot be maintained. If Option B is pursued a greater total area of land will be developed, in comparison with Option A.
 - Under “sustainable locations”, we do not agree that there is no difference in effects between the two options. The traffic consequences of building a school on Ambrose Lane make this a significantly less sustainable location than if the school were built within the Broad Location.

5. Location of Public Open Space at NW Harpenden Broad Location

An earlier draft of the SLP, submitted to the Planning Policy Committee on 13 September 2016 showed the public open space requirement for the North West Harpenden Broad Location sited at the north of the Broad Location, straddling the Green Belt boundary. This is not shown on the plans for either Option A or Option B but answers to public questions are ambiguous as to whether this may still be proposed. For the avoidance of doubt, we strongly object to the location of the proposed public open space as shown on the draft SLP considered on 13 September 2016, for the following reasons:

- Public open space in that location would be remote from both existing and new residents, decreasing the numbers of users and in particular decreasing the number of those accessing it on foot. It would not be on anybody’s way to anywhere. The public open

space would be much better placed between the new housing and the proposed new primary school, so that children leaving school are encouraged to play outside on their way home and existing and new residents can readily access it on foot.

- Having the public open space straddle the Green Belt boundary, as shown on the plan referred to, would further weaken an already very weak Green Belt boundary to the north of the Broad Location, creating yet further pressure for future development to the north.

DLP24 – Green Infrastructure, Countryside, Landscape and Trees

We strongly support the identification of areas of landscape importance as Landscape Conservation Areas. These should include all of the land currently within the Landscape Conservation Areas around Harpenden, including those areas recognised by the Green Belt Review as being of particular landscape value.