

# NORTH HERTFORDSHIRE DISTRICT COUNCIL

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15 October 2018

Spatial Planning Team  
St Albans City and District Council

Our Ref:  
Your Ref:

Submitted electronically

Contact Officer: Nigel Smith  
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Dear Sir / Madam,

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

Thank-you for consulting North Hertfordshire District Council (NHDC) on the draft Local Plan for St Albans.

Although our authorities adjoin one another, the evidence base underpinning both our emerging plans does not show the same levels of connection between NHDC and St Albans as is the case with other councils adjoining our respective authorities. In this context, there are presently no substantive, strategic issues to be addressed between our authorities under the Duty to Co-operate.

Notwithstanding this, there are still certain issues addressed in your Plan which have a (potential) bearing on North Hertfordshire. Our representations on these issues are set out below.

### **Housing Strategy – Policy S4**

We welcome your intention, as set out at our recent meeting, to meet all of your housing development needs in full. As you have explained to us, this Plan is based on the results from the Government's initial consultation on a standard methodology for housing requirements. This approach is supported in principle as it ensures need is addressed in the area in which it arises and there are no unmet needs to be considered with other Councils.

Revised household projections were recently released. These are likely to necessitate an update to the standard methodology. This update, and the outcomes it generates, is not yet known.

NHDC reserves its position in the event that any revised standard methodology produces a substantively different figure for St Albans. This could, in turn, have implications for your spatial strategy and / or your ability to accommodate any revised figure.



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We also have some concerns over your approach to ensuring the housing requirement is met. Only the 10 'broad locations' appear to be subject to any form of policy formally allocating them for development. These, along with existing permissions total to approximately 11,800 homes over the Plan period.

The housing trajectory shows a range of other categories to achieve the balance of 3,000 homes including sites with applications submitted, pre-application discussions ongoing, SHLAA sites, garage sites, Council owned sites etc. However, none of these appear to be subject to any form of designation or policy in the Plan. Delivery is therefore effectively deferred to various forms of windfall development. Paragraph 70 of the NPPF requires any windfall allowances to be realistic and supported by compelling evidence.

If these sources are not realised, it could lead to a requirement for any shortfall in housing provision to be addressed elsewhere. We would encourage you to provide greater clarity over these sources of supply, preferably by formally allocating them for development in the Plan.

This relates to the soundness tests of 'positively prepared', 'justified', 'effective' and 'consistent with national policy' in NPPF Paragraph 35.

### **Green Belt – Policy S3**

Although the evidence base considers the role of individual land parcels in meeting the purposes of Green Belt, it does not appear to have considered the role and contribution of existing settlements in line with paragraph 140 of the NPPF.

Blackmore End straddles the administrative boundary between our authorities. Its general character is that of a low-density, suburban neighbourhood. Our own emerging Plan (currently at Examination) recognises the limited contribution that that part of Blackmore End within NHDC makes to Green Belt purposes. It proposes to inset Blackmore End from the Green Belt. Your emerging Plan seeks to retain the 'washed over' status of this area, potentially leading to a two-tier policy approach across the administrative boundary.

This relates to the soundness tests of 'justified' and 'consistent with national policy' in NPPF Paragraph 35.

### **Transport Strategy – Policy L18**

The broad approach of this Policy, which seeks to facilitate sustainable travel where practicable, is supported. Direct highway connections between our two authorities are limited to B-roads and unclassified routes and I do not envisage any significant transport implications.

However, the current evidence base does not appear to contain any specific transport modelling and it is therefore not possible to come to a definitive view on this matter at present. In particular, NHDC would like to better understand the impacts of:

- i. Proposed growth at Harpenden which could impact upon journeys to and from the south-west of our District; and

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- ii. The growth proposals in your Plan more generally on the A1 corridor which provides strategic north-south connectivity through the County.

This relates to the soundness tests of 'justified' and 'consistent with national policy' in NPPF Paragraph 35.

### **Education – Policy L21**

Under Hertfordshire County Council's current school planning and admissions arrangements for secondary schools, Kimpton parish lies within the Harpenden and St Albans priority area. We are aware of the recently granted planning permission for a new secondary school at Harpenden.

Your Infrastructure Delivery Plan suggests that the new Local Plan contains sufficient provision to meet the anticipated needs over the Plan period. We would welcome clarification that this includes appropriate consideration of long-term secondary education needs arising from Kimpton.

This relates to the soundness test of 'effective' in NPPF Paragraph 35.

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

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

Cllr David Levett  
Executive Member for Planning, Enterprise and Transport