

Harpenden Society's response to the SADC local plan

Chapter 1 Spatial Strategy

The Society understands that SADC are under a clear legal obligation to develop a new local plan, but is clear that the basis for the plan is erroneous, in that it is based on a Government-driven set of planning guidelines that relate to 2014. The housing target of 15,000 new housing units for the district over the period to 2041 is based on those outdated guidelines.

That said, the Society broadly agrees with the objectives set out in 1.31, and supports the approach being taken to prioritise new build on previously developed and brownfield land first, looking to increase density and height where appropriate, and recognising constraints such as conservation areas, listed buildings and protected trees. However, the Society would like this section to take account of the nature of surrounding buildings and residences.

However, it is inevitable that the prioritised sites will not meet the Government imposed target. As a result, some Green Belt will have to be sacrificed.

Furthermore, infrastructure is key to the successful delivery of the plan, and in the Society's view, existing unmet infrastructure needs must also be addressed, which is particularly relevant to Harpenden's acceptance of its allocation of new build under the plan.

Chapter 2 Climate Emergency

The objectives that the plan proposes for addressing Climate Change etc, are well developed in terms of new build sites, but the Society believes that the ecological impact of such development should be conditional on improvement to the current levels of pollution, and in particular, the effect of increased traffic levels impacting our community.

Harpenden is acknowledged as having serious air pollution levels in the centre of the town, where the Church Green monitoring point is in the worst 30% of English communities already, with high levels of nitrous oxide and particulates.

Chapter 3 Land Use and Green Belt

The Society recognises that 81% of the District's land is classified as Green Belt, so the objectives that SADC have developed are inevitably in conflict with national policy concerning Green Belt.

However, in approaching this conflict, the Society believes that if Green Belt is to be sacrificed, then any proposed sites, particularly those defined under 3.1 should have additional conditionality. In particular, such sites should be complementary to, and not overwhelm existing development. Furthermore, they should not cause substantial infrastructure damage or overload.

The Society believes that the two large sites identified for Harpenden do have a substantial and negative impact on Harpenden's infrastructure, in particular the main through road network which is constrained by the geography in which the town sits, namely the two valleys, and pinch points such as the Nickey Line Bridge on the A1081 and the River Lea through Batford.

B2 North East Harpenden 762 units

This site is positioned adjacent to the Lower Luton Road, which is already seeing traffic overload at key times of the day. It is highly likely that the occupants of this site will be most likely to have to travel to large employment centres such as Luton, Welwyn, Hatfield, Stevenage and London (via the station, which is over 2kms away and not readily walkable), and as a result add significant pressure to the B653, which is constrained by the River Lea and its floodplain, and is already one of the busiest B roads in the county.

Therefore, what is missing from the analysis of this site is a proper, professional traffic study of the impact on the B653.

Moreover, the addition of the planned number of units will need substantial infrastructure of its own, such as schools, health facilities, and the creation of a larger commercial footprint when compared with the limited retail outlets that currently exist.

Water and in particular, sewage also present a significant challenge. Thames Water have already admitted that the existing infrastructure needs upgrading, not least to eliminate the already unacceptable raw sewage discharges into the River Lea, one of a small number of treasured chalk streams in the county, with a high level of biodiversity and which is already under environmental attack from such discharge.

B7 North West Harpenden 293 units

Like the B2 North East Harpenden site, the B7 proposal also fails to recognise its impact on traffic flows along the A1081 through the town centre. In addition, suggested alternative routes out of the site, such as Cooters End Lane, Ambrose Lane and Tennyson Road are narrow, and in the case of Tennyson Road, given the nature of the housing, there is parking on both sides of the road. An alternative route of Sun Lane and Carlton Road suffers from narrowness, the St George's School main entrance and a significant NHS facility on the Red House site.

As for the A1081 itself, leading to the town centre, it already has a serious bottleneck at the Nickey Line Bridge.

The reality today is one of substantial congestion from north of the junction for Kinsbourne Green right through the centre of the town and beyond. In addition, the road is prone to flooding from Kinsbourne Green through to the existing housing at Bloomfield Road.

If this site is chosen, additional infrastructure will be required in terms of access to the A1081. Given the distance this site is from existing schools, the railway station and the town centre, traffic flows will be materially and adversely affected at peak times.

As regards the remaining sites proposed in the document, the Society has no substantive comment other than to reiterate the observation that no Green Belt should be sacrificed if it is not an extension of existing housing, and should not create significant access problems, as is the case with the proposed Cross Lane site.

Chapter 4 Housing

In 4.6, the housing mix indicated in table 4.1 looks sensible. However, as is well known, house prices in Harpenden are high, driven by demand, and as such land prices reflect this. What this means is that the large housebuilding firms have an insatiable need to build 4 and 5 bedroom units to maximise the profit potential of the sites involved.

SADC are to be commended for the objective to improve the availability of social and affordable homes. The Society is highly supportive of this, but hopes that in achieving a better mix of new development in Harpenden, good design and suitability in respect of existing residential areas are not sacrificed.

This is of concern and is particularly relevant where the desire for higher densities does not sit neatly with existing residential areas. One example of this is the proposed 61 unit development at the top of Townsend Lane, which suggests a much higher density than that of the 28 units already built as Hartwell Gardens.

Chapter 5 Economy and Employment

Table 5.1 outlines Protected Employment Areas in the district. The Society would only comment that in recent times, industrial sites in Harpenden have been under threat, particularly in Southdown, Batford Springs and Coldharbour Lane. The Harpenden Neighbourhood Plan defines these locations as commercial and employment zones. We wonder how SADC are going to achieve their objective of ensuring no net loss of employment floor space given the recent history of land owners proposing residential developments on these sites. The Coal Board Pension Fund have not renewed the leases on several units in the Southdown industrial Estate, preferring an application for residential blocks.

Chapter 6 Town Centres and Retail

Harpenden town centre has a wide variety of commercial and retail outlets, but is not immune to the shifts in the economy. This is particularly relevant to the withdrawal of domestic banking, with all banking facilities now withdrawn (in this case the Nationwide does not qualify). The Town Council is already pursuing the provision of a banking hub in the town centre, which is an essential service for the town's businesses as well as those residents who cannot access electronic banking, or where electronic banking can't handle the service required. The Society has actively supported this initiative, and would hope that SADC holds a similar view.

TCR7 b. Whilst this comment refers directly to St Albans it also applies to Harpenden. However the ongoing closure of retail units in Harpenden town centre is due primarily to massive rent increases imposed by landlords as well as increasing overheads. Very few independent retail businesses will be attracted to replace the empty shops. National chains have been reducing the number of outlets steadily as internet sales continue to grow. Coppers, Map Stores (independents) and AGA are three examples lost since March 2023. Could a strategy of Rent Support be considered to encourage new independent business openings?

TCR4 B. The visitor economy in Harpenden could be improved by the installation of directional signs/ information boards highlighting car parks, the EMC, the Leisure Centre, children's play areas, the all-weather pitch and stadium.

Chapter 7 Community Infrastructure

The Infrastructure Delivery Plan leaves a lot to be desired, and the Society has no confidence in SADC being able to deliver under this objective. The funding constraints imposed by Central Government make it highly unlikely that the provision of education facilities, both primary and secondary, together with health facilities needed by a population growth implicit in this initial plan can be made. The c.2500 sites initially identified in this plan lead to a near 25% increase in Harpenden's population.

In our opinion, no major development should be allowed to proceed unless and until the upgrade in the infrastructure is committed and funded. We do not want to see the chaos imposed on Bishops Stortford when the A120 infill project of more than 1000 houses was substantively built without a primary school being opened, resulting in reception age children being transported by taxi and minibuses up to 10-15 miles to attend school.

Chapter 8 Transport

We have already highlighted major issues with traffic associated with proposed sites. However, as a generalisation, and to quote a senior member of Herts Highways in respect of road traffic and Harpenden's geographical constraints, 'Harpenden is full'. Furthermore the levels of traffic generated pollution is one of the highest of any community in England.

We welcome the improvements identified in the LCWIP, but would hope that there is proper integration of planning between HCC and SADC as regards other road improvements, and that any new development must have access investment planned and paid for, and without which, the development should not be allowed to proceed.

There must be, as the plan outlines, priority investment in innovative services such as LYNX bus systems, e-bikes etc, and this requires the involvement of SADC, HCC, the Town Council as well as residents.

In addition, in Harpenden's case, there needs to be improved access to the railway station regardless of any increase in population.

The plan for the improvement to the Station Approach from Station Road is to be welcomed. However, no attention has been given to the displacement of private car access via Station Approach. The access to the east carpark and platform one is already woeful, and there is no controlled traffic scheme contemplated for the Station Road/Carlton Road/East Carpark junction. This has been and is a dangerous interchange, and the single carriageway access to the carpark only just allows cars to pass by virtue of the erosion in the bank on the left.

As for rail services themselves, no analysis has been made of the impact of the increase in passenger numbers that Luton Airport has applied for – initially from 16mppa by stages to 32mppa. Furthermore the unreliability in performance of Thameslink has and will lead to increased car journeys to and from the town.

Chapter 9 Utilities Infrastructure

The two priorities here are sewage and electricity supply, and in the latter case, investment in public charging points for EVs.

We would dispute the assertion that there is adequate sewage capacity up to 2031 – the repeated discharge of raw sewage into the River Lea is testimony to the inadequate capacity for water surges. No significant further housing development should be permitted until Thames Water have eliminated raw sewage discharges, and have committed to increase capacity over the initial period of the plan.

As for electricity, we accept the reality that the developer must contract with National Grid for an adequate supply (and for gas). However, is there an opportunity here to get the developer to provide EV charging units not only on their sites, but also contribute to the provision of community chargers in the town centre?

Chapter 10 Natural Environment

The Society welcomes the objectives and commitments scoped in the draft plan, and in particular the protections envisioned for green spaces and allotments. In addition, the protection of blue infrastructure, in Harpenden's case the River Lea, is to be welcomed, and we hope that Thames Water will be closely monitored to ensure that the raw sewage release is rapidly reduced.

The section on landscape and design is a critical element in retaining Harpenden's character and ambience. The commitment to landscaping of new build together with the requirement for tree planting is to be welcomed, and we are also pleased to see that visual impact assessments are to be a requirement for any major development outside the settlement area.

However, we are firmly of the opinion that they should also be mandatory for developments inside the settlement area.

We also welcome the requirement for amenity space as outlined in table NEB11.

Chapter 11 Historic Environment

Table HE1(c) outlines the constraints that the plan seeks to maintain. The Society welcomes these proposals.

SADC are aware that a programme of updating the Harpenden Town Centre Conservation Area has recently started, initiated and supported by the Town Council. This project is being undertaken by volunteers, and given the significant amount of research involved, it will take 2-3 years to complete. In the meantime the existing records should be referred to in any proposal that affects the Conservation Area.

Chapter 12 High Quality Design

The proposals contained in this chapter are to be welcomed, and in particular, DES1 covering new development and DES2 on public spaces. However, we do believe that a minimum density of 40 units per hectare will potentially clash with much of the existing residential development across the town. The relative low density of development is a hallmark of Harpenden's character.

Chapter 13 Public Health

Our comment on this chapter relates to the existing levels of traffic generated pollution, and that the centre of the town places Harpenden in the top third of the most polluted town centres in England. It is for this reason that we would encourage SADC to develop strategies along with HCC, the Town Council and residents that reduce traffic flow, and consequent pollution, through the town. The Society would welcome its involvement in developing those strategies.

It would appear that the section on noise pollution is silent on the impact of Luton Airport's application for a Development Consent Order to increase passenger number throughput per annum by c.100% over the period of SADC's local plan. Whilst HCC and North Herts have raised substantive objections, as has the Society and other interested groups, SADC ought at least to refer to the noise and pollution effects in developing its well-being plans, and in particular, the health impact assessment criteria outlined in HW3.

This issue may not have immediate impact, but proposed developments under flight paths need to recognise the issue.

Chapter 14 Implementation

As has been outlined in earlier chapters' responses, the Society urges SADC to identify the infrastructure that needs to be upgraded to meet existing demands (traffic management, town centre parking, sewage system capacity etc) before it is able to define the needs that the implementation of the plan will generate. It is to be welcomed that developers will be required to contribute to those upgrades as outlined in SP14, although we wonder what impact SADC can have in meeting the ongoing cost of maintenance etc described in condition a) vi. However, condition g) is of some comfort but needs further definition for clarity.