NORTH HERTFORDSHIRE DISTRICT COUNCIL

Correspondence address: PO Box 480, M33 0DE Telephone: (01462) 474000

Text Phone: (01462) 474800



16 February 2016

Spatial Planning Team St Albans Council Offices St Peters Street St Albans AL1 3JE Our Ref: Your Ref:

Contact Officer: Direct Line: E-mail: Nigel Smith (01462) 474847 nigel.smith@north-

herts.gov.uk

Dear Sir / Madam,

North Hertfordshire District Council Response to St Albans Strategic Local Plan Publication Draft

Thank-you for consulting North Hertfordshire District Council on the draft Strategic Local Plan for St Albans. We welcome the publication of your draft plan as a clear expression of the City & District Council's ambitions and priorities. The aim to progress a new strategic local plan in advance of the Government's early 2017 deadline is supported. I appreciate that significant efforts have been expended in bringing the plan to this stage of preparedness.

Although our authorities adjoin one another, the evidence base underpinning both our emerging plans does not presently show the same levels of connection between North Hertfordshire and St Albans as is the case with other councils adjoining our authority such as Luton or Stevenage.

Notwithstanding this, there will still be certain issues which have a bearing on the preparation of North Hertfordshire's own local plan (for example, in relation to housing, Green Belt, unmet needs from Luton etc.)

North Hertfordshire District Council recognises and supports a number of the general principles underpinning the plan and its development. These include (but are not necessarily limited to):

- The consideration of 10-year migration trends in establishing Objectively Assessed Needs (OAN) for development;
- Seeking to meet those development needs that have been identified in full within your authority boundaries;
- Carrying out a Green Belt Review to determine if some land might be capable of release to meet development requirements; and
- Establishing the existence of exceptional circumstances to support a review of the Green Belt through the plan-making process.

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North Hertfordshire District Council fully supports St Albans City & District Council's ambition to achieve a 'sound' and legally compliant plan. Failure to achieve a satisfactory set of outcomes for St Albans could prejudice our ability to deliver a new local plan for North Hertfordshire (and vice versa).

As such, we would request that in preparing the Strategic Local Plan for submission, St Albans satisfy themselves that the plan:

- Makes appropriate provision for housing, especially having regard to the significant differences in housing requirements arising in your authority based upon 5-year versus 10-year trends;
- Has established Housing Market Area boundaries soundly and having regard to the most appropriate and up-to-date evidence;
- Is subsequently capable of satisfying Paragraph 47 of the National Planning Policy Framework (NPPF) and can express housing provision at market area level in a fashion that is compatible with surrounding authorities;
- Has considered Green Belt in a manner consistent with the (emerging) plans
 of nearby authorities, both in terms of the methodology underpinning relevant
 evidence and the expression of exceptional circumstances; and
- Contains the necessary flexibility to respond to changes in circumstances, most notably with regards to any unmet needs that might arise from within the Luton Housing Market Area.

If you would like to discuss these comments in more detail, or arrange further meetings, please contact the Strategic Planning & Enterprise team at North Hertfordshire District Council using the details provided at the top of this letter.

Yours faithfully

Cllr David Levett

Portfolio Holder for Planning and Enterprise