

# **St. Albans Local Plan Examination**

**Matter Statement of Dacorum Borough Council 1186054**

**Relating to Matter 5**

# **MATTER 5**

## **Gypsies and Travellers**

**8. Does Policy L7 accord with the guidance in Planning Policy for Traveller Sites (PPTS) and is it justified and effective?**

1. a) PPTS
2. The Council supports in principle St Albans City and District's commitment to making direct provision for Gypsy and Travellers through Policy L7 to meet identified need arising in their area, as required by the PPTS. We are also pleased to see the completion of their Gypsy and Travellers accommodation needs assessment in January 2019 (HOU 21), albeit there was no cross-boundary input from this Council into the study. However, the Council is concerned that Policy 7 does not give sufficient weight to the PPTS in terms of:
  - The need for collaborative working in coming to decisions on the location of future sites (PPTS paras. 7 and 9 );
  - The cumulative impact on the settled community (PPTS paras. 3, 4g, 7c, 10e and 13f);
  - The cumulative impact on local services (PPTS paras. 4g, 7c and 13f); and
  - The needs of the traveller community in relation to East of Hemel Hempstead (Central) Broad Location (PPTS paras. 4g and 13e).
3. These points are expanded upon in section b) below and in our response to Q.16.

b) Policy LP7

4. The Council does not consider that Policy L7 is sound. The reasons for this were set out in the Council's Regulation 19 submission to the St Albans publication Local Plan (document CD 002). In summary, our main concerns were and remain over the approach to and justification for Policy L7 in terms of:

- It was unclear why other options to meet this need had not been considered.
- The policy does not explain in any detail how St Albans came to the conclusion over the appropriateness of the Broad Locations.
- We are concerned over the suitability of East of Hemel Hempstead (Central) to accommodate a new traveller site.
- The approach does not take into account the cumulative effects of new pitches in the Broad Locations in terms of over-concentration of pitches on the north eastern side of Hemel Hempstead.

5. Policy L7 does not sufficiently evidence why the two Broad Locations (East of Hemel Hempstead South and Central) have been identified as appropriate areas for traveller sites. Indeed, we are concerned over the narrowness of its focus and the lack of joint evidence base/discussion on this matter. We note that the Gypsy and Travellers accommodation needs assessment (document HOU 21) is the only relevant up to date evidence base study available and that this provides no detailed guidance on potential locations.

6. The policy makes general statements about the suitability of the identified Broad Locations in terms of their proximity for travellers to the road network, site scale, topography and

landscaping; and range of uses provided by the Broad Locations. However, this approach to the location of sites has not been supported by any detailed assessment to date. Moreover, it would have been helpful if the six remaining non-Hemel Hempstead Broad Locations in the Local Plan (and if necessary, other locations emerging from the examination process) were similarly tested against these same factors to better understanding the potential suitability of alternative potentially more sustainable and spatially appropriate locations/options. The Council sees no fundamental reasons why other such large-scale, planned developments could not accommodate a traveller site(s). Thus the Council considers that the policy should more effectively explore the potential benefits of a more dispersed approach to sites away from Hemel Hempstead and to the other settlements in the St Albans district.

7. Policy L7 fails to take into account any consideration of cumulative effect on Hemel Hempstead as a criterion. This is a fundamental factor as it will be the closest settlement for most of the sites where logically travellers will access higher order services and facilities, particularly schools and local health facilities. This could impact on the ability of services and facilities to be able to accommodate this level of pitches.
8. PPTS warns that sites should not lead to “placing undue pressure on local infrastructure and services” (para. 13f). Too many sites could also undermine the ability of travellers and the existing and future settled community to satisfactorily integrate with each other.
9. With regards to the distribution of sites, in 2009 the Council sought the views of the travelling community on its (then) emerging LDF policy approach to the planning for new sites in Dacorum. The travelling community were asked their views on the spread of sites and all

interviewed made clear their preference for a dispersed approach. We believe this broad policy principle remains relevant in considering traveller sites in the Broad Locations under Policy L7.

10. There are currently already four established public and private sites (a total of 56 pitches) either within the town or within a radius of less than 4km from the edge of Hemel Hempstead. If we then account for planned future sites either side of the Borough boundary, this increases to seven sites (a total of 91 pitches). Therefore, it is clear that the town will experience a near doubling of sites/pitches over the next 20 years. The policy should rightly recognise and address this critical factor. This position would only worsen in the future should sites continue to suffer from overcrowding of pitches.
11. Given the above points, the Council feels there are fundamental issues with the soundness of the approach. SADC should undertake a further review of its approach to ensure the following principles are reflected in the final policy approach:
  - Policy L7 needs to make reference to potential cumulative impacts of the over-concentration of sites as a factor in deciding locations;
  - Policy 7 needs to, at a minimum, test the feasibility of a more dispersed approach to new traveller site;
  - St Albans Council needs to undertake a more detailed assessment of other non-Hemel Hempstead Broad Locations (or other equivalent sites should they emerge through the examination process); and
  - St Albans Council should commit to effective cross-boundary involvement on future decisions over the provision/delivery of the two traveller sites in the Broad Locations.

- 14. How were the 3 Broad Locations identified as being suitable for gypsy and traveller sites chosen? Why are they preferred to the other Broad Locations?**

12. See response to question.8 above.

- 16. The East of Hemel Hempstead (Central) Broad Location is a proposed employment site. As such is GT provision here appropriate? What is the nature of the work that is underway to support the delivery of 30 pitches here?**

13. The Council remains concerned over the suitability of East of Hemel Hempstead (Central) Broad Location to accommodate a traveller site. This appears to suggest that it is only acceptable for the traveller and not the settled community to be located in a predominantly employment-led proposal. They would potentially have to endure a poorer non-residential environment (noise, disturbance, late working of businesses, etc.).

14. Point e) of paragraph 13 of the PPTS emphasises that policies should provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers that may locate there or on others as a result of new development. Unless St Albans Council can demonstrate that this Broad Location can offer an environmentally suitable settled base for travellers, then this element of the proposal should be deleted and an alternative location identified taking into account our response to Question 8.

## **Employment Land**

### **19.     *How has the Functional Economic Market Area (FEMA) been defined and is it appropriate?***

15. Examination document EMP 003 (Economic Development and Employment Land Evidence Technical Report) concludes on page 95 that the official Luton Travel to Work Area (TTWA) is the best overall definition of a FEMA for the area in which SADC falls.

16. EMP 003 was published two months after the South West Hertfordshire Economic Study (examination document EMP 002). EMP 002 was commissioned by the other South West Hertfordshire authorities (Dacorum, Hertsmere, Three Rivers and Watford councils) and produced by consultants Regeneris Consulting and GL Hearn.

17. During the early stages of work on this study, Regeneris concluded that the Functional Economic Market Area (FEMA) should be defined as covering the five South West Hertfordshire authorities i.e. the commissioning authorities plus St Albans. The evidence for defining a South West Hertfordshire FEMA, including St Albans District, is set out in chapter 2 of document EMP 002. Paragraph 2.57 concluded as follows:

18. “There are clear relationships internally within South West Herts (Dacorum, Hertsmere, Three Rivers and Watford) indicating that this area is a useful starting point in determining a FEMA for the area. The data also points towards the inclusion of St Albans.

19. Chapter 3 in the South West Hertfordshire Economic Study Update deals with the economic geography of South West Herts. This chapter begins by looking at the FEMA. Paragraph 3.15 concludes that the evidence still points to a FEMA made up of Dacorum, Hertsmere, St Albans, Three Rivers and Watford, but which also has important relationships with Welwyn Hatfield.
- 20. What is the overall need for employment land that has been identified? What is the evidence for this? What is the situation regarding existing commitments and the residual need for additional land allocations? What is the past trend in take up rates for employment land?**

20. The submitted Local Plan does not set out the overall need for employment land. As far as DBC is aware, the only SADC document that addresses this question is Examination document EMP 003 (Economic Development and Employment Land Evidence Technical Report). However, this report was prepared to provide the main employment evidence base for the now abandoned St Albans Strategic and Detailed Local Plans. DBC considers that the Plan should reflect the South West Hertfordshire Economic Study (examination document EMP 002) and the now completed Economic Study Update.

21. Paragraphs 7.94-7.105 in the Economic Study Update consider the distribution of demand for office and industrial space. Table 7.21 shows a demand for additional office floorspace in the South West Hertfordshire authorities between 2018 and 2036, whilst Table 7.22 provides similar information for industrial uses. These tables show a demand for a net increase of 39,500 sq. metres of office space and 79,500 sq. metres of industrial space in St Albans District.



22. However, the Economic Study Update explains that the demand figures should be viewed as indicative floorspace figures and that:

23. "...the distribution presented here should only be treated as a guide. Decisions on local plan requirements should be informed by duty-to-cooperate discussions, which take account of land availability for new development in each of the districts."

24. Turning to the third question in Question 20, DBC has not looked closely at existing commitments in SADC. However, the St Albans Authority Monitoring Report 2018 (examination document AMR 001) states in paragraph 2.62 that apart from the Rail Freight site (which is proposed for housing development in the submitted Local Plan), only 5.7 hectares of land is available for employment development. Appendix 3 in the AMR shows that 4.0 hectares of this available land is at Punchbowl Lane, Cherry Tree Lane. This site is located at East Hemel Hempstead, but not in the East Hemel Hempstead (central) Broad Location.

**24. Does the plan allocate sufficient land to meet the identified minimum need in policy S5?**

25. Chapter 9 in the South West Hertfordshire Economic Study Update provides a quantitative and qualitative assessment of supply and demand of employment land over the period 2018 to 2036. The main focus of this chapter is the overall balance of demand and supply across South Hertfordshire.

26. Tables 9.1 and 9.2 in the Economic Study Update show the market balance for office uses and industrial uses respectively over the 2018-2036 period. The figures indicate that the submitted St Albans Local Plan allocates more than sufficient employment land. Indeed, supply exceeds demand by over 80,000 sq. meters for both office and industrial uses.

27. It should be noted that the floorspace on safeguarded/proposed sites is all on the East Hemel Hempstead (central) Broad Location. Furthermore, Appendix 3 in the St Albans Authority Monitoring Report 2018 (examination document AMR 001) estimates that 18,400 sq. metres of industrial floorspace will be built at the Punchbowl Lane/Cherry Tree Lane site in East Hemel Hempstead, referred to under Question 20 above. St Albans has almost no land available for employment development except that which is proposed East Hemel Hempstead, which is Dacorum's largest town. If all the land at East Hemel Hempstead was excluded St Albans would experience an estimated net loss of 12,600 sq. metres of office floorspace and 14,400 sq. metres of industrial space.

28. As mentioned, Dacorum considers it appropriate that a significant proportion of its own employment needs should be met through the expansion of the largest employment site currently located in Dacorum.

**25. Does the land allocated provide sufficient choice and flexibility?**

29. As explained under Question 24, nearly all St Albans' employment land supply is located at East Hemel Hempstead. This means that there is very little choice and flexibility to meet the needs of St. Albans.

30. It appears from SADC's Economic Development and Employment Land Evidence Technical Report (examination document EMP 003) that SADC considers that East Hemel Hempstead will provide such a large amount of employment land, that there is no need to consider allocating any other new sites.

31. Our response to Question 24 demonstrates that the employment land position in St Albans is considerably less strong than stated in EMP 003. DBC's view is that it would have been much better if the submitted St Albans Local Plan had included some other new employment allocations in addition to the East Hemel Hempstead (central) broad location.

32. Despite the above, DBC does not consider that the lack of choice and flexibility in the submitted Local Plan's employment allocations is a reason to find the Plan unsound. This is because we consider that the search for further employment land in South West Hertfordshire should be deferred to the South West Hertfordshire Joint Strategic Plan.

**26. *What are the Inter-relationships with other Authorities in terms of Employment land Provision and how these have been taken into account?***

33. DBC considers that the submitted St Albans Local Plan does not pay sufficient regard in terms of employment land provision to the close inter-relationships between the South West Hertfordshire authorities in general and the very close inter-relationship between East Hemel Hempstead and Dacorum in particular.

34. St. Albans proposes a 55 hectare allocation which is an extension to the Maylands Employment area located within Dacorum. Dacorum needs to accommodate 241,600 sqm of new Employment space between 2018 and 2036. DBC has updated its information on employment land commitments and has also carried out a search for new employment sites resulting in DBC considering the release of c.11.5 hectares of Green Belt land for industrial development. This could accommodate around 46,000 sq. metres of industrial floorspace.

35. Dacorum's evidence currently identifies an un-met need of Industrial floor space of 60,000 sqm and 83,000 sqm of office space in the Borough and DBC will be asking the other South West Hertfordshire authorities to accommodate its unmet need. Given that the Maylands Employment area is the largest Employment area within Dacorum, it considers that the extension to that Employment area which is proposed by St. Albans should contribute to meeting the needs of Dacorum Borough as part of that proposal. This would still enable SADC to meet its own indicative floorspace figures as stated in the Economic Study Update.