

St Albans Local Plan Examination in Public

Stage 1 Hearing Sessions

Matter 1

Statement on behalf of The Crown Estate

INTRODUCTORY STATEMENT

- i. Hearing Statements are submitted by David Lock Associates Ltd on behalf of The Crown Estate (hereinafter referred to as TCE), promoter of land at **East Hemel Hempstead (EHH)**.
- ii. TCE is the owner and promoter of East Hemel Hempstead (North), East Hemel Hempstead (Central) and East Hemel Hempstead (South), which are draft allocations ('Broad Locations') for mixed use development under Site Policies H2, H3 and H4 of the *St Albans Local Plan Regulation 19 Version* September 2024.
- iii. The three sites form part of the wider Hemel Garden Communities (HGC) programme area, awarded Garden Town Status by the government in 2019 and straddling the St Albans City and District Council (SACDC) and Dacorum Borough Council (DBC) administrative areas (see **HGC01.01** evidence paper for details). HGC is allocated with and referenced throughout the draft local plans for each Council's administrative area.
- iv. TCE has been positively engaged with the St Albans Policy Team since 2018 and throughout the evolution of the local plan, and more latterly with the Development Management Team in respect of the preparation of a planning application for EHH.
- v. TCE is engaging with the Stage 1 Examination in support of SACDC's commitment to the East Hemel Hempstead allocations in helping to meet the needs of the plan area within the plan period to 2041 and beyond. Those needs have been assessed in the evidence base and are articulated in the plan (in particular in Strategic Policy SP1). The allocations for EHH represent a spatial growth solution which is aligned with the overarching Vision and Objectives of the Plan as well as the Spatial Vision for Hemel Garden Communities – and will enable outcomes which ensure effective delivery of Plan objectives.
- vi. In response to the Inspectors' *Part 1 Matter, Issues and Questions (MIQ)* issued on 17 March 2025, TCE wish to make a number of points to supplement its representations made at the Regulation 18 consultation and the Regulation 19 consultation stages of the *St Albans Local Plan (SACDC LP)*.
- vii. Our Hearing Statements provide clarification of our clients' position to assist the Inspectors in consideration of their questions posed to the Council in the *Matters, Issues and Questions*.

MATTER 1 – LEGAL COMPLIANCE**Issue 1 – Duty to Co-Operate**Housing

Q1: How has the Council engaged constructively, actively and on an ongoing basis to maximise the effectiveness of the Plan in relation to potential unmet housing needs? Where is this evidenced?

- 1.1 It is anticipated that this question will be addressed by the Planning Authority.

Q2: What evidence can the Council point to which documents how and when it has engaged on cross-boundary issues, such as potential unmet housing needs, and what progress was made in cooperating to address these matters?

- 1.2 It is anticipated that this question will be addressed by the Planning Authority.

Q3: What is the latest position regarding the South West Hertfordshire Joint Strategic Plan?

- 1.3 It is anticipated that this question will be addressed by the Planning Authority.

Q4 Has work on the South West Hertfordshire Joint Strategic Plan identified any issues which are pertinent to the examination of the St Albans Local Plan? If so, is this consistent with paragraph 35 of the Framework, which states that in order to be effective, Plans should be based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred?

- 1.4 It is anticipated that this question will be addressed by the Planning Authority.

Employment

Q5 How much employment land does the Plan provide for and how does this compare to the identified needs?

- 1.5 It is anticipated that this question will be addressed by the Planning Authority.

Q6 *How has the Council engaged constructively, actively and on an ongoing basis to maximise the effectiveness of the Plan in relation to employment land requirements? Where is this evidenced?*

- 1.6 As a key part of the overall provision of employment land to support the local economy and to provide opportunities for local high quality employment, the Broad Locations include an allocation for strategic scale dedicated employment land, in addition to employment growth opportunities provided as part of the wider mixed use urban extensions.
- 1.7 The East Hemel Hempstead (Central) site allocation (Broad Location - H3) is allocated for 53 ha of dedicated employment land as a key element of the Council's local plan provision, together with the Radlett Strategic Rail Freight Interchange.
- 1.8 It is recognised that these two allocations together provide an oversupply when compared with St Albans' employment needs assessment, but the joint working between authorities (particularly between St Albans and Dacorum planning authorities in the context of Hemel Garden Communities) has ensured that the wider employment needs of authorities can be supported in locations within St Albans' district which are suitable, deliverable and attractive to the market.
- 1.9 The Crown Estate support the allocation of strategic employment land at EHH Central as a key element of meeting the employment needs of the area, and that the allocation is both justified in its location - related to the ambition for an expanded Maylands Business Park (the Hertfordshire Innovation Quarter (or 'Herts IQ') – and deliverable in terms of site capacity for the overall quantum and mix of employment uses proposed.
- 1.10 East Hemel Hempstead Central lies immediately adjacent to junction 8 of the M1 and the existing Maylands Industrial Estate. Strategically, it is well positioned within the South West Hertfordshire Functional Economic Market Area. Employment growth in SW Herts is positive, having grown at 0.8% per annum (i.e. 2,500 additional jobs per year), slightly above the GB average (0.7%). Employment growth has however been relatively uneven across SW Herts, with Hertsmere (1.2%), Three Rivers (1.6%), and Watford (1.1%) outpacing Dacorum (0.6%) and St Albans (0.0%). Therefore, opportunities to grow the local economy within St Albans and Hemel Hempstead (Dacorum) are supported by TCE and considered realistic and deliverable.
- 1.11 Herts IQ (the former LEP) are a partner within Hemel Garden Communities and have been closely involved in the transformation plans for Hemel Hempstead. The Crown Estate has engaged positively with Herts IQ and Hertfordshire Futures, who have identified priority sectors including Agri-tech, sustainable construction, advanced manufacturing, creative industries, life sciences, and distribution and logistics – sectors evidenced and reflected in the local plan policy drafting and site requirements.

- 1.12 The Crown Estate has been in active discussions with specialist developers of distribution, logistics and manufacturing premises, and separately with stakeholder organisations including Rothamsted Enterprises, Hertfordshire's School of Creative Industries and local colleges in relation to a prospective innovation quarter at EHH Central where the provision of high quality, higher density jobs would support the diversification of local jobs. These conversations are informing the preparation of the Outline Planning Application for land at East Hemel Hempstead.
- 1.13 Additionally, the development of 5,500 homes across the East Hemel Hempstead allocations will drive employment across a range of activities including construction, education, local retail and service provision, landscape and public realm stewardship and community development.

Highways

Q7 *If National Highways had raised concerns regarding the impacts of Local Plan growth in response to the consultation, what were the reasons for seeking to address these concerns between January and February 2025, after submission of the Local Plan for examination? Does this point go to constructive, active and on-going engagement in the preparation of the Plan?*

- 1.14 It is anticipated that this question will be addressed by the Planning Authority.

Gypsy and Traveller Accommodation

Q8 *As part of the Plan's preparation, how has the Council engaged with neighbouring local planning authorities to consider the accommodation needs of gypsies and travellers and travelling showpeople?*

- 1.15 It is anticipated that this question will be addressed by the Planning Authority.

Conclusion

Q9 *Has the Duty to Cooperate under sections 22(5)(c) and 33A of the 2004 Act and Regulation 4 of the 2012 Regulations been complied with, having regard to the advice contained in the Framework and the PPG?*

- 1.16 It is anticipated that this question will be addressed by the Planning Authority. TCE wishes to offer its strong support for the way in which the two authorities of St Albans and Dacorum have worked together since 2019 in a proactive and collaborative manner to ensure that the respective spatial strategies, growth locations, site allocations and policy frameworks within both local plans reflect the considerable work undertaken by the public and private sector interests in respect of Hemel Garden Communities.

Issue 2 – Public Consultation

Q1: *Has public consultation been carried out in accordance with the Council’s Statement of Community Involvement, the Framework, the PPG and the requirements of the 2004 Act and 2012 Regulations?*

1.17 It is anticipated that this question will be addressed by the Planning Authority.

Q2: *How has the Council taken into account representations made in response to public consultation?*

1.18 TCE wishes to support the Council’s considerable efforts to engage with respondents as part of the evolution of the draft local plan. Dialogue with TCE as landowner of the East Hemel Hempstead site allocations since the Reg 18 stage of plan-making for the current plan has been conducted in a positive and proactive manner. There is a joint ambition between planmakers and those responsible for delivering development to ensure the policy framework reflected in district wider policies and site allocation requirements reflects national guidance and best practice, can be delivered through planning applications in a timely manner, and is proportionate in terms of infrastructure and mitigation sought to support new development.

1.19 A number of matters which TCE have raised in representations at the earlier stage of the plan have been capable of resolution through dialogue and revised drafting. There are some points of clarification and detail which remain outstanding, and can be raised through the Stage 2 Hearings in due course, but we do not consider that these matters go to the heart of the Plan’s soundness.

Issue 3 – Sustainability Appraisal

1.20 It is anticipated that **Questions 1 to 6** will be addressed by the Planning Authority.

Issue 4 – Climate Change

1.21 It is anticipated that **Questions 1 and 2** will be addressed by the Planning Authority.

Issue 5 – Strategic Flood Risk Assessment

1.22 It is anticipated that this question will be addressed by the Planning Authority.

Issue 6 – Public Sector Equality Duty

1.23 It is anticipated that **Questions 1 to 3** will be addressed by the Planning Authority.

Issue 7 – Habitats Regulations Assessment

1.24 It is anticipated that **Questions 1 to 4** will be addressed by the Planning Authority.

Issue 8 – Other Legal Requirements

1.25 It is anticipated that this question will be addressed by the Planning Authority.