

**Statement on behalf of Hertfordshire County Council services to
the Examination of the St Albans Draft Local Plan to 2041**



Matter 7: Residential Site Allocations

1. Background

- 1.1.1. Hertfordshire County Council (HCC) is the upper tier authority covering the area of St Albans City and District Council (SACDC) and Dacorum Borough Council (DBC). HCC has statutory responsibility for multiple local government services, including transport, school place planning, adult and children's social care, and advising on surface water drainage.
- 1.1.2. HCC has made representations to the most recent Regulation 18 and 19 consultations to the SACDC local plan. HCC also has two agreed Statements of Common Ground with SACDC [SADC/ED3, and another SOCG that is not yet referenced].

2. Issue 2: Harpenden and Hatching Green Site Allocations

2.1. *Policy B2: North East Harpenden: Q5 Can a safe and suitable access to the site be achieved? Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?*

- 2.1.1. HCC is satisfied that safe and suitable access for the allocation can be achieved, including for individual land ownerships. This has been demonstrated through pre-application engagement with two of the landowners of the site.
- 2.1.2. However, HCC would like to see additional policy wording around access to ensure the appropriate solution is delivered at application stage. Below is our suggested wording:
- 2.1.3. *'All modes access to be provided onto Lower Luton Road, with assessment of impacts upon the existing Lower Luton Road/Bower Heath Lane/Westfield Road junction'*

2.2. *Policy M19 : Piggotshill Lane and UC47: Crabtree Fields: Q5 Can a safe and suitable access to the site be achieved? Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?*

- 2.2.1. The promoter is developing an access that does not utilise the Piggotshill Lane with SACDC. We do not wish to include policy requiring a specific solution (to retain flexibility in developing a solution) but retain the position that vehicle access from Piggotshill is not acceptable.

3. Issue 3: London Colney Site Allocations

3.1. *Policy B6: West of London Colney: Question 2: How will the proposed secondary school be delivered, and what are the reasons for allocating land for the new school in this location?*

3.1.1. The land proposed for the secondary school, shown in yellow hatching in the policies map, is in HCC ownership and this is the long term intention. HCC would therefore be able to deliver the school, securing the relevant planning consent, when required without reliance on a land transfer or acquisition process.

3.1.2. London Colney does not currently have a secondary school and is therefore an exporter of secondary school pupils to St Albans and other surrounding areas. A new school in this location would redirect and contain existing pupil flows from London Colney and Colney in the area, provide new capacity for growth in the same, and release capacity for growth in south east St Albans.

3.2. *Policy B6: West of London Colney: Q5 Can a safe and suitable access to the site be achieved? Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?*

3.2.1. It is reasonable to assume safe and suitable access to the site can be achieved. Detailed transport requirements are contained within site policy and TIA and will be further developed at application stage

4. Issue 4: Wheathampstead Site Allocations

4.1. *Policy M9: Amwell Top Field: Q5 How will the site be accessed? Can a safe and suitable access be achieved if Amwell Lane is not to be used?*

4.1.1. HCC cannot give a view at this stage

5. Issue 5: Redbourn and Hemel Hempstead Site Allocations

5.1. *Policy B3: West Redbourn: Can a safe and suitable access to the site be achieved? Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?*

5.1.1. It is reasonable to assume safe and suitable access to can be achieved. Detailed transport requirements are contained within site policy and TIA and will be further developed at application stage

5.2. *Policy M6: Land south of Harpenden Lane: Q4 Can a safe and suitable access to the site be achieved? Is it sufficiently clear to*

users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?

- 5.2.1. It is reasonable to assume safe and suitable access to the site can be achieved. Detailed transport requirements are contained within site policy and TIA and will be further developed at application stage

6. Issue 6: Bricket Wood Site Allocations

6.1. Policy M4/OS1: North of Oakwood Road: Q4 Can a safe and suitable access to the site be achieved? Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?

- 6.1.1. HCC's Local Transport Plan (LTP) Policy 5f seeks to restrict new access onto primary and main distributor roads, such as the A405, with the aim of minimising impacts on traffic flow along these key routes. HCC made representations to the SACDC Local plan highlighting we have a conflict with LTP policy due to our LTP position, and we have technical concerns over the use of the A405 as an access for this site.
- 6.1.2. St Albans have considered HCCs position but on balance have allocated the site. However, the wording within the local plan policy discussing access to the A405 is taken directly from our original representations.
- 6.1.3. The wording of LTP Policy 5f allows for flexibility through the inclusion of "special circumstances". In practice, the allocation of a site within an adopted Local Plan is considered a special circumstance. This is a position we have applied consistently in Highways Development Management responses.
- 6.1.4. Therefore, should the local plan progress through the current examination and be adopted by SADC, our policy objection falls away. We therefore raise no objection to the wording being amended as is suggested by the applicant and SADC.
- 6.1.5. It nonetheless remains necessary for a technical solution for access to be identified, and it should be noted that allocation within an adopted plan and/or removal of our policy objection does not override or prejudice the requirement to demonstrate a safe access through appropriate evidence.
- 6.1.6. Work is underway with the county council through pre application process to develop an agreed access strategy.

7. Issue 10 – Colney Heath and Radlett Site Allocations

7.1. Policy B8: Harper Lane: Radlett: Q5 Can a safe and suitable access to the site be achieved? Is it sufficiently clear to users of the Plan

what any necessary highway improvements would entail, and where and how they would be delivered?

- 7.1.1. It is reasonable to assume safe and suitable access to the site can be achieved. Detailed transport requirements are contained within site policy and TIA and will be further developed at application stage