

REPORT TO NMPC SEPTEMBER 2023

ST ALBANS CITY & DISTRICT DRAFT LOCAL PLAN 2041

– REGULATION 18 PUBLIC CONSULTATION



This report is prepared for review by Nash Mills Parish Council to highlight the key factors which may impact Nash Mills if the St Albans draft local plan proposed within the consultation is implemented.

WHAT IS REGULATION 18?

Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 is defined as follows:

18.— (1) A local planning authority must—

(a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and

(b) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.

(2) The bodies or persons referred to in paragraph (1) are—

(a) such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan;

(b) such of the general consultation bodies as the local planning authority consider appropriate; and

(c) such residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations.

(3) In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1).

PROPOSED DEVELOPMENT ADJACENT TO NASH MILLS

The land to the North-East of Nash Mills which borders the parish of Nash Mills forms part of St Albans District.



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The draft plan proposes to achieve 30% of new residential growth in St Albans as part of Hemel Garden Communities (HGC) – an extension to Hemel Hempstead. Part of HGC, if approved, would cover the land between Nash Mills and the M1 motorway.

As parts of HGC are within Hemel Hempstead, for it to progress Dacorum’s Local Plan will also need to be approved, together with the combined plan of the HGC organisation.

The map diagrams within the plan document suggest an extension of Bunkers Park beyond Bedmond Road – as shown in this subset of the map. However, this is not explicitly stated.

Below is an extract from the list of Broad Locations in the plan’s Table 3.1 and shows the proposal for a total of 5,500 dwellings for St Albans, together with provision of employment land, schools etc. This is half of the total 11,000 dwellings envisaged for Hemel Garden Communities.

Broad Locations are identified as large urban extensions of 250 or more homes or strategic scale employment.

Broad Locations	Minimum Capacity	Main land uses
North Hemel Hempstead	1,500 dwellings (including 250 beyond Plan period)	Mixed use, residential, 3FE primary school, green infrastructure, transport infrastructure and other community infrastructure
East Hemel Hempstead (North)	1,600 dwellings (Including 265 beyond Plan period)	Mixed use, residential, 3FE primary school, 8FE secondary school, green infrastructure, transport infrastructure, other community infrastructure and a significant new country park
East Hemel Hempstead (Central)	55 Ha employment provision	Principally employment with related infrastructure, including transport and energy generation.
East Hemel Hempstead (South)	2,400 dwellings (including 235 beyond Plan period)	Mixed use, residential, 3FE and 2FE primary schools, green infrastructure, transport infrastructure and other community infrastructure

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HGC has a number of “Place Principals”.

LG3 - Hemel Garden Communities Place Principles

Proposals must have Masterplans and Design Codes agreed with the Council before developing detailed designs. The approach taken in Masterplans and Design Codes should be in accordance with the District’s Strategic Sites Design Guidance¹³. There will be a Masterplanned approach to development with appropriate input from the Council, local communities, landowners and other stakeholders.

To enable the transformation of Hemel Hempstead, the design and delivery of development through Hemel Garden Communities is required to adhere to the following place shaping principles:

As part of these principals, there are 4 pillars.

- Pillar 1 “Green Network” includes “Suitable Alternative Natural Green Space (SANG) delivery” and would seem to be supported by the implied extension of Bunkers Park beyond Bedmond Road.

- This is further supported by the consultation’s Chapter 10 – “Natural Environment and Biodiversity” which includes:

10.11 An assessment of the Chiltern Beechwoods Special Area of Conservation (SAC) by Dacorum Borough Council in 2022 revealed that more action is needed to help protect Ashridge Estate on the Hertfordshire-Buckinghamshire border, and Tring Woodlands, which are under increasing visitor pressure from the surrounding areas. If nothing is done, new development will lead to further visitor pressures and damage to the integrity of the SAC. A buffer Zone of Influence of 12.6km around this covers part of St Albans District, and the Council is legally required not to issue decisions within this buffer until appropriate mitigation is secured through a Mitigation Strategy. A key element in the Mitigation Strategy will be the identification and/ or creation of Suitable Alternative Natural Greenspace (SANG) to draw people away from using the SAC.

- And by the Strategic Policy SP10 – “Natural Environment and Biodiversity” which includes:

f) Make appropriate contributions towards the Strategic Access Management and Monitoring Strategy (SAMMS), where the proposal is for additional housing within the Chilterns Beechwoods Special Area of Conservation (CBSAC) Zone of Influence (ZOI). Such development proposals will also need to make provision for a new Suitable Alternative Natural Greenspace (SANG), or alternatively contribute towards the maintenance of a suitable SANG project elsewhere.

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- Pillar 4 “Engaged Communities” includes:

Engagement of existing communities and parishes in design and delivery of the site to inform a Masterplanned approach with appropriate input from the councils, landowners and other stakeholders;

NMPC would therefore expect to be consulted on the detail of future plans by HGC , St Albans District and Dacorum Borough councils.

The principal of future consultation is further supported by Chapter 14 “Implementation” of the St Albans plan which states:

14.1 A key test for the Local Plan at Examination in Public is that it must be shown to be effective, meaning that it should be deliverable over the Plan period, and based on effective joint working on cross-boundary strategic matters

HEALTHCARE

The draft plan refers to healthcare provision.

7.5 Hertfordshire and West Essex Integrated Care Board are currently working with Hertfordshire County Council and local NHS organisations to consider the effective delivery of current and future health and social care provision. The District has one main NHS hospital at St Albans City Hospital operated by West Herts Hospital Trust (WHHT). There is also the Kingsley Green mental health and learning disability site, which opened in 2014 and is operated by Hertfordshire Partnership Foundation Trust (HPFT). A limited number of services are also provided at Harpenden Memorial Hospital. Existing provision also includes community health facilities, GP surgeries, dentists and chemists.

It does not go into the detail of the proposed reorganisation of the limited service provision by WHHT at St Albans City Hospital, nor the proposed redevelopment of wider and acute services at Watford General Hospital which would need to cater for the residents of 11,000 additional dwellings in HGC.

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IMPACT ON NASH MILLS

Such a massive increase in population could be expected to lead to a significant increase in the traffic on Bunkers Lane, also to the use of Bunkers Park.

Plans to extend Bunkers Park are positive.

St Albans District Council scheduled an exhibition on 8th September in conjunction with the Leverstock Green Village Association (LGVA) which NMPC publicised via Facebook for any interested residents.

The Nash Mills Parish residents in Woodfield Drive and at the North-East end of Bunkers Lane could be expected to join in representations being made by the LGVA as they may well be more most affected by the proposals.

HGC would have a major impact on medical service provision and re-poses the question whether the Watford General Hospital redevelopment in its current location best serves the potential increase in population in the WHHT area.

SUMMARY

Nash Mills Parish Council is unlikely to have any tangible impact on the principals of the proposed local plan, nor the principal of Hemel Garden Communities. It can however expect to be consulted at the relevant stages.

In response to the consultation NMPC should consider:

- welcoming an extension to Bunkers Park as part of SANG (Suitable Alternative Natural Green Space) whilst noting that the increased usage would exacerbate the need for an increase in parking provision.
- making representation for width restrictions on Bunkers Lane.
- stating that it looks forward to future consultation on the details of the proposed St Albans local plan as it affects land bordering Nash Mills.
- recommending an impact assessment of the St Albans (and Dacorum) revised local plans on the WHHT hospital redevelopment plans.

NMPC may also wish to consider separate representation to its County Councillor for the implementation of width restrictions on Bunkers Lane in the medium term.

NMPC's involvement with the Friends of Bunkers Park should also provide further representation as plans develop in the future.

Cllr Alan Briggs
Lead Councillor Planning
17/8/2023