

Hearing Position statement

Matter 2: Duty to Cooperate

St Albans Local Plan Examination

AIM/ Cemex consortium

December 2019

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1.0 Introduction

- 1.1 The position set out in this statement is made on behalf of our clients, A1M Securities Limited and Cemex UK Properties Limited (the “Roehyde Consortium”) in respect of Land at Roehyde and further to representation made in respect of the land to date.

The hearing procedure

- 1.2 The appointed Inspectors’ role is to consider whether the draft Local Plan submitted by St Albans and City District Council (SACDC), (“the Council”) is sound and whether the requirements of the Planning and Compulsory Purchase Act 2004 (as amended) and associated regulations have meet met.

Purpose of this hearing position statement

- 1.3 The purpose of this statement is to make short but focussed comments, further to representations made over a period of several years in respect of Land at Roehyde, having regard to the Inspectors’ matters, issues and questions detailed in documentation dated 17 October 2019.
- 1.4 The statement sets out why we, on behalf of the Roehyde Consortium, consider the plan is unsound. We go on to make suggestions for Main Modifications that we consider would make the plan sound. The comments in this statement relate to Matter 2: duty to cooperate.

2.0 Inspectors' issues and questions in relation to matter 2: Duty to Cooperate

- 2.1 Main issue: Whether the Council has complied with the duty to cooperate in the preparation of the Plan.

Question 9: What are the inter-relationships with other authorities in terms of economic activity, travel to work and the market for employment land and premises?

- 2.2 Our concern is an absence of a description of activity that may have taken place with Welwyn Hatfield Council under the duty to cooperate, as per paragraph 24 of the NPPF (2019), in respect of an alternative economic strategy to promote employment land within the A1(M) growth area in the east of the District. There appears to be no evidence presented that this has been undertaken, while we have made representations over a number of years outlining how this approach can be a suitable alternative strategy to the strategy currently being pursued in the draft Local Plan.

- 2.3 The A1(M) Growth Area connects London to Stevenage and includes the eastern side of the district. It includes the Hertfordshire University campuses and Stevenage Bioscience Catalyst, a world class cell and gene therapy hub. Allocation of land at Roehyde for a pharmaceutical, bioscience, engineering and logistics park would provide opportunities for research linked to the Hertfordshire LEP Green Triangle and the Hertfordshire University campus at Hatfield via an existing underpass under the A1(M)

Question 25: Are there cross boundary issues in relation to any of the proposed site allocations such as transport or other infrastructure requirements? If so how have they been addressed through co-operation?

- 2.3 A small part of the site falls over the district boundary to Welwyn Hatfield Council. We have identified two main potential cross boundary issues that would need addressing under the duty to cooperate. These have been addressed in representations made on behalf of the Roehyde Consortium in some considerable detail to date, and are:

- Highways;
- Green Belt.

- 2.4 To date we have not seen evidence of cooperation between the two local authorities for St Albans council and Welwyn Hatfield on these potential cross boundary issues.

3.0 Main modifications sought

- 3.1 To present evidence of discussions made under the duty to cooperate with neighbouring Welwyn Hatfield Council of an alternative strategy that pursues a growth agenda in two growth areas of the A(1) M and the M1/M25 growth areas and what role the delivery of Land at Roehyde for a pharmaceutical, bioscience, engineering and logistics park has within that.
- 3.2 Should the outcome of the assessment of the alternative strategy proposed by the Roehyde Consortium prove positive, to undertake the following main modifications in respect of economic strategy:
 - **Key Diagram** – Add an additional ‘Employment Broad Location’ covering the land at Roehyde in the east of the District, located in the A1(M) growth area;
 - **Policy S2** – Amend text to add that exceptional circumstances exist to release land from the Green Belt for development at Roehyde;
 - **Policy S5** – Amend text to add a second ‘Employment Broad Location’ covering the land at Roehyde;
 - **Policy S6** – Introduce a new policy sub-clause to add a second ‘Employment Broad Location’ covering the land at Roehyde for 25 Hectares of mixed industrial and research facilities linked to the nearby University of Hertfordshire, that delivers a pharmaceutical, bioscience, engineering and logistics park;
 - **Policy L9** – Include reference to land at Roehyde for 25 Hectares of mixed industrial and research facilities;
 - **Policy L11** – Include reference to land at Roehyde for 25 Hectares of mixed industrial and research facilities;
 - **Proposals Map** – Add new designation to land at Roehyde that reflects allocation under policies S5, S6, L9 and L11.