

St. Albans City and District

Planning Application 5/2021/0423

July 2021

**OBJECTION: Prepared by CLASH Residents
Group**

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Contents

Executive Summary.....	2
Introduction	4
Site suitability.....	4
Infrastructure	5
Ecological protection	9
Flooding	10
Ecological corridors.....	11
Air quality.....	12
Heritage Impact Assessment	13
Layout of the site	13
Strength of public objections.....	14
Response to the Planning Department recommendation.....	15

Executive Summary

1. CLASH object to this application and urge the Committee to uphold the decisions on the two previous applications 5/2011/1724 and 5/2014/0093; on the grounds of lack of demonstration of “very special circumstance” to develop on Green Belt at this location which acts as an ecological corridor with Heartwood Forest and Beach Bottom Dykes.
2. This application is not materially different from those previously rejected with regards to landscaping and visual impact. On the contrary it is more densely built and has suggested higher three storey buildings, therefore having more visual impact.
3. Recent applications and appeals: The Planning Inspector described the farmland at Roundhouse Farm, Bullens Green Lane, as urban edge and key landscape features being major roads. This site is a beautiful and high quality rural green belt setting, within 500mtrs of the South West corner of Heartwood Forest.
4. The Hertfordshire Highways report is critically flawed, from method to modelling assumptions and the vast set of conditions are undeliverable in a meaningful way. Taken together, we know the model underrepresents the reality of congestion in the area today, and the predicted additional traffic can only make it worse – much worse given the level of additional trip rates generated (which themselves are likely to be under estimated).

5. The Officer's hope of "Dutch-Style" sustainable transport for the site on the edge of the City is hopelessly optimistic and entirely unrealistic.
6. It is very clear that many of the supporting reports provided with the application are misrepresenting the baseline position of the site and local infrastructure and require either renewal or reassessment using correct and robust methodologies and accurate data points.
7. Approval of Access will allow the developer to wreak irreversible harm to the wildlife value of the site. During previous applications, evidence was been provided of the destruction of the wetland area (full of amphibian life) and the removal of surrounding mature trees, where bats have roosted. The site that has seen wildlife return since farming was halted some ten years ago. Since then it has been vandalised, with mowing during ground bird nesting and breeding season and, local people suspect, attempts to remove evidence of many aspects of wildlife. There is also an ongoing Police investigation on the disappearance of badgers from the edge of the site.
8. The Officer's report to justify the release of high quality valuable Green Belt within the ecological corridor of Heartwood Forest lacks substantive evidence, allows the 10% biodiversity gain to be monetised, and is the lowest possible standard of ecology safeguarding.
9. *"2.5 years housing supply due to the lack of Local Plan"*. This is a contentious issue, as it is this Planning Department that failed to secure Inspector backing on two major factors, liaising with neighbouring Councils and not assessing sites below the high threshold of 10,000 acres. It is very clear from the recently published review after the Call for Sites earlier in 2021, that there has been a vast amount of land put forward for consideration. This parcel of land is part of that and should be assessed alongside those other sites and ranked accordingly, before any judgement is passed.
10. We requested that if the Planning Officers are minded to grant the application, using "very special circumstances", then the site design, density, road layout, ecological and arboriculture credentials and management need to be extensively challenged in order to truly deliver a sustainability and biodiversity gain for any development on this high quality agricultural land and open Green Belt. This was not done.
11. In support of Cllr Curthouy's "call-in", CLASH notes the clear and robust response from CPRE.
12. In support of Cllr Campbell and Cllr Young's "call-in", the local community will be hugely impacted by the loss of this piece of Green Belt and the additional harmful effects on traffic, healthcare infrastructure, education, and leisure resources.

Introduction

13. This statement has been prepared by CLASH, a local residents' campaign group, made of residents who neighbour the North St Albans site and from the wider St Albans community.
14. This is a representation on the planning application 5/2021/0423, by Hunston Properties & DLA Planning, on the Sewell Trust Land, which is part of the proposed Broad Location for Development to the North of St. Albans. The purpose of this statement is to amplify the points made in the objections to the application and to respond to specific issues and questions raised by the contents of the planning application. This written statement contains reference to points that will be illustrated by reference to the appendix which is a separate document to this statement and submitted alongside.
15. This representation also includes reference to the site known as North St Albans (NSA), as it is suggested that any development in this area will irreversibly destroy the balance of the existing ecosystems, infrastructure, residential dwellings and open high quality Green Belt.
16. It is a reasonable expectation that any "presumption in favour of sustainable developments", still requires careful review and understanding and should still be assessed against all the policies in the National Planning Policy Framework (NPPF) including those that identify "very special circumstance" and those that protect the Green Belt. CLASH strongly believe that there is no case for "very special circumstance" to apply to this site and support the CPRE public comment to this application.
17. With fluctuating population figures between January 2020 and March 2021, due to the joint effects of the Covid-19 pandemic and Brexit, it is a reasonable assumption that future ONS forecasts of population and households will be revised downwards, especially in the South East of England.. These factors need to be clearly evaluated before making assessments about local housing needs and the future rate of housing delivery.

Site suitability

18. The majority of the site is agricultural land, Grade 2 and 3a, which should be protected from development. In the NPPF, paragraph 170 (a) states that policies should contribute and enhance the natural and local environment by protecting and enhancing soils. The following paragraph states that plans should allocate land with the least environmental or amenity value. A footnote specifically notes that "where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality should be preferred to those of a higher quality." In view of these statements, it is clear that higher grade farmland should only be released under exceptional circumstances. All the evidence shows that the land on the site owned by the St. Albans Boys' School at the NSA site has been continuously farmed until the present day. The Sewell Trust land, had farming stopped by the owners of the land over 10 years ago and has since then

successfully rewilded to become a biodiverse wet and dry habitat for many species of birds, mammals, amphibians and wild flora and fauna.

19. The entire site is designated as Green Belt and there are “no very special circumstances”, as under NPPF 2019 to justify its release. The existing inner boundaries of the Green Belt to the north of St. Albans are extremely well-defined. Development of the Woollam Trust Playing Fields to the north of the site was permitted as an exception to Green Belt policy, where very special circumstances were advanced for the project. This included the re-location of the Old Albanians Rugby Football Club from its former location within the city boundary.
20. Outline plans in the application clearly show the potential impact of development on the site. Land immediately adjacent to the site area consists mainly of farmland, with isolated farmhouses, cottages, and houses. In the broader location are the Woollam Trust Playing Fields. The proposed development would be incompatible with the surrounding environment. The suggested high densities of buildings have led to the conclusion that there would be much less space in which to deliver a scheme which would be sensitive to the surrounding environment.
21. In terms of the visual impact, it should be noted that the previous application on this site was refused both by the City and District Council (2011) and dismissed on appeal by the Secretary of State for Communities and Local Government (2013). Part of the reason for refusal was that the proposal:

“fails to respond to the topography of the land and the section of land to the north east of the site, if developed as proposed, would represent a built form of development of undue prominence, visible from the surrounding Green Belt land to the east and particularly the nearby footpath which passes close to the application site’s boundary.”
22. It is questionable what effect deep excavation to allow for a lower level of the site would have on the surrounding land, the water table, or the environment. There appears to have been no costings for extraction levels, for it to deliver this.

Infrastructure

23. The travel plans in the application and for the broader North St Albans area are flawed. With respect to transport infrastructure provision, the application mainly relies on the Infrastructure Delivery Plan (IDP), including Appendices 13, 14 & 15.
24. IDP Appendix 13 is a ‘Technical note on capacity of the A1081 Harpenden Road corridor, and its potential to accommodate the proposed development’; a traffic assessment in all

but name. The document uses 2017 traffic surveys as base data to inform a revised traffic model that includes traffic growth generated by the development. The note concludes that the traffic generated would not significantly increase congestion on the A1081 in the vicinity. This traffic assessment was used to judge the scoring of the broader North St Albans site. The conclusion is used to justify a revision to the scoring of the “vehicular access and traffic impact” of the North St Albans site in the assessment of broad locations.

25. The traffic assessment states that the baseline traffic data was collected on a single day. The average traffic queue lengths for junctions in the area studied are significantly underestimated when compared to the normal, daily, experience of road users. For example, the stated existing morning peak average queue for the Ancient Briton junction, as depicted in the note as reproduced as Appendix Figure 6, suggests a queue length of around 200 metres from the north. In reality, the queue on a typical weekday is around 1,500 metres, stretching back beyond the entrance to the Woollam Playing Fields.
26. There are similar discrepancies for other approaches to this junction, see Appendix Figure 5, and other junctions: the report suggests that there is ‘minimal queuing’ on all arms of the junctions between Harpenden Road and Sandridgebury Lane / Harpenden Road and Green Lane. In reality it is not unusual for vehicles to queue for at least five minutes to join Harpenden Road from these streets. With actual queue lengths typically five times longer than stated in the traffic assessment, it is clear that the baseline data used to create the traffic model is fundamentally incorrect.
27. The traffic assessment includes a ‘future’ traffic model with the proposed development. However this model is based on a development of 500 dwellings using more than one exit out of the broader NSA site. Whilst this application is for 150 dwellings, the broader NSA site is proposed to be up to 1100 dwellings. The traffic assessment with this application relies on that same data and plan proposal and is therefore not reliable.
28. To provide an estimate of the rate of trips generated per dwelling for the development, the model uses ‘Method of travel to work’ data from the 2011 Census, using the dataset for the Marshalswick South ward (007A). The majority of the population of this ward live 1 - 2 km from the key work destination points of central St Albans and St Albans City station; the data set used shows that approximately 11% of trips to work are made by walking and a further 19%¹ by public transport, with the latter including those using train services, for which access to the station is first required. It is reasonable to assume that access to the station from within the ward is largely on foot given the absence of bus services to the station from this ward, a reasonable walk time (c. 10-20 minutes), and the charges for parking.

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

29. This application and the broader North St Albans development will see residents living 3 - 4km from the same destinations. For this longer journey there will be few, if any, journeys made on foot to central St Albans or the station, leading to a much higher rate of vehicular trips compared to the average for the ward. As a result, the rate of vehicular traffic generated per dwelling is underestimated, potentially by as much as 50%.²

30. Taken together with the significant underestimate of the scale of the proposed development, it is clear that the additional vehicular traffic generated by the development will be at least double, and potentially three times that suggested in the traffic assessment. The scale of the error is such that the conclusions of the traffic assessment are considered invalid. By extension, using this same data for the scoring of the broader North St Albans site in any future broad locations assessment will also be invalid in this respect.

31. The Infrastructure Delivery Plan main report, para 11.31 states:

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

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

32. IDP Appendix 14 makes reference to the current (2017) Hertfordshire County Council Local Transport Plan, ‘LTP4’, in the context of sustainable travel. It is important to stress that LTP4 did not identify North St Albans as a potential residential development area, (page 16, fig 3.2) and consequently did not take the development into account when making proposals for future transport provision.

33. LTP4 also contains a specific policy (Policy 2), to influence land use planning that “...will encourage the location of new development in areas served by, or with the potential to be served by, high quality passenger transport facilities so they can form a real alternative to the car...”. The location of North St Albans, being on the very fringes of the city on a highway corridor that suffers extreme congestion, is unlikely to have the potential to be served by “high quality passenger transport facilities” without considerable investment in

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

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

new infrastructure and new service provision. There is no mention of such investment in the Infrastructure Delivery Plan and appendices.

34. LTP4 makes clear (page 28) the difficulty in persuading residents to switch to sustainable modes even where such provision exists. Within Hertfordshire the inter-urban trip with the highest bus mode share is Hatfield – St Albans at 10%; this route directly serves St Albans station, has high usage by students, and almost three times the level of bus service compared to the Harpenden Road. Even if a substantial improvement in facilities was delivered, a bus mode share of 10% will make little difference to the highway congestion experienced on the Harpenden Road corridor.
35. We draw attention to the objection statement by Cllr David Meachin. Cllr Meachin identifies the Department for Transport regional count point 6177, next to Ayres End Lane, which suggests irregularities with the data and subsequent conclusions put forward by the traffic assessment in the application.
36. The broader NSA location proposal is made on the assumption of moving the St. Albans School Woollam Trust sports facilities to adjacent land. This would have the following impacts:
 - further loss of Green Belt (see Appendix Figure 1)
 - further loss of Grade 2 farmland (see Appendix figure 7)
 - potential change of use of land within the Parish of Sandridge (see Appendix Figure 7).
37. Currently, (outside of lockdown conditions) especially at weekends, there are severe problems with car parking associated with Woollams. Overflow parking is accommodated on adjacent farmland to the east. With the possible intensification of activities, and the spread into the countryside to the north, this problem is likely to get much worse.
38. The Hertfordshire Highways (HH) response is transparent in the failings of the modelling and the subsequent traffic mitigation thereof. The traffic mitigation plans are left as numerous conditions that may or may not be of relevance as the assessment is flawed.
39. The HH model predicts that no traffic generated by the development will route on to Harpenden Rd South and then turn right into Green Lane. This is inconceivable, given that this is the route to the nearest local facilities and primary schools at New Greens. This will have implications for the model at the latter intersection – i.e. it will give incorrect results.
40. The HH model is localised for each intersection, and the results are not linked, i.e the impact of traffic queuing at one intersection is not included in the models for other intersections. This is a crucial flaw, and explains why it results in much shorter queue lengths than experienced in practice. It may also explain why the model predicts no right turns into Green Lane.

41. Herts CC acknowledge in their response to the application that the Ancient Briton intersection will continue to operate over capacity, and that this will worsen (considerably so) post development. HCC believe that the mitigation – an active travel and public transport corridor – will encourage a shift away from car use on the whole corridor. There is no forecast as to how much demand will shift away from car use, and therefore no way of indicating whether the mitigation will be successful.
42. In a similar vein, the data used for the trips generated is based on an area of St Albans that already has an active travel corridors – the Green Ring – in place. It is reasonable to assume that the trips estimated to be generated by the new development are already include those who would use ‘active travel’ modes, and that the mitigations proposed would be needed simple to keep car trips generated at the levels estimated, ie it won’t mitigate at all.
43. Taken together, we know the HH model underrepresents the reality of congestion in the area today, and the predicted additional traffic can only make it worse – much worse given the level of additional trip rates generated (which themselves are likely to be under estimated).
44. HH state traffic flows at Sandridgebury Lane in 2018, prior to the expansion of St Albans Girls School.
45. HH state that revised traffic counts cannot be done due to the continuing pandemic having effects on traffic modelling. However there are data points available on the A1081 and surrounding roads, including the regional count point 6177.
46. Cllr Meachin has found serious discrepancies in the measurements provided in the traffic assessment of up to 2 metres. See appendix 6.1. These would negate conditions imposed as the road would not be able to be adapted as modelled.
47. The objection from Mr Samuel Barnes was a detailed review of the cycling provision and comprehensively rebutted the cycle lane design, finding many of the same irregularities as Cllr Meachin.
48. Anyone using the A1081 or B651 St Albans Road in Sandridge, understands the huge traffic correlation and cross impact of one against the other as they are the two major tributary roads from Harpenden, the northerly villages, Luton, Luton Airport and anyone needing to avoid the M1.

Ecological protection

49. The ecological survey provided by Turnstone Ecology on behalf of the developers made an original assessment on only one day in July 2020, during the dry and warm season. This is not a complete and representative survey process and does not enable the full documentation of the biodiversity of the flora or wildlife in the area. Paragraph 3.4.5 of that report states there are “no ponds within 250m of the site”, this is false information.

There are many ponds in neighbouring gardens and many other minor ground level water features attracting wildlife in the summer months.

50. A subsequent survey by Turnstone in May 2021, was found to be less representative as the Hertfordshire Ecology report noted a high number of wildflowers. The Hertfordshire Ecology Survey was also only undertaken on one day, a comprehensive reliable survey must visit across a year in all seasons.
51. The consultee comments from the Herts Wildlife Trust categorically state the failings with the baseline ecological survey and thus this application does not demonstrate a 'measurable' net gain to biodiversity.
52. CLASH note the submission from Mr & Mrs Healey at 118 Harpenden Road and many others neighbouring the site, stating the diversity of the bird, animal and insect wildlife present at the site, including protected badgers and bats.
 - a. "There are many wildlife species that have been observed on the land, some are in significant decline. These include nesting Skylarks (on RSPB red list), flock of linnet (on RSPB red list), Starlings (on RSPB red list), raptors including Red Kite, Hobbys, Sparrowhawks, Tawny and Barn Owls, and mammals including brown hare, bats, muntjac deer, foxes, wood mice, shrews etc."
53. The EIA Scoping Report for application 5/2019/1187 and the ecological report for this application appear to differ on which species have been found at the same site, they both omit material observations and contain method failings, thus misrepresenting the reality of the ecological and local heritage baseline in the broader North St Albans area, which includes this site. The ecological elements of the 5/2019/1187 submission were deemed by SADC Planning Department as **"not adequate"**. The same conclusion should be drawn on this ecological survey.
54. The Hertfordshire Ecology attending officer saw discrepancies in the Turnstone report versus his limited site visit, which was not a detailed ecological survey as required by an application of this type.
55. The Council failed to invite comments from the Environment Agency as a statutory consultee. Their report from 2011 was a clear objection based on the lack of credible flood risk calculation. There is a pond included in all previous and existing applications to allow for excessive surface water flooding. An appropriate Flood Risk Assessment has not been provided by the developer in respect of these matters. (see below).

Flooding

56. Surface water flooding is an issue that has not been adequately addressed in this application or the Local Plan. Both the Sewell Trust Field and Sandridgebury Lane are subject to regular flooding (see Appendix Figure 4).
57. “Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network.”
58. The LLFA recommendations are from calculations that do not include the water runoff from surrounding land that infiltrates down to this site. The wider area calculations have been used to provide a substantially more extensive flood mitigation approach as demonstrated in the North St Albans Broad Location proposal, on which the Council partnered with St Albans School. The design of the high capacity sustainable drainage system can be viewed here on the boards uploaded to the development website www.northstalbans.co.uk/bd6b5a_2ced81a92aa4f31b39c6609d5714e27.pdf (filesusr.com). The pond included in the design is inadequate to protect any future development or the surrounding area from increased flood risk.
59. There is no clear assessment by the applicant on how the land contributes to the local water table. It is an area of extensive surface water flooding and provides a wetland habitat, part of which is being incorporated by the applicant as a pond. But will the wetland area continue to contain the diversity of species if surrounded by 150 houses?

Ecological corridors

60. Has consideration been given to the linking of the ecological corridors including Heartwood Forest, Batchwood, and Beech Bottom Dyke?
61. There is little evidence that this has been considered by the applicant or planning consultants – a number of landscape features and habitats would be affected by the proposed development. Heartwood Forest sits about 700 metres from the edge of the proposed Sewell Trust development site and there would be large-scale visual impact from two access points to Heartwood Forest, as well as visual impact from Sandridgebury Lane, Harpenden Road, the Hertfordshire Way public footpath, as well as other existing footpaths and rights of ways in the area (see Appendix Figure 1 and 3).
62. In accordance with the Sandridge Neighbourhood Plan, approved at a referendum in May 2021, further rights of way will be opened up immediately adjacent to the site at Cheapside Farm, down from Cheapside Bridge and on Sandridgebury Lane (see Appendix 3 for visual impact and proposed new rights of way map). Thus, the development of the site

will have further damaging visual impact on this area of high quality open Green Belt landscape.

63. The Hertfordshire Way long-distance footpath runs at the southern edge of Heartwood Forest and would also be subject to the large-scale visual intrusion arising from the both the Sewell Trust site and broader NSA site (see appendix Figures 1,2, and 3). The Hertfordshire Way also links to Batchwood and Childwickbury (see Appendix Figure 2). Childwickbury, a conservation area containing mostly listed buildings, is a country estate with farmland and private equestrian activities, all similar in character and activity to the area immediately adjacent to the broader NSA site containing the Sewell Trust land. To the west is Sandridgebury, which includes Grade 2 listed buildings, public equestrian facilities and a farm. Farms at Cheapside and Sandridgebury are a mix of arable and livestock farming (see appendix 1 and 2).
64. Beech Bottom Dyke is linked on two routes to the Hertfordshire Way and Heartwood Forest. One is via Sandridgebury Lane and the other is by a public footpath through Soothouse Spring and Long Spring Woods, then along Sandridgebury Lane (see Appendix Figures 1 & 2). Sandridgebury Lane is important for its use as an access to the Green Belt countryside for vehicles, walkers, bike riders, and runners.
65. At present the ancient woodland at Long Spring wood forms a natural boundary to the built-up area of St. Albans to the south, shielding it from surrounding countryside. The proposed development would result in significant harm to the character of the surrounding countryside when viewed from the edge of Long Spring.
66. We draw attention to the objection statement by the CPRE to this application. There is clear guidance that any test of Green Belt against the “Very Special Circumstance” should be judged via the process of the New Local Plan, which is now underway.

Air quality

67. The air quality report by Hawkins Environmental shows the area already has low air quality, with high levels of the worst pollutants in the categories of PM10 and PM2.5 at the test sites on Harpenden Road and Sandridgebury Lane.
68. The reference to monitors at other locations in St Albans is not relevant to this application as the pollutants are localised. It is not clear what height the sensors were located and for the exact duration.
69. The proposal of a cycle lane linking down to the major traffic lights at The Ancient Briton junction is an important part of the sustainability of the site, but the current design is

flawed and will not provide a safe cycling experience, thereby deterring users. Thus it will do little to mitigate the air quality as the likelihood of the application site being substantially served by bicycle is very low. There have been many representations by local cyclists and cycling groups on the issues with design of the cycle lane.

70. Walking routes for children attending local schools from the application site, will mainly be along the Harpenden Road and Sandridgebury Lane, both identified as having the highest levels of pollution in the area, based on the data presented. Having no mitigation strategy for this level of air pollution is not consistent with national or regional policies. These locations and pollution levels were not assessed in the recent Council Air Quality Action Plan.

71. The conclusion of the report infers there would be little additional impact on already poor air quality and essentially states that because it is very bad already, the incremental change will have a small proportional impact. This should not be interpreted as a positive. It is another factor to show the lack of sustainability of this site. The Council has a statutory duty to limit and reduce poor air quality.

Heritage Impact Assessment

72. There seems to have been very little consideration of the wider impact of the development on heritage assets. In particular the setting of Heartwood Forest, Sandridgebury, the stables, the Grade 2 listed buildings, and Sandridgebury Farm has not been assessed adequately. As described above, all these features link directly to the Sewell Trust site and the broader NSA site via Sandridgebury Lane and the Hertfordshire Way. The Council should consider a Heritage Impact Assessment.

73. The archaeological report shows a clear objection.

Layout of the site

74. The applicant states that the proposed layout of the site is optimal for sustainable development. However, many factors disagree with this view.

75. The car parking provision of 1.7 cars per property at this location is inadequate. There is likely to be an expectation that new homes would come with “on property” electric charging points. Each property would have to have at least two car parking spaces, with more for properties over three bedrooms. This is equivalent to the Sandridge Parish Council’s Neighbourhood Plan proposal of allocation of car parking spaces for any new development in that area. Sandridge immediately neighbours the site and most of its

main residential areas are situated at an equivalent distance to the main amenities of employment and transport, with equivalent public transport links as this site. Given this expectation for car parking provision, the number of cars on the site would be closer to 450, a lot higher than the current provision by the applicant.

76. The arboriculture assessment for the site is for a lower density of housing, the site plan does not show all trees on the site or that border it in neighbouring gardens. According to the arboriculture report by David Clarke, the majority of the trees on the site are in a good condition. There is no provision for the replacement of the trees being felled to provide access to the site by car, bike or foot, leading to further lack of real sustainability, especially within the context of sustainability assessment and taking into account the air pollution report.
77. It is not optimal for further release of back gardens, a preferred way under the NPPF of adding extra housing. The long lengths of many of the gardens on Harpenden Road and Sandridgebury Lane, would suggest a perimeter road in the site design it required to facilitate future release of back garden spaces, as the current density and design leave no scope for opening up garden development.
78. The site layout makes no provision for green corridors for the wildlife using the site or any dark corridor for bats. The wildlife on this site is at minimum the same as that found in the EIA Scoping Report for application 5/2019/1187. Though there appear to be key assessments missing in both this Ecological report and the EIA Report for the broader NSA site.
79. The suggested height of the buildings (mainly three storey) will make the development clearly visible above the existing hedgerow and tree line. The density of the development will make it incompatible with the surrounding buildings which are mainly two storey, detached dwellings on Harpenden Road, Petersfield and Sandridgebury Lane or farm style buildings and cottages at The Greens and Cheapside Farm.

Strength of public objections

80. CLASH have gathered signatures calling for Councillors to “Save North St Albans Green Belt”. These are gathered using a recognised online petition provider, accepted by Government bodies in the UK. At 8pm, 20th July 2021, there were over 1200 signatures. Over 800 within St Albans and Harpenden, a further approx. 250 in neighbouring counties. These were gathered via the CLASH contacts list and via local social media groups that cover the area of St Albans, Harpenden and Sandridge where CLASH is a direct member.

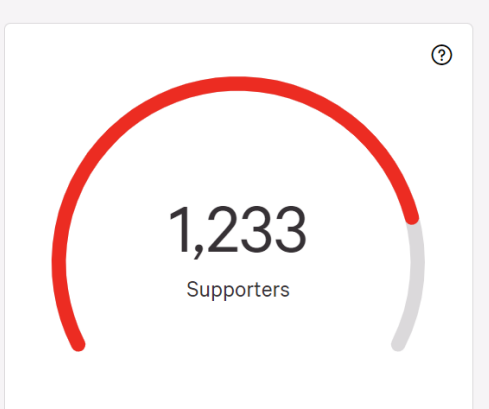
We have the data files supporting the numbers and can share with authorities to verify the signature quality, location and numbers. <http://chnq.it/iKJjPnVJ>

change.org Start a petition My petiti

Your download should start shortly.

Save North St Albans Green Belt

☰ Menu 👁 View petition



A screenshot of a Change.org petition page. At the top, the Change.org logo is on the left, and 'Start a petition' and 'My petiti' are on the right. Below the logo is a green notification bar that says 'Your download should start shortly.' The main heading is 'Save North St Albans Green Belt'. Underneath the heading are two icons: a hamburger menu icon and a magnifying glass icon labeled 'View petition'. The central feature is a large red arc that is nearly complete, representing the progress of the petition. In the center of the arc, the number '1,233' is displayed in a large font, with the word 'Supporters' written in a smaller font below it. A small question mark icon is visible in the top right corner of the arc's container.

81. With more than 250 public comments objecting to the application, they are broadly summarised under the following issues:
- The potential destruction of high quality open Green Belt, which links to the wider North St Albans area, immediately adjacent to Heartwood Forest. There is no acceptable representation of a “very special circumstance” under NPPF 2019.
 - The traffic assessment methodology and subsequent traffic impact that are presented are incorrect. The assumption of how much transport will be sustainable is also very much incorrect, in part due to the badly designed cycle lane and incorrect representation of the existing local bus service, which does not currently connect to St Albans City Station.
 - The ecological and pollution issues have been largely misrepresented and were they to be correctly represented, they would show the lack of sustainability of the site and therefore fail to meet the NPPF guidelines.
 - Lack of extra provision for healthcare and education services.
 - The lack of due process to follow the New Local Plan and allow for that process and assessment of the newly submitted sites under the call for sites to be exhausted.

Response to the Planning Department recommendation

82. The whilst the process of planning can seem opaque at time, the law is very clear, valid objections include but are not limited to the following:
- adequacy of parking/loading/turning ▪ archaeology ▪ conflict with planning policies
 - design, appearance and materials ▪ disabled access ▪ effect on listed building and

conservation area ▪ hazardous materials ▪ highway safety ▪ landscaping ▪ loss of trees ▪ nature conservation ▪ noise and disturbance resulting from use ▪ previous planning decisions (including appeal decisions) ▪ proposals/policies in the development plan ▪ road access ▪ smells ▪ traffic generation ▪ visual amenity (but not loss of private view)

- b. It is the strong opinion of CLASH that these factors have not been adequately dealt with and are mainly not subjective in matter.

83. The previous applications rejected at appeal, both retained the existing hedgerows and trees. Neither of those applications proposed three storey buildings. The Officer's statements in paragraphs 8.2.14 8.2.15 do not hold sway and are material factors in the assessment that need to be reviewed by parties who did not sponsor the Broad Location North St Albans site for development under the Draft Local Plan which was withdrawn. Appendix 3, clearly shows the view of ground level in multiple spots, not just the North East corner. This is clearly visible from many public footpaths in the area and in all seasons.
84. The use of extensive, potentially irrelevant conditions post applications, takes away the opportunity for public scrutiny and transparency. This Planning Department has recently been heavily criticised for lack of due process by the Planning Inspectorate. The lack of accountability that comes with seeking conditions that negate the opportunity for public and stakeholder review and comment, do not deliver reliable and fair planning outcomes.
85. Reference "8.14.1. *Dealing with below ground heritage first, i.e. archaeology, the District Archaeologist has confirmed that the recommendation should be refusal, pending an archaeological investigation and statement, noting that the results may influence the design of the site, As this is an outline application with all matters reserved except access*". The statutory consultee commented on an access application. Access and pre-construction ground preparation is a common cause of archaeological damage.
86. "2.5 years housing supply due to the lack of Local Plan." This is a contentious issue, as it is this Planning Department that failed to secure Inspector backing on two major factors, liaising with neighbouring Councils and not assessing sites below the high threshold of 10,000 acres. It is very clear from the recently published review after the Call for Sites earlier in 2021, that there has been a vast amount of land put forward for consideration. This parcel of land is part of that and should be assessed alongside those other sites and ranked accordingly, before any judgement is passed.
87. In response to the transport needs of an urban landscape of this size, both Hertfordshire Highways and the Planning Office, adhere to an unproven and wholly fanciful image of traffic mitigation through sustainable transport and a *Dutch-Style of commute*. Government statistics in Q4 2019, report a mere 3% of commutes were made by cycling. There is no evidence to suggest there will be a large-scale move to Dutch-Style living, for a site that is on the very edge of the existing urban footprint, with potentially undeliverable improvements due to incorrect traffic and scale data assumptions and measurements.

88. *8.15.3. Recent appeal decisions of relevance.* There seems to be little relevance for these other sites quoted by the developer, which include former garden centres and those with farm structures and buildings already on them. This site is high quality, open Green Belt, formerly farmland of DEFRA Grade 2 quality, see Appendix 7.
89. *8.3.6. The submitted Landscape and Visual Impact Assessment demonstrates a low level of impact on the wider landscape and low visibility/impact on the perception of open Green Belt countryside to the north and east. The methodology is in line with Landscape Institute guidelines (GLVIA 3). The viewpoints covered are comprehensive. 8.3.8. Whilst it is acknowledged that the change to the character and appearance of the area would be significant in terms of the site itself and its immediate surroundings, it is considered that given the conclusions of the LVIA, these impacts would be localised and overall, the essential character of St Albans would be preserved. Overall, officers consider that the harm is limited.*

Comments 8.3.6. and 8.3.8. seek to discredit the photographic evidence provided by Mr & Mrs Smedley on June 15th 2021, clearly showing the actual view, which would be substantially harmed as marked by yellow ground cover. See Appendix 3. By their nature, a view is local, a line of sight is immediate to the area and there are many points that show this. This area is also designated by Hertfordshire County Council as having improved Rights of Way and therefore opening more views across from routes connecting to the Hertfordshire Way and Heartwood Forest. These are independent of any future developments. See Appendix Figure 8.

90. *8.2.15. It is considered that **this latest application is materially different**, providing a clear buffer between the site and the open countryside, and as a result does not lead to unrestricted sprawl in the same way that previous applications were considered to by the appeal Inspector. It is therefore not considered to represent unrestricted sprawl and there is not considered to be any significant harm to this Green Belt purpose. The harm is instead low to moderate.*
91. There is nothing to substantiate the above statement. The site plans submitted in both previous applications 5/2011/1724 and 5/2014/0093, which were refused by the Secretary of State, both included the existing hedgerows, existing trees, pond feature with landscaping and both were for fewer properties. This current application has a higher density of building and will incorporate higher three storey properties.
92. Ref Farmland at Bullens Green Lane. Colney Heath is serviced by some major dual carriageways as well at the A1M where as this site is supported by the A1081 and B651, which are single carriageway local roads already gridlocked and cannot be improved without some compulsory purchase of front gardens, which would be hugely unpopular. Also, in the previous applications on this site which were refused, the Inspectors had a very different feel for this area, the rural feel and the views were described as high quality. Compared to that at Bullens Green, which was described as

"urban edge" with key landmarks being the major roads. Each application and site are different. We hope the Councillors are not pressured into unreasonable comparisons to make an irreversible and damaging decision against the views of large parts of the community.