

Appendix 1 – Reg 18 responses of other local planning authorities

Central Bedfordshire



St Albans District Council

planning.policy@stalbens.gov.uk

Your ref:

Our ref:

Date: 22/09/2023

Dear Sir/Madam,

St Albans District Council : Draft Local Plan 2041 Regulation 18 Consultation

Thank you for consulting with Central Bedfordshire Council (CBC) on the St Albans Consultation draft Local Plan 2041 Regulation 18. We welcome the opportunity to comment on the document, and we look forward to continuing the good working relations that have already been forged between the two Councils. To this end, we hope you find the comments below useful.

Housing

Policy SP3 – Land and the Green Belt establishes a target for the minimum number of homes needed in the district using the Government's Standard Methodology – which is 888 dwellings per year, or a total of 15,096 over the plan period to 2041. CBC are supportive of the Councils use of the Standard Methodology as well as the Council's approach of identifying and prioritising development sites on Previously Developed Land/Brownfield land first.

It is CBC's understanding that St Albans are able to meet all of their housing requirement in full and are therefore not seeking assistance from neighbouring authorities. Whilst this was also discussed at a recent DtC meeting on 18th September, it would be helpful if this was confirmed in the plan for clarity.

Broad Locations

In general, we support the identification of broad locations for development set out in the St Albans District Council Draft Local Plan. However, we note the proximity of the allocations at North West Harpenden (293 residential units) and North East Harpenden (762 residential units including a school) to Central Bedfordshire. The transport modelling for the two sites, and indeed the plan as a whole, appears to have been carried forward from the evidence base for a previous iteration of the plan. Updated traffic modelling for the proposed allocations is important to ensure the most up to date assumptions have been included and to ensure the impact of the proposed allocations on neighbouring areas such as Central Bedfordshire can be fully understood, and any mitigation identified where necessary. It is understood from the DtC meeting on the 18th September that St Albans will be doing bespoke model runs following this consultation using the Comet Model which will include sites and potential mitigation to resolve any impacts of growth proposed in the St Albans local plan.



We may have further comments on the sites to the North West and North East of Harpenden once we have reviewed updated strategic transport modelling evidence.

We also note that the policies for both North West Harpenden and North East Harpenden commit to a master planning process to be led by the Council. We are supportive of this approach and should the two allocations be taken forward, CBC would welcome further Duty to Cooperate discussions with you regarding the delivery of both these proposed allocations. We would also request to be kept informed in relation to any public engagement which takes place as part of this process and would encourage residents and parish councils within Central Bedfordshire within close proximity to the two proposed allocations, to be included in any future engagement. We support the aims and intentions of *Policy LG1 – Broad Locations* but consider reference should be made to engagement with adjoining local authorities in bullet point a.

We also support the aims of *Policy LG4 – Large, Medium and Small Sites* and would like to be engaged in relation to any sites near Central Bedfordshire's border.

In relation to *Policy IMP1 – Additional Infrastructure Requirements for Strategic Scale Development*, we suggest referencing neighbouring authorities to be kept informed and involved where appropriate to ensure any cross-boundary implications for the provision of infrastructure are fully considered.

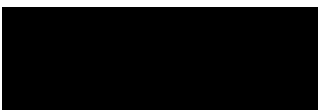
We note that the plan includes a Gypsy and Traveller policy however there are no site allocations. Clarification is sought as to how the identified need as set out in the Council's GTAA is proposed to be met within St Albans.

Beechwoods

Strategic Policy SP10 – Natural Environment and Biodiversity references the Chilterns Beechwoods Special Area of Conservation (SAC). We welcome the reference to this within the plan given the level of importance placed upon mitigating the impact of future growth on the SAC. We look forward to understanding the future of Strategic Alternative Natural Green Spaces (SANGS) provision within St Albans in due course.

We hope you find the above comments helpful. Please do not hesitate to contact me if you wish to discuss these comments further. We look forward to future and ongoing discussions and the delivery of a sound Local Plan for St Albans City & District Council.

Yours sincerely,



Caroline Danby

Head of Strategic Growth

Dacorum Borough Council

ST ALBANS DRAFT LOCAL PLAN 2041: REGULATION 18 PUBLIC CONSULTATION
(JULY 2023)

RESPONSE FROM DACORUM BOROUGH COUNCIL

1. Regulation 18 Draft Local Plan

Paragraph, table, policy etc.	Topic	Dacorum's response
Chapter 1 - A Spatial Strategy for St Albans City and District		
Table 1.3	Settlement hierarchy	Dacorum Borough Council supports Hemel Hempstead being classified as a Tier 1 settlement.
Strategic Policy SP1	A Spatial Strategy for St Albans District	Dacorum Borough Council supports this policy, particularly paragraphs 1 (proposed housing target), 4 (classification of Hemel Hempstead as a Tier 1 settlement) and 5 (growth at Hemel Garden Communities). To improve clarity, we suggest paragraph 8 is amended to state that the housing figures relate to the 2024-2041 Plan period.
Chapter 3 – Sustainable Use of Land and Green Belt		
Paragraphs 3.7-3.12	Requirements for growth	Dacorum Borough Council recognises that changes in circumstance may justify a different housing target at the next stage of the Local Plan.
Strategic Policy SP3	Land and the Green Belt	Dacorum Borough Council supports this policy.
Table 3.1	Categorisation of sites	Dacorum Borough Council supports the minimum capacity figures and main land uses proposed in Table 3.1 at the North and East Hemel Hempstead broad locations, subject to emerging evidence.
Paragraph 3.26	Housing trajectory	Dacorum Borough Council considers that this paragraph should be amended. Whilst it is good practice to have a buffer, this should not result in the minimum housing requirement being higher than the standard method figure. As drafted, paragraph 3.26 conflicts with Policies SP1 and SP3.
Table 3.2	Housing trajectory	A stepped trajectory is appropriate, as it will take some while for sites released from the Green Belt (including Hemel Garden Communities) to come on stream. However, the need for a stepped trajectory should be explained in the Plan and be the subject of a policy.
Policy LG1	Broad locations	Dacorum Borough Council supports Policy LG1, subject to our response on Policies HOU2 (affordable housing) and HOU5 (self-build and custom-build) below.
Paragraphs 3.33-3.43, Figures 3.1, 3.2' Policies LG2, LG3	Hemel Garden Communities	Dacorum Borough Council supports the section on Hemel Garden Communities, subject to the following points: Policy LG2: the proposal for 8,000 jobs in the expanded Maylands Business Park should be reconsidered in the light of further evidence – see our response on Site H3 below.

		<p>Policy LG3: whilst Dacorum Borough Council supports the proposed Hemel Garden Communities Place Principles, it is not appropriate for a policy in the St Albans Local Plan to contain proposals relating to Dacorum (for example, Pillar 2, bullet point 4 on sustainable travel across Hemel Hempstead by sustainable modes and Pillar 3, bullet point 3 on regeneration of Hemel Hempstead town centre and town centre diversification). Such material should be taken out of the policy, but can be included in the supporting text.</p> <p>If the HGC Governance is in place, it will ensure both LPAs achieve the outcomes and would it not be stronger to make sure HGC development in SADC delivers outcomes that support the wider transformation of the town, otherwise it is unlikely to come forward. I have seen this in another Local Plan for growth straddling WGC and East Herts.</p>
Policy LG6	Green Belt compensatory improvements	Dacorum Borough Council supports this policy.
Chapter 4 – Housing		
Strategic Policy SP4	Housing	Dacorum Borough Council supports this policy.
Policy HOU1	Housing mix	Table 4.1 reflects the recommendations in the existing South West Hertfordshire Local Housing Needs Assessment (September 2020). There may be a need to revise the proposed housing mix to reflect the findings of the South West Hertfordshire Local Housing Needs Assessment Review.
Policy HOU2	Affordable housing	<p>Dacorum Borough Council considers that the policy should require affordable rented housing to be genuinely affordable. This will affect viability, which may mean the overall affordable housing percentage could be reduced. Conclusions should be reached once the South West Hertfordshire Local Housing Needs Assessment Review is finalised. At that time, it may also be appropriate to amend the tenure mix.</p> <p>Outside the Local Plan process, Dacorum Borough Council would like to talk to you about whether some of Dacorum's affordable housing needs (i.e. those on Dacorum's register) should be met in the St Albans part of Hemel Garden Communities.</p>
Policy HOU3	Specialist housing	<p>The requirements in Tables 4.2-4.4 are derived from Icenis report for Hertfordshire County Council (December 2022), which relates to the 2022-2042 period. However, the numbers in Tables 4.3 and 4.4 are 25% lower than in the Icenis report, a reduction we understand St Albans has agreed with the County Council.</p> <p>Icenis are giving further thought to the need for specialist housing in the South West Hertfordshire Local Housing Needs Assessment Review. The recommendations in the Review should inform Policy HOU3 at the next stage of the Local Plan.</p>
Policy HOU4	Accessible and adaptable housing	As with Policies HOU1-HOU3, Dacorum Borough Council considers that this policy should reflect the finalised South West Hertfordshire Local Housing Needs Assessment Review.
Policy HOU5	Self-build and custom-build housing	Dacorum Borough Council considers that conclusions on this policy at the next stage of the Local Plan should take account of:

		<ul style="list-style-type: none"> • The finalised South West Hertfordshire Local Housing Needs Assessment Review. • Dacorum's own evidence on self-build and custom-build housing, which shows that a 5% target for such housing is justified. <p>Outside the Local Plan process, Dacorum Borough Council would like to talk to you about whether some of Dacorum's needs for custom and self-build housing should be met in the St Albans part of Hemel Garden Communities.</p>
Policy HOU6	Gypsies, travellers and travelling show people	<p>Dacorum Borough Council supports the positive approach of the policy to meeting the locally identified accommodation needs of the traveling community in your district. However, we have concerns that new sites are only focused within the Broad Locations in East Hemel Hempstead. There is a danger that this will lead to an over-concentration of traveller sites to the north and east of Hemel Hempstead taking into account existing and proposed public and private sites in both authority's areas.</p> <p>We are also concerned that a predominantly employment location at East Hemel Hempstead (Central) Broad Location does not offer a very suitable residential environment for a traveller site.</p> <p>We would like to explore this matter with you and possible alternative locations for traveller sites through our normal Duty to Cooperate processes, and via ongoing work with the Hemel Garden Communities programme.</p> <p>In addition, we would recommend that sites are generally no larger than 15 pitches in line with current best practice for new sites."</p> <p>Dacorum Borough Council recommends that a joint study is required to inform Reg 19 to consider capacity within the locality and any impacts with regard to design and placemaking, such as agreeing standards for good practice.</p>
Chapter 6 – Economy and employment		
Strategic Policy SP5	Employment and the local economy	<p>Dacorum Borough Council broadly welcomes this policy, particularly points b)i on employment development at East Hemel Hempstead (Central)) and b)iii which refers to assisting Dacorum in meeting its employment requirements.</p> <p>However, at the next stage of the Local Plan the requirements for East Hemel Hempstead (Central) should take account of the following evidence base studies currently in progress:</p> <ul style="list-style-type: none"> • South West Hertfordshire Economic Study Review • Maylands Business Park Plus Masterplan • The refresh of the Herts IQ vision by SQW for the Hertfordshire Local Enterprise Partnership • Socio – Economic Demographic Modelling Study <p>Also, it is unclear why the policy relates to only part of the Radlett Aerodrome site – clarification is requested.</p>

Policy EMP4	Hertfordshire Innovation Quarter	Dacorum Borough Council supports this policy, but there may be a need to amend it once the evidence base studies mentioned in our response on Policy SP5 are completed.
Chapter 6 - City, town and village centres and retail		
Strategic Policy SP6 and Table 6.1	City, town and village centres and retail Centre hierarchy	<p>Dacorum Borough Council is proposing to commission further retail evidence early next year, which will include advice on:</p> <ul style="list-style-type: none"> • The scale and nature of retail provision at Hemel Garden Communities, including the possibility of new district centres and large supermarkets. • Whether a new retail park is needed to replace existing retail warehousing at Apsley/Two Waters and where it might be located. <p>Depending on the conclusions reached, we may wish to discuss with you possible changes to the Policy SP6 and Table 6.1.</p>
Chapter 7 – Community infrastructure		
Strategic Policy SP7	Community Infrastructure	Dacorum Borough Council supports this policy.
Policy COM1	Education	Dacorum Borough Council supports this policy, including point f) on a proposed new secondary school in East Hemel Hempstead.
Chapter 8 – Transport		
Strategic Policy SP8	Transport Strategy	Dacorum Borough Council supports this policy, particularly point i) on the need to prepare masterplans for broad locations as early as possible.
Policy TRA1	Transport considerations for new development	Dacorum Borough Council supports this policy.
Policy TRA2	Major transport schemes	Dacorum Borough Council supports this policy, particularly points a)ii on M1 Junction 8 enhancement, iii on mobility hubs at East Hemel Hempstead and vi on the Hertfordshire Mass Rapid Transport Scheme (HERT).
Policy TRA4	Parking	Dacorum Borough Council welcomes initiatives to support higher mode share shift towards active travel and sustainable transport is needed, such as park and ride facilities located next to key active travel corridors. Care is needed to ensure that such proposals do not result in unplanned increases of on-street parking.
Chapter 10 – Natural environment and biodiversity		
Strategic Policy SP10	Natural environment and biodiversity	Dacorum Borough Council notes that emerging evidence from the GI Strategy will help define policy requirements and relevant design codes to inform the HGC Framework and Transformation Plan SPD. This includes consideration of suitable alternative natural greenspaces (SANG).
Policy NEB4	Significant publicly accessible green areas	Dacorum Borough Council supports this policy, particularly the protection given to Hemel Garden Communities Country Park and the Nickey Line. As with our previous comment, emerging evidence from the GI Strategy will help define policy requirements and relevant design codes to inform the HGC Framework and Transformation Plan SPD. We

		also expect to have a separate policy to support the delivery of key Greenways, like the Nickey Line and the HGC Green Loop.
Policy NEB11	Green space standards and new green space provision	Dacorum Borough Council supports this policy.
Chapter 14 – Implementation		
Strategic Policy SP14	Delivery of infrastructure	Dacorum Borough Council supports this policy.
Policy IMP1	Additional infrastructure requirements for strategic scale development	Dacorum Borough Council supports this policy.

2. Draft Site Allocations

Site ref.	Location	Dacorum's response
H1	North Hemel Hempstead	Dacorum Borough Council supports the proposals for this site.
H2	East Hemel Hempstead (North)	Dacorum Borough Council supports the proposals for this site.
H3	East Hemel Hempstead (Central)	<p>Dacorum Borough Council supports the proposals for this site in broad terms, but consider that further thought should be given to them once the evidence base studies mentioned in our response to Strategic Policy SP5 above are completed.</p> <p>Also, we would like to talk to you about the scope for various uses to relocate to H3 from elsewhere in Hemel Hempstead. Possible uses may include the household waste site and Dacorum's Council Depot.</p> <p>Please note our comments on policy HOU6 are relevant to this allocation also.</p>
H4	East Hemel Hempstead (South)	Please note our comments on policy HOU6 are relevant to this allocation also.

Hertsmere Borough Council



Planning and Economic Development

Planning Policy Team
St Albans City and District Council
District Council Offices
St Peter's Street
St Albans
Herts AL1 3JE

Contact: Mark Silverman

Date: 22 September 2023

Dear Sir / Madam,

St Albans City & District Council (SADC) Draft Local Plan Regulation 18 Public Consultation

Thank you for the opportunity to comment on the St Albans Local Publication Plan. We welcome the progress that the Council has made in terms of individual authority-to-authority liaison, the commitment to work on a Joint Plan for SW Herts and the involvement in various new or updated technical studies on a cross-boundary basis.

We do not wish to make any comment with regard to legal compliance or the Duty to Cooperate except to confirm Hertsmere Borough Council's (HBC) continued commitment to collaborative working with St Albans throughout the progress of both our Local Plans and the emerging South West Herts Strategic Plan. Our comments therefore relate solely to soundness.

Strategic Policy SP3 – Land and the Green Belt

HBC acknowledge SADC's plan to meet their housing need as set out by the Governments Standard Methodology, a figure of 888 dwellings a year, and a total of 15,096 across the 15 years of the plan. SADC's strategy of 'Brownfield first' and targeting development towards the larger towns, is also acknowledged, with a variety of small, medium and large sites allocated.

Whilst supporting absolutely the need for appropriate infrastructure to be provided alongside new development, we would also raise the issue of whether the infrastructure requirements for these broad locations have been viability tested in order that the policy complies with national policy, and will be effective ie not be undeliverable. Given recent increases in construction and labour costs, which have not been matched by a corresponding increase in sales values, a wider refresh of your viability work may be warranted in order to demonstrate that other policies in the plan, including 40% Affordable Housing, remain viable.

With regard to the broad locations for development which lie in close proximity to the boundary with HBC, in particular West of London Colney and Land at Harper Lane we would again expect to see a commitment to working closely with us in developing these proposals further, particularly in relation to the needs for and provision of shared infrastructure including local education and NHS provision. More generally, we would want to explore opportunities for shared infrastructure delivery, including in relation to any sites nearby within Hertsmere; we would welcome a Statement of Common Ground which would set out the required arrangements for how this will be achieved.

HBC would like to ensure that Harper Lane has been fully considered with regards to capacity to accommodate additional housing, noting existing Hertfordshire County Council concerns with regards to development at Harperbury Hospital across both districts. The allocation is also located just north of Radlett, and HBC request that the Key Development Objectives includes contributions

to support existing or new services that may be required in Radlett, as well as measures to further improve the safe and effective use of Harper Lane bridge for all road users.

Strategic Policy SP5 – Employment and the Local Economy

The Local Plan reference the work currently being carried out as part of the jointly prepared South West Herts Economic Study Update, and that such work will feed into the next version of the Draft Local Plan. The draft Local Plan also acknowledges that this could be above the required need for SADC, and that this provision will be shared with Dacorum Borough Council and potentially other South West Herts Authorities. HBC wish to be included in such discussions, particularly if the employment is considered to meet, or be surplus to, sub-regional need. However, given that the Strategic Rail Freight Interchange, north of Radlett, is now proposed as an allocation and with at least a reasonable prospect of the scheme proceeding, HBC considers that it should specifically be identified as contributing to the wider needs of the functional economic market area; the scale of the proposal and its delivery phasing mean that it will contribute to both local (including Hertsmere) and regional/national employment needs

HOU6 – Gypsies, Travellers and Travelling Show People

The supporting text within the policy does not identify what the SADC's determined need is for the provision of pitches. The latest published evidence (GTAA Final Report, published January 2019) indicates a need of 72 pitches for those that meet planning definition, whereas the total number allocated equals 40 pitches. National guidance: Planning policy for traveller sites seeks that use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions, set pitch targets, and work collaboratively with neighbouring planning authorities. HBC requires that meaningful collaborative work extend to this matter.

CE2 - Renewable and Low Carbon Energy

HBC welcomes SADC's response to the 'Climate Emergency', as set out in Chapter 2. However clarification is required to the scope of CE2 – Renewable and Low Carbon Energy, as it is unclear whether this criteria refers to low carbon and renewable solutions as part of wider development, or also supply to specific renewable proposals such as solar and wind farms.

TRA4 – Parking

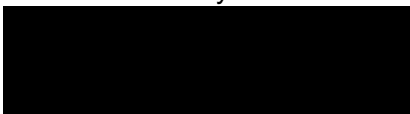
HBC has no specific comments in respect of a majority of this policy, but would like to draw attention to HBC's 'Beryl Bike' sharing scheme, and on going work with Watford Borough Council, who also has such a scheme, to link these together. There is therefore the opportunity for SADC to be included, and you may wish to refer to such cross boundary collaboration in this policy.

Flood Risk

Paragraph 10.33 refers to the Stage 1 SFRA being prepared jointly with the other South West Hertfordshire authorities. This is in fact incorrect, as HBC was not included in this assessment.

We hope these comments are useful, and look forward to reviewing and commenting on future iterations of the draft plan. Please keep us informed of all stages of the Local Plan progress.

Yours sincerely



Mark Silverman
Planning Policy Team Leader

Luton Borough Council

Comment

Consultee	Mr Clive Inwards (1338898)
Email Address	[REDACTED]
Company / Organisation	Luton Borough Council
Address	. . .
Event Name	Draft Local Plan 2041 Regulation 18 Consultation
Comment by	Luton Borough Council (Mr Clive Inwards - 1338898)
Comment ID	720
Response Date	25/09/23 16:31
Status	Submitted
Submission Type	Web
Version	0.1

Please write your comments for Chapter 8 here (please refer to the relevant section, policy, paragraph, table or map):

SP8 Transport Strategy and TRA 1 Transport considerations for new development

Luton Council supports the focus placed on reducing car dependency through the design and location of the built environment and high quality infrastructure that makes sustainable travel a viable alternative to private car use. Luton Council recognises the need to improve inter-urban connectivity, particularly by strengthening connectivity east-west through proposed schemes such as Hertfordshire Mass Rapid Transport Scheme. It is suggested that more consideration is afforded to the role Luton Airport may play in generating travel movements for existing and future employees/ passengers of the airport living in St Albans, particularly in the context of an expanded airport. Investment in the DART provides a seamless rail connection between the two places and consequently high quality, reliable first/last mile connectivity to St Albans station should be prioritised, alongside investment in other types of PT services that can serve Luton Airport.

Three Rivers District Council

Dear Chris,

St Albans District Council – Local Plan Regulation 18 (July 2023)

Thank you for the opportunity to comment on the above Regulation 18 Local Plan consultation. We note that the draft Local Plan consists of three separate documents:

- Draft Local Plan 2041 Regulation 18 Public Consultation
- Draft Site Allocations
- Policies Map

Therefore, our response below will be split accordingly to cover the respective issues arising from each of these documents.

From the outset, our comments will focus on strategic cross-boundary matters, particularly the impact of development on Bedmond, Abbots Langley and Kings Langley all of which sit close to the boundary with your district. We would encourage you to take a settlement-wide view of the village to ensure proper place-making considerations are in place across our boundaries.

In all cases, it is important that the cumulative and cross-boundary effects of development are recognised across our individual districts.

Settlement Strategy

We support the distribution of new development on the basis of the Settlement Hierarchy and the approach to prioritise larger urban centres and re-use of land within the urban areas, and can reduce the need to travel including the climate emergency issues. The density approach to maximise sustainable development sites is supported.

Housing

We note that the draft Local Plan explains that St Albans District Council has taken a number of steps in order to meet its housing needs as fully as possible, including maximising the contribution from previously developed land, and we welcome this.

We also note, a local housing need figure of 888 dwellings per annum has been calculated, based on the Government's required Standard Method and that Spatial Strategy seeks to deliver at least 15,096 net additional new homes to 2041.

This Council acknowledges the difficulties of trying to comply with the national standard method in full given the substantial scale of unconstrained need arising from it and, in particular, the potential for the loss of extensive areas of Green Belt land. We also recognise that the South West Hertfordshire (SWH) authorities are all heavily constrained in meeting such levels of growth.

Whilst the Spatial Strategy seeks to meet the unconstrained needs in full, this also needs to be seen in the context of potential cumulative unmet needs arising in some of the other SWH authorities including Three Rivers. Indeed, Three Rivers is facing its own severe challenges in achieving its identified need in full through its draft Local Plan. Acknowledging that 81% of St Albans Council is Green Belt, the rest of the areas in St Albans have more of urban character and arguably are less constrained in density terms (except areas of conservation importance) to provide the resilience and potential for absorbing additional growth, which we support.

We agree with your acknowledgement that there may, however, be significant changes in the Government's evidence / approach between this consultation draft Plan and its next iteration as a proposed final draft Plan in 2024, potentially including:

- *New household projections based on the 2021 census are due to be published by the Government in early 2024 – the Government currently requires the use of 2014 based household projections.*
- *This Council considers the Government's approach to be an illegitimate use of out of date data, and many other councils and stakeholders agree.*
- *The Government has said it will 'review its approach' to the Standard Method for calculating local housing need in 2024. 6 NPPF paragraph 141 7 NPPF paragraph 73 8 NPPF paragraph 69 23*
- *The Government may make further changes to the NPPF and / or the National Planning Practice Guidance (NPPG) which affect housing requirements and delivery.*

Notwithstanding our support for the above views and that the national government has been recently reinforcing the importance of the Green Belt in considering and setting housing targets in Local Plans, we consider that the draft Local Plan needs to provide further detailed evidence setting out if

alternative options are available. Options should include a reduction in Green Belt sites to balance growth and quality of life.

Linked to this would be that the Plan and its evidence base needs to be much clearer in explaining the extent of actual harm on Green Belt arising from significant levels of growth (alongside the potential benefits new development can bring with it in addressing identified local issues. This needs to be measured against the potential benefits that accompany with new housing.

We will of course welcome discussing this matter further with you as part of our regular engagement under the Duty to Co-operate (DtC) process.

Linked to your housing requirement, we support the broad consideration of residential or employment sites in the Green Belt categorised as Broad Locations, and Large, Medium and Small Sites. We reserve the right to comment on any individual site or collection of sites that would impact the cross-boundary infrastructural issues. We would also query the thresholds for large, medium and small sites. Not so much about the small sites, in that it is not clear if the large sites are large enough to make a strategic impact or cross-boundary impact. A new category of sites with cross-boundary impacts should be considered in this broad categorisation of sites.

We support the start date of the Plan which aligns with other emerging Plans in South West Hertfordshire) and allowing for at least 15 years from adoption. Such an approach is consistent with the guidance in the PPG on Housing and Economic Needs Assessment.

We would suggest that St Albans treat the South West Herts Economic Study (2019) with a degree of caution, particularly in translating office/industrial/warehouse floorspace figures into policy aims given the wide-ranging implications of the COVID-19 pandemic. We support the expression of intent to draw from the updated study to feed into the next version of the Local Plan (para 5.8).

2. Sites for Potential Allocation (Part 2)

As a general comment, we would encourage you to work closely with us and other relevant bodies for all proposed allocations listed below that lie close to the District boundary to ensure cumulative cross-boundary impacts on settlements such as Kings Langley and Bedmond are recognised and fully addressed. We need to be satisfied that the development will not adversely affect the functioning of the wider areas across the boundary in terms of infrastructure requirements. TRDC welcomes the provision of various facilities such as primary schools, and open spaces intended to be included

in larger sites, but we believe that further work is required to ensure any wider impacts of the proposal on the access to and services and facilities of the village are fully acknowledged and, where necessary, mitigated for.

It is vital that any large scale housing is planned for as a whole, and we would stress the need for a settlement-wide approach where impacts straddle across district boundaries. We recognise there is a limited consideration of cross boundary issues for St Albans to be had compared Dacorum in respect of Hemel Hempstead Garden Communities programme and linked initiatives. We would nonetheless welcome closer working with you on considering that it would be sensible to explore with you the potential cross-boundary linkages (and benefits) between this project and growth in and around new and upcoming urban centres.

3. Policies Map

A minor point: Hemel Garden Communities could be shown with a different key given its garden communities status.

I hope that you find the above responses constructive in taking forward your emerging Local Plan. We welcome continuing the discussions with you on these matters through our regular DtC engagement. I would suggest that we seek to arrange further meetings to discuss cross-boundary issues and progress with our respective plan-making.

Sincerely,

Planning Policy and Conservation Team
Three Rivers Council

Watford Borough Council



**WATFORD
BOROUGH
COUNCIL**

www.watford.gov.uk

Planning Policy
St Albans District Council

September 2023

Dear Mr. Briggs,

RE: Draft Local Plan 2041 Regulation 18 Consultation

Thank you for providing Watford Borough Council (WBC) the opportunity to comment on the Draft Local Plan 2041 Regulation 18 Consultation.

While Watford and St Albans do not share an administrative boundary, both authorities form part of the wider area of South West Hertfordshire. Consequently, Watford Borough Council and St Albans City and District Council (SADC) share several strategic issues including the Housing and Economic Market Areas and infrastructure provision that promotes sustainable development.

WBC welcomes the progress made by SADC on the Local Plan. This is encouraging because coordinated and sustainable development is essential to support growing communities in South West Hertfordshire. The district's proposal to meet its housing need in full is ambitious and welcomed, particularly given Watford has set out a growth strategy to do the same in its Local Plan adopted in 2022.

At this stage, the proposed site allocations are not considered to create any cross-boundary issues with Watford. However, in cases where these are located between Watford and St Albans, WBC strongly encourages the Council to put forward a clear approach to encourage masterplanning and maximise the benefits of sustainable transport infrastructure that will effectively connect residents and businesses to services and facilities.

Watford and St Albans are connected by the Abbey Line which has the potential to make an important contribution toward sustainability and improving connectivity between the two towns and the smaller settlements in between. WBC looks forward to working collaboratively on this strategic transport corridor and, in future, the Hertfordshire Essex Rapid Transit system which will have significant potential to improve sustainable transport between Watford and St Albans.

As part of the collective South West Hertfordshire local authorities, WBC will welcome continued collaborative working to make the most of local and sub-regional growth strengths, opportunities while recognising local constraints that need to be considered in decision-making. One of these constraints in Watford is the shortfall of available land to support investment in new industrial and logistical premises. Through ongoing collaboration, WBC would welcome acknowledgement of this in the Local Plan, as part of a strategic approach to employment provision in the South West Hertfordshire area, particularly if there were any opportunities to support Watford with this challenge.



**WATFORD
BOROUGH
COUNCIL**

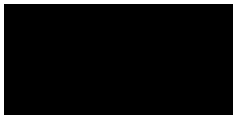
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www.watford.gov.uk

WBC also welcomes continued collaboration on the South West Hertfordshire Joint Strategic Plan which intends to set out a long-term strategy for growth in the sub-region, with a positive contribution expected from the emerging St Albans City and District Local Plan.

Should you have any queries regarding comments set out please do not hesitate to contact the Watford Borough Council Planning Policy team.

These comments provided will not prejudice any future comments the Council may wish to submit at a later date on the St Albans Local Plan.

Yours sincerely



Jack Green MRTPI
Spatial Planning Manager
Watford Borough Council

Welwyn Hatfield Borough Council

Comment

Consultee	Matthew Wilson (1341500)
Email Address	[REDACTED]
Company / Organisation	Welwyn Hatfield Borough Council
Address
Event Name	Draft Local Plan 2041 Regulation 18 Consultation
Comment by	Welwyn Hatfield Borough Council (Matthew Wilson - 1341500)
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Please write your comments for Chapter 4 here (please refer to the relevant section, policy, paragraph, table or map):

Strategic Policy SP3 – Land and the Green Belt.
See comments set out in section **Appendix 1 - Site Allocations**, specifically in relation to B5 Glinwell, Hatfield Road, St Albans, AL4 0HE

Please write your comments for Chapter 8 here (please refer to the relevant section, policy, paragraph, table or map):

Strategic Policy SP8 - Transport Strategy

The ability of the highways network to accommodate additional traffic movements forms a key part of the assessment process in considering any potential development sites for inclusion in an emerging Local Plan. It is noted in Strategic Policy SP8 - Transport Strategy the Council is to continue to work in partnership with stakeholders including Hertfordshire County Council, neighbouring authorities, National Highways and service providers to ensure that a range of sustainable and active transport options are available to all existing and future users of the transport network. It is understood the Council has and will continue to be in dialogue with HCC as Highway Authority in order to understand and assess the residual cumulative impacts of growth proposed in the emerging Local Plan. Welwyn Hatfield welcomes the partnership approach set out in SP8.

Please write your comments on Appendix 1 - Site Allocations here specifying which paragraph or allocation you are referring to:

B5 - Glinwell, Hatfield Road, St Albans, AL4 0HE

The site in the St Albans Draft Local Plan with the strongest relationship to Welwyn Hatfield is Glinwell, Hatfield Road. It is identified as a Broad Location for growth, with a site area of 20.85ha, potentially providing a mixed-used development of 436 dwellings, a possible primary school, green infrastructure, transport infrastructure, and other community infrastructure.

It is noted the site is currently in use as a nursery with glasshouses growing vegetables, together with a farm shop and associated car parking. It is understood that the Council considers the site to be Previously Developed Land (PDL).

The Welwyn Hatfield Green Belt Review notes that the gap between St Albans and Hatfield is narrow to the west of Hatfield. The smaller settlements of Smallford and Sleafshyde lie between the first-tier settlements of Hatfield and St Albans, towards the eastern urban edge of St Albans further limiting the perception of separation. This gap is therefore considered to be fragile.

As the site is just under 1km away at the nearest point to the boundary with Welwyn Hatfield, there is concern the development of this site may reduce the already “fragile gap” between St Albans and Welwyn Hatfield at this location. It is however recognised that the site contains development which does reduce the contribution it makes to the sense of openness of the wider countryside

The site-specific considerations identified in the draft plan are noted. Including the requirement for an assessment of education needs to be undertaken to consider if there is a requirement for a primary school, including Early Years provision, to serve the new community. Also, that contributions will be required towards the Ellenbrook Fields country park.

The requirement for a traffic impact assessment is welcomed, it is necessary that infrastructure is in place to cope with additional traffic on the A1057 and surrounding roads resulting from any proposed development. Similarly, the requirement for suitable access and cycle access/improvements to the A1057 Hatfield Road or mixed pedestrian and cycle use as well as suitable access and improvements to the Alban Way walking and cycle route will need to be provided is considered essential.

In addition to the site-specific considerations already identified, it is suggested that there should be appropriate landscaping and edge treatment of the site to reduce the visual impact of the development on the green belt.

Welwyn Hatfield has no objections to the St Albans Draft Local Plan 2041 at this stage but would wish to see the site-specific considerations, including landscaping and edge treatment and proposed mitigation measures incorporated in any Masterplan or planning application submitted for the Glinwell site

