

## **Observations by St Albans Civic Society**

### **INTRODUCTION 1**

The Society wholeheartedly agrees with the thrust of the Introduction, specifically:

- The CCOS presents *"an exciting opportunity to deliver a landmark development in the civic heart of this historic City Centre"* (section 1.1).
- Proposals must demonstrate *"an high quality urban design and architectural solution"* (section 1.2).

The question is, will this brief ensure that this outcome will be achieved? Read on ...

The objectives are positive and appropriate (section 1.3) though high quality architectural design should also be identified as an objective.

There is a reference to the Council's Height of Buildings Policy, but nowhere is the policy set out nor an explanation given how the policy will be applied to this site. See further below.

### **SITE BACKGROUND 2**

The City Vision envisaged the potential redevelopment of either or both Lockey House and Forrester House. It is disappointing that the brief steps back from this position.

In a recent public consultation exercise by the Society, Forrester House was identified as the top candidate for demolition. The brief should be more forceful in its criticism of these buildings and should not rule out their eventual redevelopment.

### **APPROPRIATE USES 3**

The principle of allocating a significant proportion of the land use on the site to residential is supported, but only if it is designed to have the character and appearance of urban housing (as per KF option 1) and not tucked away on the upper floors of some featureless city block (as per KF option 3).

The Society notes the conclusion that *"residential use is potentially the main value driver for the CCOS site."* (section 3.3). This may be the case, but the greater the proportion of affordable housing, the less will be the surplus for other purposes. The Council has a record of making mistaken and over-optimistic financial assessments relating to this site, with wasteful and nearly catastrophic results. It would be unfortunate if this was to be repeated in this brief.

Regarding retail (section 3.4) the KF Report is rightly sceptical about the possibility of attracting a department store for this site. The brief should acknowledge this. And, whilst the CCOS site could add to the available retail floorspace, the area west of St Peter's Street would appear to be the more promising location for any further retail development to supplement the existing shopping centre.

Regarding hotels, the Society strongly supports the statement "*Any proposals for budget / 3\* hotels would, however, be required to be of the highest of design standards and not be standard proposals as used elsewhere.*" (section 3.5). The Comfort Hotel on Holywell Hill is a good local example of an acceptable design solution for a budget hotel. The recent Premier Inn proposal is a totally contrary example, a budget hotel with an undistinguished design and at least one storey too high; it was rightly rejected by the Council.

We would support (3.7) the creation a cultural hub providing museum, exhibition space, and a flexible live performance / modest cinema venue.

## **STATUTORY PLANNING POLICY 4**

National and local planning policy is in a state of flux. Development, however, continues. The CCOS site has been the subject in recent years of a number of abortive planning applications by different developers. It is crucial, therefore, to get the brief in place, at the very least as an SPD under 'saved' policy 116 from the Local Plan Review, in case that plan finally expires before the Core Strategy is in place.

## **SITE SPECIFIC CONSIDERATIONS 5**

Figure 12 sets out some of the opportunities and constraints relating to the site. Unfortunately, it does not deal with the important urban design issue of the streetscape in Bricket Road and Victoria Street. This is a significant omission, with potentially drastic consequences.

The brief gives surprising prominence to sustainable development. This is a *sine qua non* for contemporary development, but hardly a site specific consideration of significance. This section should be down-played.

It is hard to see, however, how demolition of buildings, the Civic Offices and car park, constructed within the last 25 years is consistent with the principles of sustainable development. This should only be contemplated if there is very strong justification. This case is not made in either the KF Report or the Sustainability Appraisal. And a strong case has to be made for the demolition as against refurbishment of any of the other buildings on the site.

## **LAYOUT & DESIGN PRINCIPLES 6**

This is the heart of the brief, where the fine words in the preceding sections should be translated into tangible reality in a Masterplan.

What appears to have happened is that the block diagram for option 3 from the KF Report has been transposed, albeit with minor changes, into the brief as the block plan in Figure 25. This may be a mistake; it is certainly unfortunate and remarkably insensitive. Knight Frank are commercial and residential surveyors and agents, not urban designers. The brief they were given was "to undertake a viability study"<sup>1</sup> not a design study. Block diagrams may serve the limited purposes of their study, but are not suitable for a planning brief.

Worse still, the option selected for the brief is the one that does most damage to the city heritage<sup>2</sup>, fails to respect the inherent worth of the existing trees, some with TPO designation, and the amenity of the Municipal Gardens.

Adding insult to injury, an example is given (figure 26) from a city which has in the past suffered and done untold damage to its heritage. Development like this would run fundamentally counter to the distinctive character of St Albans.

The block diagram is such that, were this brief to be adopted, the Council would find it impossible to reject schemes along the line of the three failed schemes submitted by Antringham in 2008, 2009 and 2010 (see section 8.3). It would be a developer's charter, plain and simple.

### **FIGURES 25 AND 26 MUST BE REMOVED FROM THE BRIEF.**

The Final St Albans City Vision report stated "*The Masterplan (should) aim to put in place a finer grain of streets/blocks than currently exists – the street being a robust and flexible structuring element for cities*"<sup>3</sup>. If the brief is to include a block plan, it must follow this guidance and exhibit greater urban design sensitivity. Examples should only be of the highest standard from other historic cities. In other words a far greater people-friendly space and not massive, bulky and over high blocks.

The fact is that this section shows no understanding or appreciation of urban streetscape and design. A new section, or perhaps a more general centre-wide design SPD, should be prepared to address this aspect.

The brief should specify acceptable heights (section 6.4). 4 storeys should be set as the maximum along the northern section of Bricket Road, complementing the 3-storey office block and detached houses opposite.

## **APPENDICES 8**

It is significant that 'saved' policy 114 (building height) from the local plan review is not formally set out even in this section. It must be in case the local plan expires before being replaced.

The Site Planning History is incomplete, in that it makes no reference to the two withdrawn schemes, both submitted by a developer selected by the Council in 2006. One was for a monolithic 8-storey block, the other for twin 9+12-storey blocks to replace the Council car park.

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<sup>1</sup> paragraph 1.1 of KF Report

<sup>2</sup> paragraph 6.33 of KF Report

<sup>3</sup> page 139

## **THE KNIGHT FRANK REPORT and the SUSTAINABILITY APPRAISAL**

As a minor point, it is rather surprising to see the suggestion that "*it may be feasible to go higher along Bricket Road ...*" than Victoria Street (KF para 5.16). This is nonsense, and fails to recognise that the northern end of Bricket Road is nearly 5 metres higher than at Victoria Street<sup>4</sup>. This misconception seems to have percolated into the brief (final sentence of section 6.4) with potentially damaging impact both along Bricket Road and for the Marlborough Almshouses, especially when viewed from Hatfield Road.

On the other hand, KF option 1 includes a terrace of town houses along Bricket Road – an attractive idea that could be further extended.

As a general observation, neither report attempts to give a realistic assessment of the refurbishment options for any of the principal buildings. For example, both the Police building and Hertfordshire House could be retained in Options 1 and 2. St Albans has a literally shining example in the Ziggurat (Schweppes) building and, more recently, with the listed buildings at Oaklands (City Campus).

### **Consultation**

The Society is identified as one of the organisations consulted in connection with the preparation of this draft document. The Society wishes to make it clear that this 'consultation' involved only a half-hour discussion with Jon Baldwin of general issues arising from the City Vision exercise. It would be incorrect to say that the Society was consulted on the draft brief in any meaningful way before the text was published in November 2011.

The consultation exercise was disappointing. The visual material was limited and there was little in the way of best practice examples elsewhere to enthuse the public. The advertising for the public exhibition held at the Arena was at best meagre. There was no opportunity to make substantive comment as the Council had already selected its preferred option. There are unfortunate similarities with the limited and slanted Westminster Lodge consultation.

### **Concluding comments**

From the above, it will be appreciated that the Society is disappointed with the brief. As a Masterplan, it fails to live up to the fine words that precede it. The supporting documents and studies have their limitations, and the poorly presented consultation exercise lacked conviction.

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St Albans Civic Society (11 December 2011)

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<sup>4</sup> Figure 16 in the Local Plan Review