

# **Central St Albans Combined Residents' Associations (CCRA)**

## **Response to Regulation 18 Draft Local Plan (LP)**

### **Introduction**

The CCRA is an informal group of representatives from 11 residents' associations that are active in the central area of St Albans. All the associations in the CCRA are recognised by St Albans City and District Council (SADC) as co-opted members of the City Neighbourhoods Committee.

This response was prepared by the following members of the CCRA, working together.

- Abbey Precincts RA – Verulam ward
- Aboyne RA – St Peters ward
- Carlisle & Waverley Area RA – Batchwood / Bernards Heath wards
- Fishpool Street RA – Verulam ward
- Jubilee RA – St Peters ward
- Sandridge Road RA – Bernards Heath ward
- SAPHRA – St Peters ward
- Society of St Michaels and Kingsbury – Verulam ward
- Sopwell RA – Sopwell ward
- Verulam RA – Verulam ward
- Verulam Road and Adjoining Streets RA – St Peters / Verulam wards

Overall, we support the draft LP. We appreciate the immense amount of work that has been invested in preparing the plan, the supporting documents, and the evidence base. We want the plan to make progress according to the published timetable and to be adopted in 2025.

However, we do believe that some aspects of the draft LP could be improved before it is put forward for the Regulation 19 consultation. We think that the requirements, needs, and aspirations of the residents of St Albans are not always adequately provided for in the draft LP and we propose some amendments to correct that. We also note that the draft plan is, understandably, based largely around the three overarching objectives of the NFFP (paragraph 1.3) which are, in effect, about doing new things and the trade-offs involved in doing them. There is perhaps not enough consideration given in the plan to achieving worthwhile ends by improving what we have already got.

### **Housing**

#### **Requirements for growth**

We note the housing need calculations set out in paragraph 3.8 of the draft LP and the points made in paragraph 3.12 about the possibility of significant change to Government requirements before the end of the LP preparation period. We take it that, if the Government housing requirement changes before the Regulation 19 draft, the housing numbers in the LP will change accordingly.

We agree with the points made in paragraph 4.2 and in SP4 about shortages of smaller and more affordable homes in the St Albans District. However, we make specific points below about the impact of high density housing units and brownfield developments in the city centre on infrastructure and on residents' amenity and wellbeing.

#### **Nature of the city centre and its residents**

St Albans city centre has a large stock of quality housing in the form of conservation area terraces and other established dwellings in which householders make optimal use of limited space.

Commercial premises; heritage sites; and cultural and events venues share the city centre with residents. Amenities tend to be within walking distance and population density is high.

Most city centre housing is already in place and populated. Residents form a major and growing part of the local economy. The draft LP already recognises the need to balance the needs of residents with other uses in the city centre (TCR5). This is a complex task open to subjective judgments and commercial pressures. For simplicity, we would like SP4 to make specific reference to addressing the needs and protecting the amenity of existing residents.

### **Brownfield sites**

The city centre's potential contribution towards ensuring that a sufficient number and range of homes is provided to meet the needs of present and future generations whilst protecting and enhancing our built and historic environment is most likely to be delivered via a combination of limited new development and appropriate adaptations to the existing housing stock. Such adaptations have in practice provided a lot of extra housing in and around the city centre, but the draft LP does not acknowledge this or include any projection of future housing provision likely to come forward based on past trends, other than a projection for windfalls across the whole District. The brownfield capacity work has focused exclusively on developing new brownfield sites such as car parks. We feel that SADC should at least reference past city centre trends in its housing projections for the city centre.

Prioritising development on brownfield sites, including all the city centre car parks and vacant spaces, would produce about 1,000 homes. These will be mostly inner-city high-density dwellings (flats) and this would put yet further strain on amenities beyond already-approved new residential accommodation, such as developments at 65-69 St Peters Street, and Club Veeda in Adelaide Street.

Piecemeal / individual new developments / conversions across the city centre can currently be built with little or no regard to design consistency. This is not appropriate. Furthermore, the cumulative effect they will have and are having on city centre amenities needs to be better managed. There is an adverse effect on city centre residents in terms of demand on infrastructure, with an increase in aspects like rubbish/litter and delivery couriers and vans. The individual impacts of piecemeal brownfield developments especially across the central area need to be aggregated so that the cumulative effect is treated as a whole. We believe this is essential for managing provision and for meeting the climate change challenge and mitigating its effects on residents. We would like the draft LP to refer to something akin to a Smaller Build Development Register managed by SADC, to allow the numbers involved to be officially acknowledged and acted upon in terms of aspects such as GPs, dentists, utilities, transport, and green and blue spaces.

### **Houses in multiple occupancy (HMOs)**

The sub-division of existing dwellings and non-residential properties to form flats or HMOs can be valuable in housing provision for smaller households and single people. HMOs are a form of high-density housing. We note that in some areas of the city centre the increase in the number of HMOs has been affecting the stock and availability of family accommodation and/or undermining the character and amenities of local communities. We urge that the draft LP includes policies to manage the distribution of HMOs and restrict over-concentration, including prevention of the "sandwiching" of existing dwellings between HMOs.

### **Preservation of the character of the city centre**

City centre residents living in narrow streets in old buildings with shallow foundations have raised concerns about the proliferation of basement dug-outs and garden rooms. Residents would like the draft LP to include a policy covering visual standards and the assessment and management of impacts, including the risk of damage to buildings, pavements and utilities through the use of heavy plant. Basement dug-outs are mentioned in LG9 but this relates only to the Green Belt.

TCR7, point C talks of a variety of building heights in St Peter's Street. We would like this to state that the existing low building height scale should be maintained consistent with protecting the heritage of the city centre, to discourage inappropriate development proposals.

## **Parking**

Appendix 2, and its parking allocation formula, lacks flexibility and the 'Parking Zone 2: Most Sustainable and Accessible Areas' map approach does not adequately compensate for this, because the boundaries are prescribed but not always sensible. For instance, some areas outside the map have faster walking and cycling routes to the city centre and main station than areas within the map and the map includes areas where residents are unlikely to have/use buses yet areas within a mile of the city station and on main bus routes are excluded. This approach is too simplistic and car-centric and is inconsistent with the objective to encourage the use of active and sustainable means of transport. The draft should allow scope to consider specific cases/exceptions.

Much of the central area is recognised as Zone 3 (subject to overnight parking stress) so that new developments must provide off-road parking unless it can be convincingly argued that the central location does not require this. In practice this argument is routinely made and accepted, although new occupants generally want cars. Does the draft LP cover this situation in a way that prevents developers circumventing the requirement to provide parking?

## **Targets required for reduction of carbon emissions**

We would like to see two additional policies in CE1 – Promoting Sustainable Design, Construction and Building:

We need to have 40% carbon reduction targets for both operational carbon and embodied carbon. If we leave carbon reduction to building regulations, we will never meet the carbon reduction levels that we need. Hertsmere, Enfield, and Watford have all included these carbon reduction targets for developers in their local plan.

Those who are building extensions to their buildings should be required to meet a carbon reduction target for the extension.

## **Other points**

We would like to see permeable driveways included in the requirements in CE1 – Promoting Sustainable Design, Construction and Building Efficiency.

The plan should include a target for EV charging infrastructure – a specific number per household by end of plan life.

The proportion of time that many employees are working from home has increased and continues to increase. Home working is mentioned in the context of broadband provision (9.8 & 9.9) but not otherwise. Depending upon the nature of work performed at home it may have an adverse impact upon neighbours. Should SADC have a policy for home working?

## **Transport**

### **Requirement for a Travel and Movement Plan**

Traffic is a major source of air pollution and carbon emissions in our cities and there are significant areas of concern around transport in and around St Albans city centre. It will be nearly impossible to achieve a climate neutral city, without action to reduce vehicle traffic. Research shows that there is no one silver bullet to make cities successful in reducing car/van use; a number of policy initiatives will be required. One of the many benefits of an approved Local Plan is that it will create a timeframe to research, develop and innovate and to work with partners.

The draft LP makes positive points about transport issues but does not seem to demonstrate an overall plan and as such has many contradictions. CCRA would like to see an integrated Travel and Movement Plan and to contribute to its development.

Our view is that a Travel and Movement Plan, produced by SADC, HCC, and other key stakeholders, will be vital in producing a long term and funded strategy. A main aim would be to determine the best local solutions and establish target outcomes, for example reduced emissions; improved air quality; lower noise levels; greater safety and more cycling and walking. Zero emissions technology already exists for rail, buses, and small vehicles like cars. Establishing an effective charging infrastructure for electric vehicles at new developments and in existing areas will be an imperative. Initiatives to reduce traffic volumes might cover community, shared and public transport options; streamlining of deliveries; use of local hubs and e-cargo bikes; and controls over speed, parking and access.

We feel that the LP drafting team should have conversations with key stakeholders, get proposals agreed and state a requirement for a specific Travel and Movement Plan for St Albans within the Local Transport Plan 5 and the SW Hertfordshire Growth and Transport Plan.

### **Specific references to local good practice and to other plans**

The draft takes insufficient account of good practice in Hertfordshire elsewhere, including demand responsive transport and bike hire. Car clubs are mentioned but only in connection with new developments rather than as a means of addressing parking stress. The Local Cycling and Walking Infrastructure Plan is referenced but should be a formal supplementary planning document, as in Hampshire. This part of the plan needs to be revisited once HCC produces its new Local Transport Plan in accordance with forthcoming Government guidance. Stronger guidance on the use and priorities for S106 funding should be included, especially for pooling funding from smaller developments.

### **Effect of population increase**

The plan puts circa 2,500 additional dwellings in St Albans, mainly on the north and east. This is an increase of around 10% in the unparished area's population. Alongside piecemeal city centre growth, the number of large-scale out-of-town developments, with no identified service infrastructure, will add to city centre congestion with too few mitigating features identified to reduce vehicle usage.

The plan prioritises maintaining retail in the St Albans city centre but does not identify the linked travel and movement initiatives needed to deal with an extra 10% of people travelling into the centre without adding to congestion levels (or more if aspirations to attract more external visitors materialise). Appropriate initiatives, including improved public transport, cycling initiatives such as bike lanes; and provision for walkers, such as benches along walking routes, could reduce the need for car travel from both new locations and also serve existing homes and businesses along the routes into the centre.

Major development proposals should include an impact assessment covering aspects like the effect on the district's transport infrastructure; EV charging; sustainable transport availability plus usage assumptions, with ongoing monitoring of actual use against projections and with penalties for submitting flawed estimates.

### **New local service centres**

The plan makes no clear statements about developing (or not) new local service centres on the Marshalswick Quadrant model in the proposed major housing areas north and east. If done this could support a reduction in the need for car travel into the city centre. There is no specific plan for developing local services in order to reduce the vehicle traffic from the new areas.

## **Car park strategy**

The car parking sections assume similar numbers of car parking spaces but also identify all the current car parks as potential development sites. There are some technical solutions available (e.g., building car parks under any new buildings), but what is sensible would depend on an overall car parking strategy. There is no explanation of why it's felt the car parking spaces should remain as is (rather than increasing or decreasing), and is the mix to stay the same between visitors and residents or expected to change?

The plan should encourage visitors who use alternatives to the car, but also cover the planned number of visitors who will drive. There are car parks close to the centre on many of the roads that feed towards the city centre. A strategy to direct cars by low congestion routes to the nearest car park, using a locally developed app and with a business agreement between car park owners on sharing the benefits of additional spaces might be an option. This should accommodate the planned number of car users whilst minimising congestion and pollution. The potential to build on some existing car parking areas should be informed and guided by a strategy, such as substitution of parking spaces in more useful locations; expanding residents-only parking; permanent and Christmas-only park and ride options; and provision of safe parking for bikes in key areas.

## **St Albans east-west bypass; rail freight interchange; broad locations**

A414 mass transit corridor is referred to, including improvements to M1 links. This has limited clarity or ambitions on its projected impact on traffic crossing St Albans, or its impact on the travel plans of the additional dwellings to the west of St Albans. The impact of the rail freight terminal should also have mitigating actions.

The draft plan identifies a number of broad locations for new build residential development and these include a large area between Hemel Hempstead and St Albans that's covered by Dacorum Borough Council. Given the existing Hemel-St Albans traffic load on the A4147 and the impact on King Harry Lane and roads across St Albans how are the councils working together to consider and mitigate the impact?

## **Opportunities**

The following issues have been identified as worth further consideration within Local Plan policies, all with appropriate consultation and promotion:

- EV charging.
- Development of an integrated transport app to, for example, tell drivers where EV points are; where there are car clubs with vacant slots; how to get from A to B by public transport; provide real time bus timetable updates.
- Recognition of the need to seek real investment and improvement in bus routes and numbers and types of buses to make getting from A to B easier.
- Actions to deter car use, for instance charging a fee for transiting, using and parking in the city centre.
- Charges for use of vehicles that are not ultra-low emission compliant.
- Residents-only zones with ANPR enforcement.

## **Health and wellbeing**

### **Management of provision**

St Albans city centre is already densely populated and becoming more so. The plan says that SADC will continue to support "proposals that protect or enhance the amenity and wellbeing of existing and new residents in the city centre" (TCR7). But the draft LP makes no reference to SADC's strategy and plan for provision and monitoring of what's needed here. Is the expectation that others will provide for the wellbeing of city centre residents? At the very least we would expect

the draft LP to say what SADC will deliver and state how it is working with the Integrated Care Board to manage provision.

### **Permitted development and local infrastructure**

Much city centre growth has arisen from offices being converted to flats through permitted development rights. As a result, facilities in the city centre have not been enhanced through Section 106 funds and are under pressure.

Preserving and enhancing the quality of life and amenity of residents should be a primary consideration in all planning decisions. With that in mind we would wish to see Chapters 4 [Housing] and Chapter 8 [Transport] strengthened by the inclusion of policies to prevent either new development or inappropriate adaptations putting strain on infrastructure and resources and having negative impact on the character of the surrounding area.

TCR5 says that both residential amenity and the vibrancy of the wide mix of uses need to continue to be balanced and development that would cause significant harm to residential amenity will not be supported. The daytime and night-time hospitality industry is important to the prosperity of the city. But the “avoidance of significant harm” is a weak aim in the context of promoting the health and wellbeing of city centre residents. We would like to see more structured policies aimed at achieving that balance.

### **Piecemeal development**

Re TCR7, point F states "supporting proposals that protect or enhance the amenity and wellbeing of existing and new residents in the city centre". We are concerned that with no system in place for managing the aggregate impact, and no plans for one, protection and enhancement are unlikely to be delivered.

### **Major developments**

As well as piecemeal developments, major build area impacts need better consideration as part of the planning process. The Verulam Estate in the unparished part of St Albans is an example of a development built with no GP surgeries, no dental surgeries and without adequate public transport provision or other safe and sustainable travel and movement options. As such it is parasitic on resources elsewhere and residents are reliant on using cars to get there. This is not a good model.

### **Public spaces**

Air quality and heat mitigation in summer are of primary importance to city residents. We have a relatively elderly population and access to open space is important. We need more drinking water stations, more green spaces in the city centre, more tree cover, and more shaded spaces to mitigate the impact of climate change. We also need more public toilets (in some parts of the city centre any public toilets would be an improvement).

The plan should specify a tree canopy target, expressed as a percentage increase on the current level.

## **Environment**

### **Improvements to existing housing stock**

CCRA is pleased to see the draft LP's Climate Change and Spatial Strategy (low carbon) objective. We note there is a commitment to supporting solar power (CE2) but no proposals to define planning policy with respect to solar panels in Conservation Areas or in Article 4 areas. One possible change would be to declare a presumption of “public benefit” in assessing carbon reduction proposals. This would avoid the current impasse that solar panels in an Article 4 area may be assessed as doing little harm to the street scene but are considered to provide no public benefits to offset even that little harm, so will in many cases be refused planning permission.

The plan is lacking in guidance to individuals on house adaptations that both require planning permission and can help combat the climate emergency by through actions to limit energy and fossil fuel usage. There is a need for greater clarity, urgency and ambition around the use of alternative energy / solar panels, and general retrofitting of older properties. This applies to the conservation area and the Article 4 areas where national permitted development rights have been withdrawn and no guidance issued. Examples include:

- Solar PV panels.
- Air and ground source heat pumps
- Kerbside EV charging
- Increasing insulation, including use of secondary glazing

### **Biodiversity**

The draft LP states a target increase of 10% in biodiversity on new developments. The national target is a 10% increase by 2030. There are existing sites where increasing biodiversity will be difficult. Roads, car parks and existing buildings are all difficult or expensive to change to increase biodiversity.

New developments are an obvious area to help pull the overall average up. So why are new developments not aiming for a higher biodiversity target (say 30%?)

There seems to be nothing in the draft LP to target increases in biodiversity in the council-owned areas listed in chapter 10 (Parks, allotments, golf courses etc). Should there not be a target percentage increase of above 10% in these areas in order to support the overall target.

Overall, can we see an overall plan to support the national 10% target increase in biodiversity. But also, should we not be aiming to exceed the national targets in this area?

### **Waste management**

There is only general mention of the issue of refuse and rubbish collection. Rationalisation of bin/waste storage is mentioned in the draft LP (TCR6) but there is no reference to a plan or proposals for managing waste disposal in a way that avoids clutter in city centre alleyways or in densely packed inner-city streets.

We would welcome a more inventive focus on solving the rubbish issues within the city centre. Increasing numbers now live very close to the city centre and there is a growing emphasis on the visitor economy. Our parks, main streets and alleyways are disfigured with an overwhelming number of large bins, with many shops and businesses signed up to a range of different refuse contracts with multiple refuse corporations. We urge SADC to adopt a policy that establishes a more effective rubbish collection strategy, one that requires businesses to be part of an overarching strategy that allows for regular daily collections thereby removing the need for the inappropriate numbers of bins cluttering and disfiguring our streets. This has been achieved elsewhere, for example in the preferred supplier scheme adopted successfully in Bond Street <https://content.tfl.gov.uk/bondstreetcasestudynew.pdf>.

Additionally there is no mention of controls to address the ongoing problem of litter beyond St Peter's Street and the associated central area.

Central areas are cleaned very frequently but late-night fast food takeaway rubbish is not cleared until early the next day and attracts vermin.

### **Car ownership and use and EV charging**

The draft LP should require provision of facilities and services which enable a target percentage reduction of car ownership / use.

Household kerbside EV charging arrangement limitations remain across all areas and, for houses without off-street parking, there is no system or approved suppliers for provision of EV cable

channels across footpaths. This is preventing individuals moving easily to EVs. Hertfordshire County Council (HCC) has the remit for this area in the same way as it covers dropped kerbs. The LP team should press for what's needed to ensure SADC can deliver against its Climate Change and Spatial Strategy objective.

We think the draft LP should make it a policy that EV points are a requirement for all retrofitting where it makes sense to do so and should be compulsory for all new builds, subject to site-specific safety requirements.

The Local Plan should set an overall target for the percentage of homes in the district to have EV charge points or the number of cars adequately served by the charging infrastructure.

### **Solar panel targets**

There are no specific guidelines around use of photovoltaic (PV) systems on new builds and extensions. As part of the design, the optimum number and location of solar panels and batteries and the estimated percentage contribution to the predicted energy usage could be specified and the draft LP could cover this. In other areas of the country vagueness in this area has resulted in the fitting of token PV panels of minimal usefulness.

Guidelines for retrofitting PV systems to the existing housing stock are also needed.

### **Trees**

The plan says that one tree should be provided for each new dwelling. The national plan is to plant circa 30m trees a year or 900m by 2050. That is 15 per person in the UK. One tree per dwelling of say 3 people is 1/3 per person. Can we revisit this figure? Why is it not two or more per average dwelling with an overall aim to make St Albans a green city making a significant contribution to the national tree planting target?

SADC is now struggling to find space for tree planting on council-owned land. There is a clear opportunity to identify locations for trees on developer-owned land.

This target number on new developments obviously needs to vary depending on the property size in each development. It could be that associated with each development there may need to be tree lined paths, avenues, or small planting groups if property gardens are not of suitable size.

We would be interested in the fit between the St Albans strategic tree planting plan and the targets in the draft LP.

### **Groundwater and drainage**

The draft LP should specify that driveways and off-street parking spaces at new homes and homes that are being extended should be porous and that drainage systems on developer-provided roads must either be handed over to the highways authority or have a fully funded maintenance scheme.

### **Food production**

Developments that promote local food production or use energy-efficient distribution systems for food and consumables should be supported.

## **Economy and employment**

### **City centre balance**

CCRA's focus on the economy and employment is in and around the city centre. We welcome a busy environment and a thriving range of town centre activities, including retail, heritage, cultural and entertainment uses but note that this needs to be balanced against the needs of residents who are themselves primary customers for all the city has to offer. We need policies that meet the reasonable needs of residents. This includes management of late-night licences and noise from late night events.



## **Services & infrastructure**

### **Cultural strategy**

The plan makes numerous passing references to enhancing the cultural offer. It mentions improving cultural facilities (SP6, TCR5), retaining existing cultural and entertainment facilities (TCR5) and delivering a cultural cluster (TCR5). But we can't find an intention to produce / tie in a cultural strategy for the district with the aim of enhancing, and not merely maintaining, cultural facilities.

### **Public Houses**

We support COM4 – Public Houses.

### **Broadband**

We support UIN1 – Broadband.

### **Provision of health facilities**

We believe that health facilities should be close at hand / easily accessible for all. There may be sufficient provision across the District as a whole, but it is too concentrated in some areas to the detriment of those living elsewhere. This has an impact on transport (both public transport and car use) as well as on the well-being of residents.

We think the draft LP should mention working with Integrated Care Boards to achieve better planning and communication around alternative ways for patients with no local GP surgery to access medical care. This might include online consultations; grouping of in-person appointments by area to enable shared/demand responsive transport; provision of mobile clinics to visit outlying communities and bases for peripatetic workers such as intermediate care teams and Admiral Nurses to park and do hot-desking.

**Submitted by the Central St Albans Combined Residents' Associations**

**21<sup>st</sup> September 2023**