

The Radlett Society and Green Belt Association



Registered Charity No. 280877 Chair: Mrs Rosamund Gray www.radlettsociety.org

*Promoting the village and its facilities as a pleasant place to live and promoting
conservation of the local amenities and environment*

Please reply to: [REDACTED]

Spatial Planning Team
St Albans Council Offices
St Peters Street
St Albans AL1 3JE

By email to: planning.policy@stalbans.gov.uk

27 October 2024

Dear Sir/Madam

St Albans draft Local Plan

The Radlett Society & Green Belt Association (RSGBA) wishes to submit comments to the Reg 19 consultation on the St Albans Local Plan. We do so from the point of view of a local association representing a location adjacent to the wider St Albans borough, likely to be impacted by some of the proposals in the Plan.

We would start by congratulating those responsible for the production of the series of documents constituting the draft Local Plan. They are clear, well written and constitute a very comprehensive package. We would only observe that what is lacking is a short guide to the whole package, likely to appeal to ordinary residents and so perhaps prompt them to respond to the consultation. It does require serious effort to go through the extensive package that has been presented.

Draft Local Plan Part A

We are encouraged to see suitable mention of the 'Duty to Cooperate' with neighbouring boroughs on 'strategic planning matters' (para 1.9). We hope this is interpreted to mean cooperation on **all** matters that cross or impact boundaries. If St Albans is to designate a major site on Harper Lane as suitable for development, this must be carried out in liaison

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with Hertsmere and Aldenham Parish Council, as any such development will have a significant impact on Radlett, as the neighbouring settlement, and hence Hertsmere. This liaison must include joint consideration of infrastructure issues, together with the impact on schooling, shopping and medical provision, and of course transport aspects.

Leading on from that, we note that para 1.13 says:

‘The Local Plan must be read in conjunction with the statutory Local Transport Plan (LTP) prepared by the Local Highways Authority, Hertfordshire County Council.’

We find it a little surprising that the Local Plan and Local Transport Plan are seemingly prepared independently. Surely there must be an obligation to prepare them in conjunction?

We commend the list of Objectives at para 1.28. These seem appropriate in range and number. We do wonder if all the objectives are in effect equal or does St Albans see some as more important than others? To put it another way, if a proposed development or other action in favour of one objective goes against another objective, what mechanism is there for resolving the conflict?

Chapter 2 gives appropriate coverage to the Climate Emergency. However, whilst the listing at CE2 does mention solar power, it does not, to us, make it clear that the Council will support – or indeed call for – solar panels on all new housing and encourage their fitting to existing housing. Can that be made more explicit – or explained if it is not the case?

We naturally welcome the clear support for the preservation of the Green Belt at para 3.5; the processes outlined in LG5 & LG6 are helpful. We do think, however, that there needs to be stress on the reasons for the Green Belt, including in particular the prevention of nearby settlements merging. This to us is a key principle that must be part of Local Plans.

We applaud the importance attached to ‘Blue infrastructure’ and flood risks. The coverage of the historic environment is also very good; we accept that historic aspects cannot be an automatic ‘trump card’ to prevent any development, but it is vital to ensure that full and careful consideration is given to these aspects – and of course that all relevant sites are properly logged.

The commentary about building heights in 12.19 and related paragraphs is welcome. However, we do wonder if there need to be more said about adding an additional storey to some buildings. Would a third storey be acceptable on a block of shops with flats above? Or a fourth storey on top of an existing three storey block? (Always assuming the structure is appropriate of course.)

Draft Local Plan Part B – Site Allocations

We are naturally focussed on Site B8, the 'Ivory's' site on Harper Lane. This is identified as having the potential for a significant number of houses (274) which would make a material difference to Radlett which, although in a different borough, would be the natural destination for the services that the new residents would require. It is therefore crucial that any development of this site is done in liaison with Hertsmere.

We have commented before about this site. To summarise our concerns:

- It is currently an active business site; what happens to the variety of businesses operating there? Surely there is a risk to employment from turning the site over to housing?
- Although much of the site would be ranked as 'brownfield', it is surrounded by Green Belt land and would need to be properly screened off from the Green Belt. Indeed, the full development seems to include some Green Belt land; this does not seem to pass the 'Very Special Circumstances' necessary for building on Green Belt.
- Access to the site, if development proceeds must not be across the fields to streets such as The Avenue and The Warren in Radlett; that would be unacceptable and destroy the Green Belt in the area.
- The proposed development risks eroding significantly the remaining green gaps between Radlett and settlements to the north. This would especially be the case if the whole proposed site, including Green Belt, were developed.
- Transport is key and we welcome the acknowledgement that development would need proper investment in cycleways along Watling Street into Radlett.

However, the key issue with the site is the Harper Lane railway bridge which is very close to the exit from the site. This single carriageway bridge is already a bottleneck and should have been improved when the Harperbury Hospital site redevelopment started. The additional traffic generated by the proposed new site would exacerbate this and has the potential to cause significant blockages and risks to pedestrians and cyclists trying to cross the bridge.

The comment in the site development requirements says that:

"3. Support for enhancements of the junction of the B556 and A5183 will require attention due to capacity and constraints."

This massively understates the issue. It must surely be a prerequisite for any development proposal that there is a replacement bridge. It is not acceptable for this to be left to the Highways authorities: it needs to be clearly tied to development of the site and if the bridge cannot be improved (or of course another, separate bridge across the railway installed) then the development cannot proceed. This is a matter of safety and must outweigh a simplistic approval for a brownfield site.

We have to point to the Radlett aerodrome development which has the potential to generate a lot more heavy traffic over the Harper Lane bridge as lorries seek to access the M25 (given that this supposed railfreight/distribution depot is in the nonsensical situation of having no direct motorway or rail access access). Again, it points to the crushing need to solve the problem of the Harper Lane bridge before any development can take place that puts extra strain on it.

We note the reference (at point 5) that development "...should deliver enhancements that would better reveal the significance of the Grade II Listed Harper House; this may include the creation of open space between Harper Lane and the frontage of the Listed Building and adjacent Coach House to better reveal their significance." We just wonder how practical that is if it means the frontage of the new development is pushed back from Harper Lane.

Related matters

We note the welcome proposal for a new secondary school and a new primary school to be built in London Colney on the large site south of Napsbury Park. We have long argued that Radlett warrants a secondary school and having a new school at least reasonably close to Radlett would help (and also help Shenley and Borehamwood). It would, though, add further to the traffic along Harper Lane and over the rail bridge; it would also add to the existing congestion at the B556(Harper Lane)/B5378(Shenley Lane) roundabout.

As a final point, we find it curious that there is no mention in the documents of the Harperbury development by Bloor Homes. The site straddles St Albans and Hertsmere (about 2/3 in St Albans). It makes sense to continue development on this site it but it needs some local facilities (a few shops) and proper consideration of transport links (as mentioned in the previous paragraph, the roundabout on Harper Lane to Shenley and to London Colney is already congested and needs improvement; the impact on the Harper Lane bridge; establishing a proper bus route). In simple terms, this site needs proper strategic planning consideration given to it rather than just being left to grow randomly or just left.

Yours sincerely

Mrs Rosamund Gray
Chair, Radlett Society & Green Belt Association

Copy to: Aldenham Parish Council manager@aldenham-pc.gov.uk