

27<sup>TH</sup> JULY 2025

Inspectors Matthew Birkinshaw BA(Hons) MSc MRTPI  
and Thomas Bristow BA MSc MRTPI

Our reference: CORR/5

VIA EMAIL TO PROGRAMME OFFICER

Dear Sirs

**Re: St Albans Local Plan Review**

Thank you for inviting us to comment on the additional documentation set out in Documents SADC/ED76 through to SADC/ED81B.

We offer brief comments on these documents only to demonstrate further our view about the deficiencies of the draft Local Plan.

[Transport documents – SADC/ED76 to SADC/76C.xvi](#)

We offer comments on the HGC project only.

There appears to be some movement on the council's part about how the significant transport issues associated with the HGC project will be delivered since the draft Local Plan was submitted for examination. It is now noted (SADC/ED76B) that the challenges for Junction 8 of the M1 could be addressed by means of a new overbridge over the motorway. Two public bodies have committed to fund the design of this element of the HGC project<sup>1</sup> but not to deliver it or underwrite its cost. This is critical to the whole project and indeed the spatial strategy of the draft Local Plan.

The Infrastructure Delivery Plan that was the subject of the Regulation 19 consultation has not been updated to record the proposed change in how this critical new piece of infrastructure will be delivered or the costs of the overbridge.

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<sup>1</sup> <https://www.hertfordshirefutures.co.uk/hf-projects/infrastructure/m1-junction-8/>

We draw the inspectors' attention to the point made in SADC/ED76B that this new transport solution will only be feasible if the employment forecast for the site (during the plan period) is reduced to 4,000 jobs from the earlier plan for 8,000 jobs<sup>2</sup>. We submit that the council has made an assertion about likely job generation without offering evidence to support this claim that can be the subject of public scrutiny.

We remind the inspectors that the site allocation is for 53 ha and that it will largely remain a high tech business park which will be home for more employees than the Strategic Rail Freight Interchange (a B8 depot) and is branded as such (Herts IQ). Furthermore, the HGC project is planned to be built out until 2050, when it is planned to generate 10,000 new jobs<sup>3</sup>. Thus, the transport solution for the HGC project needs to be one to meet the needs of a development project that will not be fully operational until long after the Local Plan period. The point to ask the council and its partners is whether the overbridge will be sufficient to meet the modelled traffic needs for the whole of the HGC project.

The council states that it will continue to work with its Duty to Cooperate partners (Hertfordshire and Highways England) on this matter in anticipation of the Stage 2 hearings planned for the autumn. It is for the inspectors to determine if the council is engaging in Duty to Cooperate activity after the Local Plan has been submitted for examination.

#### [Flood risk addendum – SADC/ED77](#)

We do not wish to comment on this document in detail except to note that the council proposes to remove 41 homes from the total housing delivery target as a result of the addendum. We invite the council to bring forward other alternative sites for development to address this reduction especially since we have already demonstrated why the overall housing target and the trajectory that underpins the target and its delivery are flawed.

#### [Gypsy and traveller accommodation – SADC/ED78](#)

The council continues to demonstrate that it has failed in its public sector equality duty.

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<sup>2</sup> Refer bullet point 4 of page 2

<sup>3</sup> <https://www.hertfordshirefutures.co.uk/hf-projects/infrastructure/m1-junction-8/>

It would appear from the Examination Library that the council only did the first tailored “call for traveller sites” very late in the draft Local Plan preparation – during the Regulation 19 consultation! It is therefore pertinent to ask why it did not do a tailored one when work first started on the draft Local Plan in 2020/21 given the challenges of working with this “hard to reach” group. If it had done so, it could have then undertaken the usual prescribed steps of such an exercise such as sieving for suitability and considering candidate sites as part of the Arup Green Belt Review. Its approach to planning for this group does not comply with relevant national guidance. Its deficiencies are reinforced because it has failed to act on the 2024 consultation when it was offered a string of sites by allocating them.

As it stands, the draft Local Plan still only proposes to deliver between 30 and 40 pitches of the 94 homes that the council is obliged to deliver and even these will not be delivered until well into the 2030s. There is no set five year supply of sites.

The council has demonstrated in SADC/ED78 yet again that it does not have a consistent track record of delivering pitches over the years to meet the shortfall of travellers’ housing.

On the matter of travelling showpeople, it is not offering even to “retro allocate” the unauthorised Noak Lane site.

In the context of a Green Belt authority with some of the highest land values in the south east of England and the well-publicised issues of poverty and prejudice that gypsies and travellers face in trying to find sites<sup>4</sup>, the council’s decision (conscious or otherwise) not to plan for this well known need from the outset of its work on the draft Local Plan and thereafter not to allocate sufficient pitches for this type of housing is a grave defect in the plan making process.

We have previously set out our view that all broad locations should be directed to take up the shortfall - a practice that has been widely adopted across the Home Counties - and that the council thereafter allocate additional sites in Green Belt and other locations that are well suited for housing.

### Chilterns Nationals Landscape SADC/ED80A and 80B

We do not wish to comment on this.

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<sup>4</sup> <https://commonslibrary.parliament.uk/gypsies-and-travellers/> Refer the 2019 briefing



[Site sifting process addendum SADC/ED81 to ED81B](#)

We would invite the inspectors to investigate in detail if the council has been consistent on this matter.

We have made submissions in Regulation 19 on why its overall approach is flawed to which we direct your attention.

Yours faithfully

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LITA KHAZAKA

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For and on behalf of Studio LK Ltd.