

Additional Comments by the Harpenden Society

In respect of the

Proposed development of Land in NW Harpenden by Legal & General

Ref No: 5/2023/0327

Green belt

In developing the Local Plan, the Society fully accepts that the use of Green Belt land and “special circumstances” approvals will be needed. Whilst it is acknowledged that this particular parcel of land is, in relative terms, poorer quality Green Belt and had previously been earmarked as a potential site for development, the scale of the development and the housing stock proposed will make it a considerable blot on the landscape.

Whilst the developer claims that building on the east side of Luton Road would be consistent with the west side development, the west side is considerably less developed with a range of undulating natural features that reduce the impact the buildings have on the environment. Buildings of the type and scale proposed for this site would not create a similar environment.

The transport assessment is unrealistic

The transport assessment is solely based on a combination of traffic assessments made using national and HCC databases together with historical SADC travel to work data. None of the assessments are adjusted to reflect site specific challenges.

The nationally based assessment, using TRICS, assesses trips on the basis of traffic movements in “similar” nationwide developments (based on data collected for the 2016 Local Plan Transportation Study).

These developments can be anywhere in the country and no account is taken of the local infrastructure or environment that exists. Furthermore, the data dates back to 2014, which is grotesquely out of date (e.g. the government’s table of vehicle registrations VEH0101 for England suggests vehicle registrations increased from 30.3 million to 34.4 million between summer 2014 and summer 2024 – an increase of 14% - this increase is not reflected in the data used). Harpenden is already recognised as having a high level of vehicle ownership per household.

There is also no indication of whether the chosen sites reflect any of the circumstances relevant to the NW Harpenden site. Specifically, this is an already heavily utilised single main north/south road with no other realistic entry or exit points, and there is an absence of nearby employment centres and limited alternative means of transportation.

Similarly, HCC’s COMET model relies on the 2016 Local Plan Transportation Study so is equally unreliable in assessing trips into and out of the site.

Reference is also made to SADC’s Census 2011 Method of Travel to Work data, claiming that 28% of work journeys will be by rail. As the transport assessment notes the nearest railway station is 1.7km distance from the site entrance – and given the poor state of public transport

provision, people will need to use an alternative mode of transport to get to the station, even if 28% ultimately commute by train.

Thus, any calculated vehicle use data is wholly unrealistic.

Looking at the socio-economic analysis for the Environment Statement, it suggests the houses and retirement homes will be occupied by respectively 1,106 and 185 individuals. In relation to the former, it is estimated that 60% will be of working age and 83% of those will work. Given extremely low walking and cycling use nationally for commuting, it means that over 500 residents will travel to work by car, with the vast majority doing so in the morning and afternoon/early evening peaks. This is considerably more than the preferred methods assess. In addition, vehicles will come onto the site in the morning peak carrying staff who work at the retirement home or at the community facilities as well as vehicles delivering supplies.

Furthermore, no account is taken of school trips that will be by car. Nationally this is 35% of all school trips. It is estimated that approximately 250 school age children will be living on site, which will generate at least another 100 or so journeys, with all the morning journeys in the peak period.

Finally, new bus stops are shown to be on the highway, not in laybys, which will further reduce traffic fluidity, impacting journey times. This has not been taken into account.

Separately, but of equal relevance, is the fact that the measurement of existing levels of traffic has only been taken at a very limited number of places on one date. This is a wholly inadequate methodology for such a substantial development.

All HCC additionally recognise is that the L&G development will lead to traffic using secondary routes to avoid the congestion, thereby causing increased congestion on those routes themselves.

Finally, the assessment solely focusses on the proposed development and takes no account of the cumulative effect on the increased traffic flow impact on the town centre of other developments outlined in the plan, particularly the potential north east Batford development of up to 750 new homes.

Thus, the transport assessment is wholly inadequate.

In reality, the HCC transport assessment appears to have been carefully curated to present a less toxic outcome than will actually be imposed on the town.

It is our assertion that traffic volumes will be considerably more than the Environment Statement assesses and the impacts will therefore be considerably greater than forecast.

The walking and cycling routes are not safe or sufficiently attractive to encourage a switch from cars

A “safe” walking and cycling route has been provided as have alternative “quiet” cycling routes.

They do not comply with LTN1/20 in material aspects. In particular:

The main “safe” cycle route

- is interrupted at a key pinch point, the Nickey Line bridge, where it becomes a shared, narrow footpath for use by walkers and cyclists
- is shared with walkers between Bloomfield Road and the centre of town
- crosses numerous residential roads which are already used as alternative routes to the station and town centre to avoid the **existing** congestion along the Luton Road

Furthermore, the suggestion that the cycle and vehicle access under the Nickey Line bridge could be controlled by one-way sequential traffic lights just beggars’ belief. The suggestion of a 20-mph limit at this point is equally farcical, if the flow is to be controlled by two sets of traffic lights some 50+ metres apart.

The “quiet” cycling routes

- are undulating, both routes go up the valley sides before descending into the town centre
- cross a significant number of residential streets
- do not have good visibility at key points (e.g. Ambrose Lane crossing the Nickey Line)
- are not wide enough for two-way traffic (e.g. Tennyson Road)

As a result, it is highly unlikely that residents will switch from cars to either walking or cycling, particularly when the time taken compared to a car journey is factored in.

It is also worth noting that the statement that Hemel Hempstead, St Albans and Luton are accessible for commuters on bicycles is not supported by any evidence and therefore speculative. None of these routes are “safe” as the routes are incomplete, and cross major carriageways.

Overall, it is highly unlikely that the proposals for cycling (and walking) routes will encourage use of these modes either by residents of the new development or existing Harpenden residents.

In their letter of 18th November 2024 to the St Albans District Council, the Environment & Transport Dept of HCC have recommended that if they are minded to grant consent, then a Conditional Item should be added requiring the applicants to pay £30,000 for HCC to undertake a Study to try and find a solution to the provision of a safe cycle route under the Nickey Line railway bridge. It seems non-sensical for this to be undertaken after any consent may be granted, as it is such a fundamental matter. We would urge the District Council to require this Study to be undertaken before the application is considered by committee as it is pivotal to the safety of cyclists, pedestrians and car users.

Air quality

Data included in the Environment Statement already shows high levels of particulate matter in the air, acknowledged to be within existing legal limits, but likely to be above future legal limits.

There has been no assessment of the likely increase in particulate matter as a result of additional traffic rather “professional judgement” has been used to assess that at some future date, levels of particulate matter in the environment will be little changed from current levels. Given the increase in traffic already conceded, what justifies this comment?

This is unacceptable on any analysis. Particulate matter causes ill-health and the new developments will increase particulate matter without mitigation. The changes over time should be objectively assessed so that mitigation can be incorporated into any planning consent to minimise any increase, and to ensure there is a strategy and monitoring process in place to ensure levels of particulate matter decrease over time.

HCC have confirmed that this development will lead to additional traffic using routes in and around the town and that congestion will be worse. By their own admission the application will create highway safety issues, in terms of potential accidents and also causing health related safety issues arising from the pollution from slow moving traffic, particularly for the residents living along the effected roads, contrary to their Human Rights and the NPPF (para 13).

Conclusion

In addition to the objections the Society has already lodged, the above is further evidence that leads the Society to request that planning permission for the above application be refused.

The Harpenden Society

21st January 2025