

Appendix 02: Pre 2024 Chronology with St Albans District Council



19_07_2018 Duty to Co-operate between St Albans District Council and Hertsmere Borough Council.

DUTY TO COOPERATE MEETING BETWEEN ST ALBANS DC AND HERTSMERE BC

Venue: Hertsmere BC

Date 19 July 2018 @16.00 pm

Attendees:

St Albans City and District Council (SADC)

Hertsmere Borough Council (HBC)

Notes:

Meeting initiated by, and agenda set by, SADC.

1. Introductions

SADC had initiated the meeting and provided an agenda (previously discussed and agreed with HBC).

Agreed: SADC would record the meeting under the agenda headings (below).

Hertsmere had picked up a few typos in the meeting notes which they will feed back to SADC.

2. Update on St Albans Local Plan

SADC summarised the current SADC Plan making position and noted that details of its draft Plan were now available in published papers (Council 11 July meeting).

- *Latest on Local Plan*

SADC are intending to meet all of their housing development needs of 913 homes per annum (based on the new Government NPPF standard methodology), within their administrative boundary. The Plan will have a stepped trajectory. There are no unmet needs to be considered with other councils.

HBC asked what SADC's initial thoughts are regarding the expected reduced household projections due to be published in September 2018. SADC responded that, based on past experience, these projections will likely fluctuate over the plan period and that there is flexibility within the Plan to deal with this.

SADC noted the issues SADC faced on affordability of housing and Green Belt impact and various public/stakeholder reactions to date.

HC queried if SADC were proposing to increase the height of new development in urban areas. SADC responded that the LP does indeed seek to optimise delivery in urban areas, including by increasing height where appropriate. Given the extent and locations of the

Conservation Areas in the district, the character of the area/Conservation Areas/Listed Buildings/historic views will have a significant impact on heights.

SADC summarised the Call for Sites that was carried out in parallel to the Local Plan consultation. Approximately 150 sites were received. Sites went through 3 stages of analysis, resulting in 10 residential Broad Locations being taken forward into the Local Plan. The relevant landowners/developers had agreed that the requirements in the draft Plan were viable and deliverable.

Associated infrastructure for the Local Plan includes the upgrading of the Abbey Line, A414 improvements, 4 secondary schools and 13 primary schools. HCC will run its COMET model at the end of the year.

HBC asked about the process whereby there were some Broad Locations, such as East St Albans at 1,250 homes, where a secondary school was being provided (which wouldn't warrant a whole new secondary school in its own regard). SADC advised that in these cases these were agreed (with HCC and the landowners) as the most appropriate and deliverable locations for a secondary school to serve both the developments and wider areas.

HBC and SADC agreed it had been difficult to engage with the various strands of the NHS. It was suggested that further efforts were made to achieve an NHS representative attending a SWHG meeting.

- *Timetable for new Local Plan*

On track with LDS; Council approval 11 July. Publication 4 September – 17 October 2018 and submission in March 2019.

- *DtC including SW Herts Area, Intervention Letter.*

SADC is under pressure from the Government Intervention process to progress its Plan in accordance with its LDS. The approach in the context of joint working is to prepare a Plan which meets full need and then undertake future review in the context of SWH joint working and the proposed Joint Strategic Plan (JSP).

- *Cross boundary issues – inc: potential Harperbury Hospital area*

HBC and SADC agreed that early cooperation was required for cross boundary issues.

The permitted and currently under construction development at Harper Lane, adjacent to Harperbury Hospital was discussed.

1. Update on Hertsmere Local Plan

- *Latest on Local Plan*

HBC will be publishing (non-statutory) community and stakeholder engagement documents seeking views on potential housing and employment locations following agreement from the Executive and Full Council at meetings in September 2018. This will be an engagement exercise and not a preferred options document. The proposed Redwell Garden Village submission from the Tyttenhanger Estate will be included. HBC noted that there would be

challenges and benefits with any site consulted on and any eventually brought forward. This consultation may be followed by some focussed consultation on specific sites in summer 2019. A draft Plan would likely take a further 12+ months.

- *Cross boundary issues – inc: potential Radlett expansion; potential Garden Village*

SADC reiterated significant concerns raised previously in relation to Redwell Garden Village, as well the as the considerable local and political interest.

HBC to send SADC a link to the latest Redwell Garden Village documents.

There was a discussion about highway and public transport issues and options in the cross boundary areas.

2. Arrangements for future working and MOU/SoCG etc.

SADC asked whether HBC had any specific DtC issues with SADC's draft Plan. HBC replied that they did not at this stage, but that they would need to consider the Plan in more detail before formally replying to the Reg 19 Publication consultation.

3. A.O.B.

None

11_09_2018 Email from St Albans District Council to Hertsmere Borough Council regarding meeting on 19_07_18.

Please find attached a draft set of meeting notes for the Portfolio Holder meeting on 19.7.18. Hopefully they are a reasonably accurate reflection of the meeting.

Please let us know if you or X have any comments and then we can agree a final version.

25_10_2018 Email from St Albans District Council to Hertsmere Borough Council regarding follow up to previous email.

27_11_2018 Email from St Albans District Council to Hertsmere Borough Council regarding follow up to previous email.

19_12_2018 Email from Hertsmere Borough Council to St Albans District Council

Apologies for the delay in responding to these as we were trying to get these reviewed with the Portfolio Holder.

Please find a small number of minor edits which I hope are acceptable.

19_12_2018 Email from St Albans District Council to Hertsmere Borough Council regarding follow up to previous email.

Thanks – all changes accepted. Please find attached a final agreed version for your records.

30_01_2019 Meeting between St Albans District Council and Hertsmere Borough Council

DUTY TO COOPERATE MEETING BETWEEN ST ALBANS DC AND HERTSMERE BC

Venue: Hertsmere BC

Date 30 January 2019 @15.00 pm

Attendees:

St Albans City and District Council (SADC)

Hertsmere Borough Council (HBC)

3. Introductions

SADC had initiated the meeting and provided an agenda (previously discussed and agreed with HBC).

Agreed: HBC would record the meeting.

The minutes of the previous meeting had been agreed following some minor edits by Hertsmere.

4. Update on St Albans Local Plan

SADC summarised the current SADC Plan making position. Full Council had previously agreed to progress to Regulation 19 with almost complete support from across the Council. The draft Plan based its housing OAN on 2014-based projections (912 pa) and proposed a reduction in Green Belt coverage from 82% to 78% in order to accommodate this growth.

SADC explained how sites were progressed and the role of officers/Members. SADC clarified that there were three main steps in the shortlisting of sites, namely a need for sites to deliver at 500 units, Green Belt assessment and the overall sustainability/deliverability of the site.

HBC asked whether SADC had fully explored increased densities. SADC clarified that some uplift in density had been assumed, allowing for up to 7/8 storeys where appropriate in the borough.

300 respondents had replied to the Regulation 19 consultation. HBC asked whether this included responses from the Parish Councils in and around London Colney. SADC advised that London Colney PC raised concerns to the plans for west of London Colney, which included provision for a new secondary school, but had not formally objected.

There was a general discussion about infrastructure needs and HCC's approach in LTP4. The only new road proposed to deliver growth in the SADC area, was a new link road to Junction 8 of the M1. Promoters/developers have had to agree what must be provided by individual service providers on their sites.

- *Timetable for new Local Plan*

In terms of timescales moving forward, SADC highlighted delays at PINS which meant typically a 9-12 month delay until hearings can start, following submission to Secretary of State. The implications of these delays were a matter of concern for all Councils.

- *Reg 19 consultation*

SADC thanked HBC for the broadly positive response to the Reg 19 response. It had been highlighted by HBC that the draft Plan contained none of the conventional supporting text to justify the plan and HBC asked whether separate topic papers were being produced. SADC advised 14 'study updates' were being issued, as well as some background documents. SADC intended to publish a draft of the much delayed HCC-commissioned water study, but only that part relating to their district.

HBC offered to forward the NHS response to their Reg 19 Plan given the challenges which authorities have had in effective engagement with health providers. SADC also asked for any PINS feedback provided in respect of the 2020 start date in the Reg 19 Plan.

- *OAN*

HBC asked what SADC would do with any 'surplus' housing provision, if their plan aimed to deliver more than OAN. SADC considered it was unlikely that there would be any overprovision as the government were likely to increase the numbers/change methodology but any surplus would only be shared, if a local authority has a 'rock solid case'. It was confirmed that both Dacorum and Welwyn Hatfield have asked SADC to take unmet need.

- *SFRI site*

HBC also requested an update on the SFRI site. SADC confirmed SADC were proposing the Park Street garden village on the site which was considered to be deliverable, notwithstanding the Helioslough permission. A request was made that HBC be involved in any masterplanning and delivery of the proposal given its proximity to Radlett. SADC confirmed this would be the case as it would be also for the site proposed west of London Colney.

5. Update on Hertsmere Local Plan

- *Latest on Local Plan*

The recent consultation had resulted in 2,300 responses fairly equally distributed in relation to the sites/locations. This figure included responses from London Colney and Colney Heath. HBC confirmed that clarity would be required from the Tyttenhanger Estate submission in terms of delivery, infrastructure and the timescales for completing sand and gravel extraction.

SADC explained that the SADC plan had phased the order of sites themselves. Developers had been advised that alternative reserve sites elsewhere would be brought forward if they did not support this approach.

HBC had agreed a new LDS and HBC clarified that this meant Reg 19 publication had been put back to Spring 2020. The technical work should be completed by the end of 2019.

6. SW Herts Joint Strategic Plan

There was a general update and discussion on the various SW Herts work streams.

7. **A.O.B.**

HBC asked for clarification on how SADC were calculating their 5 year land supply and against what 'target' they envisaged the housing delivery test would be applied. SADC advised that a paper had been published explaining their position.

**06_12_2019 Email from Hertsmere Borough Council to St Albans District Council
Regarding IDP**

Good morning,

Hertsmere Borough Council has appointed consultants ARUP to prepare an Infrastructure Delivery Plan (IDP) to establish the level of infrastructure provision (and associated cost) required to support growth in the Borough to 2036.

The IDP will also provide a basis for developing our new Infrastructure Funding Statement (IFS), which will set out the Council's spending priorities for infrastructure projects to be funded through money we have collected from developer contributions (both via our Community Infrastructure Levy and through S106 agreements).

In order to make our Infrastructure Delivery Plan as comprehensive as possible we are contacting duty to cooperate bodies to ask for any input that they have. If there are any cross-boundary infrastructure issues or other relevant information you think we should be made aware of please let us know.

The council would be happy to receive any comments that you have by email but if you would like to speak to our consultants about the IDP and any concerns that you can also book a time slot to speak with them. Please refer to the tables below and let us know your availability.

If you could please send any comments by Friday 20 December 2019 or if you would like a call instead, your availability as soon as possible.

Organisation	
Contact Name	
Job Title	
Contact Email	
Contact Phone	

Time	Mon 09 Dec	Tue 10 Dec	Wed 11 Dec	Thu 12 Dec	Fri 13 Dec
09:00 – 11:00					
11:00 – 13:00					
13:00 – 15:00					
15:00 – 17:00					

Time	Mon 16 Dec	Tue 17 Dec	Wed 18 Dec	Thu 19 Dec	Fri 20 Dec
09:00 – 11:00					
11:00 – 13:00					
13:00 – 15:00					
15:00 – 17:00					

Thank you for your time and cooperation.

31_01_2020 Letter from Hertsmere Borough Council to St Albans District Council regarding unmet housing need

Hertsmere Local Plan

Hertsmere Borough Council is currently progressing work on its own Local Plan which will cover the period from 2018 to 2036.

As part of the duty to cooperate process, we have been actively engaging with all of our neighbours and stakeholders to consider how Hertsmere will meet its own identified housing and employment needs. The standard national methodology for assessing housing need has resulted in an annual requirement of 750 homes per annum (incorporating a 5% buffer, as required by the NPPF) or 13,500 homes over the plan period. By comparison, our current Local Plan which was adopted 2013, has an annual housing requirement of 266 homes. That Plan is now more than five years old and therefore deemed to be 'out of date' in determining our future strategic growth requirements.

We recognise that there is an agreement in principle to progress a joint plan for the South West Herts Housing Market Area, which would involve a comprehensive and comparative assessment of Green Belt land. Clearly this will not be in place in time to inform our new Local Plan and there remains a need for Hertsmere to bring forward this new plan without delay.

Following a Call for Sites, we have consulted on a Potential Sites for Housing and Employment document which identified and summarised the site proposals initially put forward by landowners and developers. Hertsmere's current housing and employment land capacity is considered to be solely that which can be developed on previously developed land and includes all sources on land not covered by Green Belt designation. We also recognise that there is greater emphasis in the NPPF on making effective use of land (chapter 11) and maximising densities (chapter 13) as a preliminary requirement prior to assessing where Green Belt land might be taken and whether exceptional circumstances exist for doing so. Given these requirements and to ensure that previously developed land is maximised, we have set out to:

- 1) Review the housing densities and capacities of all potential sites located within major settlement boundaries, and applying a significant uplift in the average density of residential development in accordance with paragraph 123 of the NPPF.
- 2) Assess the utilisation of local vacant housing stock as a source of untapped brownfield housing supply.
- 3) Review the achievability and deliverability of Hertsmere's own land assets.
- 4) Contact owners/occupiers of major brownfields sites who have not yet submitted any of their land holdings.

Our Housing and Economic Land Availability Assessment (HELAA), published in 2019, points to a capacity of less than 2,500 homes on previously developed land. This includes an allowance for windfall development and existing commitments. We are hopeful that around two-thirds of our employment requirement of over 25ha of employment can be accommodated within land which has previously been safeguarded for such purposes in our current Local Plan.

There is therefore a very significant shortfall between the potential housing capacity of Hertsmere's previously developed land and the level of identified need, as well as a clear deficit of land required to meet employment needs over the plan period. As an authority with almost 80% of its area designated as Green Belt, we are therefore asking you whether your authority is able to accommodate some of the growth shortfall identified within Hertsmere. A similar request has also been sent to all neighbouring authorities and other authorities within our HMA.

We are intending to arrange a Duty to Co-operate workshop in due course to discuss our emerging plan and potential cross boundary issues arising, and will be in contact again with more details about this event. In the meantime, I would be grateful for a response to this letter at the earliest opportunity.

If you have any queries relating to the above request, please do not hesitate to get in contact.

10_02_2020 Email from Hertsmere Borough Council to St Albans District Council regarding IDP

I was wondering now that you have chance to catch breath, if you were able to rely to the email below, sent by my team on behalf of consultants ARUP, who are carrying out an update to our Infrastructure Delivery Plan (IDP)?

In particular they are keen to know your thoughts on the following questions:

1. To what extent do you consider there to be cross-boundary infrastructure linkages with Hertsmere, e.g. transport corridors, education flows, shared reliance on utilities?
2. Are there any notable infrastructure improvements in the pipeline in your local authority area that might be of relevance to Hertsmere?
3. Is there any infrastructure within Hertsmere which you will potentially be reliant upon to accommodate future growth within your local authority area?

I have taken the liberty of advising them as follows, but please let me know if there is anything I have missed. Alternatively, if you would like a more detailed chat, please contact Rob Webster at ARUP direct (cc'd into this message).

- **Water** – potable (general issue across county) and waste (future capacity issues at Blackbirds and especially Maple Lodge Waste Water treatment works)
- **Strategic Road network** – particular importance of the M1, M25 and A1414 to transport movements within the area.
- **Local road network** – local pressures and congestion
- **Secondary schooling** – complicated cross boundary relationships due to parental choice based on selection / faith / OFSTEAD ratings
- **Rail** – key links from London, through Borehamwood, Radlett and on to St Albans and beyond
- **Green Infrastructure** – general links
- **Links / pressures as a result of the potential new settlement at Tyttenhanger.** Potential for synergy with new GP facility at London Colney, which the CCG advises has spare capacity to support first phases of this development. Potential links with secondary school provision on Tyttenhanger site and the new school planned at London Colney.

28_07_2020 Email from Hertsmere Borough Council to St Albans District Council

Follow up from the previous IDP emails

28_07_2020 Duty to Co-operate meeting between Hertsmere Borough Council and St Albans District Council.

NOTES AND ACTONS

Hertsmere Local Plan update

The current position was summarised as follows.

Revised LP programme just agreed:

- Reg 19 document considered by Executive and Full Council February 2021
- Reg 19 engagement to commence May 2021 (post elections)
- Submit by January 2022
- Adopt late 2022.

Plan period 2018/19 to 2036/37 – 16 years post programmed adoption, with a 19 year plan period.

Local housing need of 750 homes / year (including 5% buffer). Sites need to be allocated for about 10,850 of these. Approaches to meet need will include considering new settlement, urban extensions, and village growth, as well as maximising capacities on brownfield sites. Figure equates to a c5% reduction in the area's Green Belt, when potential sites and changes to village inset boundaries are taken into account.

HBC will also need to find sites for c27 Gypsy and Traveller pitches. The intention is to provide these as part of several strategic sites.

When choosing sites the GB study is the starting point, but there are only relatively few locations highlighted as poorly performing GB. There are two key sites being considered that are close to the SADC boundary (see below).

In addition to new homes, the SW Herts Economy study recommends the need to provide c4.5ha of new B1 space and c20.5ha of B1c/B2/B8 space.

St Albans Local Plan update

SADC sent a reply to the letter from their Inspectors on 2nd July and are awaiting a response. It is hoped that this response will be received by September at the latest. The two most likely scenarios are as follows:

- (a) Agreement that the LP examination can reconvene; or
- (b) The council have to go back to square one in terms of LP preparation.

SADC Officers thanked HBC for agreeing to being referenced as one of the parties who were supportive of the examination process continuing.

HBC Officers noted that scenario (b) could cause some issues in terms of joint working / plan alignment in SW Herts, as some of the technical work referred to by SADC was done

on a joint basis and also only covered the period to 2036. Any new LP would need to extend beyond this end date to provide the required 15 year post-adoption period.

It was noted that the SADC letter referenced the reintroduction of the Strategic Rail Freight Interchange (SRFI) proposals, and the consequent deletion of the Park Street Garden Village proposal. Work was also underway to update the GB review to look at the potential for introducing some smaller sites into the plan, as required by the NPPF.

The reallocating of the Park Street GV site would mean that some of SADC's 79 pitch Gypsy and Traveller need would need to be accommodated elsewhere.

Officers were looking at a number of options to make up the housing shortfall:

- PDL in the Green Belt
- Other potential sites in the Green belt (especially smaller sites)
- Site NE of Redbourn that was less well performing GB but had previously not been required
- Windfall assumptions (c250 year at present, although it was noted that the number of windfalls tended to increase with the age of the plan).

Discussion of cross boundary matters

(a) Housing and employment needs

Both authorities agreed that they would not be able to meet anywhere near approaching their local housing need (as established by the Government's standard method) without very significant incursions into the GB. Both authorities had limited brownfield sites, although they were seeking to maximise the use of these where possible.

HBC has previously asked SADC via a formal letter (in January 2020) whether the district could help meet HBC's housing and/or employment needs. SADC has asked the same question regarding housing needs via previous DtC meetings and through the Herts Planning Group. Both Councils confirmed that the situation remain unchanged: they would struggle to meet their own housing needs, let alone consider accommodating additional growth from any other area – even those within the agreed HMA.

SADC did highlight the fact that due to 55h of employment space that forms part of the Hemel Garden Community proposal, it may be in a position of overproviding employment space (B1). However, this would logically help to meet Dacorum's needs, as the development formed an extension to Hemel Hempstead.

The SRFI proposal may further increase the district's ability to provide B8 space. HBC Officers noted however that the SW Herts Economy Study advised that the jobs created through this scheme would largely meet regional, national and/or international demand for very large format warehousing, rather than wholly serve local needs. SADC advised that the site was likely to provide for some more localised B8 needs too.

Key sites

Harperbury Hospital

HBC Officers advised that consideration was being given to allocating land for development adjacent to the Harperbury Hospital development (and further unimplemented LP allocation). This was originally promoted as a 'Garden Village' but has reduced considerably in scale. The total scheme (including what is approved and built would equate to c600 homes). The proposal on the HBC land would include the implementation of a new cycle and pedestrian link adjacent to the existing Harper Lane bridge, to allow this to go back to two-way traffic. The principle of this change has been agreed with HCC Highways. It was noted that the bridge is just within SADC's area.

SADC Officers were concerned about the principle of development at the Harperbury Hospital site within HBC area, as it would not utilise poorly performing Green Belt and would therefore not reflect their own development strategy.

HBC Officers highlighted that the site would only be included with the Local Plan if its development were seen to enable an increase in the sustainability of the current hospital site development. This is currently solely a housing development and if by increasing the quantum of growth in the location so it could support some local services (primary school and shop), plus improvements to bus and cycle links and enable improvements to be made to Harper Lane bridge, and this would potentially provide the necessary exceptional circumstances justification.

SADC advised that they had not had any discussions with the site promoters for some time, due to the recent LP examination process. HBC Officers suggested that any discussions regarding the masterplanning of this area should be done on a joint basis, to ensure the scheme was comprehensively planned and delivered.

SADC Officers advised that as part of work to look at additional sites to include in their LP to compensate for the potential loss of the Park Street Garden Village allocation, a site that is currently in employment use next to Harper Lane Bridge (Lodge Farm) was potentially being considered as an additional housing allocation. This was currently in predominantly open storage use. HBC Officers noted that this site was on the borough boundary and any new residents here would logically look to Radlett for locals services and facilities. This was accepted by SADC.

Action: *HBC to keep SADC informed regarding discussions with the Harperbury Hospital site promoter and invite Officers to joint meetings where appropriate.*

Action: *SADC Officer to arrange a follow up meeting to discuss potential additional site options within St Albans that are close to the HBC boundary in the vicinity of the Hospital site and to keep Members update re the outcome of this meeting.*

Park Street Garden Village / SRFI

SADC Officers explained that despite the Council and local MP being opposed to the SRFI proposal, it was clear for the PINS letter than if the SADC plan was to progress it would need

to be reintroduced as the anchor use for the site. The proposal comprises 330K sqm of large format B8 space (the equivalent of 6 Wembley stadiums), and would be the biggest lorry park in Europe. At least half of the scheme could be delivered without any rail improvement works, with only about 5% of the overall scheme expected to be rail to lorry movements. There was an agreed travel plan in place, with all lorries coming into the site from a new junction on the A414 to the north. This would effectively involve a partial bypass for Park Street. Direct access from the M25 had been ruled out by Highways England. Car / cycles / pedestrians would however be able to access from the south, although as it is a 24/7 operation there would be fewer peak time movements than with the GV proposal.

The alternative Park Greet Garden Village allocation was for 2,300 homes, with 1,650 of these to be delivered within the plan period.

Action: SADC to keep HBC informed regarding discussions regarding this site.

Potential new settlement at Tyttenhanger estate

HBC Officers outlined the proposal was for 6,000 homes and supporting employment and infrastructure, but with c2,500 homes delivered within the plan period. The scheme was being promoted by Urban and Civic in agreement with the Tyttenhanger estate.

SADC were concerned about the proximity of the development to the district boundary – especially in the case of Colney Heath.

SADC had attended the first technical workshop arranged by Urban and Civic to discuss the site last September. There was expected to be a follow up workshop this autumn. HBC had appointed a Strategic Sites Officer to lead on liaison with promoters for this and other large sites.

HBC suggested that SADC attended certain meetings with the land promoter and HBC Officers would ensure they were kept updated re proposals for the site as appropriate.

SADC Officers indicated that without a PPA with U&C they would not be able to dedicate any officer resource to this. HBC Officers highlighted that there could not be PPAs for all cross boundary discussions and HBC Officers would be willing to be involved in discussions on other sites near the boundary within SADC's area without PPAs as a quid pro quo in the spirit of the DtC and good planning.

Action: HBC to keep SADC informed regarding discussions regarding this site and ensure officers and relevant elected Members were invited to any future workshops arranged by the land promoter.

(b) Infrastructure - known deficiencies and future planned provision

HBC had previously written to SADC as part of work on their Infrastructure Delivery Plan to advise what they considered the key strategic cross boundary infrastructure issues to be. SADC were not immediately aware of any specific capacity issues with settlement level provision that was relevant to cross boundary discussions, but would advise further.

HBC Officers outlined the range of infrastructure that the scheme was expected to provide once complete. IT was noted that:

- CCG had initially advised no additional GP provision was required due to there being spare capacity in the new London Colney facility. However, it has subsequently been suggested that some space in the new development should be set aside.
- HCC had initially advised the first phases of any development could be served by a new secondary school in London Colney, but it has not been agreed that all need generated by the site would be provided as part of the proposal.

Action: *SADC Officers to look into matter further and advise if there are any infrastructure matters that HBC should be aware of when considering development locations near to the borough boundary.*

(c) Any matters specifically pertaining to Colney Health/ London Colney for HBC to be aware of in advance of a DtC meeting on 4/8

Key matters of concern regarding development near the boundary were agreed to relate to coalescence, traffic congestion and infrastructure matters.

AOB

None

04_08_2020 Response from St Albans District Council to Hertsmere Borough Council regarding unmet Housing need.

Thank you for your letter of 31 January 2020 – ‘Hertsmere Local Plan’. Please accept my apologies for the delay in responding. SADC wishes Hertsmere Borough Council (HBC) the best of luck in moving forward with your draft Plan and looks forward to continuing productive work between LPAs. In response to your specific enquiries:

1 - There is therefore a very significant shortfall between the potential housing capacity of Hertsmere’s previously developed land and the level of identified need, as well as a clear deficit of land required to meet employment needs over the plan period. As an authority with almost 80% of its area designated as Green Belt, we are therefore asking you whether your authority is able to accommodate some of the growth shortfall identified within Hertsmere. A similar request has also been sent to all neighbouring authorities and other authorities within our HMA.

As raised previously in Duty to Cooperate discussions and elsewhere, SADC currently considers that it has no capacity to meet any of HBC’s unmet housing needs. We are committed to ongoing cooperation and dialogue around the issues of potential HBC unmet needs, in the context of the overall joint work on the South West Herts geography/SWH Joint Strategic Plan. Should any changes to the submitted Draft St Albans & City District Local Plan be proposed during the examination process, this request will be taken into account – bearing in mind that SADC currently considers that it has no capacity to meet any of HBC’s unmet housing needs.

As also raised previously in Duty to Cooperate discussions and elsewhere, we are happy to confirm that there may be an opportunity for the employment growth at East Hemel (Central) within SADC’s draft Local Plan to play a role in overall South West Herts employment land provision. Again, further discussion on this should be had in the context of the overall joint work on the South West Herts geography/SWH Joint Strategic Plan.

For context, St Albans can confirm that over 80% of this District is designated as Green Belt.

2 - We are intending to arrange a Duty to Co-operate workshop in due course to discuss our emerging plan and potential cross boundary issues arising, and will be in contact again with more details about this event. We are committed to ongoing discussion and continued collaboration with regard to your emerging Plan and potential cross boundary issues arising and are happy to attend a DtC workshop in due course.

As discussed previously, bearing in mind the potential for cross-boundary impacts for potential Hertsmere growth options; in particular impacts on London Colney and Colney Heath within St Albans; we ask that the potential inclusion of these Parish Councils in DtC workshops (or other appropriate engagement events) be considered. We trust that the comments above will be of assistance as you continue with your work on your Plan. We are very happy to discuss further as appropriate.

02_09_2020 Duty to Co-operate meeting between St Albans District Council and Hertsmere Borough Council

Cross boundary issues

The role of the meeting was to seek SADC's views on whether HBC and its appointed infrastructure consultants (ARUP) had:

- (a) correctly identified all key cross boundary infrastructure matters; and
- (b) considered how best these could be addressed through HBC's Local Plan.

The meeting commenced with a review of the list of issues that ARUP had identified as part of the phase 1 IDP work (determining a baseline assessment of Hertsmere's future infrastructure requirements). The following issues were identified as being particularly necessary for cross boundary consideration with SADC:

Water / waste water

The summary of findings from ARUPs Phase 1 work reflect what SADC would expect in terms of water supply and sewerage – the issues are long-term and regional, not specific to any one local authority area.

Traffic / transport

Generally the "real world" challenges around transport modal shift are evident, but SADC hope to see proximity to sustainable transport reflected in site selection decisions

SADC noted that they were keen to make sure Growth and Transport Plan schemes are reflected in the infrastructure schedule, and highway constraints are reflected in site selection decisions

Actions:

1. SADC to check GTPs to see whether any schemes in St Albans (and other surrounding authorities) of cross-boundary relevance should also be included in the infrastructure schedule
2. SADC to confirm whether HCC are going to plug the selected sites into next COMET model run, and/or advise on any specific highway mitigation for individual sites

Rail

SADC agreed with HBC's and ARUP's position that they would like Napsbury Halt station (opening / re opening) concept to remain in public documents as an aspiration, but it is recognised that delivery may be unrealistic within the current Local Plan timescales.

Potential sites in the vicinity of the Hertsmere / St Albans district boundary

Potential new settlement:

SADC reiterated concerns previously expressed by their Members that if a large potential site is constructed near the SADC border (as currently proposed by Urban and Civic), and is too far from sustainable transport and facilities this could result in potential coalescence with Colney Health / London Colney, and raise infrastructure capacity concerns.

In addition SADC were concerned at the CCG's indicated plan period reliance on the new surgery in London Colney for the needs of potential sites in this area. Their view is it should be available for patient yield from growth in London Colney, and that patient travel to London Colney from a potential development site in HBC's area is unsustainable.

Actions

1. SADC to discuss with **Annely Robinson** at the CCG, given the potential self-containment / sustainability benefits to on-site surgery provision from the outset.

SADC expressed a desire for HBC's IDP and/or Local Plan process to look at specific cross-boundary green infrastructure, links to woodland nearby within St Albans etc.

There was support from SADC for the community hub approach for any new large scale development (e.g. inclusion of onsite library provision on a potential settlement) to minimise outward travel.

There were concerns from SADC around potential stopping-up of Coursers Road (noted response from MS that this isn't a confirmed plan), as part of Urban and Civic's emerging site proposals.

Other potential sites:

For other smaller potential sites, the main infrastructure issue noted was around the Harper Lane bridge over the Midland Main Line, and the likely need for a parallel footbridge to be built.

AOB

None

Next meeting

To be confirmed

02_12_2020 Meeting between Hertsmere Borough Council, St Albans District Council and Urban and Civic to discuss a new settlement.

Meeting Notes:

U&C presented a summary of their proposal for the potential new settlement, acknowledging proximity to St Albans' boundary. The presentation also covered the vision of the 'place' which would be created. The existing quarry land use was identified, with emphasis that development on the site was intended to create a sustainable community - retaining some economic uses, as well providing homes, community / leisure facilities and seeking to enhance the local environment.

The emerging masterplan for the site was explained, alongside site phasing. The planning application for the new development is expected to be submitted alongside the local plan process. The planning application would take the form of a three tiered approach (outline, key phase and reserved matters).

The local plan strategic sites policy will tie together all main requirements, to ensure required infrastructure is delivered on the ground. This policy wording can be shared with St Albans once in full draft form.

SADC highlighted that the scheme would mostly impact St Albans residents, especially in terms of strain on infrastructure provision. SADC are pleased to see consideration for school and health care planning and phasing, as these are likely to be very contentious issues with St Albans residents.

SADC highlighted the key issues for St Albans to be:

- Clear acknowledgement of cross boundary impact and implications of the scheme on St Albans residents. This should be visibly highlighted in the technical material.
- Transport concerns; the scheme by default of location would be very car based and therefore the traffic implications of this.
- The phasing and delivery of education.
- Health care provision.
- Green infrastructure provision on site, and the linkage of this to Hertsmere boundary areas, as well as St Albans. Further dialogue around this should take place.
- The proximity of Colney Health to the new settlement. Concerns over how appropriate the built form is to the North of Coursers Road. SADC would like to see development moved away from Colney Health. SADC confirmed that they will clarify the boundary of what they consider to be Colney Health.

All parties agreed that dialogue around the site will be open and on-going.

U&C highlighted that sporting provision would be used as a link between HBC and SADC, with off-site contributions going toward closest / most appropriate provision, which may be within SADC boundary.

It was noted that St Albans' local plan was withdrawn in November 2020. Members are going to consider programme for a new plan shortly, with the objective of going to Reg. 18 in 18 months, with plan publication in January 2022.

It was agreed that further cross boundary discussion will need to take place with HBC to discuss how the planned growth within the SADC new Local Plan will impact on the new settlement.

SADC's Play Pitch Strategy will be completed in January, which will help with allocation of off-site contributions generated from the new settlement; to contact Wendy Frost to request this document once available.

SADC would like further detail on site phasing, specifically phases 1 and 2; what, where and when.

SADC requested that due to impact of the new settlement on St Albans boundary, they would like to share nomination rights of the affordable homes to be constructed. HBC confirmed that they will need to seek Member agreement for this arrangement.

Actions:

1. **HBC** to share draft site policy wording with SADC.
2. Green infrastructure cross-boundary links to be discussed in further detail with SADC.
3. **SADC** to confirm extent of Colney Health boundary.
4. **SADC** to engage HBC on implications of the planned growth within their new local plan.
5. **HBC** to contact SADC in January 2021 to request to see draft PPS.
6. **HBC** to discuss arrangement of affordable housing nomination rights for new settlement with Members.

19_01_2021 Duty to Co-operate Meeting between St Albans District Council and Hertsmere Borough Council

Update on St Albans Local Plan

- SADC provided update that SADC withdrew Local Plan on 23 November 2020 following issues raised at examination in relation to Duty to Cooperate.
- A new Local Development Scheme has been prepared and taken to Planning Policy Committee and the intention is to consultant on a Regulation 18 Draft Local Plan in January 2022.
- Aim is to adopt a new Local Plan before the end of 2023.
- Starting with 'blank sheet of paper' including new Sustainability Appraisal and Green Belt Review. Noted that some other evidence base (e.g. joint South West Hertfordshire Local Housing Need Assessment) can be used for new Local Plan. Consultation on Statement of Community Involvement, Sustainability Appraisal Scoping and Call for Sites go live on 25 January
- Draft Vision, Strategic Priorities and Objectives paper has been taken to Planning Policy Committee. Emphasis for new Local Plan is on Climate Crisis and sustainability, recognising the Council has called a Climate Emergency
- HBC inquired for Local Plan timeframe. CB confirmed currently 2020 to 2038.

Update on Hertsmere Local Plan

- In December 2020 Hertsmere Borough Council made a minor change to its Local Development Scheme.
- Local Plan Regulation 19 consultation will be taken to Executive in February 2021 and after that to Full Council
- South West Hertfordshire evidence base work will be used. Other recent evidence base work includes updates to the Green Belt Review and Landscape Assessment. HBC stated both on website to view.
- Infrastructure Delivery Plan is underway with discussions with Hertfordshire County Council on transport and education matters. Have begun to get a clearer picture on GPs and will be taking a position statement to member's panel.
- SADC asked about intended adoption date. HBC stated aim is to have a new Local Plan adopted at the beginning of 2023.

Potential Strategic Cross Boundary Issues, inc.

a) Duty to Cooperate – General inc. SW Herts Area

- Cllrs and officers all supportive of the South West Hertfordshire approach to Duty to Cooperate, evidence base and the Joint Strategic Plan. Agreed approach to collective SWH Statement of Common Ground.
- Discussion on review methodologies to ensure that there is consistency, where appropriate.

- SADC – following SADC Inspectors’ approach, SADC asking HBC if you have any capacity to meet SADC’s housing need or appropriate land for an SRFI. SADC will send a follow-up letter asking formally in due course. HBC no such capacity and will respond as expected to a future letter in due course.

b) Housing

- SADC stated that SADC approach is seeking to meet circa 900 pa housing need set out in the standard methodology within the District - subject to technical work.
- Green Belt Review expected in summer 2021.
- HBC confirmed same for HBC. Seeking to meet circa 700 pa housing need (750 with required buffer) set out in the standard methodology.
- CB updated on the Gypsy and Travellers Study. It has been completed relatively recently and states there is a need for circa 70 pitches across the Plan period. SADC is seeking to meet that need in full in the District - subject to technical work.
- HBC stated the same and that the proposed approach was to deliver smaller sites as part of strategic Green Belt release

c) Employment

- SADC stated that SADC would seek to meet its employment need in full - subject to technical work and may have capacity to support other South West Hertfordshire districts in meeting their need
- An updated was provided on Strategic Rail Freight interchange. The direction of travel is to follow advice from Inspectors in recent examination.
- Additional employment likely to come forward in Hemel Garden Communities and Enterprise Zone designation.
- HBC stated looking at extending some existing employment sites to meet need, plus use of previously safeguarded sites (e.g. new Sky studio)
- SADC noted that many SADC residents work in Elstree Studios.

d) Transport

- Discussion on HCC COMET Model and updates to the GTPS. Specific discussion around the A414 and MRT. MRT currently conceptual and needs more detail to support Local Plan delivery.

e) Education

- SADC stated that SADC would seek to meet its own need within the District and there are early high level discussions on possibly providing a school to help meet Dacorum Borough Council's need in Hemel area.
- HBC updated that there would likely be three new secondary schools at Bushey, Borehamwood and a third as part of a development proposal. Noted some liaison with Welwyn Hatfield.

f) Health

- SADC stated meeting GP need within SADC and support for improvements expected for St Albans Hospital.
- HBC – reiterated work on IDP with the NHS CCG.

g) Green Infrastructure

- Discussion on the need to consider cross boundary opportunities through HCC update work, including biodiversity net gain, tree planting and how to manage Green Infrastructure in the future - including potentially through community groups.

h) Strategic Rail Freight Interchange (SFRI)

- SADC - An update was provided on Strategic Rail Freight interchange. The direction of travel is to follow advice from Inspectors in recent examination to allocate the site - subject to technical work. Recognise that it is a complex issue and seeking as much certainty from landowners/developers as possible.
- HBC raised concerns from local community about emphasis on road rather than rail throughput.

i) Potential sites near LPA boundaries - Bowman's Cross; Harperbury Hospital; Harper Lane

- SADC stated withdrawn Local Plan had a Broad Location west of London Colney.
- Discussion around Harperbury Hospital and Harper Lane areas.

- Bowman's Cross - discussed significant infrastructure challenges e.g. sustainable transport and highways issues, potential provision of a secondary school, GP provision and taking advantages of Green Infrastructure links. SADC noted that Colney Heath Common is popular and it would lead to additional pressure on this area.
- All noted forthcoming engagement with Portfolio Holders and London Colney Parish Council and Colney Heath Parish Council as an opportunity to discuss concerns in more detail.

j) Potential unmet needs from Watford BC

- Both parties agreed they cannot meet any of Watford Borough Council's potential unmet housing need

Arrangements for future DTC working and SOCG

- Agreed that South West Hertfordshire joint approach will be followed.

A.O.B and Date of Next Meeting

- Next meeting proposed for summer 2021 in line with HBC Reg 19.

21_01_2021 Email from Hertsmere Borough Council to St Albans District Council regarding policy wording.

16_02_2021 Email from Hertsmere Borough Council to St Albans District Council regarding New Settlement

Further to our recent discussions about how we can increase liaison on the above site promotion, I am pleased to advise that HCC and U&C are happy for me to extend the invitation to you to attend the monthly PPA meetings. These meetings are currently arranged by U&C's consultants Barton Wilmore, but the roles of chair and minute taker are rotated around the 3 parties and all participants can request specific agenda items. As no decision has been taken by HBC regarding the inclusion of the site within HBC's emerging Local Plan, these meetings are held on a 'without prejudice' basis and minutes are not for wider circulation outside of the group. I will forward the Teams meeting invites for future diarised sessions. These site-specific meetings will of course be in addition to our wider DtC meetings which we will continue to programme in as necessary.

I have also spoken to U&C regarding their plans for further engagement with London Colney and Colney Heath Parish Councils and they have promised to keep both St Albans and Hertsmere informed on the nature and timing of any community-level engagement going forwards. I would also be grateful if you could continue to act as a link with the parishes and keep me informed of any new concerns or issues that arise locally.

We look forward to further positive joint-working as we move forward with our respective Local Plans.

17_03_2020 Email from Hertsmere Borough Council to St Albans District Council following up from a meeting held on same day.

LOCAL PLAN:

- Outcome of SADC's call for sites
- Outcome of HBC's employment call for sites and potential impact on LDS programme

BOWMAN'S CROSS:

- Update on baseline studies / technical reports prepared by U&C and their consultants and comments that have been fed back to them to-date
- Update on original 'vision' document vs what we are expecting now (and will hopefully have received in advance of the meeting)
- Update on site policy and associated 'map'
- Update on any outputs for viability work from BNP

- Update on any outputs form stage 2 IDP.

12_07_2021 Duty to Co-operate Meeting Between Hertsmere Borough Council and St Albans District Council

Meeting Notes:

Actions from last meeting

SADC to review parish engagement strategy and provide comment to HBC by the 7th May- *actioned*

HBC to send SADC updated site policy and map- *outstanding*

HBC to consider formalising a vision and charter document for the potential new settlement- *actioned with BW updating on progress in monthly PPA meetings*

HBC to update SADC on outcome of next planning application approach meeting with U&C and discuss further as necessary- *HBC provided update on progression of this, explaining that most of the concerns are now being addressed through the vision document and design spds.*

HBC to schedule bi-monthly DtC meeting dates to discuss this site and other cross boundary matters- *actioned*

HBC to liaise with U&C, HCC and SADC re a meeting on the proposed bus gates and how they fit with the wider sustainable transport strategy- *HBC explained HCC's 'holding' highway objection to the new settlement which has led to the sustainability strategy being revisited, and thereby the bus gate proposal.*

SADC to advise HBC of the best contact and their preferred approach for matters relating to public consultation for the EIA and planning application work- *SADC confirmed that the best contact is DM Manager.*

Update on HBC Local Plan and Regulation 18

HBC advised that the non-site specific policies were going to Scrutiny Committee on Wednesday 14th July. These policies will therefore be available within the public domain 5 days prior to this meeting.

The Regulation 18 Plan will be going before Full Council on the 30th September. The Plan is scheduled to have an initial 6 week public consultation period. HBC are currently appointing a PR company to advise on this consultation process and helping with social media contents to publicise the plan. HBC are currently working through tenders for this work.

HBC informed that a DtC meeting took place with WHDC on the 08/07/21. HBC have asked WHDC to provide a list of residential groups and other organisation they would wish BW to engage with regarding the new settlement. HBC requested SADC do the same.

SADC also advised that they would also do their own press notification about the new settlement, likely in the form of a newsletter.

HBC advised that the recently promoted studio quarter is now being received more positively by Members, with Bidwells providing a briefing to Member Planning Panel. The Regulation 18 policy for the site has just been put together however, it stills needs refinement while further technical studies are carried out. The local plan will divide specialist and traditional employment as HBC Members do not want an overprovision of employment space. In reality there will be an overprovision of employment space which could help meet WBC's job needs, but not their shortfall in "B use class".

Update on New Settlement and Regulation 18 Policy Wording

SADC are update to date on new settlement matters due to attendance at the monthly PPA meetings, which provide an update/overview of all key issues. HBC said that the regulation 18 policy wording was a stripped back version from the draft regulation 19 policy that SADC had already seen. Key infrastructure requirements will be outlined in the policy, with number of homes and G&T provision all stated. The bus gates will be removed from the policy as this is an unknown at this stage. HBC to share policy wording and associated map with SADC.

Update on SADC Local Plan

SADC advised that they are currently reviewing their LDS as Reg.19 is currently scheduled for Jan/Feb 2022. A meeting to discuss the LDS timeframe will take place in September to show an amended adoption date for end of 2023. Over 100 new sites were promoted in their recent call for sites, with around 90 sites having amended boundaries. Arup are therefore now undertaking an extensive green belt re-review.

SADC have set up a new Local Plan advisory group and Corporate Board, this has led to the Chief Executive leading on the Local Plan process to ensure a more corporate approach. HBC suggested that they are looking to do something very similar. SADC outlined that this process had come to fruition through the advisory group mechanism. SADC shared the presentation of this approach with HBC following the meeting.

Update on Parish Council liaison

HBC Parish Council liaison will need to take place, with a meeting with all Council's portfolio holders potentially offered.

HBC asked whether U&C had booked any further meetings with SADC Parish Councils. HBC are also looking to contact PCs about proposals, and will need to coordinate this with U&C's engagement and Reg.18 timetable. SADC confirmed that Cllr White was the appropriate contact. Parish Council engagement to take place in September.

AOB

The SADC appeal for 100 homes in the Green Belt was briefly discussed. It was confirmed that SADC will not be taking legal action to challenge the appeal. SADC do not consider the appeal to be of national significance. SADC do however anticipate further speculative

applications to now be submitted for consideration. SADC Councillors accept development needs to happen and are very keen to get the Local Plan in place.

Actions:

- **SADC** to provide HBC with details of residents groups and other organisations they would like BW/U&C to engage with regarding the new settlement.
- **HBC** to share new settlement regulation 18 policy wording and map with SADC
- **HBC** to arrange bi-monthly meetings, with next meeting taking place after September 14th
- **HBC** to arrange parish council and portfolio holder briefing sessions, to start in September.

18_11_2021 Duty to Co-operate Meeting between Hertsmere Borough Council and St Albans District Council.

Meeting Notes:

Feedback from Local Plan Advisory Group Meeting

SADC confirm that the meeting went as expected and thanked HBC Officer's for their attendance, which was appreciated by Members. The SADC Members do not like the message of Bowmans Cross, and were concerned about lack of infrastructure provision and detailing. Cllr White was not unaware of Bowmans Cross potential allocation, as informed by SADC Officers on many occasions; and therefore could have asked for an engagement meeting at any point.

SADC will emphasise the fact to Members that involvement on Bowmans Cross will be different in nature to of SADC and DBC (Dacorum) on Hemel Garden Communities, as it is not a joint promotion. SADC have advised Cllr White of the involvement Officers have had so far on Bowmans Cross, but due to limited resource and time, it cannot even be 10% of time spent on Hemel Garden Communities.

SADC attended a Bowmans Cross engagement meeting with U&C earlier in the week. Further detail in terms of Bell Roundabout improvements and Highway interventions were provided at the meeting, and the potential of a new Napsbury Park station was discussed. These details will be included in SADC's representations on the HBC Reg.18 Local Plan.

Discussions were had around how best to engage SADC Members on Bowmans Cross moving forward. SADC advised that it would be best if the offer of further engagement and a potential site visit to other U&C developments, came from the HBC Local Plan Portfolio Holder (Cllr Cohen), Member to Member, or from U&C themselves. It was advised that this offer should be made after the Reg.18 consultation period, once St Albans had submitted their Reg.18 response.

Action:

SADC to confirm best approach to Member engagement moving forward.

HBC to discuss with Head of Planning and Portfolio Holder engagement moving forward with SADC Members.

Update on HBC Regulation 18 Consultation

HBC outlined that the consultation process is on-going. A few complaints about newsletter delivery have been received which HBC is responding to. Response rate to plan is picking up. HBC still need to determine approach for the response to the engagement received. SADC stated that they provide a brief overall summary response, as oppose to point by point. HBC confirmed they were also unlikely to respond point-by-point due to resource and time constraints.

SADC Representation to HBC Local Plan

The draft response will be available to view on SADC Local Plan Advisory Panel agenda on the 30th November. SADC Officers have drafted the response and Members generally, do not tend to tamper with the response too much. The response is generally supportive of HBC's ambition to deliver growth to meet own housing and employment need. The response is also supportive of delivery of the extended media quarter in Borehamwood. However, the response will criticise the potential location of Bowmans Cross. The site selection process which led to this allocation will be queried. HBC confirmed that the site selection work will be available to view at Reg.19 stage, and at this stage would refer SADC to the Local Plan evidence base which feed into site selection work. HBC did share and discuss the site selection of the New Settlement location with Member Planning Panel in a Part 1 meeting.

SADC will question in their response whether HBC will move forward with the Local Plan if no suitable site is found, or whether the new settlement is a necessary option to deliver growth, at any price. HBC outlined that in order to deliver the level of housing growth required the new settlement is a necessary option, otherwise growth would amount to huge urban extensions to existing settlements. SADC confirmed that they will be probing further on this point, and want to know explicitly what the other alternatives are. HBC outlined that the quantum of growth which came forward through the call for sites would not be sufficient to make up for a new settlement level of growth. Most sites promoted in the call for sites are being taken forward by HBC. Existing settlements are also constrained in their level of growth due to infrastructure requirements, such as HCC acting as the Education Authority, placing a limited on the amount of growth taking place in Potters Bar, Elstree and Shenley. HBC confirmed that they would respond formally in due course.

SADC asked if there was an intervening residential call for sites between 2018 and now. HBC confirmed there wasn't however, a few more residential schemes were received from the recent employment call for sites, which were considered. SADC asked if HBC would do another call for sites to fully consider all options before allocating Bowmans Cross. HBC outlined that no more call for sites were planned as they would result in significant, costly delays to the local plan process. HBC also emphasised that in the Issues and Options consultation the new settlement was the preferred option of growth, voted by residents. HBC highlighted that a further call for sites was unlikely to result in a huge change to the level of housing growth currently put forward due to land ownership constraints and settlement coalescence.

SADC said they were sympathetic to the level of growth which was required and did anticipate U&C to provide a high quality development. They also appreciated Officer responses on issues such as the Land to the North of Courses Road. SADC do however, have fundamental concerns over the sustainability and accessibility of the new settlement. Hemel Garden Communities for example, is a clear urban extension and therefore more obviously accessible. HBC emphasised that transport and sustainable strategy work is still on-going and that the new settlement is a quantum of growth which is sufficient to secure the required sustainable infrastructure. Urban extensions are also not necessarily a more sustainable, accessible option, with rail stations being at the edge of the settlements, or in another Borough altogether.

SADC are keen that the public benefits received by London Colney and Colney Heath from Bowmans Cross are emphasised. It was also felt that the benefits of the new settlement were over-egged slightly in the SA, in terms of access to employment and sustainable transport.

Action: HBC to share Member Panel report on site selection for new settlement.

1_06_2022 Duty to Co-operate Meeting Between Hertsmere Borough Council and St Albans District Council

Local Plan updates

MS provided brief update on current LP situation with reference to full Council meeting/report on 27 April. No new timetable agreed/published yet but unlikely to be a new plan issued within next 12 months. Member Planning Panel meets on 15/6

CB clarified that St Albans will be going back to thirds election next year; this year's all out elections were due to boundary changes across the district.

MS asked whether SADC would want or need to revisit housing requirements after the initial census data is issued. CB advised that SADC leadership has been clear that SADC needs to press on with its Local Plan given age of current plan/aspirations to deliver 10,000 homes in accordance with standard method. Formally commissioning new work would potentially conflict with timescales/plans. Until or unless government changes basis for standard method, do not see any justification for departing from that approach. A very focussed/discreet 'census sense-check', rather than an LHNA review, may be possible although CB suggested that this could be done by officers anyway. MS indicated that consultants such as Lichfields tend to publish their own figures online.

MS indicated that Ross Whear may be raising this particular work stream informally with heads of service across SW Herts to gauge appetite for this type of work.

CB advised that following restructure at SADC, there is no Head of Planning. Dale Phillipson is new strategic director.

Cross-boundary technical work

MS explained scope of ongoing Sustainable Transport Study work (on basis of recent R18 sites) and potential targeted engagement. MS sought clarification as to whether SADC officers were able to respond to technical consultations without needing to take reports to Members, such as through its Planning Policy Committee. CB indicated that subject to being 'badged' as a technical engagement, SADC officers can respond directly. MS indicated that HBC would seek confirmation of this in writing before inviting comments.

Forthcoming cross boundary engagement from SADC:

- 1 HBC will be consulted on draft site selection methodology (work undertaken by David Coleman consultant).
2. Request to HBC to meet its unmet OAN
3. Matrix of cross-boundary matters to be circulated

SADC would also be publishing its green belt review alongside its R18 draft plan next year. MS asked for this to be shared before it is issued which CB agreed.

Site-specific issues

There was a brief discussion about Bowmans Cross and how the site is currently being assessed following the R18 Plan announcement. CB confirmed that development north of Coursers Road was essentially a 'red line' for SADC.

There was also a brief discussion about the Ivorys site on Harper Lane which contains a considerable amount of PDL in the green belt and is mainly within SADC but close to Radlett. MS confirmed that reps on the R18 had been submitted on behalf of the site. MS would forward a copy to SADC.

SW Herts Plan

The logistics of the JSP Reg 18 public consultation were discussed. CB advised SADC would be sending a communication via Objective to their LP database asking those individuals if they wished to be notified about the JSP – have taken their own internal legal/GDPR advice. MS highlighted that HBC's own SCI covers JSP engagement and essentially requires the same approach as LP engagement; suggested that as far as possible there needed to be consistency across SW Herts about how the five districts consulted. Not clear that this is the case as different authorities likely to be guided by their own GDPR advice.

06_09_2022 Duty to Co-operate Workshop between Hertsmere Borough Council, St Albans District Council, National Highways, North Herts District Council, Central Bedfordshire District Council, Three Rivers District Council, Welwyn Hatfield District Council, Hertfordshire Local Enterprise Partnership, Environment Agency, Buckinghamshire District Council, Watford Borough Council.

Invited organisations not in attendance:

Dacorum Borough Council, Luton Borough Council, Network Rail, Civil Aviation Authority, Natural England, NHS, Hertfordshire Local Nature Partnership, Mayor of London

Meeting agenda

1. Welcome and introductions
2. Production of the new Local Plan
3. Proposed approach to meeting the requirements of the Duty to Cooperate
4. Site Selection Methodology
5. Settlement Hierarchy Study
6. Sustainability Appraisal
7. Questions / AOB / Next Steps

Presentation (Chris Briggs, St Albans)

2. Production of a new Local Plan:

- Background information provided on the progression of the Plan to date, including the outcomes of the previously withdrawn 2020 Local Plan.
- Summary of the vision and objectives of the new Local Plan.
- Summary of housing needs for the area.
- Summary of how the Council will be developing the spatial strategy for the new Local Plan.
- Summary of the evidence base being developed to support the new Local Plan.
- Key tasks and next steps for progressing the Local Plan, and proposed updates to the Local Plan production timetable.

Questions / comments

No comments or questions provided from attendees on the proposed approach to progressing the new Local Plan.

3. Proposed approach to meeting the requirements of the Duty to Cooperate

- Summary of approach to cross-boundary work currently ongoing.
- Summary of Duty to Cooperate (DtC) activities undertaken to date.
- Proposed next steps for DtC activities.
 - Consideration of likely strategic and cross boundary issues, such as logistics development, residential development, infrastructure etc.

- Presented the Councils understanding of the relevant prescribed DtC bodies relevant for the St Albans Local Plan.
- Strategic cross boundary matters presented.
 - Initial assessment matrix of cross boundary matters presented to demonstrate the Councils views and understanding of strategic cross boundary matters at this time.
- Encouraged comments from workshop participants on the 'Approach to meeting the Duty to Cooperate Scoping Report' (July 2022) circulated with the workshop invitation.

Questions / comments

Mark Silverman – Regarding the political structure, how does the new committee system at St Albans Council affect the progression of the Plan?

- CB - Cllr White is in effect the equivalent of a portfolio holder for decision making. Policy Committee makes decisions regarding the progression of the Plan.

Marko Kalik – Slide should state Three Rivers District Council, not Borough Council.

- CB – Noted, this will be amended in our material.

Laura Wood – Guidance on relevant DtC bodies which the SWH JSP received advised that the Marine Management Organisation (MMO) and the Coal Authority should be consulted for completeness. The Coal Authority then asked to be taken off the mailing list.

- CB – Noted.

Janice Burgess:

- Would like to see National Highways considered within Traveller needs discussions. National Highways have concerns regarding the location of Traveller sites near their network.
- National Highways would like to be included in work related to the strategic rail freight interchange (SRFI) relevant to them.
- Interested in what the Plan will say on the provision for HGVs? Responses from National Highways will refer to this issue.
 - CB – The production of the Plan is not yet progressed sufficiently to know how this issue will be presented in the Plan. Understand that this is a wider and live issue, and welcome any comments National Highways may have throughout the Local Plan production process.

Matthew Wilson

- The approach to Green Belt (GB) could be something which WHBC may be interested in.

Adam Wood

- The LEP would be interested in planning for transport and employment needs associated with the Hemel Garden Communities.

Andrew Marsh:

- Clarification sought on whether it is the main bodies or just prescribed bodies presented by the Council.
 - CB – The Council will double check the wording which should be used. May refer to 'key' bodies.
- Historic England have been participating in habitat mitigation and GB work in other areas. They would like to participate in these topics for St Albans given its setting as a historic town.

- Will Hertfordshire minerals and waste be considered through the production of the Plan?
 - CB – Yes, working with the County Council.

Tom Sharp

- Watford Council share green and blue infrastructure related issues with St Albans, including nature recovery strategies and Colne Valley.
 - CB – Have taken a high level view on this so far, and happy to have other organisations included.

Kai Mitchell

- EA are not linked to any matters in the matrix. Would recommend including the EA in strategic and cross boundary matters relating to water and waste water, and green and blue infrastructure.

4. Site Selection Methodology

- Summary of the site selection methodology.
- Summary of extent of sites being considered in the area.
- Encouraged comments from workshop participants on the 'Draft Site Selection Methodology (July 2022) circulated with the workshop invitation. Comments were invited during and after the workshop.

Questions / comments

Tom Sharp

- Where there are sustainable locations in St Albans District which have not been put forward, will the Council be proactive in contacting landowners.
 - CB – Most potentially sustainable sites known to the Council have come forward.
 - PD – The Council is currently contacting landowners in urban areas which could form part of the consideration of sites for the Local Plan.

5. Settlement Hierarchy Study

- Summary of the approach being undertaken to produce the Study.
- Presented how this will consider areas close to the District boundaries.

Questions / comments

No comments or questions on the proposed approach to the Settlement Hierarchy Study.

6. Sustainability Appraisal

- Summary of the approach that is being undertaken by AECOM, and the work which has been undertaken to date.

Questions / comments

No comments or questions on the proposed approach to progressing the Sustainability Appraisal.

7. Questions / AOB / Next Steps

- Any comments on the material provided in advance of, and presented during the workshop, to be sent to Chris Briggs, Spatial Planning Manager, christopher.briggs@stalbans.gov.uk
- Please provide all comments by the end of September 2022.
- No comments provided will be assumed to be support for the matrix as currently drafted – for this early stage in the process.

Questions / comments

Matthew Wilson

- How will the St Albans Local Plan align with the SWH Joint Strategic Plan (JSP).
 - CB – The Council will seek to make sure that the drafting of the Plan can acknowledge the direction of travel coming out of the JSP. It is recognised that there will be a cross over with the JSP, and that this will inform the back end of the Plan.
 - Laura Wood – The JSP will not be seeking to second guess what will be in the St Albans Local Plan. The JSP should inform the next round of local plans produced in the future. At this stage, the JSP is not sufficiently progressed to inform the drafting of the Local Plan.

Tom Sharp

- How will the comments received be used and shared / distributed to the wider group in attendance today?
 - CB – The Council will make a note of the meeting, and this will be included in the DtC evidence base. We are likely to share the note of the meeting and the responses received on the material to the wider group.

Janice Burgess

- National Highways have two regional authorities for the area - East of England and South East England. They will be coming together to support the progression of the Plan.
- National Highways are supportive of the proposed approach to meeting the requirements of the DtC and producing a statement of common ground (SoCG).
- National Highways would like to work more closely with the Council on the provision of highways infrastructure to support the emerging Local Plan growth strategy.

Nigel Gorski

- National Highways look at issues regarding the location of sites. They would seek to locate sites away from junctions which could require improvements to strategic road network (SRN) junctions. Will need to consider the viability of sites near SRN junctions, where improvement / mitigation can be significantly more expensive.
- CB – acknowledged the point. There is also a need to achieve a balance between the County Council and National Highways.

CB - Thanked everyone and said we still welcome additional thoughts

08_04_2026 Letter from Hertsmere Borough Council to St Albans District Council

Thank you for your letter of 4th November which followed the Duty to Co-operate workshop which you held in September. Please note that this letter represents an informal response based on officer opinion only, and should therefore be considered as such.

You have asked whether our authority could reasonably provide any suitable sites for a number of different land uses to meet St Albans' development needs. As you will be aware, our previous technical work has demonstrated a significant shortfall between the potential capacity of Hertsmere's urban land and the level of identified need for the borough. This was reflected in the draft Regulation 18 Local Plan issued for public engagement in 2021 and which proposed a number of amendments to Green Belt boundaries in order to accommodate the borough's own needs.

That plan has now been 'set aside' following a decision of our own full Council in April 2022. However, officers have been asked to continue the technical work required to support the preparation of the Local Plan, whilst we await greater clarity from the government on its proposed planning reforms. As part of that work, a new Call for Sites is currently underway and this will inform an update of our Housing and Economic Land Availability Assessment (HELAA), a key part of our Local Plan evidence base.

As it stands and as an authority with 79% of its land being located in the Green Belt, Hertsmere is unable to meet St Albans' requirement for suitable sites for housing, economic development and other land uses. Following the updating of our HELAA, we will be in a position to review how best we can accommodate our own needs and whether there would be any scope to consider meeting the needs of neighbouring authorities.

This informal letter provides a direction and basis for discussions going forward and we look forward to further engagement with St Albans in relation to the production of both authorities' Local Plans.

12_09_2023 Duty to Co-operate meeting between St Albans District Council and Hertsmere Borough Council

Update on St Albans Local Plan

Timetable for new Local Plan

CB – Outlined SADC’s current LDS and its timescales – Reg 19 summer 2024, submission by end of 2024 and adoption by end of 2025

SADC current Local Plan Reg 18 consultation

CB – Current SADC LP Reg 18 is essentially a full draft Local Plan with full draft Policies and a full set of draft allocations

CB – LP approach to Housing - meeting Government’s Standard Method in full – which is circa 900 homes per annum and circa 15,000+ homes over the Plan period to 2041

CB – the approach to housing in the urban areas is to ‘leave no stone unturned’ – but only amounts to circa 5,000 of the 15,000

CB - A further circa 5,000 homes directly from the Green Belt Review

CB - A further circa 5,000 homes from sites which acknowledge further Green Belt harm, but provide significant Economic, Social and Environmental advantages

CB - largest is Hemel Garden Communities, then urban extensions mostly to the larger existing settlements including St Albans and Harpenden, with some at smaller settlements

CB - LP approach to Employment – SADC continue with informally agreed SWH approach to some employment land overprovision that may assist SWH/DBC with their employment land needs - meeting SADC need and because of two large sites – the Government permitted Strategic Rail Freight Interchange (SRFI) and East Hemel Central

Oakley – query on scale of potential SADC employment ‘overprovision’ – CB – will depend somewhat on what is the updated approach in the SWH Employment work – but relatively modest overprovision is likely that should assist Dacorum and potentially other SWH Councils

Evidence base update

CB – Moving forward jointly with HBC and SWH partners on joint SWH work – eg updated Housing and Employment studies

CB – SADC are doing further work on Gypsy & Traveller need and provision – will likely need significantly more allocations by time of Reg 19

CB – SADC has signed up with HCC for a ‘Comet 7.1 run’ of the HCC’s Transport model to support the LP Reg 19

MS – query about Gypsy & Traveller definitions – no sign Government updating definitions after High Court case

CB – agree may take some time for the Government to address the issues – but SADC need to address as best we can

Update on Hertsmere Local Plan

Local Plan update

RW – 2021 Local Plan Reg 18 – full draft Plan - generated nearly 18,000 responses – large majority against the Green Belt allocations – HBC Plan was meeting the Government's Standard Method for housing figure at that point

RW – in recent period been waiting for the Government to make updates to the NPPF

RW – HBC want to progress the Plan to be able to submit under the current system (by June 2025)

RW – current Direction of Travel – to accept the Government's Standard Method for housing figure as a starting point – but looking at considerations regarding constraints and potentially a lower requirement based on constraints – HBC will take reports in to committees in the autumn with the Local Plan Reg 18 intended in early 2024

RW – DLUHC person today indicated NPPF updates now likely this Autumn

RW – previous HBC approach was to seek Affordable Housing contributions on sites of less than 10 homes – looking at the issue further

RW – noted that for the Lambeth Local Plan Affordable Housing requirements for sites of fewer than 10 homes was taken out by the Inspector at Examination

Evidence base update

Nothing further

Potential Strategic Cross Boundary Issues, inc.

SADC DtC officer workshop 6 September 2022, SADC letter 4 November 2022 and HBC letter 20 January 2023

CB – thanks for the response - SADC will write formally again on potential unmet need after this meeting

SADC Updated Local Plan Reg 18 version of the DtC Matrix

CB – briefly outlined the matrix and hope HBC agree it is a reasonable reflection of the relevant issues

RW/MS – Yes - SADC DtC Matrix supported

Potential unmet needs from St Albans DC

CB – asked if any capacity to provide for SADC potential unmet needs Cllr Oakley/RW/MS – no

Potential sites near LPA boundaries

CB – site north of Radlett – ‘B8 Harper Lane – outlined the site and that it was recommended by Arup in the Green Belt Review for further consideration

Cllr Oakley – Save Our Radlett – part of Save Hertsmere – have already made comments to Hertsmere Cllrs objecting to this site

RW/CB – also aware of other groups local to Radlett that will be objecting

CB - raised previous SADC/HBC/HCC approach to not favouring significant further development at Harperbury Hospital due to poor connectivity to services and facilities – RW – confirmed HBC still has a similar view

CB – raised Bowmans Cross and SADC’s longstanding significant concerns, particularly due to its poor connectivity to services and facilities and potential impacts on the highway network and settlements within SADC’s area; concerns which have previously also been expressed by HCC – RW – Bowmans Cross will be looked at again as part of HBC Local Plan work and SADC’s significant concerns are understood

Cllr Oakley – has significant concerns about potential impacts on the highways network in particular – HBC will invite SADC to get involved at an appropriate time and in an appropriate manner as HBC considerations of Bowmans Cross progress - Cllr White – appreciate the offer to discuss Bowmans Cross as soon as reasonably possible

Cllr Oakley – think the promoter of Bowmans Cross at the very least will need to do a lot more

Cllr Oakley – the new HBC administration is looking at Bowmans Cross afresh and will want a series of matters to be looked into

Arrangements for future DtC working and SOCG

Timetable for producing

CB – Aim to have an updated draft DtC Matrix and a draft SoCG by time of Reg 19 in 2024 and to get a signed SoCG by time of LP submission end of 2024 – Cllr Oakley/RW – support this approach

A.O.B and Date of Next Meeting

CB – intention for next Cllr DtC meeting alongside SADC LP Reg 19 in September 2024

RW – support this timing

CB – SADC will draft Notes and send draft Notes, DtC Matrix and new 'unmet needs' letter altogether after SADC LP consultation finishes – Cllr Oakley/RW – agreed

22_09_2023 Letter from Hertsmere Borough Council to St Albans District Council

St Albans City & District Council (SADC) Draft Local Plan Regulation 18 Public Consultation

Thank you for the opportunity to comment on the St Albans Local Publication Plan. We welcome the progress that the Council has made in terms of individual authority-to-authority liaison, the commitment to work on a Joint Plan for SW Herts and the involvement in various new or updated technical studies on a cross-boundary basis.

We do not wish to make any comment with regard to legal compliance or the Duty to Cooperate except to confirm Hertsmere Borough Council's (HBC) continued commitment to collaborative working with St Albans throughout the progress of both our Local Plans and the emerging South West Herts Strategic Plan. Our comments therefore relate solely to soundness.

Strategic Policy SP3 – Land and the Green Belt

HBC acknowledge SADC's plan to meet their housing need as set out by the Governments Standard Methodology, a figure of 888 dwellings a year, and a total of 15,096 across the 15 years of the plan. SADC's strategy of 'Brownfield first' and targeting development towards the larger towns, is also acknowledged, with a variety of small, medium and large sites allocated.

Whilst supporting absolutely the need for appropriate infrastructure to be provided alongside new development, we would also raise the issue of whether the infrastructure requirements for these broad locations have been viability tested in order that the policy complies with national policy, and will be effective ie not be undeliverable. Given recent increases in construction and labour costs, which have not been matched by a corresponding increase in sales values, a wider refresh of your viability work may be warranted in order to demonstrate that other policies in the plan, including 40% Affordable Housing, remain viable.

With regard to the broad locations for development which lie in close proximity to the boundary with HBC, in particular West of London Colney and Land at Harper Lane we would again expect to see a commitment to working closely with us in developing these proposals further, particularly in relation to the needs for and provision of shared infrastructure including local education and NHS provision. More generally, we would want to explore opportunities for shared infrastructure delivery, including in relation to any sites nearby within Hertsmere; we would welcome a Statement of Common Ground which would set out the required arrangements for how this will be achieved.

HBC would like to ensure that Harper Lane has been fully considered with regards to capacity to accommodate additional housing, noting existing Hertfordshire County Council concerns with regards to development at Harperbury Hospital across both districts. The allocation is also located just north of Radlett, and HBC request that the Key Development Objectives includes contributions to support existing or new services that may be required in Radlett, as well as measures to further improve the safe and effective use of Harper Lane bridge for all road users.

Strategic Policy SP5 – Employment and the Local Economy

The Local Plan reference the work currently being carried out as part of the jointly prepared South West Herts Economic Study Update, and that such work will feed into the next version of the Draft Local Plan. The draft Local Plan also acknowledges that this could be above the required need for SADC, and that this provision will be shared with Dacorum Borough Council and potentially other South West Herts Authorities. HBC wish to be included in such discussions, particularly if the employment is considered to meet, or be surplus to, sub-regional need. However, given that the Strategic Rail Freight Interchange, north of Radlett, is now proposed as an allocation and with at least a reasonable prospect of the scheme proceeding, HBC considers that it should specifically be identified as contributing to the wider needs of the functional economic market area; the scale of the proposal and its delivery phasing mean that it will contribute to both local (including Hertsmere) and regional/national employment needs

HOU6 – Gypsies, Travellers and Travelling Show People

The supporting text within the policy does not identify what the SADC's determined need is for the provision of pitches. The latest published evidence (GTAA Final Report, published January 2019) indicates a need of 72 pitches for those that meet planning definition, whereas the total number allocated equals 40 pitches. National guidance: Planning policy for traveller sites seeks that use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions, set pitch targets, and work collaboratively with neighbouring planning authorities. HBC requires that meaningful collaborative work extend to this matter.

CE2 - Renewable and Low Carbon Energy

HBC welcomes SADC's response to the 'Climate Emergency', as set out in Chapter 2. However clarification is required to the scope of CE2 – Renewable and Low Carbon Energy, as it is unclear whether this criteria refers to low carbon and renewable solutions as part of wider development, or also supply to specific renewable proposals such as solar and wind farms.

TRA4 – Parking

HBC has no specific comments in respect of a majority of this policy, but would like to draw attention to HBC's 'Beryl Bike' sharing scheme, and on going work with Watford Borough Council, who also has such a scheme, to link these together. There is therefore the opportunity for SADC to be included, and you may wish to refer to such cross boundary collaboration in this policy.

Flood Risk Paragraph

10.33 refers to the Stage 1 SFRA being prepared jointly with the other South West Hertfordshire authorities. This is in fact incorrect, as HBC was not included in this assessment. We hope these comments are useful, and look forward to reviewing and commenting on future iterations of the draft plan. Please keep us informed of all stages of the Local Plan progress.

24_10_2023 Email from St Albans District Council to Hertsmere Borough Council

As agreed at our DtC Councillor meeting in September 2023, please find attached Draft Meeting Notes, a letter regarding Duty to Cooperate and an updated draft DtC Matrix.

Please feel free to suggest amendments to the draft Meeting Notes as appropriate – hopefully they are a reasonable representation of the discussion, but we are very happy to adjust as necessary.

24_10_2023 Letter from St Albans District Council to Hertsmere Borough Council regarding St Albans Unmet Housing Need.

I wrote to you on 4 November 2022 regarding the St Albans Local Plan and the Duty to Cooperate and you responded on 20 January 2023. In essence, that letter of 4 November 2022 asked if Hertsmere Borough Council could assist St Albans Council in meeting potential unmet needs outside of the Green Belt. In essence, your response of 20 January 2023 was that Hertsmere Council could not meet St Albans Council's needs.

As discussed at our Councillor Duty to Cooperate meeting on 12 September 2023, we are now writing to you again. As before, in particular we seek to address the Duty to Cooperate matters raised by the Inspectors of St Alban's withdrawn plan in their letter of 1 September 2020.

Experience from our withdrawn Plan, and the work undertaken for our new Local Plan, clearly indicates that to meet the growth needs of the District (based primarily upon the Government's 'Standard Method' for housing need and the levels of infrastructure that flow from that) will mean identifying sites within St Alban's Green Belt. Paragraph 141 of the National Planning Policy Framework states that *'before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development'*. The NPPF goes on to say that a planning authority's strategy must be *'informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development'*.

We are now asking if your Borough could reasonably provide any suitable sites regarding St Albans need for the following:

- Housing need
- A Strategic Rail Freight Interchange (SRFI)
- Employment uses
- Education needs
- Other community infrastructure needed to support growth
- Gypsy and Traveller Accommodation needs

We would be very grateful if you could respond to our request by Friday 22 December 2023. If you have any queries relating to the above request, please do not hesitate to contact me.

01_11_2024 Duty to Co-operate Meeting between St Albans District Council

Some Changes have been made to Site Allocation B8 Haper Lane, with no cycling, walking connections through t Radlett. This may result in conversations at a later date.

Harper Lane also presents larger Highways issues due to lack of bus routes and bridge bottleneck

Combined discussion with SADC, DBC, HBC and HCC to discuss highway issues within all 3 authorities in relation to LP processes.

Both Authorities are unable to commit to helping with unmet housing need.

Hertsmere Borough Council needs to review and sign the Statement of Common Ground

Hertsmere Borough Council Have submitted a transitional case to MP's and are awaiting January for the NPPF publication.

No set meeting date set until Hertsmere Borough Council progress with their local plan.

04_11_2024 Letter from Hertsmere Borough Council to St Albans District Council responding to Regulation 19

St Albans City & District Council (SADC) Draft Local Plan Regulation 19 Public Consultation

Thank you for notifying and consulting Hertsmere Borough Council (HBC) on the St Albans District Council (SADC) Regulation 19 Local Plan. This response comes from the Planning Strategy team at Hertsmere Borough Council and has been agreed with our portfolio holder.

The Local Plan document appears generally sound and consistent with national policy. We welcome the progress that the Council has made in terms of individual authority-to-authority liaison, the commitment to work on a Joint Plan for SW Herts and the involvement in various new or updated technical studies on a cross-boundary basis. Further collaborative work on strategic cross boundary infrastructure remains a high priority for our Council and we look forward to continued joint work under the duty to co-operate.

Vision and Objectives

Hertsmere's officers' support St Albans 5 Key priorities set out in the plan. We particularly support the District's objective to combat the climate emergency by seeking to achieve Net 0 by 2030 through promoting sustainable business practises. Hertsmere Borough Council continues to support long term visions of boosting the local economy, protecting and strengthening existing infrastructure and delivery of housing. As stated in our previous response, Hertsmere Borough Council continues to expect open discourse and collaboration surrounding Broad Development sites which lie in close proximity to the Hertsmere border.

Strategic Policy SP4 – Housing

We acknowledge St Albans approach to meeting their housing need as set out by the Government Standard Methodology, a figure of 885 dwellings a year, a total of 14,603 by March 2041. The proposed strategy of 'Brownfield First' and targeting development towards larger towns before assessing and releasing Greenbelt Land is supported.

HOU2 - Affordable housing

St Albans approach to affordable housing, with an overall aim providing 40% as genuinely affordable housing in Broad Location sites is supported by Hertsmere Borough Council.

HOU6 - Gypsies, Travellers and Travelling Show People

Following comments made by Hertsmere Borough Council it is noted that alterations to HOU6 – Gypsies, Travellers and travelling Show People following the recent Gypsy, Travellers and Travelling Show People the council have identified a need for 80 designated pitches. St Albans District has stated that many of these new pitches will come through the identified 12 Broad Locations, each of which can accommodate up to a maximum of 20 pitches. The determination of the number of pitches will rely on assessment of a variety of factors including proximity to road network and overall development site scale. Hertsmere supports the decision to plan to meet the full identified need for 80 pitches over the plan period (as identified in the GTAA).

Strategic Policy SP3 – Land and the Greenbelt

Hertsmere Council remains supportive of St Albans District council's approach to assessing the quality of greenbelt land and the release of lower quality land through extension of existing settlements and site allocations.

Strategic Policy SP5 - Employment and the Local Economy

The Local Plan references the work currently being carried out as part of the jointly prepared South West Herts Economic Study update, and that such work will feed into the next version of the Draft Local Plan. The draft Local Plan also acknowledges that this could be above the required need for SADC, and that this provision will be shared with Dacorum Borough Council and potentially other South West Herts authorities. Hertsmere Borough Council supports the protection of existing employment site and creation of new employment space through Broad Development.

As stated in Hertsmere Borough Council's response to the Regulation 18 consultation we hope to continue the working relationship with St Albans District Council on the continued development of the Strategic Rail Freight Interchange north of Radlett especially as it would be contributing to the wider needs of the functional economic market area; the scale of the proposal and its delivery phasing mean that it will contribute to both local (including Hertsmere) and regional/national employment needs.

TRA4 – Parking

As per our comments made as part of the Regulation 18, HBC has no specific comments in respect of a majority of this policy, but would like to draw attention to HBC's 'Beryl Bike' sharing scheme, and on-going work with Watford Borough Council, who also has such a scheme, to link these together. There is therefore the opportunity for SADC to be included, and you may wish to refer to such cross boundary collaboration in this policy.

Site Specific Comments:

B6 - West of London Colney, AL2 1LN

The site includes the allocation of an 8FE secondary school which is generally encouraged by HBC. The proposed Bowmans Cross allocation currently allocated in HBC Reg. 18 plan includes up to 2 x secondary schools. HBC would encourage the agreement of these schools timings in a future Statement of Common Ground.

B8 – Harper Lane, North of Radlett, WD7 7HU

Due to the proximity of this site to Hertsmere's Boundary and Radlett, a reasonable proportion of the Affordable Housing allocation would be expected to be attributed to Hertsmere. This can be further detailed and agreed in a future Statement of Common Ground between the authorities.

Hertsmere would also encourage the development and improvement of the active travel and public transport links as much as feasibly possible surrounding the site ensuring the sustainable connection of the site with the wider area.