

By email only

28 October 2024

St Albans Draft Local Plan 2041 Regulation 19 – Consultation Response

Thank you for the opportunity to comment on the Regulation 19 publication version of the St Albans Draft Local Plan 2041. Our comments generally relate to elements of the Plan that are likely to have cross boundary implications.

The St Albans draft Local Plan sets a target of 14,603 new homes or 885 dwellings per annum (for the period 1 October 2024 to 31 March 2041). This figure is based on the current standard method for assessing housing need. Under the draft consultation NPPF 2024, the standard methodology is proposed to change and the new housing target for St Albans is likely to rise to 1,544 dwellings per annum (above the 200-home threshold in the proposed transitional arrangements). St Albans should consider how they might accommodate this additional growth.

Draft Policy COM1 (Education) states that major development will be required to make appropriate provision for new schools and the Plan makes provision for Secondary Schools (e.g. at East of Hemel Hempstead, St Albans and London Colney). We note that a growth of around 1,427 new dwellings is proposed in Harpenden, but no provision is made for a new secondary school there. Residents in Kimpton and Blackmore End in North Herts currently rely on Secondary School provision in Harpenden. Therefore, we are concerned that the additional growth proposed in Harpenden may lead to under provision in secondary school places for North Herts residents. Clarification of this point would be appreciated.

The northeast Harpenden site (B2) allocation for 738 homes would benefit from the inclusion of a requirement to provide support for bus provision in the rural area north-east of Harpenden to offset car trips generated by the new development. This would help reduce traffic in Harpenden and also benefit local villages such as Kimpton and Blackmore End in North Herts.

The Council should consider the cumulative impacts of Local Plan allocations, North Herts sites (east of Luton and Codicote) and the expansion of Luton Airport (both the consented expansion to 19mppa and the to-be-decided expansion to 32mppa) on traffic through the villages within the rural area east of the A1081, north of the A1057, west of the A1(M) and south of the A505. This area has poor transport provision for all modes.

We look forward to meeting with you to discuss matters relating to the Reg 19 publication version of the St Albans Draft Local Plan in due course.

Should you have any questions, please do not hesitate to contact us.

Yours sincerely

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