

Independent Examination of the St Albans Strategic Local Plan

Statement by Luton Borough Council

October 2016

Q1. Have cross-boundary strategic priorities been properly identified?

The sub-regional context in Section 2 of the St Albans Local Plan recognises the strong spatial relationships with Luton as well as the importance of strategic road and rail connectivity and the proximity of London Luton Airport.

In terms of the relationship with Luton, LBC understands, in terms of unmet housing need within St Albans City and District (SACDC), that there are no impacts on the Luton Housing Market Area. For its part LBC has informed SACDC of a significant shortfall in housing capacity within Luton to meet its OAN and of ongoing joint work (through the Joint Growth Options Study) with Central Bedfordshire Council, Aylesbury Vale DC and North Hertfordshire District Councils to address this matter. The objective is that Luton's housing shortfall should be met within the Luton HMA but in the event that cannot be achieved then this would lead to a Stage 2 Growth Options Study to which SACDC along with several other authorities (including Dacorum, Milton Keynes and Stevenage) would be asked to participate. It is important to stress at this stage, however, that work is progressing on the initial Joint Growth Options Study and there is no current 'ask' of SACDC to accommodate any of Luton's housing need / requirements. In the event this situation were to change then SACDC would be invited to participate in a Stage 2 Growth Options Study with any implications for additional growth being addressed in a review of the St Albans Local Plan, not the current submitted version. It should be noted that SACDC is represented on a wider reference group helping inform the Growth Options Study.

In addition to housing, the discussions between LBC and SACDC have covered the full range of matters covered by the Duty to Cooperate including specific issues relating to London Luton Airport and strategic highway linkages.

There is an audit trail of consultations and meeting notes which confirm the extent of liaison under the Duty to Cooperate and confirming SACDC's commitment to participate in the Part 2 Growth Options Study should this prove to be necessary.

Q2. What processes and procedures have been initiated to engender co-operation? Is there a commitment to long-term co-operation?

There has been continuing liaison between SACDC and LBC in relation to the local plans of both authorities. This has included:

- Formal consultation at key stages in the plan making processes, with both authorities responding as appropriate.
- Duty to Cooperate meeting between the two authorities have been held on 13 March 2015, 24 November 2015 and 2 February 2016. The March 2015 and February 2016 meetings

included lead Member representation from both authorities. Notes from all three meetings are available, if required.

- Mutual participation on joint technical work. This includes the Luton and Central Bedfordshire Strategic Housing Market Assessment for 2010, 2012, 2014 and 2015 where SACDC participated on the steering group. SACDC are also part of the wider reference group on the Luton HMA Joint Growth Options Study.

LBC remain committed to continuing cooperation with SACDC and it is our understanding that SACDC are also committed to cooperation with LBC on strategic cross boundary matters.

Q3. From initial thinking has St Albans City and District Council engaged with nearby local planning authorities and other public bodies:

- **Constructively, collaboratively and diligently (for example has the Council responded constructively to requests for co-operation?)**
- **actively and in a sustained manner**
- **on an on-going basis**
- **for the mutual benefit of neighbouring authorities?**

Q4. Is the evidence of co-operation robust?

LBC considers that the liaison with SACDC has met the requirements of the Duty to Cooperate with LBC and has no reason to suggest that this will not continue to be the case.

Q5. The outcomes of co-operation – how has co-operation influenced the content of the Strategic Local Plan?

Has the effectiveness of the plan making process been maximised and have effective and deliverable policies on strategic cross boundary matters been produced (including the element of soundness that refers to effective joint working on cross-boundary strategic priorities – NPPF paragraph 182)? For example in relation to:

- **Housing (including gypsies, travellers and travelling showpeople)**
- **Jobs**
- **Retail**
- **Infrastructure provision (including highways)**
- **Green belt**

The meetings between LBC and SACDC held under the Duty to Cooperate that have taken place covered the full range of matters covered and included all the matters referred to above. In addition, the discussions also covered other matters including the ongoing implications arising from the growth of London Luton Airport and from the recent designations of Enterprise Zones within each authority's area.

Q6. Any other related matters

As part of the preparation of the Luton Local Plan, LBC proposed Statements of Common Ground (SOCG) with all neighbouring authorities including one with SACDC. These statements were drafted to cover the local plans of both authorities.

SACDC declined to take this particular draft SOCG forward but alternatively agreed the following which was included in LBC's statement to Stage 1 of its Public Examination hearings held in July 2016:

"St Albans City & District Council wishes to confirm that its position has not altered with regard to its Regulation 19 representation of 7 December 2015. The content of the Luton Local Plan is noted and specifically the references to St Albans Council. No objection is raised regarding these points. Our only objection is the one raised with regard to LP6 referred to in the 7 December 2015 letter.

St Albans City & District Council wishes to confirm that it supports draft minor modification 18 as a response to our objection to policy LP6.

We would like to take this opportunity to again wish you well for the remaining stages of the process and to re-confirm our commitment to positive engagement between both Councils on an ongoing basis."