

Hearing Position statement

Matter 6: Broad Locations for Development

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 draft Local Plan submitted by St Albans and City (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 6: Broad Locations for Development.

2.0 Inspectors' issues and questions in relation to matter 6: Broad locations for development

- 2.1 Main issues: Whether the policies for the development and delivery of the Broad Locations for Development are justified, effective and consistent with national policy?

Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national planning policy in relation to the overall provision for infrastructure needs of St Albans over the Plan period.

Whether it contains effective mechanisms to secure the provision of strategic infrastructure as and when it is needed.

Question 3: Is the Sustainability Appraisal of the options for the broad locations robust?

- 2.2 Only one Employment Broad Location is proposed. As we have detailed in the current set of hearing position statements to the Examination, we consider that a single location has not assessed all reasonable alternatives for delivery of sufficient choice and flexibility of employment land. For the SA to be robust it must undertake a proper assessment of the potential for delivery of employment land at Roehyde, where exceptional circumstances exist to release the site from the Green Belt.

3.0 Main modifications sought

- 3.1 To review the proposal for a single Employment Broad Location and whether this is sufficiently robust. To feed this into consideration of an alternative strategy that pursues a growth agenda in two growth areas of the A(1) M as well as the currently proposed 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 further ‘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.