

**1. Have cross-boundary strategic priorities been properly identified?**

1.1 Transportation has been identified as a strategic duty-to-cooperate priority.

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

2.1 The Hertfordshire Local Transport Plan (LTP) [and its daughter documents, including Urban Transport Plans (UTPs) in areas where they have been prepared] provide important strategic context for transportation policy and priorities, both for Hertfordshire as a whole and for individual localities. However, whilst they provide this context, they are of varying levels of assistance in informing the preparation of local plans. More often than not, local plans require specifically tailored intelligence and evidence to explore the transportation implications of the growth aspirations broad forward within them (albeit building on any intelligence that already exists - for example, modelling work undertaken to prepare a relevant UTP, or specific schemes promoted within an LTP/UTP).

2.2 For many years a Protocol has existed in Hertfordshire's which articulates how the authorities will work together to ensure that local plans are sufficiently evidence-based to enable:-

- the transportation implications of local plans to be understood,
- identify policies and schemes to support growth,
- identify the agencies responsible for delivery,
- how funding is to be secured.

2.3 Over recent years it has become increasingly challenging to operate the Protocol as efficiently as intended. This has come about for a range of reasons that include the following:

- uncoordinated local plan preparation processes, making it difficult to take a collective sub-regional view on strategic transportation implications, priorities and mitigation measures.
- the demise of regional planning and regional assemblies, brought with it the running down of the regional transportation model and it becoming out-of-date and defunct – leaving an absence of a high level strategic modelling overview, within which local work could sit and build upon.
- pressure on local plan preparation timeframes not adequately accounting for the time required to build a transportation evidence – particularly where a new or updated model is required or where a model needs to respond to a changing scale and distribution of growth as plan preparation progresses.
- variations in approach to Local Plan – two stage SLP/DLP vs single Local Plans.
- difficulty in using what is available locally/in relatively small sub-regions to take a strategic overview of pressures, challenges and how to go about responding to these.
- incomplete coverage of sub-regional transportation models in the County.

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2.4 One of the ways the Hertfordshire authorities have sought to address these challenges is through the development a countywide transportation model – COMET. The intention is that COMET would be readily available to inform Local Plan preparation processes on a consistent basis. It is able to explore the implications, not just of individual Local Plan growth proposals, but take a wider view on the impact of collective growth over larger sub-regional greater spatial areas, both within and beyond Hertfordshire. The cumulative impact of proposed growth is being assessed as part of the twice yearly COMET runs and is being used to highlight unforeseen impacts on the network as a result of a number of smaller scale developments that individually were not considered likely to cause problems. Any identified impacts will need to be considered as part of the relevant Local Plans development and are likely to require LPAs to work together to develop deliverable mitigations as part of the Local Plan's development.

2.5 The current timeline for COMET is that the County Council has committed to undertake a twice yearly cumulative test of COMET (in Autumn and Early Spring) to identify the overall impact of growth based on the most up to date development pattern and will therefore reflect the ongoing adoption of any local plans both within and beyond Hertfordshire. It will also provide a means to test agreed growth scenarios, proposed strategic transport improvement measures and provide the LPAs and highway authority with information to help determine the most suitable infrastructure for inclusion the Local Plan.

2.6 Boroughs/districts also have the opportunity to test the impacts of their proposed Local Plan independently of the County Council-led runs to help inform Local Plan development and demonstrate the effectiveness of any mitigation measures using COMET.

2.7 At this stage Hertfordshire is in a period of transition as we move towards an environment within which COMET is a fully operational tool. As a consequence, some local authorities currently preparing local plans have had to continue to rely on existing spatially smaller models to inform their Local Plans and, where possible, utilise COMET as it emerges and is rolled out.

2.8 As a consequence of the above the Protocol as it was known, has had various iterations in response to changes in planning guidance and new challenges associated with the funding and delivery of transport infrastructure. Additionally as Districts have progressed Local Plans, each at different rates, our understanding of the process and its implications has evolved.

2.9 The new 'Highways Requirements for Local Plans' document sets out the level of transport / highway information and evidence already available as well as providing a clear picture of what is required to enable a sound understanding and evidence base to be developed at each stage of the Local Plan making process which is consistently applied across the County.

2.10 The overall aim of this document is to ensure that sufficient evidence is available by the time of a examinations so that the County Council is able to support the development strategies and Infrastructure Development Plans being brought

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forward in Local Plans across Hertfordshire and around its borders and to ensure a joined up and planned approach to transport infrastructure provision helping to maximise the benefits of investment long term.

2.11 The SLP has emerged in this period of transition and unfortunately this has brought with it issues. In terms of how well the Protocol has worked in terms of preparation of the SLP and how the two authorities are moving forward, this can be summarised as follows:

- the County Council's response to the emerging local plan dated 28 November 2014 referred to the need (in accordance with the Protocol in existence at the time) for the district council to undertake transportation modelling to inform the emerging local plan (no reference is made to COMET in this correspondence as at that stage there was no commitment to it).
- no district wide modelling was commissioned by SADC at this stage. SADC did however support the LEP and Crown Estate funded localised modelling for East Hemel/the Maylands growth Corridor, although this modelling work was specifically related to this site.
- The County Council committed to build the COMET model in early 2015. SADC have co-operated in providing planning data to support runs of the model. The results from the first forecast model run were available in March 2016.
- SADC progressed with its SLP without addressing the concerns raised in our November 2014 response.
- as a consequence, when the County Council responded to the pre-submission Local Plan it identified the need for traffic modelling to be carried out to allow us to fully assess the impact of the growth proposals on the local road network, and that in its absence, the SLP could not be considered sound.
- meetings at an officer and political level since then have found that SADC were progressing on the understanding that COMET would provide the SLP with a key part of the transportation evidence base it needed. Whilst there was an opportunity to do this it necessitates SADC undertaking more specific work to identify hotspots and proposal to mitigate those issues.
- the current position is that an agreed programme of work mapping out the additional modelling work required has now been agreed, referred to as SADC - Further Transport Evidence Base Work Plan – June 2016. It is not clear when this work will be complete but it will not be in time to inform the SLP.
- to support this SADC are in the process of commissioning AECOM through the County Council's transport planning framework contract to undertake the modelling and design tasks identified.
- developers of the more substantive growth locations in the SLP have undertaken their own modelling and design work, but generally this is confined to the access junctions and areas nearest their sites and does not necessarily take into account cumulative impact.

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- as a consequence, SLP (and the IDP supporting it) is not as progressed as it might be in terms of articulating the nature and scale of the strategic transportation implications of the growth strategy and whether and what mitigation measures might be required, who is responsible for delivery and how they are to be funded.
- should the modelling work subsequently demonstrate that there are substantive transportation issues that cannot be managed through the DLP and ongoing 'live' IDP, SADC have advised the County Council that it would instigate a review of the SLP. In the interests of moving the Local Plan process forward, the County Council supports this approach. The formal position is as follows, which is also detailed in SADC - Further Transport Evidence Base Work Plan – June 2016.

*“Based on initial transport modelling congestion is identified at various junctions requiring further investigation. Subject to further work/modelling being carried out to establish whether feasible mitigation(s) exist, HCC as Highway Authority will not object to the St Albans Strategic Local Plan. The further work/modelling required to support the Detailed Local Plan is broadly set out in the SADC Further Transport Evidence Base Work Plan. In the event that mitigation is not achievable this would require a review of the Spatial Options which form the Local Plan”*

2.12 Initial outputs from COMET modelling have identified some specific pinch-points (which will be subject to forthcoming technical work to inform the DLP), those of particular concern are those away from the strategic development sites which are not actively being looked at for example:

- A414/A1081 London Colney roundabout
- Junctions on the road which circles St Albans to the North between A1583 and Sandpit Lane
- A1081 junctions in Harpenden

2.13 In addition to the current outputs from COMET, there are some key genuinely strategic issues which are exacerbated by the growth aspirations of multiple boroughs and districts, including those of SADC, and which require strategic cross-boundary cooperation and agreed mitigation measures and delivery mechanisms. Amongst the most substantive of these are:

Issue	Current and future co-operation
<ul style="list-style-type: none"> <li>• Capacity and delay issues at the junctions on the A414 south of St Albans City</li> <li>• Link capacity issues on the B653 corridor (Lower Luton Road) to Junction 4 of the A1(M)</li> <li>• Link capacity and delay issues on routes between Hatfield and St Albans [Junction 3 A1(M)]</li> </ul>	<p>An 'A414 Group' is comprised of the following partners:</p> <ul style="list-style-type: none"> <li>• Dacorum Borough Council, Welwyn Hatfield Council, City and District of St Albans, East Hertfordshire District Council, Harlow Council, Hertfordshire County Council', Hertfordshire LEP, Highways England, Network Rail, University of Hertfordshire, Oaklands College, private sector partners to be</li> </ul>

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	<p>determined, including key developers.</p> <p>These partners have submitted a £2 million bid (June 2016) to the Hertfordshire SEP Refresh/Growth Deal III for a A414 Growth Corridor Study and Strategy. The project proposes developing an overall transport and growth strategy for the A414 transport corridor. The strategy will require a detailed study to examine the transport needs of the proposed and emerging growth options, their implications, and how they can be delivered along the A414 in Hertfordshire between Harlow to the east and Hemel Hempstead to the west. The timeframe for completion of the study is 2020, so beyond the timeframe of this SLP and the DLP to follow.</p> <p>The Autumn Statement will announce whether or not the bid has been successful.</p>
<ul style="list-style-type: none"><li>• M1 Junction 8</li></ul>	<p>The 'Maylands Study Steering Group' is a group (sitting below the Maylands Corridor Project Board that oversees the development of the Enterprise Zone and growth in Maylands area), led by the Hertfordshire Local Enterprise Partnership (LEP) and also comprised of SADC, Dacorum Borough Council, Highways England, Hertfordshire County Council and the Crown Estate.</p> <p>The work has coordinated projects being undertaken by Crown Estates consultants considering the East of Hemel site in terms of traffic modelling and initial master planning and the LEP-commissioned AECOM study that has considered a number of aspects including M1 junction 8/Green Lane junction options to accommodate predicted growth up to 2031 (with a preferred option still to be confirmed), sustainable transport access and improvements to the network to facilitate the proposed developments.</p>

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	<p>The initial outputs have been modelled and will be run through the revised version when complete.</p>
<ul style="list-style-type: none"><li>• A1(M) strategically</li></ul>	<p>Hertfordshire A1 Corridor Consortium (HACC), two of the main objectives of which are to:</p> <ul style="list-style-type: none"><li>• articulate to decision-makers the economic importance of resolving congestion issues in the delivery of the growth aspirations of local authorities, the Hertfordshire Local Enterprise Partnership (LEP), businesses and other stakeholders by recognising the A1's role as a vital piece of infrastructure underpinning the Hertfordshire economy;</li><li>• develop a high-level strategy for the A1 corridor to 2031 and beyond, based on known growth patterns, planned interventions and traffic modelling;</li></ul>

2.14 Further, the County Council has made representations on the Luton Local Plan and to the Examination into it in relation to the failure of the Luton Local Plan to assess the impact of the growth proposed within it and that of the wider Luton/Dunstable/Houghton Regis conurbation on the Hertfordshire highway network, including that within SADC. The County Council's concerns have, as yet, resulted in limited productive response.

### **3. 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?)**

3.1 Not to the extent that might have been expected in relation to the request of the County Council that transportation modelling should be undertaken to inform the SLP. An approach agreed between SADC and the County Council is now in place (see para 2.11).

3.2 There are, however a range of mechanisms in place taking forward already known substantive strategic transportation issues with which both SADC and HCC are actively involved (see paras 2.12 and 2.13).

- **actively and in a sustained manner**

3.3 Ditto.

- **on an on-going basis**

3.4 Ditto.

- **for the mutual benefit of neighbouring authorities?**

3.5 Ditto.

#### **4. Is the evidence of co-operation robust?**

4.1 See para 2.11, 2.12 and 2.13. Minutes of meetings between SADC and the County Council and of wider groupings are available.

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

5.1 Had co-operation been more effective following the County Council's initial response 28 November 2014 to the emerging Local Plan, the SLP could have been in a stronger position to articulate the implications of the SLP on the transportation network and identify potential solutions to these, preferred mitigation measures, responsibilities and resource/funding availability. As things currently stand, the IDP points to considerable uncertainty ('Further detailed investigations required', 'Detailed transport studies required...', 'Further modelling is required.', etc) in relation to:

- Strategic road network – Junctions 7 and 8 of the M1, A1(M) junctions 3 and 4, M1 Junction 9 and M25 J21a.
- Park and Ride.
- Inter Urban Route Strategy.
- Hemel Hempstead North-East relief road.
- Transport Network Improvements linked to development at broad locations.

5.2 In addition to these, there could also have been a greater understanding of the implications of sub-regional growth:

- along the A414 and progress on agreeing what mitigation measures are required.
- along routes to from the Luton Dunstable Houghton Regis conurbation, which has a very substantial growth agenda.

**6. 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:**

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

6.1 The SLP contains limited guidance on what the transportation implications of the growth strategy are, what transportation policies are required to support growth, what strategic transport schemes may be required and how they are to be delivered, and so on. This is because these issues have been devolved to the Detailed Local Plan process. SADC has committed to a review of the SLP in the event that the DLP identifies unresolvable transportation issues. In the interests of moving the collective Local Plan process forward, the County Council is content with this approach and is actively supporting SADC.

- **Green belt**

### **7. Any other related matters**

7.1 None.