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### **Response to St Albans City & District Consultation on Local Plan 2018**

APRA represents households that fall entirely within the St Albans Conservation Area (designated areas 2b, 2c, 5b, 5c and partly 7b). Members will respond personally to the major aspect of where new houses might be built, but it seems inevitable that parts of the Green Belt will be lost if the Government imposed targets are to be approached.

Our concern is that development of the city should not detract in any way from its distinctive historic character, either in scale or nature. The National Planning Policy Framework states (paragraph 126) that Councils should set out a ‘positive strategy’ in their local plans for the historic environment. We therefore expect to see a proactive approach to this in all relevant policy areas of the Local Plan, not solely in relation to heritage buildings. There should be an overall statement recognising the current issues and pressures and how these will be addressed through positive enhancement of the city’s exceptional historic core.

In our view, the most evident pressures on the conservation area are:

- Intrusion, congestion and damage caused by motor traffic, especially large construction, delivery and service vehicles and large buses and coaches serving St Albans School. The local plan, in association with Herts County Council, should promote a new approach, for example requiring all schools to submit Travel Plans and a long-term plan for a reduction of large vehicles in the area. More streets, especially narrow culs-de-sac should have heavy traffic bans.
- Infilling and backland development affecting the character and appearance of the conservation area, the settings of listed buildings, views and green spaces and, potentially, the landscape setting of the conservation area (i.e., the important green setting in relation to Verulamium Park.). The policy approach to traffic and access should take into account both safety and effects on the character and quality of the conservation area.

We note that Local Plan 2018 is a comprehensive 16-year plan, not just a list of strategic policies as previously. The sustainability appraisal for this plan should therefore be more detailed and draw out current issues and opportunities more fully than before. The previous Sustainability Appraisal (ref CD 0079) contained little information on issues and opportunities for cultural heritage. We hope that the above issues will be incorporated so that positive policy responses are identified and taken forward.

The plan most recently consulted on (ref CD 002) contained policies SLP3 Historic Environment and Townscape and SL22–23 for the Cathedral Quarter and Visitor economy. We hope that these policies will be expanded and more detailed treatment added to ensure that conservation and enhancement are promoted in a positive manner.

Looking more widely at the issues for St Albans, urban extensions to the boundaries will bring their own requirements and demands on access to the city centre and over-stretched infrastructure (schools, health services and parking). The long-term effect on the Conservation Area will be cumulative. The additional traffic impacts will also feed directly into the blight of air pollution. We would like to see more widespread heavy vehicle restrictions and further improvement of traffic control.

We look for a firm commitment to maintaining and enhancing the attractiveness of the Conservation Area for the benefit of both residents and visitors so that St Albans continues to be recognised and appreciated as having a very special place in the last 2000 years of English history.

Yours faithfully

A handwritten signature in black ink, appearing to read 'R. J. Pankhurst', with a long horizontal flourish extending to the right.

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cc. Verulam Ward Councillors