



**REPRESENTOR ID: 837689**

**EXAMINATION OF THE ST ALBANS DISTRICT LOCAL PLAN**

**STATEMENT OF HERTFORDSHIRE COUNTY COUNCIL (HCC)  
GROWTH & INFRASTRUCTURE UNIT**

**ON BEHALF OF HCC (excluding HCC Property)**

**IN RELATION TO MATTER 2: THE DUTY TO CO-OPERATE**

**DECEMBER 2019**

## **1.0 Summary**

- 1.1 This statement is in response to the questions that have been raised by the Inspectors under Matter 2: The Duty to Co-operate that are contained within Examination Document: *ED26-Stage 1 Matters, Issues and Questions*.
- 1.2 HCC has only sought to address the specific questions that are of relevance to the topic areas covered in the county council's representations to the Regulation 19 Publication Draft St Albans Local Plan (submitted to the district council on 17 October 2018).
- 1.3 This statement follows the format of the questions that are listed under Matter 2 in Examination Document ED26.

## **Questions**

## **2.0 Transport Infrastructure**

### Q12. What are the strategic matters and particular issues?

- 2.1 As set out in our response to the Regulation 19 consultation HCC considers that the plan is unsound in terms of Transport Infrastructure. The reasons that HCC considers that the plan remains unsound is due to a lack of transport evidence being available at the key Regulation 18 and 19 stages. The transport modelling outputs were not available at the various stages of the plan's development.
- 2.2 **Background**  
HCC has an adopted Local Transport Plan (LTP4). Policy 1 of the plan sets out a Transport User Hierarchy which states that HCC will, in the design of any scheme and development of any transport strategy, seek to consider opportunities to reduce the need to travel, provide for vulnerable road users, such as pedestrians and cyclists, and facilitate passenger transport users before considering the needs of motor vehicle users. This approach seeks to enable a step change in transport provision within Hertfordshire with a much greater emphasis on sustainable transport measures. Purely increasing capacity for private vehicles on the existing network is therefore contrary to this policy and not a viable solution for this plan, and a significant shift towards a sustainable travel-based transport system will be required for the district to have a functioning transport system.
- 2.3 HCC's Growth and Transport Plans (GTPs) are supporting documents to the LTP and identify packages of transport measures required for sustainable growth to happen for the district at a strategic level. St Albans district is covered by the recently adopted South West Herts GTP and the emerging A1 South Central GTP. Additionally, for the area in the south of the district, the scheme concepts have also been taken forward in the adopted A414 strategy

## 2.4 **Transport Modelling**

The annual local plan transport modelling work undertaken by HCC using the countywide Transport Model (COMET) includes all the planned growth in St Albans and wider areas. It also includes infrastructure already identified and that contained within the GTPs (and A414 strategy) and the earlier SADC design work. The results from the latest Local Plan Run 4 (LPR4) of the COMET model run were reported in Spring 2019.

2.5 The model results showed that at a high level, with the inclusion of the infrastructure from the GTP and assumptions made around access points for development, and broader assumptions made around windfall growth, the final model run shows a final 2036 scenario that does 'work' and there are no 'show stoppers' appearing from that output. This is however a strategic level output, which assumes generic development trip rates and there is an expectation that further local modelling work will be required by individual developments to confirm local impacts and identify suitable mitigation. It should also be noted that the model assumes that all the packages identified in the GTPs and A414 strategy would be implemented.

2.6 The district council commissioned some design work to identify junction improvement measures potentially required to accommodate growth in the local plan. This however predated the adoption of LTP4 and the focus was on providing increased highway capacity rather than looking at the needs of other users.

2.7 The district council has also commissioned separately a more detailed analysis of the LPR4 outputs, this work identified where trips from the key development sites were likely to travel on the highway network. Additionally, as part of the A414 strategy an Implementation plan is being developed which uses this intelligence to identify which development could be potentially linked to the various transport measures. These various strands of work identified above now need to be brought together by the district council to identify which developments should be contributing towards/delivering the packages of measures identified in the GTP and A414 strategies. Until this exercise is complete there remains uncertainty about the ability of the developments to collectively mitigate their impact on the highway network and prevent a residual impact which is considered to be severe.

## 2.8 **Impact on the submitted Local Plan**

As a result, HCC considers that there are two resulting fundamental issues with the local plan and its evidence:

1. **Failure to identify and link transport mitigations to sites** - Whilst technical work is ongoing, there is as yet, no definitive identification of what strategic infrastructure is required to deliver a particular development and how that development should deliver/contribute towards the mitigation. This

is a particular issue with the sites identified since the submission of the Publication Draft Local Plan.

2. **Phasing of Mitigation** – Due to this failure, work has not been undertaken to identify the phasing as to when strategic infrastructure is required over the plan period. The COMET run simply shows the totality of the Growth and Transport Plan infrastructure that is required to be delivered by the end of the plan period.
- 2.9 The main concern resulting from these issues is the understanding of when infrastructure will be required for the delivery broad locations. Currently this is not known for any period within the plan (including the first five years). Timeframes for delivery have not been set out, doing so would not be possible due to the current level of technical work available.
- 2.10 **Over- reliance in the plan on site-based master planning** - Due to the two issues raised above, the plan contains no evidence base upon which delivery mechanisms could rely. Due to this lack of information, policies intended to be delivery mechanisms for transport infrastructure do not contain details of specific infrastructure. This is evidenced by, what HCC considers to be the overreliance on Policies S6, L17, L18, L19 as the identified delivery mechanisms within the local plan, which rely on individual site master planning to identify and deliver infrastructure.
- 2.11 As currently drafted the approach within the plan for the Broad Locations will require the master-planning process to identify and deliver all associated transport infrastructure, as it wasn't considered/identified at the earlier stage of plan making. HCC is concerned with such an approach to infrastructure delivery. In discussions with promoters/developers of the broad locations HCC's experience to date has demonstrated that without a clear policy requirement, it is unlikely that the infrastructure required to address the cumulative impact of growth will be delivered as it isn't a current requirement of the site specific policies.
- 2.12 **Suggested way forward** -The level of growth proposed within the plan will require significant transport improvements at both a local and strategic level to enable the transport network to function. Identification and phasing of those measures and their delivery will be fundamental so that they can be incorporated in future modifications to the plan such that it might be considered "sound".
- 2.13 Whilst the additional work identified at 2.7 above might provide an indication of what transport infrastructure is required it hasn't been able to influence the drafting of the submitted plan. It is likely that further modelling would be required to establish when the infrastructure needs to be in place. It is important to establish when the infrastructure is required to understand whether it is feasible for it to be delivered in the timescale and its requirement will need to be factored into the respective developments viability assessment.

- 2.14 In addition to the above there also needs to be an acceptance that modelling work completed to date has been at a strategic level and it is reasonable to assume that more detailed localised modelling work will need to be undertaken to support any planning application which may well identify the need for further mitigation measures.

Q13. Who has the Council engaged with? When did this engagement begin, has it been active and ongoing and what form has it taken?

- 2.15 The district council has engaged with HCC as Highway Authority during the development of the plan. This engagement has been active and ongoing; however, there have been issues with the required technical work being completed, as can be seen in HCC's Regulation 18 and 19 responses for this plan.
- 2.16 The county council has set up a series of Strategic Site meetings with the district council and this has been the main means of engagement. These meetings have been used to discuss the technical work undertaken by HCC and review the transport modelling outputs produced by our transport planning framework consultants, AECOM. More recently the meetings have focussed on the master planning process for the individual sites.
- 2.17 A programme of work has been discussed between the district council and HCC and the work required to address the issues raised by the county council is understood by both parties.

Q14. In overall terms has the Council engaged constructively? What has been the outcome of co-operation and how has this addressed the issue?

- 2.18 The district council have engaged constructively, and work is continuing. Unfortunately, HCC are now in a position where the reliance on master-planning limits the ability to assess and address the cumulative impact of growth.
- 2.19 To address this issue, HCC feel the outcome of the ongoing work will identify the infrastructure required by each of the broad locations. The plan could then be modified to include the identified infrastructure within the individual policies for each of the broad locations. By including the required infrastructure within the relevant policies, it will ensure its delivery.

### **3.0 Broad Locations for development**

Q25. 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?

- 3.1 In addition to highways and transport related issues, the county council has been engaging with the district council on a number of cross boundary issues,

in relation to the 11 broad locations that are identified in the Publication Draft St Albans Local Plan. These include the provision of additional schools, a new Household Waste Recycling Centre (HWRC), which is subject to a soundness objection) and adult care provision.

- 3.2 Discussions with the district council have resulted in specific adult care and new school provision being listed within the applicable policies that aim to deliver the 10 residential-led broad locations. Specific comments in relation to these were outlined in HCC's Regulation 19 representations to the Local Plan in October 2018.
- 3.3 The county council still considers that a 1ha HWRC should be allocated within the East Hemel Hempstead (Central) Broad Location, the justification of which is outlined in HCC's soundness objection to Policy S6 ii) and elaborated further in the separate statement that has been submitted by HCC in relation to Matter 6.