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 7: THE BROAD LOCATIONS FOR DEVELOPMENT-SPECIFIC MATTERS (POLICY S6 (i) to (xi)

DECEMBER 2019

1.0 Summary

1.1 This statement is in response to the questions that have been raised by the Inspectors under Matter 7: The Broad Locations for Development 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 7 in Examination Document ED26.

Questions

2.0 East Hemel Hempstead (North) S6 (i)

Q3. What is the justification for the care home/flexi care/special needs accommodation required?

2.1 The wording within the policy reflects the projected accommodation needs that will be needed within this broad location, along with the other adult care requirements that are identified in Policies S6 iii) and iv) as part of the wider East Hemel Hempstead residential-led extension.

2.2 HCC requested a modification from the service (ACS) to this requirement that clarifies the land take required, as stated in the county council's representation to the Regulation 19 Publication Draft St Albans Local Plan.

Q9. What further infrastructure work needs to be undertaken, and is this appropriate to be left to the masterplanning stage?

2.3 The county council's statement to Matter 2, outlines HCC's concerns regarding the reliance on the master-planning stage limiting the ability to assess and address the cumulative impact of growth. HCC is of the view that the associated infrastructure needed to deliver all of the broad locations should not be left to the master-planning stage.

Q13. Is the approach to the new primary and secondary school on the site (in relation to the Green Belt) justified?

2.4 HCC supports the allocation of a new primary and secondary school within the East Hemel Hempstead (North) Broad Location; the justification of which is outlined in the county council's representation to the Regulation 19 Publication Draft St Albans Local Plan.

2.5 HCC maintains the soundness objection to Policies S3 and L21, along with the Local Plan Policies Map, in relation to the education allocations remaining solely in the Green Belt. Modifications were suggested that sought removal of the school build zones from Green Belt, as justified in these objections.

2.6 The total site area, along with the school build zone and footprint areas for a ten form entry (10f.e) secondary school (as requested by HCC instead of a 8f.e secondary school, as stated within Policy S6 i) and a 3f.e primary school are outlined in Appendix 1.

3.0 East Hemel Hempstead (Central) S6 (ii)

Q9. Should the plan identify specific allocations/areas for employment uses within the broad location?

3.1 Please refer to the county council's response to Question 10 in the statement submitted to Matter 6, regarding HCC's soundness objection to the non-allocation of a Household Waste Recycling Centre within the East Hemel Hempstead (Central) Broad Location.

4.0 East Hemel Hempstead (South) S6 (iii)

Q7. Should the specific location for the primary school within the site be identified?

4.1 The 2f.e and 3f.e primary schools that are outlined as a requirement under criterion 12 within Policy S6 iii), should be shown as education allocations within the East Hemel Hempstead (South) Broad Location. The school build zones and footprint areas should also be removed from the Green Belt.

4.2 The justification for this is outlined in the county council's soundness objection to the Local Plan Policies Map, with a modification requesting the education allocation is shown on the policies map.

4.3 The total site area, along with the school build zone and footprint areas for a 2f.e and 3f.e primary school are outlined in Appendix 1.

5.0 North Hemel Hempstead S6 iv)

Q9. Should the specific location for the primary school within the site be identified?

5.1 The 2f.e primary school under criterion 11 within Policy S6 iv) should be shown as an education allocation within the North Hemel Hempstead Broad Location. The school build zone and footprint area should also be removed from the Green Belt.

5.2 The justification for this is outlined in the county council's soundness objection to the Local Plan Policies Map, with a modification requesting the education allocation is shown on the policies map.

5.3 The total site area, along with the school build zone and footprint areas for a 2f.e primary school are outlined in Appendix 1.

6.0 East St Albans S6 (v)

Q3. Is the approach to the new primary and secondary school on the site (in relation to the Green Belt) justified?

6.1 HCC supports the allocation of a new primary and secondary school within the East St Albans Broad Location; the justification of which is outlined in the county council's representation to the Regulation 19 Publication Draft St Albans Local Plan.

6.2 HCC maintains the soundness objection to Policies S3 and L21, along with the Local Plan Policies Map, in relation to the education allocations remaining solely in the Green Belt. Modifications were suggested that sought removal of the school build zones from Green Belt, as justified in these objections.

6.3 The total site area, along with the school build zone and footprint areas for a 8f.e secondary school and a 3f.e primary school (as requested by HCC instead of a 2f.e primary school within Policy S6 v) are outlined in Appendix 1.

7.0 North St Albans S6 (vi)

Q5. Should the specific location for the primary school within the site be identified?

7.1 The 2f.e primary school that is outlined as a requirement under criterion 10 within Policy S6 vi) should be shown as an education allocation within the North St Albans Broad Location, with the school build zone and footprint areas removed from the Green Belt.

7.2 The justification for this is outlined in the county council's soundness objection to the Local Plan Policies Map, with a modification requesting the education allocation is shown on the policies map.

7.3 The total site area, along with the school build zone and footprint areas for a 2f.e primary school is outlined in Appendix 1.

Q10. Has regard been had to the potential for mineral extraction in this broad location?

7.4 As part of the Duty to Co-operate, the county council as Minerals Planning Authority has previously provided the district council with comments regarding the need to explore opportunistic mineral extraction on this site, as it falls within the sand and gravel belt. These comments were reaffirmed in the county council's representations to the Regulation 19 Publication Draft St Albans Local Plan.

7.5 Opportunistic sand and gravel extraction is in line with the requirements of the 2019 National Planning Policy Framework (NPPF), which encourages the prior extraction of minerals where non-mineral development may take place.[1]

8.0 West of London Colney S6 (ix)

Q4. What is the justification for a new secondary school and how would it enhance the sustainability of London Colney as a small town?

8.1 HCC continues to support the identification of a new 8f.e secondary school that is identified as an Education Allocation on land to the West of London Colney Broad Location. The justification for this, along with the other additional primary and secondary schools that are required in the district is outlined in the county council's representation to Policy S6 in the Regulation 19 Publication Draft St Albans Local Plan.

Q5. Is the approach to the 'all-through' school on the site (in relation to the Green Belt) justified?

8.2 HCC maintains the soundness objection to Policies S3 and L21, along with the Local Plan Policies Map, in relation to the education allocations remaining solely in the Green Belt. Modifications were suggested that sought removal of the school build zones from Green Belt, as justified in these objections.

8.3 The total site area, along with the school build zone and footprint areas for 8f.e secondary school and a 2f.e primary school are outlined in Appendix 1.

8.4 HCC requested within the representation submitted to the local plan that the reference to 'all through school' be removed from the policy. Whilst "all-through" schools can be appropriate in certain locations, the county council's preference on this particular site is to create separate primary and secondary schools. This will ensure that either school could be developed independent of one another to assist the phasing of the development and to help to ensure flexibility with regard to education provision. The schools could be co-located with independent demises but potentially sharing some facilities such as access and parking.

Q10. Has regard been had to the potential for mineral extraction in this broad location?

8.5 As part of the Duty to Co-operate, the county council as Minerals Planning Authority has previously provided the district council with comments regarding the need to explore opportunistic mineral extraction on this site, as it falls within the sand and gravel belt. These comments were reaffirmed in the county council's representations to the Regulation 19 Publication Draft St Albans Local Plan.

[1] Paragraph 204 (d), National Planning Policy Framework, February 2019. https://www.gov.uk/government/publications/national-planning-policy-framework--2

8.6 Opportunistic sand and gravel extraction is in line with the requirements of the 2019 NPPF, which encourages the prior extraction of minerals where non-mineral development may take place.

9.0 West of Chiswell Green S6 (x)

Q3. Should the specific location for the primary school within the site be identified?

9.1 The 2f.e primary school that is outlined as a requirement under criterion 8 within Policy S6 x) should be shown as an education allocation within the West of Chiswell Green Broad Location, with the school build zone and footprint areas removed from the Green Belt.

9.2 The justification for this is outlined in the county council's soundness objection to the Local Plan Policies Map, with a modification requesting the education allocation is shown on the policies map.

9.3 The total site area, along with the school build zone and footprint areas for a 2f.e primary school is outlined in Appendix 1.

10.0 Park Street Garden Village S6 (xi)

Q6. Does the Abbey Railway Line have capacity to support the proposal?

10.1 The current trip generation by rail for the district is 0.205 trips per dwelling. On this basis, the proposed 2,300 dwellings would generate an additional 471 rail trips per day. This should be within the capacity of the existing trains on the Abbey Line, which have a seating capacity of 277.

10.2 However, it should be noted that the trip generation is likely to be in a narrow window to coincide with normal commuting times. Thus, with a train frequency of one every 45 minutes, the additional demand would most likely be placed on two services in each direction, which would mean an additional 118 passengers per train.

Q7. What evidence is there to demonstrate that services would be increased? Can rail operators provide the increased peak period service sought?

10.3 The current 45-minute frequency is the maximum service that can be operated on the existing infrastructure, which is a single-line railway. The end-to-end running time is 16 minutes, and turnaround time is also required at the terminal stations. A 30-minute frequency is theoretically possible if calls at some or all of the intermediate stations were removed. This would be detrimental to the intermediate settlements, and reliability may be compromised due to the reduction in turn round times that would be available.

10.4 Therefore, services could only be increased by the introduction of a major infrastructure improvement e.g. a passing loop.

10.5 Given the long lead-in time for new infrastructure, it could be assumed that the rail operator would have sufficient time to plan for an increase in services and ensure that the necessary resources are available. Such changes are often introduced as part of a new franchise agreement. The current franchise is held by West Midlands Trains (operating as London Northwestern Railway) and runs until March 2026.

Q8. Is the passing loop on the Abbey Railway line justified and deliverable?

10.6 A recent study commissioned by the local rail user group (Abfly) concludes that the additional revenue generated would not cover the additional running costs nor the construction costs of the passing loop. However, this is based on operating the current train type (which require a guard and a revenue protection officer in addition to the driver) and on adopted housing growth figures. There is scope to reduce train operating costs and increase predicted passenger numbers which may give a positive outcome, but the additional study required has not yet been undertaken.

10.7 In addition, it can be assumed that passenger numbers would be higher than predicted through current modelling standards as recent examples have shown that improved rail services generate additional traffic to that predicted.

10.8 A passing loop would allow service frequencies to be increased to every 30 or 20 minutes. Such an improved frequency would greatly increase the attractiveness of the line to all users. The county council's COMET model has shown that passenger numbers on the Abbey Line would increase by 90 – 170% between 2014 and 2031 if the train frequency were increased to one train every 30 minutes. This is a result of the improved service and increased traffic congestion on the competing road network.

Q9. What is the likelihood of the direct rail services to Euston via Watford (or future extension to Metropolitan line to Watford) or an additional station on the Midland Mainline?

10.9 The West Coast Main Line which runs between Euston and Watford Junction is quoted as being the busiest mixed-traffic line in Europe. If any train paths were available there would be a better business case in allocating them to 8 or 12-car trains serving a wider range of major settlements than to a 4-car train serving the Abbey Line.

10.10 The opening of High Speed 2 Phase 1 between London and Birmingham will release capacity on the West Coast Main Line. There will be competing demands from main line commuting, intercity and freight services for the freed-up paths, but there might be opportunity to provide through running from the Abbey Line. The official opening date of High Speed 2 Phase 1 is still 2026, but it is acknowledged by Government that the earliest opening date is likely to be 2031. In addition, the Oakervee Review is currently looking at the whole High

Speed 2 programme, and it may recommend significant changes which could alter timescales or capacity. The publication of the review has been delayed until after the General Election.

10.11 The Metropolitan Line Extension scheme has been abandoned and hence there are no proposals to extend Metropolitan Line services to Watford Junction. If the scheme were to be resurrected, connection with the Abbey Line would be via changing platforms at Watford Junction station. Direct through running would require trains crossing the main line at level, which would have hugely detrimental effect on capacity on the West Coast Main Line. The new tunnel from the Abbey Line to the Metropolitan Line would be possible but would be very expensive to construct.

10.12 A station at Napsbury on the Midland Main Line existed until 1959. This station was an island platform serving the slow lines only. Further studies would be required to understand whether a new station could be accommodated under current construction standards. It should also be noted that any additional station stop on the route would increase overall journey times and hence reduce the capacity of the line.

Q9. Is the approach to the primary and secondary schools on the site (in relation to the Green Belt) justified? Should their locations be identified?

10.13 HCC supports the allocation of new 2f.e primary and 3f.e primary schools, along with a 8f.e secondary school within the Park Street Garden Village Broad Location. The county council considers these schools that are outlined as a requirement under criterion 12 and 12 within Policy S6 xi) should be shown as education allocations within the Park Street Garden Village Broad Location, with the school build zone and footprint areas removed from the Green Belt. The justification for this is outlined in the county council's representation to the Regulation 19 Publication Draft St Albans Local Plan.

10.14 The total site area, along with the school build zone and footprint areas for a 8f.e secondary school, along with the 2f.e and 3f.e primary schools are outlined in Appendix 1.

Appendix 1: Hertfordshire Land Areas for New School Sites

For new school locations, HCC seeks land allocations of the following sizes:

School Size	Total Site Area	Build Zone (Indicative)
Primary 2 Form of Entry School	2.1ha	0.9ha
Primary 3 Form of Entry School	3.0ha	1.2ha
Secondary 6 Form of Entry School	8.5ha	2.9ha
Secondary 8 Form of Entry School	11.0ha	3.7ha
Secondary 10 Form of Entry School	13.4ha	4.5ha