

## **Independent Examination of the St Albans Strategic Local Plan (2011-2031)**

### **Initial Hearing Session on Issue 1**

#### **Statement of North Hertfordshire District Council (representor ref: 974380)**

1. North Hertfordshire District Council (NHDC) has been requested by the appointed Inspector to appear at the session identified above. At the pre-submission stage, North Hertfordshire District Council made a range of broad observations, rather than submitting specific representations relating to soundness and legal compliance.
2. Given the nature of the relationship between the two authorities, NHDC is largely content to rely on these and address any specific questions that the Inspector may have at the hearing session itself. However, for completeness, some points are reiterated and / or set out below.
3. NHDC is within the administrative area of Hertfordshire County Council (HCC) and adjoined by eight district or unitary authorities (Central Bedfordshire, South Cambridgeshire, Uttlesford, East Hertfordshire, Stevenage, Welwyn Hatfield, St Albans and Luton) and two further County Councils (Cambridgeshire and Essex).
4. Given the presence of 11 relevant authorities, in addition to the other bodies prescribed by legislation, NHDC has therefore focussed its Duty to Co-operate (the Duty) interactions with those organisations with which it has the strongest relationships and taking a more peripheral role in the preparation of plans and strategies for those authorities where links are considered less strong.
5. The evidence to date suggests that NHDC's relationship with St Albans City & District Council (SACDC) upon matters which are covered by the Duty to Co-operate are significantly less strong than with other authorities such as (but not necessarily limited to) Stevenage, Luton and Hertfordshire County Council.
6. The District Council has worked collaboratively with six other authorities to identify *Housing Markets in Bedfordshire and surrounding areas* (ORS, 2015). This study shows that NHDC and SACDC do not share a functional housing market area (HMA).
7. SACDC's own evidence (HOU005) does suggest its HMA may overlap with peripheral areas of NHDC, particularly around Kimpton. However, it is noted that this conclusion is reached through the identification of a simple oval shape, drawn so as to encompass the City and District's administrative boundary.
8. NHDC consider that whether or not SACDC have correctly identified the HMA boundary is a matter of soundness for SACDC to address.
9. SACDC's plan and associated evidence base purport to identify an objectively assessed need and then meet it within the administrative area. To that extent, and given the lack of overlap in HMAs between the two authorities, there has been no

formal approach or request of NHDC by SACDC under the Duty to accommodate any unmet needs for housing within NHDC's own local plan (or vice versa).

10. NHDC consider that whether or not SACDC have correctly identified their objectively assessed needs and / or appropriate opportunities to meet such needs are matters of soundness for SACDC to address.
11. NHDC's own evidence, produced in conjunction with other relevant authorities, does not suggest that NHDC and SACDC share a functional economic market area (FEMA). There has been no formal approach or request of NHDC by SACDC under the Duty to accommodate any employment requirements within NHDC's own local plan (or vice versa).
12. Within Hertfordshire, much of the strategic transport infrastructure is in the form of radial routes to / from London. SACDC's infrastructure is focussed more towards the M1 and Midland Mainline corridor. NHDC's infrastructure is focussed more towards the A1(M) and East Coast Mainline corridor. There is no overlap in strategic east-west connections. In this respect, SACDC is primarily served by the A414 and M25 and North Hertfordshire by the A505. This is reflected in the coverage of transport models developed by HCC for the purposes of testing local plan proposals. The 'WHaSH-BL' model that has been used by NHDC does not cover any part of SACDC.
13. A small area of the rural south-west of North Hertfordshire District falls, for the purposes of education planning, within HCC's Harpenden School Planning Area. The number of new homes proposed by NHDC within this part of the district is relatively low and HCC have not identified any substantive concerns in relation to education infrastructure that would need to be addressed by NHDC and SACDC under the Duty.
14. It is considered that the overlaps between NHDC and SACDC on other strategic priorities to which the Duty relates, as set out in paragraph 156 of the NPPF, are similarly marginal.
15. In light of the above, NHDC consider that, notwithstanding a shared administrative boundary, there are limited connections between the two authorities in terms of matters covered by the Duty to Co-operate and the District Council does not consider it necessary to take a central role in the examination of SACDC's Strategic Local Plan.

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