

Appendix 7:

Statutory Consultee responses



PLANNING & BUILDING CONTROL

Tracy Harvey - Head of Planning & Building Control

My ref: 5/2017/2733

Please ask for: Sarah Smith

Telephone: 01727 866100

E-mail: sarah.smith@stalbans.gov.uk

Date: 2 January 2018

Mr Chay Dempster
Spatial Planning and Economy Unit
Postal Point CHN216
County Hall
Hertford
Herts
SG13 8DN

By email

Dear Mr Dempster,

TOWN AND COUNTRY PLANNING ACT 1990

Land to the north of Lower Luton Road, Harpenden, Hertfordshire

Proposed development: application for the construction of new 6 FE school buildings, vehicular access/egress onto the Lower Luton Road, vehicular access onto Common Lane, two pedestrian accesses/egresses onto Common Lane, car parking, cycle storage, coach parking, playing fields, tennis courts / multi-use games area, surface water attenuation measures, hard and soft landscaping and other associated development

I write further to your email of the 15th December 2017 with additional information and further to our comments of the 28th November 2017.

This application was discussed by Cabinet on the 21st December 2017.

Whilst the Council welcomes the application in principle, specific concerns have been raised, as set out below and Hertfordshire County Council as decision maker are requested to ensure that these matters are addressed along with those set out in my letter dated 28th November 2017 prior to a decision being made.

- There is concern about the safety of the Lower Luton Road and that this road has been designated a safe route for children to access school on foot or by cycle.
- The amount of parking proposed is not considered to be adequate for staff and it is not clear how staff would safely access the school and that displaced parking would cause congestion.
- Continued concerns about the Travel Plan and the proposed parking and drop off arrangements at the site causing congestion and delays during drop off.
- Request that sixth formers enter a home / school contract to prevent parking on the school site or in local roads, causing congestion.

Yours sincerely,

Tracy Harvey
Head of Planning & Building Control

Historic St Albans District: a premier community

St Albans City & District Council District Council Offices, St Peter's Street, St Albans, Herts AL1 3JE

Tel: 01727 866100



Textphone: 01727 819570

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PLANNING & BUILDING CONTROL
Tracy Harvey Head of Planning & Building Control

Mr Chay Dempster
Hertfordshire County Council
Spatial Planning And Economy Unit
CHN216 County Hall
Hertford
SG13 8DN

Our Ref: 5/17/2733
Case Officer: Sarah Smith
E-mail: planning@stalbens.gov.uk
Date: 28 November, 2017
Your ref: SLUP/CC0798 PL\0886\17

Dear Sir/Madam,

TOWN AND COUNTRY PLANNING ACT 1990

Land At Junction Of Lower Luton Road And Common Lane Harpenden Hertfordshire

CONSULTATION ONLY: Proposed application for the construction of new 6 FE school buildings, vehicular access/egress onto the Lower Luton Road, vehicular access onto Common Lane, two pedestrian accesses/egresses onto Common Lane, car parking, cycle storage, coach parking, playing fields, tennis courts / multi-use games area, surface water attenuation measures, hard and soft landscaping and other associated development

The above proposal was considered at the Council's Planning Referral Committee of 27th November 2017, where it was resolved that St Albans City and District Council recommend to Hertfordshire County Council as the decision maker that prior to making a decision they satisfy themselves that the case for very special circumstances overcomes the in principle and any actual harm, namely:

- The site has been identified as containing matters of potentially nationally significant archaeological interests. Whilst the majority of the site has areas of archaeological interest that can be dealt with by condition there is a section of the site which contains burials which may be of national significance and a suitable methodology for protecting these remains needs to be established, either through protecting the remains by burying them, or excavating the site prior to granting permission.
- The applicant has not used appropriate methodology to demonstrate that the impact upon the ecology of the site is acceptable, and further information should be sought in this respect.
- Consideration as to whether all of the sports facilities are essential to the provision of the school and whether a portion of the site could be retained for agricultural purposes thereby minimising the amount of land that is lost from agricultural purposes.
- To assess whether the proposed technical details of the access are acceptable and will result in a safe and functional highway network. It is requested that the provision of the access, visibility splays and road improvements are secured by condition
- The following matters are secured via a legal agreement:

- a) School Travel Plan for pupils and staff
- b) Improvements to bus network, including frequency of services and service routes
- c) Wider sustainable access improvements including concern is raised that the currently inaccessible ford at the end of Crabtree lane is shown as a 20mph zone. Offsite works should be secured by a legal agreement, with a timetable for implementation. It would be expected that these works are in place as soon as possible, ideally before the second year of year 7 entry in 2019.
- d) Establishing whether any community use of the school facilities can be secured by way of a legal agreement
- e) Future maintenance of the surface water drainage strategy.

Furthermore the proposal comprises Green Belt development which by reason of having greater than 1000sqm of floor space, together with its scale, nature and location would have a significant impact on the openness of the Green Belt and as such under The Town and Country Planning (Consultation) (England) Direction 2009 the decision maker, should refer this application to the Secretary of State for consideration as to whether it should be 'called in' for a decision by the Secretary of State.

If the County Council are minded to grant planning permission they are invited to attach the following conditions

1. The development hereby permitted shall be begun before the expiration of 3 years from the date of this permission.
REASON To comply with the requirements of Section 91 of the Town and Country Planning Act 1990.

2. No development shall take place until samples of the materials to be used in the construction of the external surfaces of the development hereby permitted have been submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details.
REASON To ensure that the finished appearance of the development is satisfactory. To comply with Policies 69 and 85 of the St. Albans District Local Plan Review 1994 and The National Planning Policy Framework 2012.

3. No development shall take place until there has been submitted to and approved in writing by the Local Planning Authority a plan indicating the positions, design, materials and type of boundary treatment to be erected. The boundary treatment shall be completed before (a) the use hereby permitted is commenced (b) before the building(s) is/are occupied or (c) in accordance with a timetable agreed in writing with the Local Planning Authority. Development shall be carried out in accordance with the approved details. REASON In the interests of visual amenity. To comply with Policy 70 of the St. Albans District Local Plan Review 1994 and The National Planning Policy Framework 2012.

4. Prior to the commencement of the development hereby permitted, details of all materials to be used for hard surfaced areas within the site including roads, driveways and car parking area shall be submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the details so approved.
REASON To ensure that the development does not detract from the appearance of the locality. To comply with Policies 69, 70 and 85 of the St. Albans District Local Plan Review 1994 and The National Planning Policy Framework 2012.

5. Details of the proposed finished floor levels of all buildings and the finished ground levels of surrounding property, including the finished relationship with the adjacent buildings shall be submitted to and approved in writing by the Local Planning Authority before any work commences.
REASON To ensure that construction is carried out at a suitable level having regard to drainage, access, the appearance of the development and the amenities of neighbouring occupiers, in

compliance with Policy 69 of the St. Albans District Local Plan Review 1994 and The National Planning Policy Framework 2012.

6. Prior to the commencement of development details of screened facilities for the storage of refuse shall be submitted to and approved in writing by the Local Planning Authority. The refuse area shall remain thereafter and shall not be used for any other purpose.

REASON To ensure a satisfactory appearance and standard of environment. To comply with Policy 70 of the St. Albans District Local Plan Review 1994 and The National Planning Policy Framework 2012.

7. No external loudspeaker systems shall be installed without the prior approval in writing of the Local Planning Authority.

REASON In the interests of the amenity of nearby properties. To comply with Policy 9 of the St. Albans District Local Plan Review 1994 and The National Planning Policy Framework 2012.

8. This permission does not extend to the installation of external lighting. A scheme for such works shall be submitted to and approved in writing by the Local Planning Authority, before the development hereby approved is commenced.

REASON In the interests of amenity and highway safety.

9. No plant or machinery shall be operated on the premises before 7am on weekdays and 9am on Saturdays nor after 6pm on weekdays and 1pm on Saturdays, nor at any time on Sundays or Bank Holidays.

REASON In the interests of the amenity of nearby residential properties. To comply with Policy 82 of the St. Albans District Local Plan Review 1994 and The National Planning Policy Framework 2012.

10. Construction work shall not begin until a scheme for protecting the proposed development from noise has been submitted to and approved in writing by the Local Planning Authority. All works which form part of the scheme shall be completed before any part of the development is occupied.

REASON In the interests of the amenity of nearby residential properties. To comply with Policies 9 and 82 of the St. Albans District Local Plan Review 1994 and The National Planning Policy Framework 2012.

11. Prior the commencement of development a phasing plan for the construction and occupation of the site, shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the scheme shall be constructed in accordance with the approved details.

REASON In the interests of highway safety.

12. Phase 1 of the development shall not be occupied until the car parking and turning areas for phase 1 accessed from Common Lane shown on the approved plan have been constructed, surfaced and permanently marked out. The car parking and turning areas so provided shall be maintained as a permanent ancillary to the development and shall be used for no other purpose at any time. Phase 2 of the development shall not be occupied until the remainder of the car parking shown The car parking and turning areas so provided shall be maintained as a permanent ancillary to the development and shall be used for no other purpose at any time.

REASON To ensure adequate parking provision at all times so that the development does not prejudice the free flow of traffic or the conditions of general safety along the adjacent highway, or the amenities and convenience of existing local residents. To comply with Policies 34 and 39 of the St. Albans District Local Plan Review 1994 and The National Planning Policy Framework 2012.

13. The development shall not be brought into use until the proposed vehicle and pedestrian access(es) have been constructed to the specification of the Highway Authority and the Local Planning Authority's satisfaction.

REASON To ensure that the access is constructed to the current Highway Authority's specification as required by the Local Planning Authority in accordance with Policy 34 of the St. Albans District Local Plan Review 1994 and The National Planning Policy Framework 2012.

14. No development shall take place until details of both hard and soft landscape works have been submitted to and approved in writing by the Local Planning Authority and these works shall be carried out as approved. These details shall include (a) proposed finished levels and contours; (b) means of enclosure; (c) car parking layouts; (d) other vehicles and pedestrian access and circulation areas; (e) hard surfacing materials; (f) minor artefacts and structures (e.g. furniture, play equipment, refuse or other storage units, signs, lighting etc); (g) proposed and existing functional services above and below ground (e.g. drainage, power, communications cables, pipelines etc, indicating lines manholes, supports etc.); (h) retained historic landscape features and proposals for restoration where relevant; (i) existing trees to be retained; (j) existing hedgerows to be retained.

REASON To ensure satisfactory landscape treatment of the site in the interests of visual amenity. To comply with Policy 74 of the St. Albans District Local Plan Review 1994 and The National Planning Policy Framework 2012.

15. A landscape management plan indicating long term design objectives, management responsibilities and maintenance schedules for all landscape areas, shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of the development or any phase of the development whichever is the sooner for its permitted use. The landscape management plan shall be carried out as approved.

REASON To ensure satisfactory landscape treatment of the site in the interests of visual amenity. To comply Policy 74 of the St. Albans Local Plan Review 1994.

16. No development shall take place until a schedule of landscape maintenance for a minimum period of five years has been submitted to and approved in writing by the Local Planning Authority. The schedule shall include details of the arrangements for its implementation. Development shall be carried out in accordance with the approved schedule.

REASON To ensure satisfactory landscape treatment of the site in the interests of visual amenity. To comply with Policy 74 of the St. Albans District Local Plan Review 1994 and The National Planning Policy Framework 2012.

17. If within a period of five years from the date of the planting of any tree or plant, that tree or plant, or any tree or plant planted in replacement for it is removed, uprooted or destroyed or dies or becomes seriously damaged or defective, another tree or plant of the same species and size as that originally planted shall be planted at the same place, unless otherwise the Local Planning Authority gives its written consent to any variation. The tree or plant shall be planted within three months of felling/dying or if this period does not fall within the planting season by 31 January next.

REASON To ensure satisfactory landscape treatment of the site in the interests of visual amenity. To comply with Policy 74 of the St. Albans District Local Plan Review 1994 and The National Planning Policy Framework 2012.

18. The presence of any contamination not previously identified that becomes evident during the development of the site shall be brought to the attention of the Local Planning Authority. An intrusive investigation will not necessarily capture all contaminants present; hence there is a need to keep a watching brief and to appropriately address any new sources discovered during excavation and development. No further development shall take place unless otherwise agreed in writing with the LPA.

REASON To ensure that adequate protection of human health is maintained and the quality of groundwater is protected. To comply with Policy 84 of the St. Albans District Local Plan Review 1994.

19. If piling is considered the most appropriate method of foundation construction, prior to commencement of development, a method statement detailing the type of piling and noise emissions, shall be submitted to and approved in writing by the Local Planning Authority. All piling works shall be carried out in accordance with the agreed details.

REASON In the interests of the amenities of residents of neighbouring properties. To comply with Policy 70 of the St. Albans District Local Plan Review 1994.

20. Prior to the commencement of the catering use hereby permitted a scheme for the ventilation of the premises, including the extraction and filtration of cooking fumes shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out prior

to the commencement of the use hereby permitted. The applicants attention is drawn to the document entitled 'Guidance on the Control of Odour and Noise from Commercial Kitchen Exhaust Systems', prepared by Netcen on behalf of the Department for Environment, Food and Rural Affairs (Defra).

REASON To safeguard the amenities of those premises nearby the application site and the appearance of the building as a whole. To comply with Policy 9 of the St. Albans District Local Plan Review 1994.

21. The development shall be carried out in accordance with the approved Flood Risk Assessment and maintained thereafter in accordance with the approved details.
In order to ensure that surface water is adequately dealt with.

Please note that copies of all neighbour comments sent to us will be forwarded to you separately for your action.

Yours faithfully

A handwritten signature in black ink, appearing to read 'TH', followed by a long horizontal line extending to the right.

Tracy Harvey
Head of Planning & Building Control

Sue Atkinson

From: Carl Cheevers <Carl.Cheevers@harpenden.gov.uk>
Sent: 29 November 2017 09:49
To: Spatial Planning
Subject: Harpenden Town Council response to Planning Application PL\0866\17

Importance: High

Dear Chay

Harpenden Town Council discussed our response to the KWS Planning Application at our Council meeting on Monday 27 November 2017.

At this meeting Council resolved to:

Support the application, however express concern that this development will have a negative impact on the surrounding road network.

Harpenden Town Council would request that additional mitigating measures are put in place for transport infrastructure. In particular, the site requires a proper turning circle for vehicles entering it and additional parking spaces provided on site to cater for staff and visitors to limit the number of vehicles parking on adjoining roads.

In addition, the Council would request that a condition is put in place for future use of floodlights. This should set out the permitted hours of operation.

Please could you confirm receipt of this response.

Kind Regards

Carl

Carl Cheevers
Town Clerk
Harpenden Town Council

Tel: 01582 463669
Email: carl.cheevers@harpenden.gov.uk
www.harpenden.gov.uk

Wheathampstead Parish Council response to the Katherine Warrington School Planning Application Lodged by Hertfordshire County Council

1.0 Site Search and History

The Design and Access Statement for the school, written by Vincent and Gorbing outlines the history of the site selection for the school. Wheathampstead Parish Council has always had serious reservations about the methodology of site selection and the ultimate choice of this site. We still consider that the topography of the site to be poorly suited to the development of a large school and we consider that this proposal will cause significant harm both to the Green Belt that adjoins Wheathampstead Parish and to the immediate road network. However, we appreciate that there is a need to address the lack of school places for village children, both now and in the future and that this is the only current proposal for a secondary school for students from Harpenden and Wheathampstead. We also note that the vast majority of children from Wheathampstead will be allocated Katherine Warrington School and that in some ways it represents a loss of 'choice' for village children. Equally, it also presents an opportunity for village children to remain together and for the school to be a community asset which benefits all residents of the village both in terms of school and leisure/sporting facilities.

Our comments in relation to the planning application focus on these areas of greatest concern to us, and we ask that both Hertfordshire County Council and St Albans District Council listen to and act upon our legitimate planning concerns if this proposal is to proceed.

2.0 Topography

There is a 38.12m level change across the site from the highest part in the north-east to the lowest part in the south west. We support the decision to locate the school buildings in the most logical place: the lowest south west corner. However, we are concerned by the significant degree of land reforming that is proposed and the volume of soil that will be pushed up to the north-eastern part of the site. The area is one of "high landscape sensitivity" (Design and Access para. 3.35). The significant land reforming, which involves cut and fill activity to create level areas, will result in the ground to the north east of the site increasing in height by up to six metres. We think that significant 'reforming' of the landscape will also occur as a result of accessing the site from the Lower Luton Road. This will completely change the nature of the site, therefore destroying the gentle natural rural transition from rural landscape to the edge of the urban settlement.

We are also concerned about the visual impact of the 2-3m high gabion wall, proposed as part of the athletics track, as it will be highly visible and urbanising. However, we also recognise that it is the least worst option for retaining soil and that, if done well, it can provide wildlife habitat potential.

3.0 Lighting on Site

We have looked at the lighting plans proposed for the site and the design is relatively low key and appropriate for the rural setting. However, we are concerned that it only appears to cover utility lighting for the driveway, parking and pedestrianised areas of the school site. There is no indication of the requirements for sports lighting, although we know that sport pitch flood lighting will be requirement for use either by the school or by the community. Plans for the school indicate the location of sports facilities but not the detail of floodlighting. Invariably the 400m athletics track, which is noted as 'dark', will require floodlighting to be both accessed and used. This point potentially applies to access to the football pitches in the north-east corner of the site, as well as the tennis courts, MUGA court and sports centre which are closer to the school buildings.

The lack of indication of floodlighting is at odds with St Albans District Council policies on the same. Policy 80 states "planning applications including floodlighting will not be granted where the visual impact of floodlighting columns, intensity of lighting or glare would detract from the visual amenity of residential properties, rural areas or listed building and conservation areas; the provision of floodlighting would enable undue intensification or extension of a sports facility to the detriment of a residential area or character of rural area; and the presence of lighting would harm the ecology of an area."

We are concerned that the absence of any details of sports lighting is avoiding dealing with this aspect of planning at this stage. All lighting proposals for the present and future use and their impacts should be explicit within the planning application, particularly as this area is a sensitive Green Belt location where light pollution will be highly visible.

4.0 Green Belt—Design Choices

We recognise that our thoughts which we believe make it unsuitable for a school site, such as those regarding the topography of the site, its location in the Green Belt and transport issues, have not been considered in the past and the proposal has progressed. Our response is therefore limited to design issues in relation to its location in Green Belt, rather than the principle of whether development is appropriate in the first place. However, we remain concerned about coalescence between Harpenden (Batford) and Wheathampstead and that as a result of this development only one field held in multiple ownership (Property Spy owners) will separate Wheathampstead from Harpenden. It is for this reason that we want to ensure that no 'creeping urbanisation' of the parts of the site closest to Wheathampstead and Mackerye End is subsequently allowed. This would include ensuring that any structures, seating, pavilions and lighting in the 'rural' parts of the site are not allowed in future and also not associated with this planning application.

We support the decision to locate buildings in the lowest part of the site, closest to the urban edge of Batford. We also support attempts to keep the height of the building to two stories to minimise the adverse impact on the Green Belt. However, the choice of red brick (the predominant material in the urban area) as the principal hard landscaping material shows insufficient thought and appreciation of the history of the site as agricultural land and its continued location in the Green Belt. NPPF and Local Plan policies on good design and development in the Green Belt apply, including St Albans District Council Policy 1 Metropolitan Green Belt, which states "New development within the Green Belt shall integrate with the existing landscape; siting design and external appearance are particularly important and additional landscaping will normally be required."

The design of the proposed building, which includes the range and choice of landscaping materials for paths, surfaces and parking is urban and reflects an urban landscape, which is not consistent with the rural setting of this school. The external appearance of the building is bulky, and while bulky structures (steel or timber barns) are not unusual in rural settings, large red brick structures are not consistent with rural location. Policy 69 in the St Albans District Local Plan states that "Large isolated buildings in rural or settlement edge settings shall be clad in materials that take account of the general colour and tonal value of their background". Policy 104 of the St Albans Local Plan refers to the Landscape Conservation Areas and the school site is within a Landscape Conservation Area. This requires that any development must "pay regard to setting, siting, design and external appearance".

We believe that insufficient thought has been given to the choice and use of hard landscaping materials on the site and the layout closest to the school buildings. We also believe that the height of the sports centre is too high relative the height of the school buildings and is at odds with the overall desire to keep the school buildings as low and unobtrusive as possible.

The photographs used to inform the materials on the site are taken from the immediate urban surroundings in Batford, with no reference taken from agricultural structures in nearby Mackerye End or Wheathampstead. We believe that reference to rural agricultural buildings would create connection with the rural heritage of this site. In particular, dark timber cladding is a common feature of older agricultural buildings in this area which we suggest would be more in keeping than red brick and white render.

Many of the landscaping materials used on site also fail to take account of the connection that the site has with the countryside beyond. Flint filled gabions, self-binding gravel, bound gravel, post and wire fencing and timber bollards are excellent choices for natural or natural looking materials that connect with the rural nature of the site. However, concrete block paving, concrete flag paving, macadam, concrete seating cubes and walls and the seating, dining, cycle shelters and cycle hoops that are proposed are not choices that sit well in the location.

We would want to see 'buff coloured macadam' used and would prefer to see resin bound gravel used instead of concrete block paving. We like the use of self-binding gravel paths in some areas away from the school. We also think that loose gravel retained within a cedar gravel honeycomb is not a good choice as gravel will move and the honeycomb will become quickly exposed with wear. We would like to see a consistency of paved materials both in terms of colour (light coloured) and material (gravel/shingle). We would like to see seating/outdoor dining/shelters/bin storage etc choices that use natural materials i.e. wood that reflect the simplicity of the countryside, rather than steel, concrete and Perspex.

We think that the area in the centre of the school buildings is too urban and uses too many different materials to define areas. We would like to see more green spaces within this area, even if AstroTurf is used. We support thoughtful choices such as the inclusion of a herb garden, outdoor classroom and outdoor gym.

We would like to see the existing tree and hedge boundaries in all site locations strengthened and protected against future development. In particular, we would like to see many more trees planted on both existing hedge boundaries as well as tree planting to screen, where possible the building from the road and in other key locations. We note the tree choices in the landscaping plan but would like to see appropriate evergreen specimens included too, for example, *Pinus sylvestris*.

5.0 Flood Management

The Flood Risk Assessment (MLM Consulting Engineers Ltd) identifies that an informal watercourse runs along the western boundary of the site (Common Lane) which drains 129 hectares of surrounding rural and residential land. Buildings and hard surfaces will account for 13% of the 17.20 ha site (Design and Access para. 6.6) and we have some concerns about the impact of hard surfaces on flooding, particularly in the south-west corner of the site. We recognise that flood attenuation through a planted basin and swales are proposed for the south and south-west areas of the site. We also recognise that the hard landscaping proposals include fully permeable surfacing in many areas of the site, although it is not clear what percentage is permeable and impermeable. We are concerned that the Flood Risk Assessment identifies that there is a risk of flooding of local infrastructure (roads) if the local sewers/drains are overloaded with flood water or become blocked (para. 10.4 Infrastructure Flooding).

We are also concerned that the ongoing maintenance of the planted basin, swales, permeable surfaces and onsite drainage will be managed by others and we see no evidence of the long-term management plan suggested by MLM, which is important to the on-going effective drainage of the site. There is also insufficient information about how the sports pitches will be drained and the impact on the overall site.

Our concerns about drainage are principally about the impact upon the Lower

Luton Road, if the drainage proposals either do not work as planned, fail through incorrect maintenance or are subject to extreme weather (cloud burst). We recognise that drainage calculations have been adjusted for global warming, but we are concerned that a combination of circumstances could result in flooding on the heavily used Lower Luton Road.

6.0 Transport Network and School Transport

The transport logistics of the site location are by far the greatest concern of Wheathampstead Parish Council. Road safety along the heavily used Lower Luton Road teeters on the brink of traffic chaos at peak times. We are therefore concerned that if not extremely well managed, the impact of school buses, parental drop offs and large numbers of students trying to cross the Lower Luton Road and Common Lane all within a small window of time will cause both traffic chaos and significant risk of accidents.

Currently the route to school between Wheathampstead and Harpenden has been assessed as 'safe'. We do not consider the route to be safe, as the path is extremely narrow 60-75cm in places, traffic usage of the Lower Luton Road is extremely heavy at peak times and is also used by HGV's, buses, intercity coaches, cars and cyclists. The narrowness of the road and single path that runs alongside it in places means that it is not safe for travel on foot or by cycle to school. For example, when two large HGV's meet on the Lower Luton Road, one will frequently mount the pavement to ensure clearance when passing. We support the view in your transport analysis that neither walking nor cycling from Wheathampstead to the school is safe. The Lower Luton Road cannot be designated as a safe route to school.

We recognise that the proposed one-way configuration in and out of the site is probably the only viable option for traffic management around the site. However, we are very concerned about this configuration which we believe will affect the flow of traffic along the Lower Luton Road, increasing already bad congestion and increasing the risk of car/car and pedestrian/car accidents.

6.1 Risk of accidents using the Toucan pedestrian crossing

We are very concerned about the risk of shunting accidents caused either by the pedestrian crossing or by school coaches/cars turning into the school site from Wheathampstead. We consider that the entire road surface that adjoins the entire width of the school site should be surfaced in a different material to the usual roadway macadam to ensure cars/coaches/HGV's slow down at entry to this 'problem area'. This could reduce the risk of car shunting accidents and/or pedestrian injury. We are dismayed to see that there appears to be no evidence of speed survey of traffic on the Lower Luton Road, when the risks of traffic volume and traffic speed related accidents generated by this proposal are a concern for many.

6.2 Risk of accidents at Common Lane

Common Lane which adjoins the site is incorrectly described as "a two-way carriageway approximately 2.5km in length linking Lower Luton Road to Kimpton Bottom (B652)" (Design and Access para. 3.56) It is only a two-way road for a few hundred metres, the remainder is a single carriageway rural road with passing places. There have been numerous accidents at the Common Lane/Lower Luton Road junction in the past five years. The need to access the school site from either Common Lane (pedestrians/school staff cars/parents with cars) or Lower Luton Road (school coaches/parents with cars/pedestrians) will result in accidents unless the traffic management system is thoroughly and systematically worked out in advance of the school opening. We draw attention to the very real concern that increased traffic will compromise emergency vehicle access. Ambulances regularly attend the vicinity as it abuts the Lea Springs Residential Care Home.

6.3 Risk of accidents exiting the school site

Your Transport Audit identifies that the topography of the site will make access from the Lower Luton Road difficult. The 'in/out' access into site are further up the hill and while the layout appears to make sense when viewed as a flat plan, we are worried that the height of the site relative to the road has not been fully taken into account when assessing the traffic risks. Your own report highlights the problem of the poor visibility splay caused by level changes when leaving the site.

We are also concerned about the lighting in this location and feel that better quality lighting is needed along this stretch of the Lower Luton Road, including highly visible lighting at both entry/exit points into the site. We note the engineer has suggested in the Transport Audit that the visibility splays for the entrance/exit onto Lower Luton Road will require significant cutting back of the existing banking in order to facilitate visibility. We are concerned that this will affect the footpath that currently runs alongside the Lower Luton Road and that there is a lack of clarity about how the school entrance cuttings/ghost island and footpath will work with the current 1.5-2m level change from the road onto the green field site.

We do not agree with the assessment from the Education and Skills Funding Agency, that "analysis of road casualty data has not revealed any identifiable existing collision issues associated with the expected movements generated by the proposed development, therefore it is considered that there are no existing road safety issues pertinent to the development of the site". In fact, the evidence of the county council's own Transport Audit highlights accurate safety concerns and in the past five years a total of 18 collisions occurred in this location. This includes Lower Luton Road between the junctions with Castle Rise and Pickford Hill, and Common Lane. Most collisions took place in the spring and autumn months, times of the year when schools are also at their busiest.

19.6% (225) of the school's 1,150 students are expected to be travelling from

Wheathampstead. We believe that all students from Wheathampstead should be encouraged to use buses to travel to school. We consider that the pedestrian route to the school (Including cycling) from Wheathampstead is unsafe. We do not want to increase traffic volumes and associated accidents on the Lower Luton Road through increased car usage. We therefore suggest accessible bus transport between Wheathampstead and the school be made available, alongside extensive encouragement of parents and pupils to use dedicated school transport at peak times.

We reiterate our view that the current route to school is unsafe and as a result all children from Wheathampstead must be able to access statutory school transport funded by Herts County Council to Katherine Warrington School on the basis that the route is not safe. We also note that all figures for travel to school by bus assumed that 50% will travel by this mode. We would want all children from Wheathampstead to travel to school and return by bus, unless they are taking part in after school activities. Discounted use of public buses still amounts to hundreds of pounds per child each year and unless statutory school transport is implemented for Wheathampstead children, there will remain very high levels of parental cars trying to access the site or locations nearby for drop off and pick up.

We are very concerned about the volume of traffic that will result on Leasey Bridge Lane/Cherry Tree Lane as parents from Southdown attempt to access the school site from the other side of Harpenden. This narrow single-track road with passing places is already close to gridlock in the morning and is dangerous at both ends. Previous Herts County Council studies have highlighted the problems caused by too much traffic using this unsuitable road, but nothing is mentioned in this planning application and no solutions are proposed. We find this extremely disappointing.

We welcome improvements to existing walking/cycle paths between the proposed school to the Lea Valley Estate but we would also like to see a pedestrian crossing put in place near the junction of Marshall's Heath Lane and the Lower Luton Road. This would facilitate access across the road for cyclists from Gustard Wood/Blackmore End/Mackerye End who might then use the Nicky Line walking/cycle path to reach the school 'off road'.

This concludes our comments regarding the planning application.

**Wheathampstead Parish Council response to the Katherine Warrington
School Planning Application Lodged by Hertfordshire County Council
Addendum re archaeological remains**

Wheathampstead Parish Council is now aware of archaeological remains on this site including a locally rare rural cemetery. This burial site of potential national significance dates from the late 7th Century and is vulnerable to development and illicit activities such as night hawking. In the event of development being approved Wheathampstead Parish Council believe that excavation of this site is essential for the long term public benefit and for the acquisition of knowledge. This significantly outweighs any option to deep bury the cemetery in situ.

**Land to the north of Lower Luton Road, Harpenden
(Katherine Warlington School)**

Planning Application: 5/2733-17

Addendum to response to planning application by Wheathampstead Parish Council dated 4 Aug 2017 (and 14 Nov 2017 for archaeology) following the submission of further Information.

Wheathampstead Parish Council notes the additional information provided in support of this application for a new type of sustainable school, however we remain concerned about the viability of the site for a new school. The Local Transport Project Report refers to the lack of safe routes for cycle and pedestrian access especially east of Folly Fields.

Despite a detailed technical analysis of traffic movement and public transport there remain several outstanding issues:

- No regard has been given to the planned increase in traffic that will result from the recent plan to increase passenger numbers at Luton Airport by 50%. The Lower Luton Road is at near standstill at rush hour already without any additional traffic for the airport or the proposed school.
- In 2011 Mouchel examined the Lower Luton Road as a "safe route to school" and concluded that it was safe. The brief paragraph analysing the dangerous c1000m section of footway says:

"Cross Lower Luton Road on the existing pelican crossing at the Folly Fields junction as the northern footway runs out shortly. The footway continues on the southern side of the road. From here the footway runs next to the main carriageway. It is narrow at 1.25m and pupils should really use this in single file but it should be wide enough. The carriageway is not wide either and on occasions large vehicles run close to the kerb face when dealing with oncoming traffic. In places, when this happens, nearside 'wing mirrors' can be an issue, but this can be addressed by 'siding out' the footway to increase its width. The road is a bus route, the St. Albans Area Lorry Ban should control the number of large HGVs but a significant number still use this route. The section suffering with 'wing mirror issues' is some 300m in length and would benefit from maintenance to side out the footway and cut back hedgerow bushes."

It highlights the dangers of wing mirrors and the need to walk single file. It recommended 'siding out' the footway to increase the width. It claims it is 1.25m but in fact it narrows to 85cm in places. Siding out is flawed advice that cannot be delivered as most of the route is restricted by brick walls, lighting columns and other fixed obstacles. The carriageway itself is too narrow comfortably to cater for large vehicles without their mounting the pavement. The Parish Council has received complaints from residents along the road because of the damage caused to their driveways as a result. Tyre marks, broken kerbs stones and drain covers confirm this.

It is reassuring that the Local Transport Project Report acknowledges the dangers of the Lower Luton Road and absence of a safe route for cyclists and pedestrians.

We therefore strongly recommend a full review of the Lower Luton Road as a safe route to school.

- **There is no indication in this application as to how the numerous pinch points (one just before Marshalls Heath Lane and multiple others beyond Folly Fields) and safe road crossing from Leasey Bridge Lane to the east of the school can be dealt with. Given the above and the likelihood of all village children eventually attending this school, Wheathampstead pupils still have no safe route to get there – either by foot or by bicycle. The current footway is totally inadequate and dangerous for much of its length. There is a high probability that a child could be seriously injured or even be killed on these unsafe paths. The fact that the Travel Plan does not recommend walking or cycling between Folly Fields and the village confirms this view.**
- **The only safe way to overcome these shortcomings is to ensure village children travel on buses that can disembark and embark on the school site without causing gridlock on the Lower Luton Road. We suggest further land is purchased to enable buses to enter the site from Common Lane and not the Lower Luton Road.**
- **We see no incentive to ensure pupils take the bus option. There needs to be bus subsidy to achieve this. If the cost of using buses is high then parents will resort to driving their children and dropping them off and picking them at the site.**
- **Further, the new estimate of the number of parents who will drive their children to school is, in our opinion, underestimated and unrealistic.**
- **Too much emphasis is given to the extension of the 30 miles an hour speed restriction as a means of protecting the children and preventing accidents. The main danger comes from the inadequate safe route to school.**

Wheathampstead Parish Council fully supports the need for a new school but remain extremely concerned that the access issues have not been adequately addressed for this site. We reiterate our previous concerns about the application.

9 January 2018

Mr Chay Dempster
Hertfordshire County Council
County Hall
Pegs Lane
Hertford
Hertfordshire
SG13 8DQ

Highways
PO Box 153
Stevenage
SG1 2GH

Email: HighwaysPlanning@hertfordshire.gov.uk

Website: www.hertfordshire.gov.uk

Our Ref:

Your Ref: 5/2733-17

Date: 15 January 2018

Dear Mr Dempster

ADDRESS

Land to the north of Lower Luton Road, Harpenden, Hertfordshire

PROPOSAL

Proposed application for the construction of new 6 FE school buildings, vehicular access/egress onto the Lower Luton Road, vehicular access onto Common Lane, two pedestrian accesses/egresses onto Common Lane, car parking, cycle storage, coach parking, playing fields, tennis courts / multi-use games area, surface water attenuation measures, hard and soft landscaping and other associated development

Application No. 5/2733-17

DECISION

Notice is given under article 10 of the Town and Country Planning (General Development Procedure) Order 1995 that the Hertfordshire County Council as local highway authority does not wish to raise an objection to this planning application subject to planning conditions.

RECOMMENDED PLANNING CONDITIONS

NEW ACCESS TO COMMON LANE

Prior to the first occupation of the development hereby permitted the vehicular access to Common Lane shall be provided and thereafter retained at the position shown on the approved plan (Preliminary Design – Potential S278 Works – Common Lane vehicle Access Drawing Number 2675-AWP-oo2-1) in accordance with the approved highway specification. Arrangement shall be made for surface

water drainage to be intercepted and disposed of separately so that it does not discharge from or onto the highway carriageway.

Reason: To ensure satisfactory access into the site and avoid carriage of extraneous material or surface water from or onto the highway.

NEW ACCESS TO LOWER LUTON ROAD

Prior to school second year intake of the development hereby permitted the vehicular access to Lower Luton Road shall be provided and thereafter retained at the position shown on the approved plan (Car Bus Drop off Spaces, Drawing Number LTP/2675/T1/05.01) in accordance with the approved highway specification. Arrangement shall be made for surface water drainage to be intercepted and disposed of separately so that it does not discharge from or onto the highway carriageway.

Reason: To ensure satisfactory access into the site and avoid carriage of extraneous material or surface water from or onto the highway.

PROPOSED CROSSING/CAPACITY IMPROVEMENTS - LOWER LUTON ROAD/STATION ROAD

Part A

Notwithstanding the details indicated on the submitted drawings no works shall commence on site unless otherwise agreed in writing until a detailed scheme for the off-site highway improvement works as indicated on S8 –Proposed Crossing Conversion / S11 – Proposed Capacity Improvements, Drawing No. 2675/AWP/S08/01 have been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the highway improvement works are designed to an appropriate standard in the interest of highway safety and to protect the environment of the local highway corridor.

Part B

Prior to first occupation of the development hereby permitted the off-site highway improvement works referred to in Part A of this condition shall be completed to the written satisfaction of the Local Planning Authority in consultation with the Highway Authority.

Reason: To ensure that the highway network is adequate to cater for the development proposed.

HIGHWAY IMPROVEMENTS – OFF-SITE SUSTAINABLE TRANSPORT IMPROVEMENTS LISTED IN TRANSPORT ASSESSMENT (TABLE 22) AND TRAVEL PLAN (TABLE 5)

Part A

Notwithstanding the details indicated in the Transport Assessment and indicative drawings no works shall commence on site unless otherwise agreed in writing until a detailed scheme for the off-site highway improvement works have been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the highway improvement works are designed to an appropriate standard in the interest of highway safety and to protect the environment of the local highway corridor.

Part B

Prior to the first occupation of the development hereby permitted the off-site highway improvement works referred to in Part A of this condition shall be completed to the written satisfaction of the Local Planning Authority in consultation with the Highway Authority.

Reason: To ensure that the highway network is adequate to cater for the development proposed.

TRAVEL PLAN

No part of the development hereby permitted shall be occupied prior to the implementation of the approved Travel Plan Reference No. LTP/2675/Final Issue 3, 06/12/2017. Those parts of the approved Travel Plan that are identified therein as being capable of implementation after occupation shall be implemented in accordance with the timetable contained therein and shall continue to be implemented as long as any part of the development is occupied.

Reason: To ensure that the development offers a wide range of travel choices to reduce the impact of travel and transport on the environment.

AREA WIDE OFF-SITE PARKING RESTRICTIONS (PART A)

Prior to the second year intake, all waiting restrictions shown in principle in Drawing No.2675-AWP-S30-01 (Proposed Waiting Restrictions) will be implemented.

Reason: In the interests of highway safety.

AREA WIDE OFF-SITE PARKING RESTRICTIONS (PART B)

Prior to the fifth year pupil intake a second phase of off-site parking restrictions will be implemented to overcome any further parking issues attributable to the school operation to the approval of the planning authority. For the avoidance of doubt the restriction may take the form of either additional standard style waiting restrictions and/or CPZ.

Reason: In the interests of highway safety and environmental amenity.

HIGHWAY WORKS - LOWER LUTON ROAD

Part A

Notwithstanding the details indicated on the submitted drawings no occupation shall be permitted unless otherwise agreed in writing until a detailed scheme for the off-site highway improvement works as indicated on drawing no 2675-AWP-SL01-02 (Option 1 – Extension of existing 30mph Speed Limit Wheathampstead to Batford) have been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the highway improvement works are designed to an appropriate standard in the interest of highway safety and to protect the environment of the local highway corridor.

Part B

Prior to the second year intake of the development hereby permitted the off-site highway improvement works referred to in Part A of this condition shall be completed to the written satisfaction of the Local Planning Authority.

Reason: To ensure that the highway network is adequate to cater for the development proposed.

CONSTRUCTION MANAGEMENT PLAN

Construction of the development hereby approved shall not commence until a Construction Management Plan has been submitted to and approved in writing by the local planning authority. Thereafter the construction of the development shall only be carried out in accordance with the approved Plan. The Construction Traffic Management Plan shall include details of:

- Construction vehicle numbers, type, routing;
- Traffic management requirements;
- Construction and storage compounds (including areas designated for car parking);
- Siting and details of wheel washing facilities;
- Cleaning of site entrances, site tracks and the adjacent public highway;
- Timing of construction activities;
- Provision of sufficient on-site parking prior to commencement of construction activities;
- Post construction restoration/reinstatement of the working areas and temporary access to the public highway;
- Provision of pre-condition condition survey.

Reason: In order to protect highway safety and the amenity of other users of the public highway and rights of way

COMMENTS

INTRODUCTION

Hertfordshire County Council officers have met with the applicant's representatives to discuss the highway issues associated with the proposal. Our discussions have covered a wide range of issues relating to internal layout, off-site highway works and wider transport provision. The focus of our discussions can be summarised under several main subject headings:

- | | |
|------------------------------------|-----------|
| • Overview | Section 1 |
| • Internal Layout | Section 2 |
| • Traffic Impact | Section 3 |
| • Sustainability | Section 4 |
| • Travel Plan | Section 5 |
| • Parking | Section 6 |
| • Lower Luton Road - Highway Works | Section 7 |

This report considers each subject in turn.

1. Overview

- 1.1 This planning application is for a new 6 form of entry (6FE) secondary school at land to the north of Lower Luton Road, Batford, Harpenden. The school will have a capacity of up to 1,150 pupils, made up of 900 pupils in the main school and 250 in the sixth form.
- 1.2 The school is expected to employ a total of 84 FTE (Full-Time Equivalent) staff upon full occupation of the site. Given the phased occupation of the school, staff numbers are expected to gradually increase broadly in line with pupil numbers.
- 1.3 Under current proposals, the school will open in temporary accommodation at the site in September 2018 and will have an initial Year 7 intake of 180 pupils. The main school building will then be constructed and a fresh intake of 180 pupils in each academic year, with full capacity expected by September 2024. Once the main school building has been constructed the temporary accommodation will become the sports hall.
- 1.4 The site is expected to have sports facilities available for community use. It should be noted that this community use would be outside of the typical network peak hours.
- 1.5 The site has two primary highway boundaries, Lower Luton Road to the south and Common Lane to the west. The applicant has carried out an assessment of the options and settled on a main highway access from Lower Luton Road, with a secondary access via Common Lane initially to serve the temporary first year arrangements, thereafter primarily to serve community sports facility, delivery and servicing.
- 1.6 The primary access will take the form of two priority T-junctions to Lower Luton Road. A one-way loop will operate internal to the site, with the westernmost access from Lower Luton Road being entry only, and the easternmost access being exit only. Lower Luton Road is proposed to be widened within the site frontage in order to provide a central ghost-island right-turn lane at the site entry point, with capacity for approximately 5 vehicles.
- 1.7 Lower Luton Road is a busy route used by a combination of local and through traffic. The route is generally free flowing outside usual peak periods but the mini roundabout junction at Station Road is the point where a majority of congestion occurs. As part of the proposal the applicant will deliver a scheme to increase capacity at the junction and help accommodate additional demand.
- 1.8 In the immediate vicinity of the school new and improved pedestrian facilities will be provided including a new toucan crossing between Common Lane and the proposed entrance to the school. A further package of off-site pedestrian and cycle improvements is proposed as part of the development.
- 1.9 The existing 30mph speed limit which terminates in the vicinity of the proposed school access will be extended eastwards towards Wheathampstead. Unfortunately, due to the orientation of the access arrangement, directly to Lower Luton Road, it will not be practical to introduce a 20mph school zone to cover the access layout. Lower Luton Road forms part of the county's main distributor road network, therefore due to

the nature of the route it is not considered feasible to introduce sufficient physical measures to support a 20mph speed limit.

- 1.10 A fundamental part of measures to support the school is the additional bus service provision which is specifically designed to around the scale and location of predicted catchment.
- 1.11 The proposals include the provision of a total of 97 car parking spaces, including 79 spaces served via the primary access from Lower Luton Road, and 18 spaces served via the secondary access from Common Lane. A series of off-site parking restrictions will be introduced to ensure vehicles dropping off/picking up do not obstruct routes or junctions. An additional contribution towards further parking restrictions and/or a residential CPZ will be made available. A total of 117 cycle parking spaces will be provided at the site. These spaces will be located in a covered and secure area with good natural surveillance to the south-east of the main school building.
- 1.12 Sixth form parking will not be permitted on-site and all on-site parking is expected to be reserved for staff and visitors. As with arrangements at other schools in Harpenden sixth form students driving to/from the school will be required to register their vehicle registration number, for the purposes of identification in the event of off-site parking issues.
- 1.13 The overarching theme of the proposal is a greater emphasis towards sustainable access to the school. The combination of an extensive package of off-site pedestrian/cycling measures with specific additional bus services are designed to support an ambitious modal split target which will be monitored by a robust Travel Plan.

2. Internal Layout

- 2.1 The internal layout has been the subject of further to discussions with the applicant. In relation to the main access from Lower Luton Road the latest revision is shown in Drawing LTP/2675/T1/05.01 (Car and Bus Drop Off Spaces). The access/egress operates as a clockwise one-way system. The junction layout has been the subject of a Stage 1 Safety Audit and recommendations have been incorporated into the design.
- 2.2 Due to the demand to access the school over such a narrow time period, when fully occupied the parking/pick up/drop off area will be congested. Therefore, to ensure the area is works efficiently it must be relatively free flowing.
- 2.3 The latest layout submitted by the applicant includes a number of internal road markings to ensure that appropriate circulation for both buses and cars is maintained within the site:
- The provision of double yellow lines around the offside of the internal road to ensure this lane is kept free of parking, allowing all vehicles, including buses to circulate around the site. Additional measures (e.g. signing) could also be provided on the offside to restrict stopping in this lane if necessary.
 - The provision of double yellow lines at all locations within the site where parking will be prohibited. These restrictions would still allow brief drop-off and pick-up trips to occur in the nearside lane.
 - The provision of a bus lane adjacent to the easternmost lay-by, to allow stacking space for up to 9 buses, whilst maintaining a traffic lane for other vehicles. This area would only be expected to contain the maximum number of waiting buses during the School PM peak, with staggered arrivals during the AM peak. The waiting restrictions will allow a bus to enter the site and proceed to the bus bays unimpeded, and cars will also be required to give way to departing buses on exit. This will allow for better bus circulation within the site and avoid any unnecessary delay for buses on exit.
 - Dedication of a row of parking to the western side of the car park for visitor and pick-up parking, allowing a number of pick-up trips to occur away from the main internal loop.
- 2.4 The phased occupation of the school, will allow the on-site management of both car and bus drop-off/pick up can be reviewed by the school on an annual basis as part of the Travel Plan monitoring process.
- 2.5 The operation of the junctions with Lower Luton Road has been modelled and although it is noted that any queues at the site exit are predicted they will be contained within the site. In addition, the capacity of the right turn movement into the entrance is considered acceptable to accommodate right turning vehicles, leaving Lower Luton Road westbound carriageway largely unobstructed.

Recommended Conditions

New Access to Common Lane

Prior to the first occupation of the development hereby permitted the vehicular access to Common Lane shall be provided and thereafter retained at the position

3. Traffic Impact

- 3.1 The proposed school will have capacity for 1,150 pupils consisting of 6 form entry (6FE), up to 180 pupils in each academic year (Years 7 to 11) and 250 pupils in the sixth form.
- 3.2 Under the current proposals, the school will open in temporary accommodation at the site in September 2018 with an initial Year 7 intake of 180 pupils. The main school building will be constructed for occupation by entry of second year intake and 180 pupils in each academic year thereafter, with full capacity expected by September 2024. Once the main school building has been constructed, the temporary accommodation will become the sports hall.
- 3.3 The school is expected to employ a total FTE of 84 staff. Given the phased occupation of the school, staff numbers are expected to gradually increase in line with pupil numbers.
- 3.4 In the Transport Statement (Table 9) provides a summary of school catchment area and the amount of pupils predicted to attend:

Area	% Pupils	Proposed Pupils
Area 1 (Kinsbourne Green)	0.5%	5
Area 2 (New Mill End/East Hyde)	0.9%	10
Area 3 (Batford/Marshall's Heath)	7.5%	86
Area 5 (Central Harpenden)	7.5%	86
Area 6 (Hatching Green)	0.9%	10
Area 7 (Southdown)	21.6%	248
Blackmore End	1.2%	14
Flamstead	5.9%	67
Hemel West & South	9.1%	105
Kimpton	3.7%	43
Redbourn	7.0%	81
Sandridge	0.5%	5
Welwyn & East	0.5%	5
Wheathampstead	19.6%	225
Luton & North West	3.3%	38
North Villages	7.9%	91
St Albans & South	2.5%	29
TOTAL		1,150

(TA Table 9: Proposed Pupil Distribution Split)

- 3.5 Table 10 from the TA summerises catchment area/pupil numbers and distance from site.

	0 – 1km	1 – 2 km	2 – 5km	5km+	total
Pupils	151	141	442	416	1,150
% Pupils	13.1%	12.3%	38.4%	36.2%	100%

(TA Table 10: Proposed pupil distance from site)

- 3.6 Table 9 demonstrates that 292 pupils (25.4%) are expected to live within a 2km and are therefore likely to be within a suitable walking distance. "Acceptable" walking distances will obviously vary between individuals and circumstances and will depend

shown on the approved plan (Preliminary Design – Potential S278 Works – Common Lane vehicle Access Drawing Number 2675-AWP-oo2-1) in accordance with the approved highway specification. Arrangement shall be made for surface water drainage to be intercepted and disposed of separately so that it does not discharge from or onto the highway carriageway.

Reason: To ensure satisfactory access into the site and avoid carriage of extraneous material or surface water from or onto the highway.

New Access to Lower Luton Road

Prior to school second year intake of the development hereby permitted the vehicular access to Lower Luton Road shall be provided and thereafter retained at the position shown on the approved plan (Car Bus Drop off Spaces, Drawing Number LTP/2675/T1/05.01) in accordance with the approved highway specification. Arrangement shall be made for surface water drainage to be intercepted and disposed of separately so that it does not discharge from or onto the highway carriageway.

Reason: To ensure satisfactory access into the site and avoid carriage of extraneous material or surface water from or onto the highway.

on various factors. However, 2km is considered to be an industry standard distance and originates from 'Guidelines for Providing for Journeys on Foot' (IHIT 200).

- 3.7 The 2km distance is a key factor for this proposal as the school catchment area extends to cover Wheathampstead which is predicted to generate 20% of pupils. The centre of Wheathampstead is approximately 3.5km from the site and therefore for analysis purposes not considered to be within walking distance. The section of Lower Luton Road between the site and Wheathampstead has been assessed as a school walking route against road safety audit guidelines and judged 'not to be safe'. Therefore, for analysis using modal split, pupils from Wheathampstead are included in the 38% (442 pupils) expected to live within a 2-5km distance of the site and will travel by bus.
- 3.8 Normally, distances between 2km and 5km would be ideal for cycling. Unfortunately, in this case the only practical route available is along B653 Lower Luton Road. Although the applicant will extend the 30mph speed limit to cover the complete section being between the site and Wheathampstead the nature of the road (and pinch points) rule out the opportunity to provide suitable cycling facilities. The applicant will carry out improvements to the route which will include extensive vegetation clearance and 'siding out', which should effectively increase carriageway and footway widths, which combined with other works will lead to a safer more attractive route. In the section of Lower Luton Road between Valley Rise and the school entrance the footway will be increased to a minimum 3m width. The majority of pupils attending the school originating from Wheathampstead are expected to travel by bus.
- 3.9 Pupils living in excess of 5km of the school are expected to be largely reliant upon car or bus services to travel to and from school, although a small number of pupils may be expected to cycle.
- 3.10 The baseline modal split based on original 'Highways and Access Feasibility Study – 2017 Review' (Stomor, 2017) is listed in Table 13 of the TA

Mode	Percentage	No. Pupils
Walk/Cycle	24.5%	282
Car Share	11.4%	131
Car/Taxi	28.6%	329
Bus	35.5%	408
TOTAL		1,150

(TA Table 13 – Baseline Modal Split)

- 3.11 As a result of the package of sustainable transport improvements, most notably the enhancements to bus services, the applicant predicts the following 'enhanced' pupil modal splits will be achieved. It should be noted that for capacity analysis purposes the applicant has included 'baseline' modal split calculations in the TA alongside an 'enhanced split' for sensitivity testing purposes.

Mode	Percentage Pupils	No. Pupils
Walk/Cycle	25.6%	294
Car Share	5.1%	59
Car/Taxi	12.8%	147
Bus	56.5%	649
TOTAL		1,150

(TA Table 15 – Enhanced Modal Split)

- 3.12 The number of two-way vehicle trips likely to be generated by the school peak periods is outlined within Table 16 of the TA. Reductions have been applied to allow for a proportion of trips taking place either side of peak periods (due to extracurricular activities/after school clubs, etc) a deduction has also been applied to allow for existing trips which may already be taking place on the highway. The table below summarises total predicted vehicle trip rates

	Baseline Modal Split- Vehicle Trip Generation			Enhanced Modal Split – Vehicle Trip Generation		
	Arrivals	Depart	Two Way Trips	Arrivals	Depart	Two way Trips
AM Peak						
Pupil Trips	253	253	506	114	114	228
Staff Trips	32	0	32	32	0	32
Total	285	253	538	146	114	260
PM Peak						
Pupil Trips	200	200	400	90	90	180
Staff Trips	0	27	27	0	27	27
Total	200	227	427	90	117	207
Network PM Peak						
Pupil Trips	40	40	80	18	18	36
Staff Peak	0	14	14	0	14	14
Total	40	54	94	18	32	50

(Based on TA Table 19 Two Way Total Vehicle Trip Generation)

Off- Site Highway Works

- 3.13 As part of pre-application scoping discussions, HCC expressed concerns about significantly increasing capacity on the Lower Luton Road corridor as this may encourage additional through-traffic, to the detriment of residents of Batford, Harpenden and Wheathampstead. However, it is acknowledged that a balance between mitigating against the impact of the development and providing measures to promote sustainable travel needs to be struck. Nevertheless, it should also be noted that there is a limited corridor width available on Lower Luton Road, particularly within Batford and at the Station Road junction, which effectively rules out the potential for major practical capacity improvements to be implemented. However, several junctions have been tested to understand the impact of the proposal.
- Lower Luton Road junction with Common Lane (mini-roundabout)
 - Lower Luton Road junction with Station Road (mini Roundabout)
- 3.14 In both cases, the junctions are currently operating above normal capacity criteria. By 2025 (year of school's full capacity) without any development background traffic levels are predicted to have increased leading to a slight worsening in current levels of congestion. During peak school arrival/departure times traffic generated by a secondary school will add additional pressure across the local road network. Individual modelling of both junctions demonstrate the scale of increase in congestion at these junctions, particularly during the AM peak period, when school arrival combines with road network peak.

- 3.15 There is little opportunity to improve the operation of the mini roundabout at Common Lane. The applicant offered a replacement layout consisting of a ghost island/right turn facility but on balance the highway authority prefers the existing arrangement to remain unchanged. However, as a result of the increase in demand on the Station Road mini roundabout improvements to the junction have been prepared. The scheme involves alterations to the existing kerb line on the western side of the roundabout to allow the provision of two lanes on the immediate Station Road and Lower Luton Road (W) approaches to the mini-roundabout. Alterations to the existing kerbed central islands are also proposed, to allow the provision of two approach lanes on the Lower Luton Road (E) arm.
- 3.16 Although it is accepted that the mini-roundabout will continue to operate above the capacity during all modelled periods, the proposed improvement scheme would mitigate against the impact of the development.
- 3.17 The highway authority agrees with the conclusion reached by the applicant that the proposed development will not have a severe impact on the operation local highway network. Therefore the proposals are considered to be in accordance with the 'National Planning Policy Framework' (DCLG, 2012), which states that "*development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe*".

Recommended Condition

Proposed Crossing/Capacity Improvements - Lower Luton Road/Station Road

Condition (A)

Notwithstanding the details indicated on the submitted drawings no works shall commence on site unless otherwise agreed in writing until a detailed scheme for the off-site highway improvement works as indicated on S8 –Proposed Crossing Conversion / S11 – Proposed Capacity Improvements, Drawing No. 2675/AWP/S08/01 have been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the highway improvement works are designed to an appropriate standard in the interest of highway safety and to protect the environment of the local highway corridor.

Condition (B)

Prior to first occupation of the development hereby permitted the off-site highway improvement works referred to in Part A of this condition shall be completed to the written satisfaction of the Local Planning Authority in consultation with the Highway Authority.

Reason: To ensure that the highway network is adequate to cater for the development proposed.

4. **Sustainable Transport Measures**

- 4.1 The package of sustainable transport improvement measures brought forward reflects HCC's request for greater emphasis towards sustainable transport.

Walking

- 4.2 As previously outlined, guidance from the CIHT suggests that 2km as the preferred maximum walking distance for a number of trips, including commuting and school trips (IHT, 2000). Walking trips will therefore be promoted amongst pupils living within a 2km of the site, which includes large residential areas to the south and west.
- 4.3 A number of the proposed sustainable access improvements are focussed on improving the walking environment surrounding the school. Given that a large part of the proposed catchment area covers the Aldwickbury estate and Southdown areas, it is expected that a high proportion of pupils that walk to/from the site.
- 4.4 Walking trips will not be specifically promoted amongst pupils living outside of this 2km area, including pupils in Wheathampstead and Redbourn for example, although it is acknowledged that some pupils may choose to walk greater distance.

Cycling

- 4.5 As outlined in the TA (Table 15), under the proposed modal split projections, a total of 25.6% of pupils could be expected to walk or cycle to school. The DfT state that *"in common with other modes, many utility cycle journeys are under three miles (5km), although, for commuter journeys, a trip distance of over five miles (8km) is not uncommon"* (DfT, 2008). Cycle trips would therefore usually be promoted amongst pupils living within a 5km of the site. Unfortunately, there are significant constraints to encouraging cycle access to the site, for example the topography of Harpenden and the availability of land which both limit the potential for improving cycle routes.
- 4.6 However, as outlined within the TA (Table 22 Section 8.2), a number of the proposed sustainable access improvements will include measures to encourage cycling, including:
- The provision of a toucan crossing on Lower Luton Road within the site frontage, connecting KWS with Crabtree Lane;
 - The provision of street lighting along Piggottshill Lane, a quiet lane which provides a link between KWS and the Southdown area;
 - The provision of traffic calming on Crabtree Lane; and
 - The provision of a shared-use foot/cycleway between KWS and Valley Rise to the east of the site.
- 4.7 It is expected that cycle trips could therefore be promoted amongst pupils living within the Lea Valley Estate to the west of the site, as well as the Aldwickbury estate and Southdown areas located to the south. A number of streets within Southdown are traffic calmed and provide a suitable environment for cycling. The Piggottshill Lane link will provide a quiet, lit cycle route to the site and the proposed traffic calming on Crabtree Lane will provide a safer environment. The proposed toucan

crossing within the site frontage will allow cyclists travelling to/from the south to safely cross Lower Luton Road.

Access by bus

- 4.8 The proposed bus provision for the school has been informed by a detailed Public Transport Study and subsequent Supplementary Public Transport Note which provide information regarding the potential bus service improvements to be implemented as part of the development. These studies provide an outline of all bus services operating on schooldays within Harpenden and include a summary of routes, fares and times of operation. The study uses this information along with the proposed school catchment area, modal split projections and surveys of existing bus demand/capacity to determine the service improvements.
- 4.9 These improvements are based on the proposed pupil catchment data provided, and will need to evolve to meet the actual pupil catchment once the school becomes operational. It is therefore proposed to undertake an annual review of pupil postcodes relative to the available bus services as part of the annual Travel Plan monitoring process.
- 4.10 The school will work with HCC's Passenger Transport Unit, The School Trust and local bus operators (the Bus Delivery Group) to agree the bus service delivery plan, this part of the Travel Plan will be reviewed annually thereafter.
- 4.11 Under the enhanced modal split projections, a total of 56.5% of pupils are expected to travel to school by bus. As outlined within the applicant's 'Public Transport Strategy' document, in order to achieve this modal split, a total of 75% of pupils living in excess of 2km of the site will have to travel by bus. As outlined in the TA, a number of service improvements are proposed in order to facilitate sufficient capacity and services for the bus modal split to be achieved.

Area	Distance from Site	Total Pupils	Pupils by bus
Area 1 (Kinsbourne Green)	2 - 5km	5	4
Area 2 (New Mill End/East Hyde)	2 - 5km	10	8
Area 3 (Batford/Marshall's Heath)	0 - 1km	86	N/A
Area 5 (Central Harpenden)	0 - 1km	86	N/A
Area 6 (Hatching Green)	2 - 5km	10	8
Area 7 (Southdown)	1 - 5km	284	93
Blackmore End	2 - 5km	14	11
Flamstead	5km+	67	50
Hemel West & South	5km+	105	79
Kimpton	5km+	43	32
Redbourn	5km+	81	61
Sandridge	5km+	5	4
Welwyn & East	5km+	5	4
Wheathampstead	2 5km	225	169
Luton & North West	5km+	38	29
North Villages	2 - 5km	91	68
St Albans & South	5km+	29	22
TOTAL		1,150	642

(Table 21 TA – Projected Pupil Bus Use by Area)

- 4.13 Table 21 demonstrates that the greatest demand for bus travel is expected to be from Wheathampstead, Southdown, Hemel West & South, Redbourn and Flamstead areas, the majority of which are outside the typically recommended walking and cycling distances of the site.
- 4.14 As previously stated, the bus service improvements are based on the proposed pupil catchment data provided, and will need to evolve to meet the actual pupil catchment once the school becomes operational. The applicant has confirmed they will provide financial support for all additional bus service provision for 7 years from date of first occupation.

Off-site measures

- 4.15 In order to support sustainable travel a package of off-site measures will be delivered as part of the proposal. The measures include off-site highway works to improve routes for walking/cycling and junction improvements.
- 4.16 The measures are designed around the key routes likely to be used by pupils. Many of these improvement schemes centre on the Lower Luton Road corridor but also include improvements within the Southdown area, along the Crabtree Lane and Station Road corridors. A plan showing the locations of the proposed sustainable access improvements is included in the TA (Drawing No.LTP/2675/T1/01 Rev B) and listed in Table 22 and in Travel Plan Appendix 5.

Ref	Location	Improvement Scheme
1	Site Frontage, Lower Luton Road	Proposed accesses, right turn lane, toucan crossing, Mini-roundabout modifications, new bus stops, Crabtree Lane raised table, Common Lane new eastern footways
2	Site Frontage, Lower Luton Road & Crabtree Lane Speed Limit	Proposed 30mph Speed Limit extension and school zone to be agreed with HCC
3	Common Lane junction with Batford Road & Milford Hill	Proposed pedestrian dropped kerbs and tactile paving
4	Common Lane existing bus stops	Improvements to provide raised bus boarder kerbs
5	Lower Luton Road, west of Batford Road	Proposed pedestrian crossing improvements, either conversion to zebra crossing or upgrade to puffin crossing, subject to further investigations
6	Lower Luton Road junction with Southview Road, Pickford Hill & Porters Hill	Proposed pedestrian dropped kerbs and tactile paving
7	Lower Luton Road, east of the mini-roundabout with Station Road	Proposed pedestrian crossing improvements, either conversion to zebra crossing or upgrade to puffin crossing, subject to further investigations
8	Lower Luton Road, west of the mini-roundabout with Station Road	Proposed pedestrian crossing improvements, either conversion to zebra crossing or upgrade to puffin crossing, subject to further investigations

9	Station Road, south of the mini-roundabout with Lower Luton Road nr Coldharbour Lane	Proposed controlled crossing (zebra or puffin), subject to agreement with HCC
10	Station Road, near the junction with Marquis Lane	Proposed controlled crossing (zebra or puffin), subject to agreement with HCC
11	Lower Luton Road / Station Road Mini-Roundabout	Proposed capacity improvements
12	Station Road, between the connections with the Upper Lea Valley Greenway and Harpenden Rail Station	Proposed pedestrian improvements, dropped kerbs and tactile paving
13	Sun Lane, south of the double mini-roundabout with Hollybush Lane	Proposed pedestrian refuge island
14	Crabtree Lane, over the River Lea	Surfacing and lighting improvements (assumes no works to footbridge required)
15	Crabtree Lane, over the River Lea	Footbridge improvements if required by HCC
16	Crabtree Lane, between the junctions with Marquis Lane and Aldwickbury Crescent	Proposed traffic calming and pedestrian dropped kerbs and tactile paving improvements
17	Dalkeith Road, between the junctions with Crabtree Lane and Aldwickbury Crescent	Proposed pedestrian crossing improvements (dropped kerbs and tactile paving)
18	All of Piggotshill Lane, and Marquis Lane between Piggotshill Lane and Crabtree Lane	Proposed Quiet Lane link and street lighting improvements
19	All of Alzey Gardens	Proposed pedestrian crossing improvements (dropped kerbs and tactile paving)
20	Wheathampstead Road, west of the mini-roundabout with Piggotshill Lane/Alzey Gardens, and Piggotshill Lane, north of the mini-roundabout with Wheathampstead Road/Alzey Gardens	Proposed pedestrian crossing improvements (dropped kerbs, tactile paving and pedestrian refuge island)
21	Lower Luton Road, between site boundary to Valley Rise	Proposed footway / cycle track and pedestrian crossing improvements
22	Lower Luton Road, between Valley Rise and Folly Fields	Proposed footway improvements
23	Various, to be agreed	Proposed commuted sum or similar mechanism to be agreed with HCC to implement future parking restrictions / CPZ within school vicinity

(TA Table 22: Off-Site Sustainable Transport access Improvements (amended))

- 4.17 The principle of the schemes has been agreed with HCC, although there would still need to be agreement on the detailed design of the works following any planning approval. With the exception of the capacity improvements to the Lower Luton Road/Station Road mini-roundabout (scheme 11) where completion is considered necessary prior to second year intake, all other schemes would be implemented prior to occupation of the school.

Scheme ref 14 & 15 Crabtree Lane over River Lea

- 4.18 In relation to Scheme Ref 14 & 15 it was agreed with the applicant that the area listed as Crabtree Lane over River Lea is considered to be a significant importance that the extensive environmental improvement required will be sensitive yet far reaching to provide long lasting enhancements at an important junction. The applicant has stated that a scheme in this area will include hard and soft landscaping, vegetation clearance, lighting, footpath improvements and parapet improvements. It was agreed that alongside all other off-site works the scheme will be implemented prior to first occupation of development.

Pedestrian measures - Lower Luton Road

- 4.19 With specific reference to the eastern section of Lower Luton Road (between the site and Wheathampstead), the applicant has listed a scheme consisting of 'footway improvements'. In several sections hedges have grown up to directly abut edge of carriageway which has the effect of narrowing adjacent running lanes for larger vehicles. The applicant has clarified that the improvement scheme in this area is to include vegetation clearance both sides of the road, to re-establish highway boundary where encroachment has occurred. This should effectively restore carriageway width. Where footways are present, full vegetation clearance will also effectively widen usable width for pedestrians. To reinforce the vegetation clearance extensive 'siding out' will be carried out to both carriageway and footway throughout. However, there are sections, 'pinch points', where the extent of footway width is restricted due to historic highway boundaries. In these areas it is not possible to provide major improvements and, as a result, despite the improvements, the pedestrian route between the site and Wheathampstead has been specifically assessed against road safety audit guidelines and judged to 'not be safe'. This classification is understood to have implications in relation to the cost of public transport for pupils.
- 4.20 It is accepted that the overall package of off-site measures will help support the required modal split and also provide wider community benefits.

Recommended Condition

Highway Improvements – Off-Site Sustainable Transport Improvements listed in Transport Assessment (Table 22) and Travel Plan (Table 5)

Condition 'A'

Notwithstanding the details indicated in the Transport Assessment and indicative drawings no works shall commence on site unless otherwise agreed in writing until a detailed scheme for the off-site highway improvement works have been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the highway improvement works are designed to an appropriate standard in the interest of highway safety and to protect the environment of the local highway corridor.

Condition 'B'

Prior to the first occupation of the development hereby permitted the off-site highway improvement works referred to in Part A of this condition shall be completed to the written satisfaction of the Local Planning Authority in consultation with the Highway Authority.

Reason: To ensure that the highway network is adequate to cater for the development proposed.

5. Travel Plan

- 5.1 The applicant has submitted a Travel Plan which provides a strategy for encouraging all users of the site including pupils, staff and visitors to travel by sustainable modes of transport.
- 5.2 The overall transport modal split for pupils attending secondary schools across Harpenden is:

Mode	Split	Pupils
Walk/Cycle	24.5%	282
Car Share	11.4%	131
Car/Taxi	28.6%	329
Bus	35.5%	408
Total		1,150

(Travel Plan, Table 6: Baseline Pupil Modal Split)

- 5.3 The modal split in Table 6 reflects a reasonable baseline situation, however the applicant has used relatively ambitious 'enhanced' modal split throughout the preparation of the scheme that reflects the expected travel patterns. To deliver predicted modal split it is crucial that upon implementation the proposed package of sustainable access improvements, which includes walking and cycling infrastructure improvements and significant enhancements to bus services.

Mode	Split	Pupils
Walk/Cycle	25.6%	294
Car Share	5.1%	59
Car/Taxi	12.8%	147
Bus	56.5%	649
Total		1,150

(Travel Plan Table 7: Target Pupil Travel Harpenden)

- 5.4 Following extensive discussions the Travel Plan and delivery of the Public Transport Strategy, has been combined into a revised Travel Plan which outlines the proposed mechanism for delivery. The Travel Plan includes a review of the Intervention Strategy to provide more innovative measures and suggested trigger points for their implementation.

Recommended Condition

Travel Plan

No part of the development hereby permitted shall be occupied prior to the implementation of the approved Travel Plan Reference No. LTP/2675/Final Issue 3, 06/12/2017. Those parts of the approved Travel Plan that are identified therein as being capable of implementation after occupation shall be implemented in accordance with the timetable contained therein and shall continue to be implemented as long as any part of the development is occupied.

Reason: To ensure that the development offers a wide range of travel choices to reduce the impact of travel and transport on the environment.

6. PARKING

Internal

- 6.1 The internal layout includes a total of 97 parking spaces (79 in the main site car park and 18 spaces provide in a smaller car parking area adjacent to the proposed sports centre served from Common Lane). The applicant has demonstrated that the parking provision complies with St Albans City and District Parking Standards. In addition, the proposed site layout also incorporates 19 parking/waiting spaces for drop off and pick up of pupils in cars and capacity for 4 buses (plus additional spaces if managed double parking occurs).
- 6.2 Initial parking calculations have been clarified by the applicant. At the time of the original planning submission, the school was expected to accommodate 95 FTE staff. However, the school trust have reassessed staffing levels and provided a fuller breakdown of staffing numbers, as shown in the Table below

Academic Year	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26
SLT	2.1	2.2	2.3	4.5	6	7	7	7
Teaching	8.5	15.5	22.5	29.8	34.2	42.5	46	46
Pupil support	1.6	2.1	3.2	4	4.6	4.6	4.8	4.8
Administration	4.8	9	9.9	12.3	14.6	14.6	16.9	14.9
Premises	1	2.6	2.6	3.4	4.5	4.8	4.8	4.8
Catering	0.9	2	2.5	3.6	5.1	5.1	5.1	5.1
Other	0.3	0.3	0.3	0.4	0.6	0.6	0.8	1
Total	19.2	33.7	43.3	58.0	69.9	79.2	83.4	83.6

(Additional information provided by applicant)

- 6.3 As stated by the applicant the maximum staffing at the school will be 84 FTE staff, lower than the previously predicted. The applicant makes the case that even if all of those 84 FTE staff require a parking space they can easily be accommodated with additional spaces available for visitors and any crossover period for part-time staff.

Off-Site Parking

- 6.4 All parking associated with staff and visitors is intended to be accommodated within the site. However, only a proportion of pupil drop off is predicted to take place within the site.
- 6.5 The proposal will increase the demand to park in the area. In response, the applicant has prepared a scheme which consists of a series of waiting restrictions which are designed to ensure that any off-site parking relating to the school does not present a hazard. An outline scheme to show the type and extent of waiting restrictions has been prepared (Proposed Waiting Restrictions Drawing No.2675-AWP-S30-01). It is anticipated that the restriction will only be required prior to second year intake. The exact extent and type of waiting restriction (single/double yellow line) will require further consideration alongside extensive resident consultation.

- 6.6 In addition to standard parking restrictions the applicant is proposing a series additional waiting restriction and/or a Controlled Parking Zone which will sit alongside standard restrictions to help prevent any displaced and/or overspill parking causing a nuisance to residents. The details of further restrictions will have to be prepared in the future when the impact of the school and associated waiting restrictions have had a chance to become established. To ensure additional restrictions remain an option and the applicant has agreed to a planning condition that requires them, if necessary, to deliver a second phase of off-site parking restrictions in the form of either additional standard waiting restrictions or a CPZ.

Recommended Condition

Area Wide Off-Site Parking Restrictions (Part A)

Prior to the second year pupil intake, all waiting restrictions shown in principle in Drawing No.2675-AWP-S30-01 (Proposed Waiting Restrictions) will be implemented.

Reason: In the interests of highway safety.

Area Wide Off-site Parking Restrictions (Part B)

Prior to the fifth year pupil intake a second phase of off-site parking restrictions will be implemented to overcome any further parking issues attributable to the school operation to the approval of the planning authority. For the avoidance of doubt the restriction may take the form of either additional standard style waiting restrictions and/or a CPZ.

Reason: In the interests of highway safety and environmental amenity.

7. HIGHWAY WORKS - LOWER LUTON ROAD

- 7.1 The introduction of a secondary school in this location requires a significant level of off-site highway infrastructure. In the vicinity of the school access/egress there will be a new bus stop layby (eastbound), toucan crossing and a series of enhanced pedestrian facilities. The applicant has also produced a revised proposal to extend the 30mph speed limit beyond what was originally intended to cover the complete section of Lower Luton Road between the site and Valley Rise to the east. To ensure the speed limit complies with HCC's Speed Management Strategy the applicant has prepared a revised indicative scheme (Extension of existing 30mph speed limit Wheathampstead to Batford, Drawing No. 2675-AWP-SL01-02) which includes a series of central islands, gateways, lining, street lighting and signage. The scheme submitted is likely to be subject to further revision, therefore a planning condition is recommended that requires the final design to be approved prior to first occupation. The final scheme will be required to be complete by first occupation of the school's second year intake.
- 7.2 Unfortunately, due to the orientation of the access arrangement, directly to Lower Luton Road, it will not be practical to introduce a 20mph school zone to cover the access layout. Lower Luton Road forms part of the county's main distributor road network, therefore due to the nature of the route it is not considered feasible to introduce sufficient physical measures to support a 20mph speed limit.

Recommended Condition

Highway Works - Lower Luton Road

CONDITION (Part A)

Notwithstanding the details indicated on the submitted drawings no occupation shall be permitted unless otherwise agreed in writing until a detailed scheme for the off-site highway improvement works as indicated on drawing no 2675-AWP-SL01-02 (Option 1 – Extension of existing 30mph Speed Limit Wheathampstead to Batford) have been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the highway improvement works are designed to an appropriate standard in the interest of highway safety and to protect the environment of the local highway corridor.

CONDITION (Part B)

Prior to the second year intake of the development hereby permitted the off-site highway improvement works referred to in Part A of this condition shall be completed to the written satisfaction of the Local Planning Authority.

Reason: To ensure that the highway network is adequate to cater for the development proposed.

Yours sincerely

James Dale
Area (Mid Herts) Highway Development Manager

Environment Director & Chief Executive:
John Wood



Chay Dempster
Spatial Planning & Economy
Hertfordshire County Council
County Hall
Pegs Lane
Hertford
SG13 8DN

Lead Local Flood Authority
Post Point CHN 215
Hertfordshire County Council
County Hall, Pegs Lane
HERTFORD SG13 8DN

Contact Sana Ahmed
Tel 01992 556279
Email FRMConsultations@hertfordshire.gov.uk

Date 23 January 2018

RE: 5/2733-17 - Land to the north of Lower Luton Road, Harpenden, Hertfordshire

Dear Chay,

Thank you for consulting us on the above application for the construction of a new 6FE school buildings, vehicular access/egress onto the Lower Luton Road, vehicular access onto Common Lane, two pedestrian accesses/egresses onto Common Lane, car parking, cycle storage, coach parking, playing fields, tennis courts / multi-use games area, surface water attenuation measures, hard and soft landscaping and other associated development.

Following the review of the Flood Risk Assessment carried out by MLM reference FS0448-MLM-ZZ-XX-RP-C-9100 Rev P05 dated January 2018, we can confirm that we the Lead Local Flood Authority (LLFA) have no objection in principle on flood risk grounds and can advise the Local Planning Authority (LPA) that the proposed development site can be adequately drained and can mitigate any potential existing surface water flood risk if carried out in accordance with the submitted drainage strategy.

It has been acknowledge that there is an overland flow route which crosses the site and as part of pre-application discussions between the LLFA and the applicants' consultants, it was agreed that as a minimum the risk of flooding to the highway (the Lower Luton Road) up to a 1 in 30 year rainfall event that results from this overland flow should be removed. An infiltration basin has been proposed on the site at the junction of Common Lane and the Lower Luton Road to accommodate this and this has been designed to provide a total storage volume of 3250m³. This basin will naturally overtop for flows in excess of the 1 in 30 year rainfall event onto the Lower Luton Road. We, the LLFA, have conducted our own independent catchment assessment (copy included with this response) which indicates that for a 1 in 30 year rainfall event a storage volume of 3200m³ needs to be provided; therefore the current design appears to be sufficient. Basin cross section drawings, half drain-down times and inflow/outflow hydrographs have been provided to support the basin design.

Infiltration tests have been carried out to ensure the feasibility of the proposed scheme. The topography of the site is to be re-profiled and this may affect the infiltration potential of the soils and it has been agreed that detailed infiltration tests would be set as a condition and carried out following re-profiling of the site. At the detailed design stage we would also expect information relating to the ground water and river levels to be confirmed and whether there are any impacts to the ability to infiltrate through the bottom of the basin as this could fundamentally impact upon the approach being taken to discharge water from the site.

The surface water volumes from the development site for the 1 in 100 year rainfall event plus climate change will be managed within the site prior to discharging into the infiltration basin. The infiltration basin is solely a means of disposal for surface water and does not provide any attenuation for the development site. Site drainage features provide total attenuation volumes of 1932m³ which include permeable paving (440m³), swale (30m³) and an attenuation tank (1462m³). The sports pitches (1, 2 and 3) and the Multi Use Games Area (MUGA) will manage surface water within their sub-base and discharge at a maximum rate of 2l/s into the site surface water drainage network. Quick storage estimates for these areas have been provided and the storage required will be provided for within the sub-base for these features.

The proposed permeable pavements, sub bases to sports pitches and MUGA, swales and the below ground attenuation tank will provide sufficient attenuation to allow the discharge of surface water runoff to the infiltration basin at no greater than 7.1 l/s, equivalent to QBAR from the pre development site, for events up to and including the 1 in 100 year plus the 40% allowance for climate change.

Details regarding the capacity of the run-off diversion ditch have been provided along with long section plans. The calculations show that the peak flow rates anticipated for the 1 in 100 year plus climate change event can be accommodated within the open grassed ditch. Where the ditch crosses access roads to the site, a concrete box culvert section of 1m internal width and 0.75m internal height is proposed. A calculation of the capacity of these culverted sections has also been provided.

The Archaeological Impact Assessment identifies a 7th Century cemetery near the western site boundary and sets out proposals for the protection in the form of extra cover to the archaeological remains. It has been confirmed that the levels of the proposed development and the ditch conveying the overland surface water runoff are incorporated into the current protection contours. We therefore recommend the following conditions to the LPA should planning permission be granted.

LLFA position

A. Pre-commencement conditions

Condition 1. Updated Infiltration and ground condition tests

The development hereby permitted shall not be commenced until updated infiltration and ground condition tests have been submitted to and approved in writing by the Local Planning Authority. The information should include:

1. Location specific infiltration tests for the main infiltrating features including the basin at the level of the bottom of the finished basin at 83.70m AOD
2. Confirmation of information relating to the ground water and river levels and whether there are any impacts to the bottom of the basin and its ability of infiltrate.
3. Updated half drain down times for the infiltration basin using any revised infiltration results.
4. A minimum infiltration figure of approximately 1.0×10^{-5} m/s in accordance with BRE Digest 365 to be achieved which if not achieved may mean that an alternative discharge strategy will need to be considered for the management of the overland flow and surface water run-off from the development. If this cannot be achieved a revised drainage strategy will need to be submitted to and approved by the Local Planning Authority.

Condition 2. Provision of the final detailed site drainage strategy based on updated infiltration tests.

The development hereby permitted shall not be commenced until the final detailed site drainage strategy based on updated infiltration tests has been submitted and approved in writing by the Local Planning Authority. The scheme shall be based on the approved Flood Risk Assessment carried out by MLM reference FS0448-MLM-ZZ-XX-RP-C-0100 Rev P05 dated January 2018 and the mitigation measures as detailed within the surface water drainage strategy. The scheme shall include:

1. Providing a minimum attenuation volume of 1932m³ (excluding MUGA and pitches) to ensure no increase in surface water run-off volumes from the development for all rainfall events up to and including the 1 in 100 year + climate change event.
2. Limiting the surface water run-off to a maximum of 7.1l/s with discharge into the infiltration basin for the 1 in 100 year event.
3. Undertake the drainage strategy to include to the use permeable paving, swales, and an attenuation tank and infiltration basin as indicated on the drainage drawing FS0448-MLM-ZZ-XX-DR-C-9013 Rev P04.
4. Confirmation of which SuDS features will be infiltrating and specific infiltration rates for each feature.
5. Exploration of opportunities for above ground features reducing the requirement for any underground storage.
6. All calculations, modelling and drain down times for all storage features.
7. Full detailed engineering drawings including cross and long sections and all components of the scheme, pipe runs etc. this should be supported by a clearly labelled drainage layout plan showing pipe networks. The plan should show any pipe 'node numbers' that have been referred to in network calculations and it should also show invert and cover levels of manholes.
8. Silt traps for protection for any residual tanked elements.
9. Details of final exceedance routes, including those for an event which exceeds to 1:100 + cc rainfall event.

Condition 3. Confirmation of final overland flow management arrangements

The development hereby permitted shall not be commenced until details of final design of the overland flow management arrangements have been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on Appendix H –

Offsite Runoff Diversion & Infiltration Basin and drawings FS0448-MLM-ZZ-XX-DR-C-9013 Rev P04 and FS0448-MLM-ZZ-XX-DR-C-9105 Rev P01.

The information should also include:

1. Detailed assessment of the catchment area and characteristics and modelling of flows for the 1:30, 1:100, and 1:100 + 40% for climate change events.
2. Updated catchment modelling and include assessment of residual flows coming down Common Lane impact upon the safe access and egress from the school site.
3. Details of any exceedance routes including exceedance flooding in the vicinity of the site which may arise from the channelling of the flow route to the basin.

Condition 4. Final design and engineering details regarding the surface water ditch

The development hereby permitted shall not be commenced until details of final design and engineering details regarding the surface water ditch have been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on drawings on FS0448-MLM-ZZ-XX-DR-C-9106 Rev P01 and FS0448-TLP-ZZ-XX-DR-L-0121 Rev 2.

The information should include:

1. All modelling of the channel and the supporting calculations for the surface water run-off ditch should be provided to support the proposed scheme.
2. Definition of any residual impact on Lower Luton Road for events over 1 in 30 return period.
3. Details of the impact of the flows from the ditch on the infiltration basin
4. Details of storage volumes within the ditch, including any flood event hydrographs to show the speed of flow.
5. Longitudinal bed profile and cross sections, plus detailed drawings of culverts/structures that could affect the flow.

Please note conditions 3 and 4 covering the final design details for the management of the overland flow have to be pre-commencement as it is our view that the management of this flow route will need to occur at the beginning of in the construction process in order to prevent flooding to the site during the construction phase.

Condition 5. Management of surface water during construction

The development hereby permitted shall not be commenced until a construction management plan to address all surface water runoff and flooding issues during the construction stage has been submitted to and approved in writing by the Local Planning Authority. The management plan should include the following:

1. Timeframes for construction activity and explanation of any phasing approach to the construction.
2. Final plan for the management of surface run-off during any construction activity on the site to prevent flooding to the site or any disruption to the Lower Luton Road.

B. Pre-occupation conditions

Condition 6. Implementation principles

Prior to occupation of the site the development permitted by this planning permission shall be carried out in accordance with the Flood Risk Assessment carried out by MLM reference FS0448-MLM-ZZ-XX-RP-C-9100 Rev P05 dated January 2018 and the following mitigation measures as detailed within the surface water drainage strategy:

1. Implementing the appropriate drainage strategy based on infiltration using appropriate above ground SuDS measures as indicated on drainage strategy drawing FS0448-MLM-ZZ-XX-DR-C-9100 Rev 05.
2. Implement appropriate measures to manage the overland flow route up to the 1 in 30 year event incorporating a surface water diversion ditch and infiltration basin to attenuate and manage the flows.
3. Limiting the surface water run-off to the infiltration basin to a maximum of 7.1l/s for the 1 in 100 year + climate change critical storm event so that it will not exceed the run-off from the undeveloped site and not increase the risk of flooding off-site. The following discharge rates should be provided as the maximum for each development area:
 - Discharge from all Sports Pitches/MUGA restricted to 2l/s into the school surface water drainage network.
 - Discharge from the remainder of the School site restricted to 5.1l/s into infiltration basin.
4. Providing storage to ensure that there is no increase in surface water run-off volumes for all rainfall events up to and including the 1 in 100 year + 40% climate change event. The following minimum volumes (or such storage volume agreed with the LPA) should be provided for each development area:

• Infiltration basin	3250m ³
• Permeable paving	440m ³
• Swale	30m ³
• Attenuation Tank	1462m ³
• Sport Pitch 1	870m ³
• Sport Pitch 2	1886m ³
• Sport Pitch 3	2198m ³
• MUGA	372m ³

Total	10,508 m³
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The mitigation measures shall be fully implemented prior to full site occupation and in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

Condition 7. Detailed drainage strategy for the sports pitches and any landscaped areas on the site.

Prior to occupation of the site, a detailed drainage strategy for the sports pitches and any landscaped areas on the site must be submitted to and approved in writing by the Local Planning Authority. The scheme shall include:

1. A maximum discharge of 2 l/s from all pitches to the school surface water drainage network. This will also require provision of the minimum storage provisions with locations to be detailed on the final plan.
2. Final design for the drainage of the sports pitches including the locations of any storage features and any control structures to manage the run-off and final engineering drawings.
3. Final runoff rates and storage volumes.
4. Details of the final discharge location and means of conveyance for residual flows to the basin.

C. Upon completion conditions

Condition 8. Completion and sign off for drainage system (possibly phased)

Upon completion of each phase of the drainage works, a complete set of as built drawings for both site drainage and overland flow route management should be submitted to and approved in writing by the Local Planning Authority. The scheme shall also include:

1. Final confirmation of management and maintenance requirements
2. Provision of complete set of as built drawings for both site drainage and overland flow route management.
3. Details of any inspection and sign-off requirements for completed elements of the drainage system.

Condition 9. Annual maintenance and reporting requirements

Upon completion of the drainage works a management and maintenance plan for the SuDS features and drainage network must be submitted to and approved in writing by the Local Planning Authority. The scheme shall include maintenance and operational activities; arrangements for adoption and any other measures to secure the operation of the scheme throughout its lifetime.

Informative to the LPA

Due to the nature of the development site, the LLFA wish to be notified of phases of the construction activity and appropriate arrangements to be made for inspections of the completed drainage features. Details regarding timeframes should be provided of the works to the surface water diversion ditch and when these are likely to commence in relation to the development.

Yours sincerely,

**Sana Ahmed
Sustainable Drainage Systems Officer
Environmental Resource Planning**

Landscape Report		10th November 2017
From: HCC Landscape Officer, Natural Historic and Built Environment Advisory Team		To: HCC Planning Officer, Spatial Planning
Application No.	5/2733-17	
Location:	Land to the north of Lower Luton Road, Harpenden, Hertfordshire	
Proposal:	Proposed application for the construction of new 6 FE school buildings, vehicular access/egress onto the Lower Luton Road, vehicular access onto Common Lane, two pedestrian accesses/egresses onto Common Lane, car parking, cycle storage, coach parking, playing fields, tennis courts / multi-use games area, surface water attenuation measures, hard and soft landscaping and other associated development	

1. Landscape Policy & Guidelines¹

National Planning Policy Framework

The NPPF¹ promotes the conservation and enhancement of the natural environment and good design, ensuring that developments respond to local character and are visually attractive as a result of good landscape design.

St Albans District Local Plan Review 1994

- Policy 1 - Metropolitan Green Belt
- Policy 69 - General Design and Layout
- Policy 74 - Landscaping and Tree Preservation
- Policy 104 - Landscape Conservation

St Albans Strategic Local Plan 2011-2031 (Publication Draft 2016)

- Policy SLP2 - Metropolitan Green Belt
- Policy SLP4 - Urban Design
- Policy SLP26 - Natural Environment
- Policy SLP27 - Green Infrastructure

¹ National Planning Policy Framework (7 Requiring Good Design & 11 Conserving and Enhancing the Natural Environment)

Hertfordshire Landscape Character Assessment

The site lies within the Upper Lea Valley (Area 33)

Strategy and guidelines for managing change: Improve and Conserve

- improve the network of woods within the open arable landscape between Wheathampstead and Harpenden by planting on the tops of the slopes to emphasise the valley form and to screen the raw built edges of 20th century development
- resist the targeting of redundant or derelict pasture for development
- encourage the creation of wetland landscape features such as reed beds, ponds, scrapes, alders and pollarded willows
- promote hedgerow restoration through locally appropriate measures including coppicing, laying and replanting/gapping-up

The northern end of the site lies within Blackmore End Plateau (Area 34)

St Albans District Green Infrastructure Plan March 2011

The site lies within the **chalk valleys conservation zone**: conserving key GI assets as part of the movement, habitat and physical landscape network, also securing links to the river valley network and associated Wetland Habitat Zone. Links to landscape restoration and enhancement in the Colne Valley and delivering landscape character assessment objectives in this area (considered jointly with Watford and Hertsmere Boroughs).

The northern tip of the site lies within the **woodland enhancement zone**: linking woodland habitats and restoring landscapes/defining the network of valleys including regionally rare Wooded Chalk Valleys. This includes enhancement to the setting of historic GI assets such as Prae Wood and Symondshyde Wood—buffering and protecting such sites, through creating woodland linkages.

The public right of way that runs along the eastern site boundary is a recognised **local link**.

2. Landscape & Visual Effects²

The following comments are given with reference to the submitted Landscape and Visual Impact Assessment (LVIA), 1st September 2017. Please note that the impact upon the purposes of the Green Belt is addressed in the Case Officers Report.

The LVIA methodology assumes that *'major and major-moderate effects can be considered to be significant, and that they therefore merit particular consideration in the planning process.'*³ This threshold is not supported and, based on experience and industry good practice, should be moderate or above.

Landscape effects

Landscape policy designations

The LVIA identifies the relevant landscape designations that are Landscape Conservation Area, Mackersey End Conservation Area and listed buildings, and concludes that *'there are no significant effects on landscape related designations.'*⁴ This conclusion is supported for the reasons as discussed below.

With regards to Landscape Conservation Areas the emerging policy SLP26 seeks to ensure that *'the condition and strength of character (including remaining areas of tranquillity) of the District's landscapes will be conserved, managed, and where appropriate enhanced.'* The site is currently vacant grassland and the proposed development will enhance the character and condition of the grassland through the introduction of meadow and other small scale habitat features that will be positively managed in the long term as part of the schools on-going management and maintenance regime.

With regards to Mackersey End Conservation Area and listed buildings, the proposed woodland within the northern apex of the site is considered sufficient to provide an adequate landscape and visual buffer to protect the setting of these historic assets.

Landscape character areas

The LVIA identifies the relevant landscape character areas that overlap the site and are Area 33 Upper Lea Valley and Area 34 Blackmore End Plateau.

Area 33 Upper Lea Valley overlaps the majority of the site. With regards to the impact upon landscape character in the vicinity of the site the LVIA determines that the proposed development has a major-moderate adverse effect at year 1 becoming moderate adverse at year 10. This conclusion is supported. The proposed development fundamentally changes the existing character of the south facing valley slope, between the Blackmore End plateau and the River Lee corridor, from open countryside that is characterised by semi-improved grassland to one that is developed and characterised by a school campus with associated meadow, amenity grassland and sports pitches.

² Comments are given in line with current best practice guidance 'Guidelines for Landscape and Visual Impact Assessment Third edition, Landscape Institute and Institute of Environmental management and Assessment.' (GLVIA3)

³ Paragraph 12.1.6

⁴ Paragraph 12.7.3

Area 34 Blackmore End Plateau overlaps the northern end of the site. With regards to the impact upon landscape character in the vicinity of the site the LVIA determines that the proposed development has a moderate adverse effect at year 1 becoming minor adverse at year 10. This conclusion is supported. The proposed development changes the character of the plateau from open countryside characterised by semi-improved grassland to one that is characterised by amenity grassland and a small football pitch, and woodland. At year 10 the woodland will be well established and providing more effective mitigation, contributing to local landscape character and visual amenity.

Landscape features

The LIVA identifies the relevant key landscape features of the site that are landform, landuse, vegetation, and historic site boundaries.

With regards to landform the LVIA determines that the proposed development has a major adverse effect at year 1 becoming major-moderate adverse at year 10. This conclusion is supported. The proposed development significantly alters the natural topography of the south facing valley side. The proposed cut and fill operations change the consistent valley slope to a series of flat development platforms and terraces separated by retaining walls and steep banks. (see further comments under landform).

With regards to landuse the LVIA determines that the proposed development has a major-moderate adverse effect at year 1 becoming moderate adverse at year 10. This conclusion is supported. The proposed development fundamentally changes the use of the site from vacant grassland to educational use comprising a school campus with associated amenity grassland and sports pitches.

With regards to vegetation the LVIA determines that the proposed development has a neutral effect at year 1 becoming minor beneficial at year 10. This conclusion is supported as the proposed development will increase the quantity of vegetation across the site.

With regards to historic site boundaries the LVIA determines that the proposed development has a minor adverse effect at both year 1 and year 10. This conclusion is supported. It is proposed to remove two sections of established hedgerow and five trees to accommodate the development. In addition there is no intention to recreate any historic hedgerow boundaries that may have crossed the site.

Visual baseline

The visual baseline has not been carried out in accordance with industry good practice guidance. There is no zone of theoretical visibility (ZTV) to show the extent to which the site is potentially visible from the wider area. This baseline information is critical to demonstrate the worst case scenario and the identification of representative viewpoints.

Visual effects

The LVIA⁵ concludes that *'By Year 10, significant effects on visual receptors would be limited to very localised points on public footpaths or from a small number of specific residential properties in the surrounding landscape.'*

This conclusion is supported in part. With regards to local visual effects, there are significant effects upon short distance views from the highways within close proximity to the site boundary. From here the development is viewed as a new large scale element within wider views of the settlement edge and sloping valley landform. The proposal to locate the new school campus within the lower lying south west corner of the site is fully supported, in this location the main building and sports hall appear as an extension of the settlement edge, and their rooflines are viewed against the backdrop of the open and elevated sports pitches, helping to assimilate them with their wider valley landscape setting.

There is concern for the extent of potential significant effects on moderate to long distance views from the surrounding area, in particular from the north facing valley side. A ZTV is required to show this (see comments under visual baseline).

Submitted viewpoints O and P represent views from the existing settlement on the north facing valley side, out towards the site and the open countryside beyond. From these locations the new school campus is generally well hidden to views due to its location within the lower lying south west corner of the site, and the screening effect of the intervening topography, buildings and vegetation. However there are clear views of the more elevated and open northern part of the site that will change from a consistent sloping landform with a simple grassland landcover, to an area characterised by a series of terraces accommodating sports pitches and goal posts, separated by a steep slope with a more diverse and textured landcover of sports turf, amenity grassland and meadow with small clusters of trees and mown pathways.

With regards to views from the north, the majority of visual receptors are located across the flat plateau where there are very limited views of the site due to its sloping topography on a south facing orientation.

⁵ Paragraph 12.7.4

3. Landscape Layout & Design⁶

Landform

It is proposed to carry out a significant quantity of cut and fill and create a series of flat development platforms and terraces separated by retaining walls and steep banks. Further information is required to show the existing and proposed landform across the site. In particular a composite plan that shows existing and proposed levels and 1m contours is required to clearly show where material will be removed and deposited and levels raised or lowered. This should be shown in context with contours beyond the site boundary. A northeast-southwest site cross section should also show the existing and proposed landform profile and indicate the gradient of slopes.

Outdoor teaching spaces

The intention to create a wide range of space typologies to support various activities is fully encouraged and supported. It is important to ensure that the new school community has the opportunity to take ownership of their environment and influence the layout and function of spaces. With this in mind there is concern for the over prescription of uses in places, for example with regards to the table tennis area, should the tables become redundant it is important that they could be easily removed to accommodate an alternative use. Flexibility in the layout and use of spaces could be encouraged through the provision of temporary screens and moveable seating.

The proposed classrooms have no direct access to external spaces and there is an opportunity to make better connections between the indoors and outdoors and create secure and individual outdoor spaces that are an extension of the classroom.

It is proposed to locate planting along the school building elevations and '*prevent access to the windows.*'⁷ There is concern for this approach that may restrict access to the building façade for maintenance operations such as window cleaning and gutter cleaning. A maintenance strip should be provided.

The outdoor classroom (next to the engineering zone) requires an element of shade that could be provided by trees or a canopy.

Outdoor café and dining area

There is concern for the location of the outdoor café and dining area, along the western site boundary, that is remote from the key public 'heart' of the campus and would benefit from being in a more public central location. There is also concern for the quality of the microclimate, due to the long and narrow nature of the space that is partially overshadowed by the main school building.

⁶ Comments are given in line with current good practice guidance 'Schools for the Future, designing school grounds' department for education and skills

⁷ Paragraph 6.41

Access, circulation and legibility

It is not clear how the service access from Common Lane will be achieved due to the changes in levels.

It is suggested that there is a key desire line from the visitor's car park to the 'heart' of the school. The current student entrance via the canopy feels secondary to the visitor entrance and would benefit from greater prominence and enhanced legibility. This could be achieved in the approach to the landscape layout and design, for example the approach to the paving language could clearly highlight these key routes.

Security and lighting

The proposal not to provide any floodlighting for the sports pitches within this sensitive urban- rural edge location is fully supported. In particular the northern part of the site is highly sensitive due its elevated and open location, and any form of artificial lighting should be avoided in these areas.

The provision of cycle spaces is fully supported. In their current location they are not overlooked occupants of the building and would benefit from a location where they are overlooked to provide passive surveillance.

Pond and swales

The submitted information refers to the provision of a small corner pond (adjacent to the allotments) to enhance biodiversity that could provide a teaching opportunity about surface water management and safety.⁸

This approach is supported in principle however the SuDS scheme (swale and attenuation ponds) is currently fenced off to public access and creates an impassable boundary along the western site boundary. There is a key opportunity to better integrate the SuDS system within the landscape scheme. Issues regarding safety and security can be addressed through a considered layout and design, to include controlled access via a dipping platform, and a terraced pond profile to create shallow margins.

With regards to providing a biodiversity enhancement, the pond design requires greater resolution to ensure that they do not become an empty depression devoid of any vegetation, but can realistically support a diverse range of habitats and species.

Sustainability

There is an opportunity to build a range of environmental solutions into the landscape scheme. For example rainwater could be collected to help irrigate the food growing and crop science areas. The areas of planting to the building elevations could be designed as 'rain gardens' and directly fed by roof water.

Green roofs would be ideal and help to assimilate the buildings within this sensitive urban-rural edge location, and the surrounding sloping topography.

⁸ Planning, Design and Access Statement, paragraph 6.55

Planting strategy

The details set out in the submitted planting strategy⁹ are fully supported, in particular the intention to use native species along the site boundaries and peripheral areas becoming more mixed and ornamental towards the heart of the school campus within recreational spaces.

Hard surfacing

The intention to use surface treatments that are sympathetic to the sensitive urban-rural location of the site is commended.

The proposed use of resin bound gravel is hard wearing and fully supported, however there is strong concern for the proposal to use flint gravel in plastic geogrid and aggregate rolled surfacing that are high maintenance. With regards to gravel in geogrid, the gravel is likely to require occasional raking, to maintain gravel levels and distribution and ensure that the geogrid does not become exposed and damaged. With regards to aggregate rolled surfacing, whilst the majority of aggregate will become embedded in the surface, there will be a quantity of loose aggregate that will wear and travel and eventually the surface will need rerolling.

Site boundaries

There is concern for the creation of an impassable boundary along the western site boundary and the effect that this may have on links with the retained strip of land for future development between the school and Common Lane.

4. Arboricultural Strategy

The conclusions and recommendations of the submitted tree survey, Arboricultural Impact Assessment and Arboricultural Method Statement are supported and should be complied with in full.

Overall it is proposed to remove five trees and two sections of hedgerow to create access from Common Lane and Lower Luton Road. Whilst it is preferable to avoid the loss of existing trees and hedgerows, on this occasion their loss will be adequately compensated for with new hedgerow and tree planting along the site boundaries' and within the development itself.

⁹ Drawing number FS0448-TLP-ZZ-XX-SP-L-0410 Rev 2, Sheets 1-3

Summary & Conclusion

Landscape and visual effects

Overall the proposed development fundamentally changes the landscape character and condition of the site from a vacant parcel of semi-improved grassland, to a fully developed school campus with associated sports pitches; however the significance of this is mitigated due to the introduction of woodland, meadow, trees and native shrub planting that make a significant contribution to the landscape resource and enhance biodiversity.

With regards to effects on visual amenity, further baseline information (ZTV) is required to show the area from which there are potential views of the site.

In general, the location of the proposed built elements within the lower lying south west corner of the site, appears as a logical extension of the settlement, and helps to assimilate the buildings within views and the wider landscape setting.

In viewpoints O and P from the north facing valley side to the south of the site, the northern part of the site is highly visible and further information is required to demonstrate the existing and proposed contours, gradients and levels in these areas.

In summary the following additional landscape and visual information is required:

- Zone of theoretical visibility (ZTV)
- Existing and proposed 1m contour plan (to include levels and gradients)
- Northeast-southwest site cross section

Landscape layout and design

Overall the intention to create a comprehensive range of spaces and planting typologies is fully supported. It is encouraged to ensure that use of space is not too over prescribed and allows flexibility as well as being easily manageable and secure.

There is an opportunity to enhance the sense of arrival and legibility through the landscape layout and design; this could include a paving strategy to highlight key desire lines and routes.

The opportunity to provide a wider range of integrated sustainability solutions should be explored.

Landscape Report		2nd January 2018
From: HCC Landscape Officer, Natural Historic and Built Environment Advisory Team		To: HCC Planning Officer, Spatial Planning
Application No.	5/2733-17 (Additional Information)	
Location:	Land to the north of Lower Luton Road, Harpenden, Hertfordshire	
Proposal:	Application for the construction of new 6 FE school buildings, vehicular access/egress onto the Lower Luton Road, vehicular access onto Common Lane, two pedestrian accesses/egresses onto Common Lane, car parking, cycle storage, coach parking, playing fields, tennis courts / multi-use games area, surface water attenuation measures, hard and soft landscaping and other associated development	

Landscape comments have previously been submitted in a report dated 10th November 2017.

The submitted additional information does not address the landscape issues raised within the previous report, they therefore remain outstanding.

Darryl Keen
Director: Community Protection
and Chief Fire Officer



Hertfordshire County Council
County Hall
Pegs Lane
Hertford
Hertfordshire
SG13 8DN

HERTFORDSHIRE FIRE & RESCUE SERVICE
Fire Protection
Postal Point MU103
Mundells
Welwyn Garden City AL7 1FT

Telephone: 01707 292310
Fax : 01707 292588
E mail : administration.cfs@hertfordshire.gov.uk
Your ref :
My ref : 022357
Date : 26/10/2017

Dear Sir/Madam,

**TOWN AND COUNTRY PLANNING ACT 1990
TOWN AND COUNTRY PLANNING (APPLICATION) REGULATIONS 1988**

**FE School Building Land to the North of, Lower Luton Road, Harpenden,
Hertfordshire, AL5 5AL**

Thank you for your letter regarding the above Planning Application.

We have examined the drawing and note that the provision for Access does not appear to be adequate.

ACCESS AND FACILITIES

- 1. Access for fire fighting vehicles should be in accordance with The Building Regulations 2000 Approved Document B (ADB), section B5, sub-section 16.**
- 2. Access routes for Hertfordshire Fire and Rescue Service vehicles should achieve a minimum carrying capacity of 18 tonnes.**
- 3. Turning facilities should be provided in any dead-end route that is more than 20m long. This can be achieved by a hammer head or a turning circle designed on the basis of Table 20 in section B5.**

WATER SUPPLIES

- 4. Water supplies should be provided in accordance with BS 9999.**



5. This authority would consider the following hydrant provision adequate:
- Not more than 60m from an entry to any building on the site.
 - Not more than 120m apart for residential developments or 90m apart for commercial developments.
 - Preferably immediately adjacent to roadways or hard-standing facilities provided for fire service appliances.
 - Not less than 6m from the building or risk so that they remain usable during a fire.
 - Hydrants should be provided in accordance with BS 750 and be capable of providing an appropriate flow in accordance with National Guidance documents.
 - Where no piped water is available, or there is insufficient pressure and flow in the water main, or an alternative arrangement is proposed, the alternative source of supply should be provided in accordance with ADB Vol 2, Section B5, Sub section 15.8.
6. In addition, buildings fitted with fire mains must have a suitable hydrant sited within 18m of the hard standing facility provided for the fire service pumping appliance.

The comments made by this Fire Authority do not prejudice any further requirements that may be necessary to comply with the Building Regulations.

If you require any further clarification regarding the contents of this letter, please contact the inspector named below.

Yours faithfully,

J. Attenborough

Jim Attenborough
Fire Safety Inspector

HERTFORDSHIRE ECOLOGY

Providing ecological advice to Hertfordshire's Local Authorities and communities

Environmental Resource Planning
Hertfordshire County Council, County Hall, Hertford, SG13 8DN
ecology@hertfordshire.gov.uk
Tel: 01992 555220

Mr Chay Dampster
Planning Officer
Spatial Planning and Economy Unit
Environment and Commercial Services
Hertfordshire County Council
County Hall Pegg Lane
Hertford SG13 8DN

Your Ref: 5/2733-17
Ask for: M J Hicks
Tel: 01992 556158
Date: 23/10/17

Dear Chay

Application: Proposed application for the construction of new 6 FE school buildings, vehicular access/egress onto the Lower Luton Road, vehicular access onto Common Lane, two pedestrian accesses/egresses onto Common Lane, car parking, cycle storage, coach parking, playing fields, tennis courts / multi-use games area, surface water attenuation measures, hard and soft landscaping and other associated development
Address: Land to the north of Lower Luton Road, Harpenden, Hertfordshire
Application No: 5/2733-17

Thank you for consulting Hertfordshire Ecology on the above application, for which I have the following comments:

1. We have little existing data for this application site and this is restricted to White-letter hairstreak butterfly (which would be associated with hedgerows) and badger, mainly by the main road. The site would appear to have limited ecological interest other than its boundary habitats. Aerial photos suggest it has been improved grassland for 20 years or more.
2. This view is reflected in the ecological assessment which identified four fields of improved grassland, tree and scrub lines along the eastern boundary (an important green lane), hedgerow along the northern boundary, and scrub and tree cover along the southern end of the western boundary. The surveys undertaken appear reasonably thorough and I have no reason to dispute the results.
3. Collectively the habitats within the proposed development site are assessed as being of Lower value at the Parish level. I consider this probably overestimates the site's value given it has long been is intensive farmland other

Funded by the following Local Planning Authorities:
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than the hedgerows; the grassland has little intrinsic quality but it is reasonably extensive and consequently is likely to support some farmland ground nesting birds depending on management and disturbance as well species which use the hedgerows and grassland edge habitats. If the site has been left for some time this interest (and so relative value) will almost certainly have increased, but this is a temporary function of management.

4. Green Infrastructure is stated as having the potential to have a minor beneficial impact by improving habitat connectivity both within the site and the wider landscape. This is probably true although in some respects but not in others given the use of the site will change considerably influencing the wildlife that can use it. Retention of the open space between the site and the ribbon development to the east which almost links to Wheathampstead would be important to retain north-south links to and from the river, although this too is now likely to come under pressure for development.

5. A range of some protected species are likely to use the site from time to time, such as badgers, bats, possibly reptiles, breeding birds and invertebrates although there is nothing to suggest the site supports any community or species of such significance it would represent a major constraint on the proposals. Although no breeding bird surveys were undertaken the quality of the habitats and existing records do not suggest any such species of any importance are reasonably likely to be present. The boundary hedgerows are to be retained but their nature will be changed given the loss of the grassland and agricultural environment within the site. A walkover survey for badgers has been recommended two weeks prior to development which follows best practice, as badgers can move into an area if it is accessible and has become suitable.

6. The Impact on the existing habitat is considered to be minor adverse; however I believe this underestimates the impact given the nature of the whole site will change, some areas will be largely urban with hardstanding as well as formal amenity (playing field) grasslands which will lead to the area opened-up to significant disturbance, despite the habitat enhancements. However I consider the relative *significance* of this is low to negligible given the nature and importance of the site to begin with and it would certainly not represent an ecological constraint on the proposals.

7. Furthermore, the proposals to create large areas of 'meadow' (see below) are to be welcomed, although I am concerned that the management required to maintain these (cut *and* lift) will not be undertaken given the areas will not be subject to any traditional agricultural operation which could otherwise provide the required management. However, if it can be secured I consider this will be a locally significant habitat improvement to the site, perhaps higher than the neutral impact suggested in the ecology assessment.

8. The assessments for other species groups seem reasonable based upon the existing habitat resources present.

9. I support the following as outlined in the Design and Access Statement:

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CITY AND DISTRICT OF ST ALBANS, THREE RIVERS DISTRICT, WATFORD BOROUGH, WELWYN HATFIELD BOROUGH

- **Retain as much of the existing vegetation and trees as possible around the perimeters of the site and under appropriate management – such as cutting edges in alternate years,**
- **Enhance the habitat value of the site through planting and management**
- **Allotments for school use;**
- **Creation of landscape features shown on the Landscape masterplan – I note this also includes a small orchard**
- **The site will be developed to enhance its overall biodiversity as well as developing it as a nature conservation learning resource**
- **Student involvement in the management of the proposed habitat area and hazel coppice and features such as beetle loggeries, bird and bat boxes, hedgehog domes, brush-wood and small rubble mounds to provide hibernacula for species like bumble bees and reptiles in the peripheral areas of site.**
- **Extensive areas of meadow management are also proposed to the sloping areas around the playing fields, which would be cut once or twice a year to encourage insects. If this can be achieved it will enhance its habitat value.**
- **An open ditch for SUDS would be planted with wetland marginal and tree and shrub species and widened to form a shallow pond, in addition to the flood attenuation lagoon;**
- **Proposed planting will involve large maturing tree species where possible and appropriate, native tree and shrubs around the perimeter to reinforce local distinctiveness, plants selected to enhance biodiversity with berry-producing, seed bearing and nectar rich species.**

10. The aims as outlined above should be confirmed within detailed planting plans and a formal landscape / ecology management plan which should be submitted to and approved by the planning authority as a condition of Approval. It is stated this will be 6 months prior to completion of works.

11. I note there are no proposals for floodlighting on the site. This is supported; it would be a sensitive issue given the location of the site and its topography. Internal lighting is described and would appear acceptable. Bollards and columns must have cut-offs to prevent unnecessary directional or skyward illumination.

12. Removal of woody vegetation to form site access points, or for any other reason, should take place outside the bird nesting season (i.e. take place between August and February inclusive). Should this not prove possible then vegetation should be inspected by an experienced ecologist within 48 hours of its programmed removal. Any active nests would need to be avoided until such time as young birds have fledged. This follows best practice and should be attached as an Informative to any approval.

13. I note that most further survey options are excluded from recommendations. I concur with this view given the nature of the site and development proposals.

14. **No compensation is proposed and this is reasonable as no habitat of particular significance is going to be lost. The grassland will be enhanced by the proposals for meadows and other small scale habitat features within the site.**

15. I also note the retained land will now be too small to be incorporated into the existing livestock enterprise. Depending on what subsequent management is employed the land has the potential to improve its ecological value locally although if other proposals for development ultimately emerge this is likely to have a further degrading impact on the biodiversity locally. This would need to be addressed in due course but is beyond the scope of the existing planning application.

16. Other than the issue I have raised above, I have no further issues with this proposal in respect to ecology.

I trust these comments are of assistance,

Regards,

Martin Hicks MCIEEM
Ecology Advisor, Hertfordshire Ecology

Sue Atkinson

From: Consultations (NE) <consultations@naturalengland.org.uk>
Sent: 21 December 2017 07:56
To: Spatial Planning
Subject: PL/0866/17 - Consultation Response

Dear Sir or Madam

Our ref: 234370
Application ref: PL/0866/17

Natural England has no comments to make on this application.

Natural England has not assessed this application for impacts on protected species. Natural England has published Standing Advice which you can use to assess impacts on protected species or you may wish to consult your own ecology services for advice.

Natural England and the Forestry Commission have also published standing advice on ancient woodland and veteran trees which you can use to assess any impacts on ancient woodland.

The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes. It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision making process. We advise LPAs to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.

We recommend referring to our SSSI Impact Risk Zones (available on Magic and as a downloadable dataset) prior to consultation with Natural England. Further guidance on when to consult Natural England on planning and development proposals is available on gov.uk at <https://www.gov.uk/guidance/local-planning-authorities-get-environmental-advice>

Yours faithfully

Alice Watson
Consultations Team
Natural England
Electra Way
Crewe Business Park
Crewe
Cheshire
CW1 6GJ
Tel: 0300 060 3900

consultations@naturalengland.org.uk

www.gov.uk/natural-england

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

For further information on the Discretionary Advice Service see [here](#)

For further information on the Pre-submission Screening Service see [here](#)

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Development Services/Planning Applications/Web comments - Comment

Call date: 16/10/2017 14:16:14
User: 2662252/2
Contact number:
Document Number: 7477093

Comment on Planning Application

About You

Please provide details about yourself. Those fields marked with an asterisk must be completed for us to accept your comments. The telephone and email fields will be redacted on the website but still available to view at our offices. Do not put these details in the Comments box.

Full Name	Matt Dodds
Organisation/Company	Herts and Middx Wildlife Trust
Address	Grebe House, St Michaels Street, St Albans
Contact Number	
Email	

Details

If your comments are over 2000 characters, you will see an error message on submission. Please ignore this as there is no 2000 character limit and your comments have been received. Our system supplier have been asked to resolve this issue as soon as possible.

Comments

Objection: DEFRA biodiversity assessment metric required to objectively demonstrate no net loss or net gain to biodiversity in accordance with NPPF. Once this assessment has been undertaken and a net positive score demonstrated the objection will be removed.

In principle there is no objection to the location and concept of this development. The habitats present are of low (but not no) value and there is space to provide substantial habitat creation to offset any measured impacts. However, in order to conform with the requirements of NPPF and BS 42020, the proposals need to demonstrate that the development will achieve measured no net loss and where possible net gains to biodiversity. The information submitted to date does not indicate that the required assessment of ecological value has been undertaken.

In order to objectively assess the ecological value of the site and to guide the amount of ecological compensation or mitigation required, the DEFRA metric e.g. Biodiversity Impact Calculator (Environment Bank 2015) should be employed to quantify the net ecological impact of the development.

Ecological information should clearly, definitively and measurably show: what is there, how it will be affected by development, how any negative impacts can be avoided, mitigated or compensated to ensure no net loss and where possible net gains to biodiversity, as required by NPPF. NPPF and BS 42020 require that ecological information demonstrate no net loss and where possible net gain in biodiversity, not a subjective assessment of the significance of impacts on significant habitats.

NPPF, paras 109 and 118 state:

109 "the planning system should contribute to and enhance the natural and local environment by:

• minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures."

118 "When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity..."

In order to objectively assess the ecological value of the land proposed for development a consistent and fair methodology should be employed. It is not sufficient to subjectively state that no net loss will be achieved, this must be measured or the phrase becomes meaningless and a matter of opinion. The implementation of an acceptable biodiversity accounting methodology should ensure appropriate mitigation or compensation resources are provided to achieve the conservation and enhancement of biodiversity, as required by NPPF.

Therefore It is advised that the Biodiversity Impact Calculator (BIC Environment Bank 2015) be employed to assess the pre and post development ecological value of this proposal. The calculator must show a neutral or positive ecological unit score in order for the development to demonstrate that it is consistent with NPPF. The requirement to clearly demonstrate net gain is consistent with BS 42020 Biodiversity - code of practice for planning and development.

The reason for the application of the calculator is that it provides an objective mechanism to measure ecological impacts of any given development. It is transparent and ensures a measurable, standard and fair approach for developers and the local authority to provide consistency in assessing and calculating ecological impacts and therefore the required mitigation and or compensation measures. Without the application of the calculator, assessments of precise ecological impacts on habitats are subjective. The calculator has been devised by DEFRA, Natural England, several Local Authority Planning departments and upheld in a number of planning decisions as a suitable mechanism to assess no net loss or net gain.

These proposals involve the destruction and modification of large areas of this greenfield site, with potential mitigation and compensation measures suggested but not definitively proposed. At present there is no indication that a BIC assessment has been undertaken to

objectively assess ecological impacts, sufficient for the LPA to make an informed decision as to whether no net loss or net gain has been achieved. BS 42020 is clear that it the responsibility of the applicant to supply sufficient information to make this judgement.

In order to maximise the habitat value of created and retained habitats either on or offsite, details of species, establishment regimes, management regimes and funds to secure on-going management of these habitats must be supplied. Habitats and species should be native, appropriate, and local provenance where possible and should be guided by the Herts Ecological Networks Mapping priorities for the area. All mitigation, compensation, enhancement, habitat creation measures must be definitively stated in the application and marked on maps. It is not acceptable to state what could or should be provided, only what 'will' be provided in order to ensure post development enforcement A- as stated in BS 42020.

Object to Proposal
5/2017/2733

Do you wish to:
Planning reference number (do not overtype)

Environment Director & Chief Executive:
John Wood



Chay Dempster
Development Management
Hertfordshire County Council

Natural, Historic & Built Environment
Advisory Team
Post Point CHN 108
Hertfordshire County Council
County Hall, Pegs Lane
HERTFORD SG13 8DN

Contact Andy Instone
Tel 01992 555241
Email
historic.environment@hertfordshire.gov.uk

Date 21 December 2017

RE: 5/17/2733 - Proposed application for the construction of new 6FE school buildings, vehicular access/egress onto the Lower Luton Road, vehicular access onto Common Lane, two pedestrian accesses/egresses onto Common Lane, car parking, cycle storage, coach parking, playing fields, tennis courts / multi-use games area, surface water attenuation measures, hard and soft landscaping and other associated development at Land to the north of Lower Luton Road, Harpenden, Hertfordshire

ARCHAEOLOGICAL IMPLICATIONS

Dear Chay,

Thank you for re-consulting us on the above application.

In previous advice dated 13 and 30 November this office noted that archaeological investigations at the site have found heritage assets dating from the Mesolithic and Neolithic periods, the Bronze Age, Iron Age and early medieval (Anglo-Saxon) period. The evidence from the early Neolithic and Middle Iron Age is significant, but the most interesting archaeological remains are up to fourteen human burials which are thought to date to the seventh century. These were found in the northern part of the site in an area originally proposed for playing fields, but now to remain as a meadow. Archaeological evidence from the end of the Roman Empire until after the Norman conquest is extremely rare in Hertfordshire and these finds are regionally significant at least. The regional research framework for East Anglia says

"It is increasingly apparent in Hertfordshire that an early Anglo-Saxon presence does not exist and even middle Saxon material is very rare. Establishing a chronological framework and identifying the material culture of the period 450–600 for Hertfordshire is a priority." (Research and Archaeology Revisited: A Revised Framework for the east of England, East Anglian Archaeology Occasional Paper 24, 2011 page 50).

As a result this office advised you that the applicant should demonstrate that a strategy of preservation *in situ* could be an appropriate treatment of these heritage assets. This is in line with paragraphs 135 and 139 of the National Planning Policy Framework (NPPF). The programme should include provision to protect the archaeological remains from disturbance. We have advised you that the proposal that was submitted was inadequate. We later advised that a second proposal was also inadequate. Since then Historic England have sent you comments. These conclude that the archaeological remains are of such significance that they should be treated in line with paragraph 139 of the NPPF and that the information submitted by the applicant is not sufficient for us to be confident that the heritage assets will be appropriately conserved.

This office has engaged with both the applicant and you to gather the appropriate archaeological information to make an informed planning decision. As noted above, given the significance of the heritage assets that have been found we have tried to agree in principle a programme of archaeological works (including preservation *in situ*) with the applicant as soon as possible. This is to ensure that we can advise you that we believe the historic environment can be appropriately conserved should you be minded to grant consent. This will also minimise any delay for the applicant in the future should the scheme go ahead because the scope of the required archaeological programme of works will be clear. However we understand that the applicant has now said that they do not wish to continue these discussions until a planning decision has been made.

Nonetheless given the archaeological information that has been submitted so far, we believe it is likely that the archaeological implications of the development can be dealt with by the imposition of archaeological conditions if you are minded to grant consent. Therefore further to our previous advice to you, we recommend that a suitable programme of archaeological preservation of heritage assets and/or archaeological investigation and recording is agreed with the planning authority before any development or site preparation takes place.

This may include preservation *in situ* of the Saxon burials and Middle Iron Age features in the northern part of the site, together with appropriate archaeological investigation of the rest of the site to mitigate the effects of the development. If a suitable scheme of preservation and protection is not possible then other strategies such as archaeological excavation may need to be considered for the whole site.

This advice is dependent on the details of any drainage or landscaping schemes which may be submitted as part of this proposal. We recommend that the applicant should demonstrate that these will not have an adverse impact on any heritage assets before they are approved.

We believe that these recommendations are both reasonable and necessary to provide properly for the likely archaeological implications of this development proposal. We further believe that these recommendations closely follow the policies included within Policy 12 (para. 139, 141, etc.) of the National Planning Policy Framework.

We therefore recommend that three appropriately worded conditions on any planning consent would be sufficient to provide for the level of archaeological investigation that this proposal warrants.

In this case we also recommend that provisions are made to conserve the historic environment both during the construction period and in the future should preservation of the heritage assets be achieved. This may be via planning conditions or formal agreement between the parties.

We suggest the following wording for the archaeological conditions:

A No demolition/development shall take place/commence until an Archaeological Written Scheme of Investigation has been submitted to and approved by the local planning authority in writing. The scheme shall include an assessment of archaeological significance and research questions; and:

- 1. The programme and methodology of site investigation and recording***
- 2. The programme and methodology of site investigation and recording as required by the evaluation***
- 3. The programme for post investigation assessment***
- 4. Provision to be made for analysis of the site investigation and recording***
- 5. Provision to be made for publication and dissemination of the analysis and records of the site investigation***
- 6. Provision to be made for archive deposition of the analysis and records of the site investigation***
- 7. Nomination of a competent person or persons/organisation to undertake the works set out within the Archaeological Written Scheme of Investigation.***

B The demolition/development shall take place/commence in accordance with the programme of archaeological works set out in the Written Scheme of Investigation approved under condition (A)

C The development shall not be occupied/used until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under condition (A) and the provision made for analysis and publication where appropriate.

If planning consent is granted, we will be able to provide detailed advice concerning the requirements for the investigations, and to provide information on professionally accredited archaeological contractors who may be able to carry out the necessary work.

Please do not hesitate to contact me should you require any further information or clarification.

Yours sincerely,



**Andy Instone
Senior Historic Environment Advisor
Environmental Resource Planning**

Environment Director & Chief Executive:
John Wood



Chay Dempster
Development Management
Hertfordshire County Council

Natural, Historic & Built Environment
Advisory Team
Post Point CHN 108
Hertfordshire County Council
County Hall, Pegs Lane
HERTFORD SG13 8DN

Contact Andy Instone
Tel 01992 555241
Email
historic.environment@hertfordshire.gov.uk

Date 13 November 2017

RE: 5/17/2733 - Proposed application for the construction of new 6FE school buildings, vehicular access/egress onto the Lower Luton Road, vehicular access onto Common Lane, two pedestrian accesses/egresses onto Common Lane, car parking, cycle storage, coach parking, playing fields, tennis courts / multi-use games area, surface water attenuation measures, hard and soft landscaping and other associated development at Land to the north of Lower Luton Road, Harpenden, Hertfordshire

ARCHAEOLOGICAL IMPLICATIONS

Dear Chay,

Thank you for consulting us on the above application.

In May 2015 this office recommended that should development of the site be proposed, an archaeological evaluation be carried out and the results submitted with any planning application, as per the National Planning Policy Framework (NPPF), paragraph 128. Therefore the applicant has submitted some archaeological information with this planning application. This includes an archaeological desk-based assessment, a geophysical survey, an archaeological trial trench report and an addendum describing the exhumation of a human burial.

Eighty trial trenches were dug in the summer of 2017 and heritage assets were found in 34 of them. The investigations uncovered multi period heritage assets with archaeological interest. These date from the Mesolithic and Neolithic periods, the Bronze Age, Iron Age and early medieval (Anglo-Saxon) period. Several of these discoveries are of high significance. These include an enclosure which dates to the Middle Iron Age, a period for which evidence is rare in Hertfordshire and pottery which dates from the early Neolithic period which is another rare and exciting find. In addition hundreds of pieces of flint from

the Mesolithic to the Bronze Age were found. This prehistoric evidence was mainly located in the southern part of the site.

The most interesting archaeological remains were up to fourteen human burials which are thought to date to the seventh century. These were found in the northern part of the site in an area proposed for playing fields. Archaeological evidence from the end of the Roman Empire until after the Norman conquest is extremely rare in Hertfordshire and these finds are regionally significant at least. It is possible that further burials remain to be discovered. This will be discussed further below because we recommended that one of these burials be exhumed so that their significance could be better understood, as per NPPF, paragraph 128.

The applicant has submitted a short report on this investigation. The date of the burial was confirmed as the latter half of the seventh century. The report notes that associated finds include an Iron buckle and knife and remnants of some iron sheeting. The buckle is dated to the sixth or seventh century which is similar to the date of the skeleton. Although this study has given us some useful information about the date of the burials and their significance it has not included information about the sex or age of the individual or pathology, for example evidence of trauma, disease, wear and tear, or cause of death.

Given the significance of the burials and the fact that this planning proposal allows for minimal development and disturbance in the part of the site where the burials are located, we have agreed that a strategy of preservation *in situ* could be an appropriate treatment of these heritage assets. This is as per NPPF paragraphs 135 and 139. Therefore the applicant has also submitted an *Archaeological Impact Assessment*, which includes a method statement to achieve the preservation of these heritage assets. As it stands it is inadequate. This is because it does not demonstrate that the method proposed for covering the cemetery will protect the archaeological remains. Further archaeological investigation is required to confirm the area which needs to be preserved. We can provide more detailed comments about this separately.

Should an acceptable proposal for the preservation and protection of the area of the burials be submitted, it is likely that the archaeological implications of the development on the rest of the site can be dealt with by the imposition of archaeological conditions if you are minded to grant consent.

The archaeological investigations to discharge these planning conditions are likely to include further archaeological evaluation in the first instance. The purpose is to confirm the extent of the cemetery and therefore the area to be preserved and also to inform the programme of mitigation for the rest of site. This may include preservation *in situ*, archaeological excavation, watching brief and such other provisions as may be necessary to conserve any heritage assets which are identified. It is also likely that we will recommend analysis and publication of the results of the archaeological investigations where appropriate (NPPF paragraph 141).

We believe that these recommendations are both reasonable and necessary to provide properly for the likely archaeological implications of this development proposal. We further believe that these recommendations closely follow the policies included within Policy 12 (para. 141, etc.) of the National Planning Policy Framework. In this case three appropriately worded conditions on any planning consent would be sufficient to provide

for the level of investigation that this proposal warrants. We suggest the following wording:

A No demolition/development shall take place/commence until an Archaeological Written Scheme of Investigation has been submitted to and approved by the local planning authority in writing. The scheme shall include an assessment of archaeological significance and research questions; and:

- 1. The programme and methodology of site investigation and recording***
- 2. The programme and methodology of site investigation and recording as required by the evaluation***
- 3. The programme for post investigation assessment***
- 4. Provision to be made for analysis of the site investigation and recording***
- 5. Provision to be made for publication and dissemination of the analysis and records of the site investigation***
- 6. Provision to be made for archive deposition of the analysis and records of the site investigation***
- 7. Nomination of a competent person or persons/organisation to undertake the works set out within the Archaeological Written Scheme of Investigation.***

B The demolition/development shall take place/commence in accordance with the programme of archaeological works set out in the Written Scheme of Investigation approved under condition (A)

C The development shall not be occupied/used until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under condition (A) and the provision made for analysis and publication where appropriate.

If planning consent is granted, we will be able to provide detailed advice concerning the requirements for the investigations, and to provide information on professionally accredited archaeological contractors who may be able to carry out the necessary work.

Please do not hesitate to contact me should you require any further information or clarification.

Yours sincerely,



**Andy Instone
Senior Historic Environment Advisor
Environmental Resource Planning**



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Mr Chay Dempster
Hertfordshire County Council
Spatial Planning and Economy Unit, CHN216
County Hall
Hertford
Hertfordshire
SG13 8DN

Direct Dial: 01223 582720

Our ref: P00677118

19 December 2017

Dear Mr Dempster

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LAND TO THE NORTH OF LOWER LUTON ROAD, HARPENDEN,
HERTFORDSHIRE
Application No. PL086617 5/2733-17**

Thank you for your letter of 4 October 2017 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

This application is for the construction of a new school on land to the north of Lower Luton Lane, the development of which would affect the buried remains of a seventh century Anglo-Saxon inhumation cemetery. We have previously advised that your council should take the advice of local advisors and national policy in respect of impacts on the historic built environment. However, we offer further advice, at your request, on the impact of the proposed development on buried archaeological remains - their significance, the impacts which the development would have on their conservation, and the appropriateness of the mitigation strategy which has been proposed in order to offset the harm which would be caused to their significance.

Historic England Advice

Archaeological trial trenching of the proposed development site (on the basis of a 4% sample) revealed a range of multi-period archaeological features. The most important of these is an early Anglo-Saxon inhumation cemetery of seventh century date.

Anglo-Saxon cemeteries have very rarely been located in Hertfordshire. It is postulated that the cemetery might contain somewhere in the order of 40 burials. On the basis of the single burial which has been excavated and dated, preservation

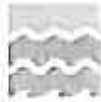


24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
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appears to be good, with some 75% of the skeletal elements preserved. This suggests that the site contains the potential to investigate the age, sex, health, diet and, potentially, mobility of the population; providing an insight into the lives of an Anglo-Saxon community which is almost absent in the archaeological record of the county. This is explicitly recognised in the current East Anglian Archaeological Research Framework (p.50) which states that

'it is increasingly apparent in Hertfordshire that an early Anglo-Saxon presence does not exist and even middle Saxon material is very rare. Establishing a chronological framework and identifying the material culture of the period 450-600 for Hertfordshire is a priority'

The cemetery would be located on the edge of the proposed school grounds, close to the area where playing fields are proposed. Although there are no proposals to build on the area, the development includes remodelling of levels over the area of the playing fields and cemetery and, as a result, it is proposed that the cemetery would be preserved in situ, by covering the remains with 1m + of topsoil to protect them and to prevent damage from illicit metal detecting, after which the area would be retained as a meadow (Archaeological Impact Assessment (AIA), Sections 5.21, 5.7). The strategy includes the restriction of vehicle access in the preservation Area so that only authorised vehicles can enter (Section 5.13).

The conservation of heritage assets is given great weight in the National Planning Policy Framework. Given the rarity of Anglo-Saxon cemeteries in Hertfordshire, set out above, Historic England believes that the remains have the potential to be of national importance and should, for planning purposes, be treated as though it were a scheduled monument, in line with para 139. That being the case, paras 132-4 apply: that the more important the asset, the greater the weight which should be given to its conservation, and that since such assets are irreplaceable, any harm to their significance should require clear and convincing justification. If the level of harm is judged to be less than substantial, this should be weighed against any public benefits in the proposed development.

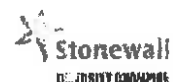
The DCMS note on scheduled monuments and nationally important archaeological sites (p10) states that their importance may be defined in a number of ways, but in particular, by their archaeological interest: that of carrying out expert investigations at some point into the evidence places hold, or potentially may hold, of past human activity. (<https://www.gov.uk/government/publications/scheduled-monuments-policy-statement>). The issue is therefore one of ensuring that the mitigation strategy adopted results in no loss of significance which could be recovered through archaeological investigation.

A brief summary method has been provided for the raising of the topsoil (Sections 5.22 to 5.5.29) and, in general, the approach presented could potentially protect the



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Telephone 01223 582749
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archaeological remains. However, additional information would be required before determining whether the remains would be adequately conserved, in both the short and long term, by this approach. Historic England has produced advice on the preservation of archaeological remains (<https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/>) and we advise that the following matters should be addressed before the proposed mitigation strategy is approved.

- The evaluation report indicates that the graves were found buried at depths that ranged from 0.14m to 0.41m. The range in depth of the archaeology needs to be taken into account so that it is clear that the proposed strategy will be suitable for the more shallow remains as well as those that are more deeply buried. For example, if a maximum of 100mm is stripped from some areas, as stated in Section 5.23, there may only be a minimum of 40mm between the stripped surface and the archaeology which would not be sufficient to ensure its conservation.
- Information also needs to be provided regarding the loading pressure on the underlying deposits after the soil has been placed on top, as well as the sort of machines that will carry out the work. For example, smaller, tracked vehicles should be preferred over larger vehicles or wheeled vehicles.
- A method statement should set out clear working arrangements which demonstrate how civil contractors will carry out the work while complying with the risk management strategy.
- There should be a management plan setting out how the area of the cemetery would be managed as part of the school's grounds, to ensure that the existence and protection of the site was documented and actively managed, to avoid accidental damage to the remains from works associated with maintenance, services or longer term development. In these circumstances, Hertfordshire County Council may wish to consider requesting Historic England Enhanced Advisory Service (<https://historicengland.org.uk/services-skills/our-planning-services/enhanced-advisory-services/fast-track-listing/>) to assess whether the site should be recommended to the DCMS for scheduling, thus providing a degree of certainty as to the status of the heritage asset, and its management.
- In the event that an effective and sustainable methodology for protecting the remains in situ cannot be assured, an alternative strategy of prior archaeological excavation should be considered.

Recommendation

The proposed development has the potential to conserve nationally important



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

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undesigned remains through the implementation of a programme of mitigation to preserve the cemetery *in situ* within the school grounds. However, Historic England considers that further work needs to be done in order for your council to have confidence that the mitigation strategy would sustain the preservation of the buried archaeological remains without any erosion of their significance, in line with the aims and aspirations of the Framework. If this does not prove possible, an alternative strategy of prior excavation may need to be considered.

Yours sincerely

Deborah Priddy

Inspector of Ancient Monuments

E-mail: debbie.priddy@HistoricEngland.org.uk



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 682749
HistoricEngland.org.uk



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Sue Atkinson

From: Roy Warren <Roy.Warren@sportengland.org>
Sent: 23 October 2017 09:51
To: Spatial Planning
Cc: Ruth Gray
Subject: Planning Application Ref: PL\0866\17 - Land to the north of Lower Luton Road, Harpenden, Hertfordshire (SE Ref: E/HEC/2017/46908/N)
Attachments: FA AGP Guide 2013.pdf

For the attention of Chay Dempster

Dear Mr. Dempster

Planning Application Ref: PL\0866\17 - Land to the north of Lower Luton Road, Harpenden, Hertfordshire (SE Ref: E/HEC/2017/46908/N)

Thank you for consulting Sport England on the above application.

Summary: The principle of the planning application is supported as a non-statutory consultee. The following issues require consideration and, if appropriate, addressing before a planning application is determined:

- Design and Layout of the Sports Hall – advisory comments are made and an informative regarding design is requested;
- The football pitch dimensions should be reviewed against the Football Association's guidance

The following matters are requested to be addressed through planning conditions being imposed on any planning permission:

- Sports Pitch Feasibility Study and Specification
- Artificial Cricket Wicket Specification;
- MUGA Design Specifications;
- Community Use Agreement.

Sport England – Non Statutory Role and Policy

The Government, within their Planning Practice Guidance (Open Space, Sports and Recreation Facilities Section) advises Local Planning Authorities to consult Sport England on a wide range of applications.

<https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/open-space-sports-and-recreation-facilities>

This application falls within the scope of the above guidance as it relates to the creation of a major sports facility and the creation of a site for one or more playing pitches.

Sport England assesses this type of application in line with its planning objectives and with the National Planning Policy Framework (NPPF). Sport England's planning objectives are to PROTECT existing facilities, ENHANCE the quality, accessibility and management of existing facilities, and to PROVIDE new facilities to meet demand. Further information on Sport England's planning objectives can be found here: <http://www.sportengland.org/facilities-planning/planning-for-sport/aims-and-objectives/>

The Proposal and Assessment against Sport England's Objectives and the NPPF

The proposal is for a new 6 FE secondary school, to be known as the Katherine Warrington School, which would be constructed on an area of agricultural land to the east of Harpenden. The new school would include a sports hall and activity studio supported by changing facilities that would be provided in a

separate sports hall block from the main school building. In terms of external sports facilities, there would be natural turf playing fields split across two areas of the site that would provide for a range of winter and summer pitches and a multi-use games area (MUGA) suitable for tennis and netball. It is understood that the sports facilities would be available for community use outside of school hours.

Principle of the Development

There is no up-to-date sports facility strategy available for St Albans district that would inform community indoor and outdoor sports facility needs in the Harpenden area. However, the consultations with sports governing bodies that I have undertaken indicate that this is an area of high participation levels in a range of sports and that the existing supply of facilities does not meet current needs. For example, the Lawn Tennis Association have advised that community use of the tennis courts would be great for helping to meet club and casual community use needs in the area.

As it is proposed to make the sports facilities available for community use, Sport England would be **supportive** of the principle of the sports facility proposals in the proposed school development as they would offer potential to accord with the above objectives relating to providing new facilities to meet demand. However, the following specific issues and comments outlined below about particular aspects of the scheme require consideration as part of the determination of the application to help ensure that the sports facilities are fit for purpose for meeting school and community needs.

Sports Hall Block

The provision of a sports hall that would be available for community use outside of school hours would be welcomed in principle as it would offer potential for meeting any unmet indoor sports facility needs. However, community access would need to be secured through a community use agreement to help ensure that the facility meets community needs over a long term period in practice. Attention will also need to be given to the design and layout of the facility. To this end, Sport England has developed detailed guidance on expectations for good facility design. Further information on design is detailed on our website at <http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>. Advisory comments based on the submitted floor plans are appended to this response which I would be grateful if the applicant could be **requested** to consider before the internal design is finalised in order to ensure that the design and layout is broadly in accordance with our design guidance.

In order to help ensure that the detailed elements (such as internal flooring and lighting specifications) of the design of the sports hall are fit for purpose, it is **requested** that an informative be added to a decision notice if the application is approved advising that the sports hall should be designed in accordance with Sport England's relevant design guidance notes.

Informative: The applicant is advised that the design and layout of the sports hall should comply with the relevant Industry Technical Design Guidance, including guidance published by Sport England, National Governing Bodies for Sport. Particular attention is drawn to the "Sports Hall Design & Layouts" design guidance note <http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/sports-halls/>.

Playing Fields

The Landscape Masterplan shows that a range of winter and summer sports pitches could be marked out in practice on the natural turf playing field which is welcomed. The provision of an artificial grass cricket wicket is particularly welcomed as this will help facilitate school and community cricket use on the site and artificial wickets are preferable to natural turf wickets on school sites due to the relative maintenance costs associated with them. While not ideal, it is understood that the playing field has to be separated into two areas to address the constraints imposed by the gradients of the site. I have the following advisory comments:

- The design and construction of the playing pitches will need to be informed by a sports pitch feasibility study to ensure that it is fit for purpose in practice;
- While not part of the planning application, it has been indicated that the playing fields have been designed to accommodate potential all weather pitch in the future. This is considered to be prudent

and is welcomed in principle. At this stage, the site layout should ensure that sufficient space is allowed to accommodate a full size artificial grass pitch. While the plans indicate that a 102 x 66 m football pitch is currently proposed for the area to the north of the proposed MUGA, to future proof it an overall area of 112 x 76m should be preserved for future artificial grass pitch use as this allows for the run-off areas, goal storage recesses and spectator areas required on a full size 3G artificial grass pitch suitable for football as set out in the attached design guidance. If an artificial pitch suitable for hockey was proposed this would be smaller (101.4 x 63 m overall area) than the area required for a 3G pitch.

- The artificial cricket wicket should meet the ECB's Guidance for the Provision and Installation of Non Turf Cricket Pitches and Net Cage Facilities and installation must be by a supplier of an ECB approved NTP system to ensure that it is safe and meets performance requirements. See the ECB's website <https://www.ecb.co.uk/be-involved/club-support/club-facility-management/surface-types> for design guidance and approved systems;
- The football pitches should have dimensions which meet the FA's recommended dimensions to ensure that the pitches are suitable for school and community competitive use. The Football Foundation (on behalf of the FA) have advised that the pitches shown on the Landscape Masterplan do not meet the guidance and should be amended where applicable to meet the following dimensions:
 - Youth U11 and U12 (9v9) 73 x 48m (79 x 52m including safety run-off area)
 - Youth U13 and U14 (11v11) 82 x 50m (88 x 56m including safety run-off area)
 - Youth U15 and U16 (11v11) 91 x 55m (97 x 61m including safety run-off area)
 - Youth U17 and U18 (11v11) 100 x 64m (106 x 70m including safety run-off area)
 - Over 18 and Adult (11v11) 100 x 64, (106 x 70m including safety run-off area)

Sports Pitch Feasibility Study & Specification

As the grass playing fields are being designed to accommodate both school and potential community use it is considered essential that the school's playing field is constructed to a standard that will allow intensive use. Unless specialist consideration is given to the ground conditions and the proposals for the construction and maintenance of the new playing field, there are likely to be constraints on the ability of the playing field to meet the needs of the school and the community in terms of the carrying capacity of the playing fields and surface quality. Sport England's has had regular experience of playing fields on new school sites being unusable for the majority of the academic year due to inadequate consideration being given at the planning and design stages. As retrospectively addressing such scenarios is usually very costly and disruptive to schools, it is considered essential that appropriate provision is made for addressing playing field construction issues through any planning permission. The applicants proposal to undertake an agronomic assessment in paragraph 6.33 of the Design and Access Statement is therefore welcomed in principle. Sport England would therefore expect a feasibility study to be prepared to assess the ground conditions (drainage, soils, topography etc) and identify the constraints that may affect the ability to deliver good quality playing surfaces that would sustain the anticipated levels of use by both the school and the community. A sports pitch specification would also need to be prepared (based on the feasibility study recommendations) to ensure that an appropriate quality playing field is provided in practice. Sport England's guidance note "Natural Turf for Sport" (2011) provides guidance on what should be included in a site assessment and how new playing pitch sites can be planned, designed, managed and maintained to maximise their quality. This document and the other design guidance notes referred to in this response can be downloaded from our website at <http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/natural-turf-for-sport/>. The feasibility study and sports pitch specification should be prepared by an agronomist/sports turf consultant. Sport England can provide details of agronomists/sports turf consultants as well as example studies upon request.

I would therefore request that a planning condition be imposed on any planning permission requiring the submission and approval of an assessment of the ground conditions of the area proposed for playing field use which would lead to a related detailed sports pitch specification being prepared for addressing ground condition constraints (such as gradients, drainage, surface quality and maintenance issues) that have been identified in the assessment which may restrict the playing capacity and performance quality of the playing field. This should be approved before any works commence on the playing field element of the development. It is requested that the following condition is used for addressing this matter (based on

model condition 10a of our conditions schedule <https://www.sportengland.org/facilities-planning/planning-for-sport/planning-applications/>) :

- (a) *No development of the playing field area shall commence until the following documents have been submitted to and approved in writing by the Local Planning Authority after consultation with Sport England:*
 - (i) *A detailed assessment of ground conditions (including drainage and topography) of the land proposed for the playing field which identifies constraints which could affect playing field quality; and*
 - (ii) *Based on the results of the assessment to be carried out pursuant to (i) above, a detailed scheme which ensures that the playing field will be provided to an acceptable quality. The scheme shall include a written specification of soils structure, proposed drainage, cultivation and other operations associated with grass and sports turf establishment and a programme of implementation.*
- (b) *The approved scheme shall be carried out in full and in accordance with a timeframe agreed with the Local Planning Authority. The land shall thereafter be maintained in accordance with the scheme and made available for playing field use in accordance with the scheme.*

*Reason: To ensure that the playing field is prepared to an adequate standard and is fit for purpose and to accord with Development Plan Policy **.*

Informative: The applicant is advised that the scheme should comply with the relevant Industry Technical Guidance, including guidance published by Sport England, National Governing Bodies for Sport. Particular attention is drawn to 'Natural Turf for Sport', (Sport England, 2011)].

Artificial Cricket Wicket

A planning condition and associated Informative is requested requiring the specification of the proposed artificial cricket wicket to be submitted and approved. This is justified to ensure that the facility is fit for purpose and of a suitable quality to meet safety and performance requirements. An implementation programme is also requested to provide clarity and certainty about when the wicket will be constructed in practice. The ECB have advised that compliance with these standards would be a pre-condition of their support in order to ensure that the facilities are suitable for community cricket use.

It is requested that the following condition and Informative be imposed on any planning permission to address this matter (which is based condition 9 of our model conditions schedule):

"Prior to installation of the artificial cricket wicket, details of the design and layout of the artificial grass cricket wicket together with an implementation programme shall be submitted to and approved in writing by the Local Planning Authority after consultation with Sport England. The artificial grass cricket wicket shall not be constructed other than in accordance with the approved details.

*Reason: To ensure the development is fit for purpose and sustainable and to accord with Development Plan Policy **.*

Informative: The applicant is advised that the design and layout of the artificial grass cricket wicket should comply with the relevant industry Technical Design Guidance, including the England & Wales Cricket Board's (ECB) TS6 document on Performance Standards for Non-Turf Cricket Pitches Intended for Outdoor Use <http://www.ecb.co.uk/development/facilities-funding/facilities-guidance-and-project-development/non-turf>. The applicant is also advised to ensure that an ECB approved non-turf system is installed.

Multi-Use Games Area (MUGA)

The proposal to provide a MUGA that would be suitable for 4 netball and tennis courts is welcomed. Sport England would advocate that the MUGA is designed for a range of sports informed by the school's priorities and that the detailed specification is informed by the priority sport as there are some differences in

the detailed specification of the surface for instance if netball has greater priority than tennis or vice versa. It is noted that sports lighting for the MUGA is not proposed in the application which will restrict the extra-curricular and community use potential of the MUGA. To future proof the potential to install lighting at a later date (subject to planning permission), it is recommended that the MUGA is constructed with the electrical services (i.e. service ducting) provided so that the school can install lighting at later efficiently without the costs of retrospectively providing electrical services to the facility.

At this stage, there is no information available about the detailed specifications for the design and layout of the MUGA to determine their suitability e.g. surfacing, line marking, fencing. This should be provided at pre-commencement stage to allow an informed assessment to be made of whether the detailed design will be fit for purpose in practice. Without such information being provided, there is a risk that the design will not be suitable in practice for meeting the needs of proposed sports that will be played or opportunities may be missed which may not be viable to retrospectively address. When developing the specifications for the detailed design of the games courts, attention should be given to the relevant Sport England and national governing body design guidance referred to in the informative below and discussions should take place with the relevant sports governing bodies. **It is requested that the following condition and informative** be imposed on any planning permission to address this matter (which is based on condition 9 of our model conditions schedule):

"No development of the multi-use games area hereby approved shall commence until details of the multi-use games area specifications including the surfacing, fencing and line markings have been submitted to and approved in writing by the Local Planning Authority after consultation with Sport England. The multi-use games area shall not be constructed other than in accordance with the approved details.

Reason: To ensure the development is fit for purpose and sustainable and to accord with Development Plan Policy **.

Informative: The applicant is advised that the design and layout of the multi-use games area should comply with the relevant industry Technical Design Guidance, including guidance published by Sport England, National Governing Bodies for Sport. Particular attention is drawn to: Sport England's 'Artificial Surfaces for Outdoor Sports' guidance note (2013), England Netball's 'Performance Requirements for Indoor Surfaces' guidance note <https://englandnetball.co.uk/make-the-game/facilities-information/>, and the LTA's 'Porous Macadam Tennis Courts and Floodlighting Outdoor Tennis Courts' guidance notes <https://www.lta.org.uk/venue-management/facilities-advice/>

Community Use

The new school provides a rare opportunity to provide substantive new sports facilities that the community in the Harpenden area could use for meeting their needs. Regardless of the facilities provided and their design, community use should be maximised outside of school hours and access should be formalised and secured through a formal community use agreement being completed. A community use agreement sets out a school's policy and arrangements for community use of its sports facilities and covers matters such as hours of use, types of bookings accepted, restrictions on community use etc. The agreement is usually between a school (or academy trust) and the relevant local authority (e.g. St Albans City & District Council) but may involve additional bodies. The completion of such agreements is usually secured through planning conditions on planning permissions for school developments. Such a condition is justified to avoid a scenario where community access (outside of school hours) to the proposed facilities does not take place (or is significantly restricted) following the implementation of the proposed development and to ensure that the community use arrangements are safe and well managed. Without suitable community access being secured over a long term period in practice, the potential offered by this development in terms of meeting wider community needs may not be realised. A community use agreement also provides clarity and formalisation with respect to community access arrangements for all parties. It has been noted that the applicant has advised that the school would be willing to complete a community use agreement as a requirement of a planning permission. Community use agreement templates, examples of completed agreements and further advice can be provided upon request. For information, Sport England's guidance for schools on preparing for and delivering community use is available at

<http://www.sportengland.org/facilities-planning/use-our-school/> . The **following condition is requested** to be imposed to address this (which is based on model condition 16 of our conditions schedule):

"No occupation of the sports hall shall commence until a community use agreement prepared in consultation with Sport England has been submitted to and approved in writing by the Local Planning Authority, and a copy of the completed approved agreement has been provided to the Local Planning Authority. The agreement shall apply to the sports hall, activity studio, multi-use games area, playing field and other suitable facilities to be defined in the agreement and include details of pricing policy, hours of use, access by non-educational establishment users, management responsibilities and a mechanism for review, and anything else which the Local Planning Authority in consultation with Sport England considers necessary in order to secure the effective community use of the facilities. The development shall not be used at any time other than in strict compliance with the approved agreement."

Reason: To secure well managed safe community access to the sports facility/facilities, to ensure sufficient benefit to the development of sport and to accord with Development Plan Policy **.

I would be happy to discuss the matters raised in this response with the local planning authority and/or the applicant during the planning application determination process.

The absence of an objection to this application in the context of the Town and Country Planning Act, does not in any way commit Sport England or any National Governing Body of Sport to support for any related funding application.

If this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agendas, report(s) and committee date(s). We would be grateful if you would advise us of the outcome of the application by sending us a copy of the decision notice.

Please contact me if you have any queries.

Yours sincerely,

Roy Warren
Planning Manager

T: 020 7273 1831
M: 07769 741 137
F: 01509 233 192
E: Roy.Warren@sportengland.org



APPENDIX – ADVISORY DESIGN COMMENTS

Sports Hall

- The location of the sports hall is positive in relation to the external sports facilities and having a dedicated sports block has the advantage of the facility being able to be used by the community outside of school hours without the maintenance and security issues associated with having to open other areas of the school building.
- The provision of dedicated car parking is welcomed but attention will need to be given to the pedestrian access links between the main car park at the front of the site and the sports hall to ensure that there is safe and convenient access from the main car park as 18 spaces to serve the sports facilities is unlikely to be sufficient especially during peak periods of community use when the sports hall and external facilities are being used by the community at the same time.
- SE recommend a draft lobby at the point of entry to limit the heat loss at reception and to ensure this area is a positive environment.
- It is unclear whether provision is proposed for a reception desk with a drop level design to assist disabled users. The reception desk should not be too close to the point of entry because with potential automated doors these will continually be opening as people wait at the reception desk.
- There is currently no provision for spectator areas into the sports hall. As a school and community facility Sport England would expect to see some form of small social space where views into the hall can be accommodated. Without this, the appeal for school events and community use will be diminished. Also when used by the community, a small social space is a relatively easy way of driving additional income through vending.
- There is currently only one entry into the sports hall. SE recommend two points of entry so when the hall is split into 3 and 1 and 2 and 2 court layouts there is less disruption for users.
- Hall size – Sport England guidance recommends that a 4 court hall should be 34.5x20m – 690sqm in total with a clearance height of 7.5m. A 33x18m hall (594 sq.m) as proposed would not be able to fully meet potential community needs.
- Cricket – if the sports hall is being designed for indoor cricket, the ECB have advised that it must comply with ECB Indoor Sports Hall with Cricket Provision (TS3) guidance <https://www.ecb.co.uk/be-involved/club-support/club-facility-management/surface-types>, meeting the required specifications for flooring, lighting and nets layout.
- Storage – The drawings are indicative but SE recommend that a minimum of 12.5% of the floor space be provided as storage. This equates to a minimum of 74 sq.m for a hall of the proposed size which is above the 63 sq.m that is proposed which is likely to create capacity issues for the school.
- Storage - if the hall is split into different usage sections only the end court has access to the storage space without activity being disrupted. Storage distributed along the side of the hall is therefore recommended.
- SE recommends that the internal walls of a hall are all block work which are a consistent colour. This offers a more robust design solution and a better sporting experience.

Changing Accommodation

- SE do not recommend that changing rooms serve both indoor and outdoor spaces as it often results in major mud contamination and additional cleaning requirements especially if a natural turf pitch is proposed.
- The flow of a change should ideally be entrance, toilets, entrance, change, showers. If a space is serving both indoor and outdoor needs, two entry / exit points are usually provided which compromises this flow.
- Two accessible changing rooms that double up for staff changing are positive. However, they should not be designed so that access is only via the staff office as this would require school or community disabled users to have to access the office to get to the changing room which is likely to be disruptive to staff and may deter users that require access to these rooms. This could be

addressed if the accessible changing rooms could be accessed from the adjoining circulation lobby as well as the staff room. Accessible lockers outside this space should be provided.

Activity Studio

- A 150 sq.m space is positive as this would allow a range of activities and class sizes to be accommodated. SE recommend 4.5-5sqm of floor space per item of equipment. Therefore, if a space is to accommodate a class of 30 pupils it needs to be a minimum of 135sqm.
- The provision of natural light in to the space is positive but glare and solar gain issues may require consideration. This space should have air conditioning.

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Chay Dempster

From: BCTAdmin@thameswater.co.uk
Sent: 20 October 2017 09:14
To: Spatial Planning
Subject: 3rd Party Planning Application - PL/0866/17

Hertfordshire County Council
County Hall
Hertford,
Herts,
SG13 8DN

Our DTS Ref: 54794
Your Ref: PL/0866/17

20 October 2017

Dear Sir/Madam

Re: LAND TO THE NORTH OF, LOWER LUTON ROAD, HARPENDEN, HERTFORDSHIRE, AL5 5AF

Waste Comments

Thames Water would advise that with regard to sewerage infrastructure capacity, we would not have any objection to the above planning application.

Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. The contact number is 0800 009 3921. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

Water Comments

With regard to water supply, this comes within the area covered by the Affinity Water Company. For your information the address to write to is - Affinity Water Company The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.

Yours faithfully
Development Planning Department

Development Planning,
Thames Water,
Maple Lodge STW,
Denham Way,
Rickmansworth,
WD3 9SQ
Tel: 020 3577 9998
Email: devcon.team@thameswater.co.uk

This is an automated email, please do not reply to the sender. If you wish to reply to this email, send to devcon.team@thameswater.co.uk

Sue Atkinson

From: Nunn, Craig <craig.nunn@ukpowernetworks.co.uk>
Sent: 09 October 2017 11:01
To: Spatial Planning
Subject: CN0032 - Common Lane Harpenden - Your Ref PL\0866\17
Attachments: \$SCAN\$_nunn01c_07-10-2017_08-05-13.pdf

Dear Mr Chay Dempster

I am writing to you on behalf of UK Power Networks.

Thank you for the attached letter, could you please make a comment on the application on my behalf.

Our records indicate the presence of an 11,000volt underground cable within the Lower Luton Rd side of the proposed development.

Further information can be secured from our Plan Provision team

The best way to make a request is to email plans@ukpowernetworks.co.uk or call 08000565866 option1.

We can take a request by telephone if it is for a residential site.

FEES OFTEN APPLY.

We will need the following information:

Customer name, Company name, Contact details, Full site address, Nature of works, Site plan showing boundary of the site clearly marked, Delivery address for paper plans or email address for electronic plans.

Kind Regards Craig,

Craig Nunn
Asset Management Surveyor
01284 726329
07875 114089
craig.nunn@ukpowernetworks.co.uk
UK Power Networks Property & Consents (P&C)
c/o Barton Road, Bury St Edmunds, IP32 7BG

Please note I am not currently at work on Tuesdays.
AM Surveyor hubs 5, 6, 9 and 10.

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Registered Office: Newington House, 237 Southwark Bridge Road, London SE1**

Sue Atkinson

From: Consultations (NE) <consultations@naturalengland.org.uk>
Sent: 10 October 2017 13:34
To: Spatial Planning
Subject: Re: PL/0866/17

Dear Mr Dempster

Application ref: PL/0866/17
Our ref: 228099

Natural England has no comments to make on this application.

Natural England has not assessed this application for impacts on protected species. Natural England has published Standing Advice which you can use to assess impacts on protected species or you may wish to consult your own ecology services for advice.

Natural England and the Forestry Commission have also published standing advice on ancient woodland and veteran trees which you can use to assess any impacts on ancient woodland.

The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes. It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision making process. We advise LPAs to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.

We recommend referring to our SSSI Impact Risk Zones (available on Magic and as a downloadable dataset) prior to consultation with Natural England. Further guidance on when to consult Natural England on planning and development proposals is available on gov.uk at <https://www.gov.uk/guidance/local-planning-authorities-get-environmental-advice>

Yours sincerely

Joanne Widgery
Natural England
Consultations Team
Hornbeam House
Crewe Business Park
Electra Way,
Crewe
Cheshire, CW1 6GJ

Tel: 0300 060 3900
Email: www.gov.uk/natural-england

www.naturalengland.org.uk

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

For further information on the Discretionary Advice Service see [here](#)

For further information on the Pre-submission Screening Service see [here](#)

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Standing up for Hertfordshire's countryside

Our Ref:

Your Ref:

Chay Dempster
Principal Planning Officer
Development Management
County Development Unit
Hertfordshire County Council
County Hall
Hertford
SG113 8DN

15th November 2017 (by email)

Dear Mr. Dempster,

Application No. PL\0866\17

Katherine Warrington School - Proposed Application for the construction of new 6FE school buildings, vehicular access/egress onto the Lower Luton Road, vehicular access onto Common Lane, car parking, cycle storage, coach parking, playing fields, tennis courts/multi-use games area, surface water attenuation measures, hard and soft landscaping and other associated development.
On land to the north of Lower Luton Road, Harpenden, Hertfordshire.

CPRE Hertfordshire has considerable concerns regarding this proposed development in the Green Belt.

The proposal constitutes inappropriate development contrary to the Green Belt Policies in Section 9 of the National Planning Policy Framework and the site, though in the ownership of Hertfordshire County Council, is within St Albans City and District and is therefore also contrary to Policy 1 of the current St. Albans Local Plan.

Consequently there is a requirement on the applicant to demonstrate 'very special circumstances' which are sufficient to outweigh the harm to the Green Belt through inappropriateness or other harm.

The only 'very special circumstance' put forward in the documentation accompanying the application is in paragraph 6.7 of the Green Belt Assessment and repeated in the Planning, Design and Access Statement, to the effect that "there is a 6.2FE need for a secondary school in Harpenden in 2019/20 which cannot be met in any other location." This is not entirely true. The site assessments carried out by Vincent Gorbing in 2014 identified three possible sites. In that analysis, published in 2015, Site A (land east of Luton Road), assessed as having 'slight adverse impact' was considered to be more appropriate than the proposed

site (Site F) which was assessed as having '*moderate adverse impact*' and the conclusion at para. 5.10 of the assessment was that a planning application for Site F '*might not successfully address Green Belt Policy*' (The emphasis is the report's, not ours.) Of the three potential sites which were considered might be suitable, Site F was ranked third. Site A (as stated in the updated 2017 Addendum Report accompanying this application) '*offered the best location for a secondary school*' (para 2.14). Part of the argument against Site A in the current application documentation is that it was included as a potential housing site in the draft St Albans Local Plan 2011-2031. That Plan was subsequently withdrawn and the argument must now be considered speculative and of no weight.

The only material change in the intervening period has been the purchase of the freehold of Site F by the County Council. In the viability assessment undertaken by Pick Everard, Sites A & F were ranked equally first (Section 6), though Site F would be cheaper to purchase. The assessment argues that the purchase of Site F results in a higher score of 'cost and viability'. This would have been true of any site which the Council chose to purchase and is not unique to this site. The purchase does not, in itself, make the site 'more appropriate' in planning terms.

At the present time, under the provisions of the St Albans Local Plan, Common Lane provides a clear and defensible Green Belt Boundary. That defensible boundary will disappear if this proposal goes ahead. This is exacerbated by the exclusion of the strip of land between the School site and Common Lane, a site which we understand has now been put forward to St Albans Council as a potential housing site. It is fatuous for the applicant to claim that the school would act as a buffer between Harpenden and the development at Lea Valley Estate when the existing field already fulfils that Green Belt function.

The impact on the character of the Green Belt would be substantial and irreversible. Apart from the intrusion of the buildings themselves, there would be extensive terracing of those parts of the site not built on to provide level playing fields in place of the currently sloping hillside. The sports pitches would presumably be floodlit though there are no details of the lighting provided in the application.

St. Albans Local Plan Policy 104 seeks to protect designated landscape conservation areas, within which Site F lies. Para. 5.13 of the Site Assessment is clear that Site F would result in conflicts with that Policy. Similarly, Policy 86 seeks to protect Heritage Assets. The site assessment concludes that development would have '*a large adverse effect on heritage assets*' (again the report's emphasis). In both instances this is also contrary to NPPF policies (paras. 11 and 128, 132 and 133 respectively).

On archaeological impact (covered by Local Plan Policies 110 and 111 and NPPF paras. 128, 132 and 133), the assessment concludes that there would be slight adverse impact (para 5.20). We note that this is contradicted by the response from the St Albans District Archaeologist on the Council's website.

The applicant acknowledges in para. 3.6 of the Planning, Design and Access Statement that the land is of Grade 3a agricultural quality. The National Planning Policy Framework defines best and most versatile agricultural land as "*Land in grades 1, 2 and 3a of the Agricultural Land Classification*" and NPPF para.112 states that development of this land should be avoided and due weight given to its economic value. Similarly, St Albans Local Plan Policy 102 says that such land should not be used for development. This point is not addressed in the Planning, Design & Access Statement or in any of the incarnations of the Site Assessments. Consequently the Council is required to take this into account when assessing the planning balance.

We will not comment on the educational needs assessment in any depth, but it does appear that the focus has been on meeting current need in Harpenden, with scant regard being paid to the potential impact of housing development proposed in both the Dacorum and St Albans emerging Local Plans. For example, those proposals included the provision of an 8FE school on the land to the south west of Harpenden. These, if realised, would shift the need and catchment areas away from the site of this application and raise the question of its suitability to sustainably meet future demand.

There also appears to be a similar focus on Harpenden in the various elements of the Transport and Traffic Assessments. A substantial section of the proposed student intake will come from the North and East of the site, particularly Wheathampstead. It is not acceptable to assume that all journeys from there will be made by bus. Access on foot or by bicycle will not be easy from these directions (even unsafe, as noted in the Transport analysis). This will inevitably be exacerbated by the increase in vehicular traffic on the B653 in peak periods, generated by the school itself and, in our view, the safety aspects and possible mitigation factors beyond the Lea Valley Estate have not been satisfactorily addressed in the proposal.

For the above reasons we urge the Council to reject this application.

Yours sincerely,



David Irving

