

1. We have been appointed by the Secretary of State to conduct the examination of the St Albans Local Plan to 2041. We have commenced our preparation and have some initial questions, as set out below, where a response from the Council would be helpful in taking matters forward. In responding to the questions, please can the Council refer us to the relevant examination documents by title and reference number?

Initial Questions for Examination

Duty to Cooperate

2. As you are aware, Section 33A of the Planning and Compulsory Purchase Act 2004 places a duty on Local Planning Authorities to engage constructively, actively and on an ongoing basis in the preparation of development plan documents.
3. National planning policy relevant to this examination, as expressed in the December 2023 National Planning Policy Framework (the 'Framework') also provides clear expectations for Local Planning Authorities. Paragraph 26 states that *"Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy."* In order to demonstrate effective and on-going joint working, paragraph 27 requires the preparation of Statements of Common Ground which should be made publically available throughout the plan-making process to provide transparency.
4. The Planning Practice Guidance ('PPG') advises that a Statement of Common Ground is a way of demonstrating how effective cooperation has taken place at the plan-making stage. It also forms part of the evidence required to demonstrate how Local Planning Authorities have complied with the duty (Paragraph: 010 Reference ID: 61-010-20190315).
5. We have now reviewed the Statements of Common Ground recently submitted by the Council and added to the examination library on 23 January 2025. We have the following questions where a response from the Council is needed at this stage.

Question 1 – The Statements of Common Ground refer to the approach “...to *accommodating unmet housing needs that may exist within the wider Housing Market Area.*” Have any unmet housing needs been identified, and how has the Council engaged in the issue as part of this Plan’s preparation?

1.1 No unmet housing needs have been identified. There are no identified unmet housing needs within the relevant Housing Market Area for SADC, which is the South-West Herts Housing Market Area. This has been confirmed by all the constituent LPA’s, Dacorum, Hertsmere, Three Rivers and Watford, including through the DtC meetings set out in LPCD 06.01 Duty to Cooperate Statement of Compliance. There are also no unmet housing needs that have been identified by other neighbouring/nearby LPAs in different Housing Market Areas.

1.2 The current position can be summarised as:

South-West Herts LPAs – in the **same** Housing Market Area

1 – Dacorum Borough Council (DBC) - DBC is taking forward a new draft Local Plan and undertook a Regulation 19 stage in late 2024. DBC are currently intending to submit their draft Plan by 11 March 2025. DBC have not currently identified any ‘unmet housing needs’ that it is seeking to be potentially addressed by SADC.

2 - Hertsmere Borough Council (HBC) – HBC is taking forward a new draft Local Plan and is currently between Regulation 18 and Regulation 19 stages. HBC have not currently identified any ‘unmet housing needs’ that it is seeking to be potentially addressed by SADC.

It can additionally be noted that in October – November 2021 HBC undertook a draft Local Plan Regulation 18 consultation that met HBC’s ‘Standard Method’ for housing needs in full.

3 - Three Rivers Borough Council (TRDC) - TRDC is taking forward a new draft Local Plan and is currently between Regulation 18 and Regulation 19 stages. TRDC have not currently identified any ‘unmet housing needs’ that it is seeking to be potentially addressed by SADC.

It can additionally be noted that in May 2021, TRDC Council considered a draft Local Plan recommended by their Local Plan Sub-Committee and Policy & Resources committee and their officers for Regulation 18 consultation, that met TRDC’s ‘Standard Method’ for housing needs in full.

4 - Watford Borough Council (WBC) – WBC adopted a new Local Plan in 2022. They are currently at early stages in the development of a new Local Plan. WBC have not currently identified any ‘unmet housing needs’ that it is seeking to be potentially addressed by SADC.

Neighbouring / Nearby LPAs in **different** Housing Market Areas

5 – Welwyn Hatfield Borough Council (WHBC) – WHBC adopted a new Local Plan in 2023. They are currently at early stages in the development of a new Local Plan. WHBC have not currently identified any ‘unmet housing needs’ that it is seeking to be potentially addressed by SADC.

6 – Central Bedfordshire Council (CBC) – CBC adopted a new Local Plan in 2021. They are currently at early stages in the development of a new Local Plan. CBC have not currently identified any ‘unmet housing needs’ that it is seeking to be potentially addressed by SADC.

7 – North Herts District Council (NHDC) – NHDC adopted a new Local Plan in 2022. They are currently at early stages in the development of a new Local Plan. NHDC have not currently identified any ‘unmet housing needs’ that it is seeking to be potentially addressed by SADC.

8 – Luton Borough Council (LBC) – LBC adopted a new Local Plan in 2017. They are currently at early stages in the development of a new Local Plan. LBC have not currently identified any ‘unmet housing needs’ that it is seeking to be potentially addressed by SADC.

- 1.3 The Council engaged in the issue as part of this Plan’s preparation from the very start and on an active and ongoing basis all the way through. As set out in LPCD 06.01 Duty to Cooperate Statement of Compliance at:

Draft Local Plan 2041 – key DtC Activities - Chronology

3.3 SADC has undertaken a comprehensive series of activities in order to meet the DtC.

3.4 There are regular ongoing meetings that address Local Plan matters and potential strategic cross-boundary matters that have taken place since the withdrawal of the previous draft Plan in 2020. These include quarterly officer meetings at a South West Herts and Hertfordshire geography. There are numerous regular and one-off meetings involving SADC, DBC, HCC, Hertfordshire Futures, National Highways and Homes England regarding HGC.

3.5 Early DtC engagement specifically on SADC’s approach to the new draft Local Plan and its associated evidence included:

2021

3.6 Councillor (Portfolio Holder) level DtC meetings with surrounding authorities and Hertfordshire County Council between January – March 2021, which included: Updates on Local Plan production and associated evidence base work to be provided; discussions on potential strategic cross boundary issues to be considered; agreed future arrangements for DtC liaison.

- 1.4 The discussions on potential strategic cross boundary issues included potential unmet housing needs for SADC and for the other LPAs involved. No unmet housing needs were identified.

2022

3.10 Invitations were sent in July 2022 to key DtC bodies asking them to attend a Local Plan DtC Workshop in September 2022 (invitation letter at Appendix A; attached to the invitation was a DtC Scoping report July 2022 at Appendix B; post-workshop meeting notes are at Appendix C).

- 1.5 The discussions at the workshop included potential unmet housing needs for SADC and for the other LPAs involved. No unmet housing needs were identified.

2023

3.13 At Regulation 18 stage in September 2023 another round of DtC Councillor meetings were held with all adjoining / nearby Councils

- 1.6 The discussions included potential unmet housing needs for SADC and for the other LPAs involved. No unmet housing needs were identified.

2024

3.16 At Regulation 19 stage in October 2024 another round of DtC Councillor meetings were held with all adjoining / nearby Councils.

- 1.7 The discussions included potential unmet housing needs for SADC and for the other LPAs involved. No unmet housing needs were identified.
- 1.8 It can also be noted that the issue of potential unmet housing need was considered throughout the Sustainability Appraisal process, including as set out in LPCD 03.01 - St Albans Local Plan Sustainability Appraisal Report (2024).

Question 2 – In response to the Regulation 19 consultation, National Highways concluded that there is “...insufficient evidence to demonstrate that the Local Plan growth can be accommodated in transport terms on the SRN. Further evidence will be required to demonstrate that the Local Plan is sufficiently robust on transport grounds.” How has the Council engaged with National Highways (and Hertfordshire County Council) on strategic cross-boundary transport matters in the preparation of the Plan? What outcomes can the Council point to which demonstrate constructive, active cooperation on this matter?

How has the Council engaged with National Highways on strategic cross-boundary transport matters in the preparation of the Plan?

- 2.1 The Council has engaged with National Highways on strategic cross-boundary transport matters in the preparation of the Plan since the start of the Plan’s creation and throughout. As set out in LPCD 06.01 Duty to Cooperate Statement of Compliance:

2021

3.8 Consultation on the draft Local Plan Sustainability Appraisal scoping report between January – March 2021. Responses received from the Environment Agency, Hertfordshire and Middlesex Wildlife Trust, National Highways, and Historic England.

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Appendix C – September 2022 Workshop Notes

Organisations in attendance: Name Organisation

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*Janice Burgess National Highways
Jennifer Searl National Highways
Kelly Milburn National Highways
Nigel Gorski Jacobs, National Highways*

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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.

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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.*

2023

3.15 A round of officer DtC meetings were also held with DtC bodies including Natural England, the Environment Agency, Historic England and National Highways to discuss their Regulation 18 responses and to agree next steps and actions for SADC to address the matters raised.

2024

3.17 A round of officer DtC meetings were also held with DtC bodies including Natural England, the Environment Agency, Historic England and National Highways to discuss their Regulation 19 responses and to agree next steps and actions for SADC to address the matters raised.

3.18 An updated DtC Matrix was sent out to key DtC bodies alongside the Regulation 19.

3.19 The DtC Matrix and an overarching SoCG were published with the Regulation 19, setting out in the public domain where discussions over the DtC Matrix and key cross-boundary matters had reached at that point in time.

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3.22 The fundamental DtC conclusion for all of the DtC bodies is that SADC has met the DtC and none contend otherwise.

2.2 As set out in HGC 01.01 - HGC Evidence Paper for the Inspector:

2. Progress to date

Since 2018, the HGC partnership has been progressing work to develop a strategic approach to ensure the homes, employment opportunities and new infrastructure is transformative to the whole town of Hemel Hempstead and the wider area. This includes:

2020 – Ongoing – *Establishment of workstream focused sub-groups including the Stakeholder Steering Group (6 weekly basis) which includes representation from Key Landowners (The Crown Estate; Bloor; Pigeon; Kitewood; Appin Land (2024)); Homes England and National Highways.*

Summary table showing key meetings between SADC and National Highways since 2018:

	Date	Engagement	Attendees
1	17 October 2018	National Highways / Hemel Garden Communities Funding Bid discussion	SADC DBC HCC Officers National Highways
2	1 February 2019	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures Growth Area Developers National Highways Homes England
3	11 April 2019	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures Growth Area Developers National Highways Homes England
4	1 August 2019	HGC Stakeholder Steering Group Meeting and HGC Transport Sub Group	SADC DBC HCC HGC Officers Hertfordshire Futures Growth Area Developers National Highways Homes England
5	1 August 2019	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures Growth Area Developers National Highways Homes England
6	4 September 2019	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures Growth Area Developers National Highways Homes England
7	4 September 2019	HGC Transport Sub Group	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways
8	6 November 2019	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures Growth Area Developers National Highways Homes England
9	15 December 2020	HGC Transport Sub Group	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways
10	27 January 2021	HGC Transport Sub Group	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways
11	25 August 2021	HGC Transport Sub Group	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways
12	7 October 2021	HGC Transport Sub Group	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways
13	17 November 2021	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
14	9 December 2021	HGC Transport Sub Group	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ

			Growth Area Developers National Highways
15	5 October 2022	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
16	11 January 2023	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
17	11 January 2023	HGC Transport Sub Group	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways
18	27 February 2023	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
19	5 April 2023	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
20	17 May 2023	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
21	28 June 2023	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
22	4 July 2023	HGC Transport Sub Group	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
23	20 September 2023	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
24	9th October 2023	HGC Transport Sub Group	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
25	1 November 2023	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
26	6 November 2023	National Highways Meeting - SADC/DBC/HCC and HGC	SADC DBC HCC HGC Officers National Highways
27	7 November 2023	National Highways Meeting - SADC/HCC	SADC HCC Officers National Highways
28	4 December 2023	HGC Transport Sub Group	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England

29	7 December 2023	National Highways Engagement Meeting (SADC and HCC)	SADC HCC National Highways
30	13 December 2023	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
31	9 January 2024	HGC Transport Sub Group	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
32	24 January 2024	National Highways Engagement Meeting (SADC and HCC)	SADC HCC National Highways
33	31 January 2024	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
34	13 March 2024	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
35	24 April 2024	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
36	26 April 2024	National Highways Engagement Meeting - COMET (SADC and HCC)	SADC HCC / WSP National Highways
37	5 June 2024	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
38	10 June 2024	HGC Transport Sub Group	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
39	17 July 2024	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
40	22 July 2024	HGC Transport Sub Group	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
41	28 August 2024	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
42	24 September 2024	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
43	9 October 2024	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England

44	24 October 2024	HGC Transport Sub Group	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
45	20 November 2024	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
46	18 December 2024	National Highways Engagement Meeting (SADC and HCC)	SADC HCC National Highways
47	19 December 2024	HGC Transport Sub-Group Meeting - Initial findings from Joint SADC and DBC model run presented	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
48	15 January 2025	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
49	29 January 2025	National Highways Engagement Meeting (SADC and HCC)	SADC HCC National Highways
50	30 January 2025	HGC Transport Sub-Group Meeting - Results from Joint SADC and DBC model run presented	SADC DBC HCC HGC Officers Growth Area Developers National Highways Homes England
51	12 February 2025	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
52	12 March 2025	National Highways Engagement Meeting (SADC and HCC)	SADC HCC National Highways
53	20 March 2025	HGC Transport Sub Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
54	26 March 2025	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
55	7 May 2025	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
56	18 June 2025	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England

How has the Council engaged with Hertfordshire County Council on strategic cross-boundary transport matters in the preparation of the Plan?

- 2.3 The Council is conscious that the Duty to Cooperate is judged at the point in time of Submission of the Plan, in this case 29 November 2024. As set out above, National Highways had been involved in the process and directly commented on the emerging “Duty to Cooperate potential strategic cross boundary issues matrix” in September 2022. This then evolved into the Local Plan Regulation 18 version of the “Duty to Cooperate potential strategic cross boundary issues matrix” discussed with National Highways in October 2023. This then evolved further into DTC 01.01 - Statement of Common Ground (overarching) that was published with the Local Plan Regulation 19 Publication.
- 2.4 This then evolved into a draft bilateral Duty to Cooperate (DtC) Statement of Common Ground (SoCG) between SADC and National Highways that was discussed at a Local Plan Regulation 19 meeting on 1 November 2024 (as at Appendix 2.1). National Highways colleagues set out at the meeting that they agreed that St Albans has met the Duty to Cooperate but that there was a need to make a small amendment to expand the DtC SoCG in relation to Planning for Gypsy & Traveller needs. There were then a series of follow up emails and discussion of the outstanding DtC SoCG between SADC and National Highways on several occasions at bilateral and wider meetings in subsequent weeks and a slightly updated signed DtC SoCG was finalised on 12 February 2025 as at Appendix 2.2. The substantive work to get to the point reached by 29 November 2024 shows clearly that the DtC requirements between SADC and National Highways had been met by the time that the Plan was Submitted for Examination.
- 2.5 The Council has engaged with Hertfordshire County Council on strategic cross-boundary transport matters in the preparation of the Plan since the start of the Plan’s creation and throughout. As set out in LPCD 06.01 Duty to Cooperate Statement of Compliance:

2021

3.6

Councillor (Portfolio Holder) level DtC meetings with surrounding authorities and Hertfordshire County Council between January – March 2021, which included: Updates on Local Plan production and associated evidence base work to be provided; discussions on potential strategic cross boundary issues to be considered; agreed future arrangements for DtC liaison.

2023

3.13 At Regulation 18 stage in September 2023 another round of DtC Councillor meetings were held with all adjoining / nearby Councils

...

3.15 A round of officer DtC meetings were also held with DtC bodies including Natural England, the Environment Agency, Historic England and National Highways to discuss their Regulation 18 responses and to agree next steps and actions for SADC to address the matters raised.

2.6 For the avoidance of doubt, HCC including HCC Transport colleagues were involved in all three of the sets of meetings outlined above.

2024

3.16 At Regulation 19 stage in October 2024 another round of DtC Councillor meetings were held with all adjoining / nearby Councils.

3.17 A round of officer DtC meetings were also held with DtC bodies including Natural England, the Environment Agency, Historic England and National Highways to discuss their Regulation 19 responses and to agree next steps and actions for SADC to address the matters raised.

3.18 An updated DtC Matrix was sent out to key DtC bodies alongside the Regulation 19 (Appendix I).

3.19 The DtC Matrix and an overarching SoCG were published with the Regulation 19, setting out in the public domain where discussions over the DtC Matrix and key cross-boundary matters had reached at that point in time.

...

3.22 The fundamental DtC conclusion for all of the DtC bodies is that SADC has met the DtC and none contend otherwise.

2.7 For the avoidance of doubt, HCC including HCC Transport colleagues were involved in both the sets of meetings outlined above at paragraphs 3.17 and 3.18.

2.8 The most recent SADC Local Plan Regulation 19 DtC meeting with HCC was held on 1 November 2024. The SADC Draft Meeting Notes were sent to HCC on 5 November 2024 and can be seen at Appendix 2.3. These Meeting Notes concisely reflect the discussion that was had regarding the strategic cross-boundary issue of transport. The Meeting Notes set out that HCC officers consider that:

yes HCC consider that SADC have fully met the DtC; HCC will be supportive of the Local Plan but will raise a number of areas where the Local Plan can be made more effective

...from a Highways perspective also supportive of the SADC Local Plan

2.9 There was a previous SADC Local Plan Regulation 18 DtC meeting with HCC on 8 September 2023. The SADC Draft Meeting Notes were sent to HCC on 2 February 2024 and can be seen at Appendix 2.4. These Meeting Notes concisely reflect the discussion that was had regarding the strategic cross-boundary issue of transport. As the Meeting Notes set out "SADC has signed up with HCC for a 'Comet 7.1 run' of the HCC's Transport model to support the LP Reg 19".

2.10 There was a previous SADC Local Plan DtC meeting with HCC on 22 January 2021. The agreed Meeting Notes can be seen at Appendix 2.5. These Meeting Notes concisely reflect the discussion that was had regarding the strategic cross-boundary issue of transport including identifying transport as a potential strategic cross-boundary matter and looking at transport in more detail in sections 2, 3 and 4.

2.11 As set out in HGC 01.01 - HGC Evidence Paper for the Inspector:

1.2. Collaborating as a partnership (The HGC Partners) St Albans City and District Council (SADC), Dacorum Borough Council (DBC), Hertfordshire County Council (HCC)

2. Progress to date

Since 2018, the HGC partnership has been progressing work to develop a strategic approach to ensure the homes, employment opportunities and new infrastructure is transformative to the whole town of Hemel Hempstead and the wider area. This includes: • November 2018 - a Hemel Garden Communities bid was submitted to the Ministry for Housing, Communities and Local Government (MHCLG). The bid was prepared by the three authorities, alongside Hertfordshire LEP, Herts IQ and The Crown Estate.

- 2.12 HCC including HCC Transport are one of the three key partners in HGC and are involved in all the key work strands, sub groups and evidence base.
- 2.13 Further, in order ensure that the Duty to Cooperate was being fully addressed from the start of the Plan process, HCC Transport have been part of the St Albans Local Plan Corporate Overview Board (LPCOB) since 2022. The SADC Local Plan Corporate Overview Board consists of: the SADC Chief Executive, SADC Strategic Director for Community an Place Delivery, SADC Spatial Planning Manager, SADC Spatial Planning & Design Team Leader, HCC Growth Area Team Leader (South West) Growth and Infrastructure Unit and HCC Local Plan and Strategic Development Manager – Transport for Hertfordshire.
- 2.14 That HCC LPCOB involvement with HCC Transport led to the creation of the Transport Impact Assessment work at INF 09.01 - Transport Impact Assessment (TIA) – INF 09.12. Much of this TIA work was then translated directly into draft Local Plan policy in Part A and predominantly in Part B.
- 2.15 Most recently there have also been SADC / HCC officer meetings, including with HCC Transport, seeking to resolve the matters of detail HCC raised in their Local Plan Regulation 19 response. These have included at LPCOB on 19 December 2024 and at a 7 February 2025 meeting ‘SADC / HCC - HCC Reg 19 Local Plan comments and SADC way forward / Main Mods / Minor Mods (follow up to discussion at LPCOB 19.12.24)’.

Summary table showing key meetings between SADC and HCC Transport since 2018:

	Date	Engagement	Attendees
1	17 October 2018	National Highways / Hemel Garden Communities Funding Bid discussion	SADC DBC HCC Officers National Highways
2	1 February 2019	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures Growth Area Developers National Highways Homes England
3	11 April 2019	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures Growth Area Developers

			National Highways Homes England
4	1 August 2019	HGC Stakeholder Steering Group Meeting and HGC Transport Sub Group	SADC DBC HCC HGC Officers Hertfordshire Futures Growth Area Developers National Highways Homes England
5	1 August 2019	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures Growth Area Developers National Highways Homes England
6	4 September 2019	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures Growth Area Developers National Highways Homes England
7	4 September 2019	HGC Transport Sub Group	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways
8	6 November 2019	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures Growth Area Developers National Highways Homes England
9	15 December 2020	HGC Transport Sub Group	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways
10	27 January 2021	HGC Transport Sub Group	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways
11	25 August 2021	HGC Transport Sub Group	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways
12	7 October 2021	HGC Transport Sub Group	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways
13	17 November 2021	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
14	9 December 2021	HGC Transport Sub Group	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways
15	7 February 2022	Local Plan Corporate Overview Board (LPCOB)	SADC HCC
16	May 2022	Local Plan Corporate Overview Board (LPCOB)	SADC HCC
17	2 August 2022	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Growth Area Developers
18	31 August 2022	Local Plan Corporate Overview Board (LPCOB)	SADC HCC
19	12 September 2022	HGC Transport Discussion	SADC HCC
20	5 October 2022	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England

21	6 October 2022	HGC Transport Discussion	SADC DBC HCC HGC Officers Hertfordshire Futures The Crown Estate
22	17 October 2022	Local Plan Corporate Overview Board (LPCOB)	SADC HCC
23	11 November 2022	SADC/HCC Local Transport Plan	SADC HCC
24	28 November 2022	Local Plan Corporate Overview Board (LPCOB)	SADC HCC
25	18 December 2022	SADC Local Plan Transport Discussion	SADC HCC
26	11 January 2023	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
27	11 January 2023	HGC Transport Sub Group	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways
28	11 January 2023	Local Plan Corporate Overview Board (LPCOB)	SADC HCC
29	12 January 2023	HGC Partner Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ
30	9 February 2023	SADC Local Plan Transport Discussion	SADC HCC
31	27 February 2023	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
32	27 February 2023	Local Plan Corporate Overview Board (LPCOB)	SADC HCC
33	13 March 2023	HGC Transport Discussion	SADC DBC HCC HGC Officers
34	10 March 2023	HGC Transport Discussion	SADC DBC HCC HGC Officers
35	13 March 2023	HGC Transport Discussion	SADC DBC HCC HGC Officers
36	27 March 2023	HGC Transport Discussion	SADC DBC HCC HGC Officers
37	3 April 2023	Local Plan Corporate Overview Board (LPCOB)	SADC HCC
38	5 April 2023	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
39	5 April 2023	SADC Local Plan Transport Discussion	SADC HCC
40	20 April 2023	HGC Transport Officer Working Group Meeting	SADC DBC HCC HGC Officers
41	11 May 2023	Local Plan Corporate Overview Board (LPCOB)	SADC HCC
42	17 May 2023	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
43	18 May 2023	HGC Transport Officer Working Group Meeting	SADC DBC HCC HGC Officers
44	22 May 2023	HGC Transport Officer Working Group Meeting	SADC DBC HCC HGC Officers
45	5 June 2023	HGC Transport Officer Working Group Meeting	SADC DBC HCC HGC Officers
46	14 June 2023	Local Plan Corporate Overview Board (LPCOB)	SADC HCC
47	19 June 2023	HGC Transport Officer Working Group Meeting	SADC DBC HCC HGC Officers
48	26 June 2023	HGC Transport Officer Working Group Meeting	SADC DBC HCC HGC Officers

49	28 June 2023	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
50	3 July 2023	HGC Transport Officer Working Group Meeting	SADC DBC HCC HGC Officers
51	4 July 2023	HGC Transport Sub Group	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
52	18 July 2023	SADC Local Plan Transport Discussion - COMET	SADC HCC
53	24 July 2023	HGC Transport Officer Working Group Meeting	SADC DBC HCC HGC Officers
54	7 August 2023	HGC Transport Officer Working Group Meeting	SADC DBC HCC HGC Officers
55	14 August 2023	HGC Transport Officer Working Group Meeting	SADC DBC HCC HGC Officers
56	18 September 2023	HGC Transport Officer Working Group Meeting	SADC DBC HCC HGC Officers
57	20 September 2023	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
58	25 September 2023	HGC Transport Officer Working Group Meeting	SADC DBC HCC HGC Officers
59	2 October 2023	HGC Transport Officer Working Group Meeting	SADC DBC HCC HGC Officers
60	5 October 2023	HCC/ SADC Strategic Transport Discussion - HERT	SADC HCC
61	5 October 2023	HGC Nickey Line Workshop	SADC DBC HCC HGC Officers Stakeholders and Members
62	9 October 2023	HGC Transport Sub Group	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
63	16 October 2023	HGC Transport Working Group Meeting	SADC DBC HCC HGC Officers The Crown Estate
64	23 October 2023	HGC Transport Officer Working Group Meeting	SADC DBC HCC HGC Officers
65	30 October 2023	SADC Local Plan Transport Discussion	SADC HCC
66	1 November 2023	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
67	6 November 2023	National Highways Meeting - SADC/DBC/HCC and HGC	SADC DBC HCC HGC Officers National Highways
68	6 November 2023	HGC Transport Officer Working Group Meeting	SADC DBC HCC HGC Officers
69	7 November 2023	National Highways Meeting - SADC/HCC	SADC HCC Officers National Highways
70	9 November 2023	Local Plan Corporate Overview Board (LPCOB)	SADC HCC
71	4 December 2023	HGC Transport Sub Group	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England

72	7 December 2023	National Highways Engagement Meeting (SADC and HCC)	SADC HCC National Highways
73	11 December 2023	HGC Transport Officer Working Group Meeting	SADC DBC HCC HGC Officers
74	13 December 2023	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
75	9 January 2024	HGC Transport Sub Group	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
76	10 January 2024	Local Plan Corporate Overview Board (LPCOB)	SADC HCC
77	11 January 2024	SADC Local Plan Transport Discussion - COMET	SADC HCC/WSP
78	24 January 2024	National Highways Engagement Meeting (SADC and HCC)	SADC HCC National Highways
79	31 January 2024	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
80	1 March 2024	Local Plan Corporate Overview Board (LPCOB)	SADC HCC
81	4 March 2024	HGC Transport Officer Working Group Meeting	SADC DBC HCC HGC Officers
82	13 March 2024	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
83	9 April 2024	SADC Local Plan Transport Discussion	SADC HCC
84	24 April 2024	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
85	26 April 2024	National Highways Engagement Meeting - COMET (SADC and HCC)	SADC HCC / WSP National Highways
86	29 April 2024	HGC Transport Officer Working Group Meeting	SADC DBC HCC HGC Officers
87	5 June 2024	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
88	10 June 2024	HGC Transport Sub Group	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
89	11 June 2024	Local Plan Corporate Overview Board (LPCOB)	SADC HCC
90	12 June 2024	SADC Local Plan Transport Discussion - COMET	SADC HCC/WSP
91	19 June 2024	SADC Local Plan Transport Discussion - COMET	SADC HCC/WSP
92	17 July 2024	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England

93	22 July 2024	HGC Transport Sub Group	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
94	28 August 2024	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
95	3 September 2024	Local Plan Corporate Overview Board (LPCOB)	SADC HCC
96	24 September 2024	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
97	24 September 2024	HGC Partner Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ
98	9 October 2024	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
99	24 October 2024	HGC Transport Sub Group	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
100	20 November 2024	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
101	18 December 2024	National Highways Engagement Meeting (SADC and HCC)	SADC HCC National Highways
102	19 December 2024	Local Plan Corporate Overview Board (LPCOB)	SADC HCC
103	19 December 2024	HGC Transport Sub-Group Meeting - Initial findings from Joint SADC and DBC model run presented	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
104	6 January 2025	HGC Transport Officer Working Group Meeting	SADC DBC HCC HGC Officers
105	15 January 2025	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
106	15 January 2025	HGC Partner Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ
107	20 January 2025	HGC Transport Officer Working Group Meeting	SADC DBC HCC HGC Officers
108	29 January 2025	National Highways Engagement Meeting (SADC and HCC)	SADC HCC National Highways
109	30 January 2025	HGC Transport Sub-Group Meeting - Results from Joint SADC and DBC model run presented	SADC DBC HCC HGC Officers Growth Area Developers National Highways Homes England
110	30 January 2025	S106/CIL Officer Workshop in association with the HGC IDP (SADC DBC HCC HGC)	SADC DBC HCC HGC Officers Gilian Macinnes Associates
111	6 February 2025	HGC IDP to 2050 Stakeholder Workshop - Transport	SADC DBC HCC HGC Officers Arup
112	12 February 2025	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ

			Growth Area Developers National Highways Homes England
113	12 February 2025	HGC Partner Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ
114	13 February 2025	HGC Developers Forum Meeting	SADC DBC HCC HGC Officers Growth Area Developers Arup
115	3 March 2025	HGC Transport Officer Working Group Meeting (Planned fortnightly)	SADC DBC HCC HGC Officers
116	6 March 2025	HGC IDP to 2050 Stakeholder Workshop - Transport	SADC DBC HCC HGC Officers Arup
117	12 March 2025	National Highways Engagement Meeting (SADC and HCC)	SADC HCC National Highways
118	20 March 2025	HGC Transport Sub Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
119	26 March 2025	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
120	26 March 2025	HGC Partner Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ
121	7 May 2025	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
122	7 May 2025	HGC Partner Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ
123	18 June 2025	HGC Stakeholder Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ Growth Area Developers National Highways Homes England
124	18 June 2025	HGC Partner Steering Group Meeting	SADC DBC HCC HGC Officers Hertfordshire Futures / Herts IQ

What outcomes can the Council point to which demonstrate constructive, active cooperation on this matter?

- 2.16 With regard to National Highways, the outcomes that the Council point to which demonstrate constructive, active cooperation on this matter include the signed SoCG as set out in more detail above at paragraphs 2.3-2.4 and Appendix 2.2.
- 2.17 Outcomes also include the positive approach to requiring Masterplanning in the draft Local Plan at LG1, LG3 and LG4. As set out by National Highways in their Local Plan Regulation 19 representation:

We would reinforce that a master planning process presents an opportunity for the Council, and early consultation/working with key stakeholders, to consider traffic associated with the developments using, accessing, and exiting the SRN and viable alternatives to the private car, to understand future infrastructure requirements, to develop a package of mitigation measures with detailed costing, to utilise Travel Plan monitoring strategies triggered through phased development and where applicable to collect appropriate mitigation funding.

2.18 There are also now Masterplans coming forward for the HGC sites within the District including through Planning Performance Agreements (PPAs) where National Highways will be involved at appropriate stages. These include PPAs for Broad Locations H2, H3 and H4 with the Crown Estate and H1 with Bloor and Pigeon.

2.19 Also in regard to National Highways' Local Plan Regulation 19 representation at:

National Highways and St Albans City and District Council along with Hertfordshire County Council and their transport modelling consultants have been liaising and corresponding over the use of the existing COMET transport model covering Hertfordshire for the Local Plan modelling assessment. We previously raised concerns over the suitability of the model due to the lack of suitable calibration and validation evidence provided to demonstrate that the model was operating satisfactorily. Although some evidence was provided and agreement was reached on a suitable transport modelling methodology for the Local Plan assessment, some of the requested information about the model validation/calibration and evidence on mode shift was not provided. This specifically concerned evidence that the COMET model could replicate base year traffic flows on the M25 and other parts of the SRN plus evidence of how mode shift in modelled scenarios 2 and 3 could be delivered. While there is some further information provided within the evidence base on the latter, it is insufficient to demonstrate that the mode shift can be achieved. The former traffic flow information is still outstanding and this raises concerns as to the validity of the transport modelling evidence in relation to impacts on the SRN.

2.20 A technical note covering the performance of the model and how well it calibrated / validated against existing conditions on the Strategic Road Network in St Albans and Dacorum districts was sent to National Highways on 17 April 2024 '240409 Comet 2014 Base Year Model Review SRN Final' (see Appendix 2.6). Subsequent to this National Highways confirmed that they considered the calibration / validation of the model to be sufficiently robust for ongoing transport assessment work, but they did require further information on how well the model was performing including in the vicinity of the M25. This additional information was provided to National Highways on 8 July 2024 ('240701 Comet 2014 Base Year Model Review SRN Addendum' at Appendix 2.7). This latter document was unfortunately not considered by the National Highways review team due to changes in their staffing and was therefore resupplied to them at their request on 29 January 2025.

2.21 SADC and HCC have explained further what had been done for the SADC COMET Local Plan Regulation 19 run. This work was supplied to National Highways originally in July 2024 and with the Local Plan Reg 19 Publication in September 2024 and their acceptance of this work now has successfully resolved a substantial proportion of the concerns raised by National Highways at the Reg 19 stage.

2.22 Some further work to explain in more detail to National Highways the impacts on the SRN including in relation to technical details regarding merge and diverge impacts is ongoing and currently anticipated to be resolved by the end of May 2025. The clear direction of travel is that National Highways have already accepted that there is an appropriate answer to the large majority of their queries about the calibration and validation evidence provided to demonstrate that the COMET model was operating satisfactorily and the remaining limited number of queries relating to technical details

of outputs should be resolved soon. This continuing dialogue with National Highways about technical details of outputs is inevitable and there are a small number of outstanding issues which need to be resolved at a technical level, but they don't go to the principles of development. At Submission there was more than sufficient evidence to support the Plan.

2.23 Also in regard to National Highways' Local Plan Regulation 19 representation at:

We have examined the transport assessment evidence base from St Albans' website, it appears that the main transport report has not been included. There is a tab labelled "Report Final Issued.pdf", however when clicking on the tab it produces a report "COMET 7 Forecasting Report" dated November 2022, identical to the report under a separate tab above on the same webpage. The main report has seemingly been omitted presumably by administrative error, so further documentation is required in support of the transport evidence.

2.23 As discussed and agreed at a meeting between SADC, HCC and National Highways on 18.12.24, SADC have confirmed that the evidence is based on the two key documents and the link is correct (the confusion was that the link goes onto two lines).

2.24 Paragraphs 2.19-2.23 can be summarised as:

- 1 – National Highways acceptance of the calibration and validation of the COMET Model – outcome achieved
- 2 – National Highways acceptance of the outputs of the SADC Local Plan Regulation 19 – outcome achieved

2.25 As set out in LPCD 06.01 Duty to Cooperate Statement of Compliance (p13-15) there have been outcomes which demonstrate constructive, active cooperation in regard to:

1 - sharing of information about Gypsy and Traveller accommodation as it impacts the Strategic Road Network

Effective Outcome 6 – appropriate approach to Gypsy & Traveller accommodation

Planning for gypsy & traveller needs

- *Approach to accommodating unmet traveller needs.*

Strategic matter between: SW Herts local authorities

Hertfordshire County Council

National Highways

2 - sharing of information about the Hertfordshire Essex Rapid Transit (HERT) which will run along the A414 corridor.

Effective Outcome 10 - appropriate approach to transport infrastructure

Planning for transport infrastructure

- *Plans for a Hertfordshire Essex Rapid Transit (HERT) which will run along the A414 corridor. It will also be necessary to consider the potential impacts of growth on traffic congestion on the highway network, including the M1 and M25.*

Strategic matter between: SW Herts local authorities

*Central Bedfordshire Council
Hertfordshire County Council
Luton Borough Council
National Highways
Homes England
Hertfordshire Futures*

3 - sharing of information about the Government-permitted Strategic Rail Freight Interchange at the former Radlett Aerodrome site.

Strategic Rail Freight Interchange

- *The Government-permitted Strategic Rail Freight Interchange at the former Radlett Aerodrome site on Green Belt land and any potential alternative locations.*

Strategic matter between: SW Herts local authorities

*Hertfordshire County Council
Network Rail
National Highways*

- 2.26 It can also be noted that there are no specific Objections from National Highways to any draft Policies in the draft Local Plan and indeed there is support for the Plan as set out in their Regulation 19 representation at:

...National Highways supports the safeguarding of land for expansion of M1 J8 should it come forwards at a later date, during the Plan period.

...

...National Highways supports St Albans District Councils commitment to work in partnership with stakeholders including Hertfordshire County Council, neighbouring authorities, National Highways and service providers to ensure that a range of sustainable and active transport options are available to all existing and future users of the transport network.

- 2.27 In November 2023, National Highways wrote to the HGC Transport Sub Group (See Appendix 2.8) outlining support for the HGC Transport Vision & Strategy document (HGC 05.02)

The Vision and Strategy is bold and ambitious and National Highways support the objective of the working group. It aims to move away from Predict and Provide and instead focus on a Vision and Validate approach to prevent increasing number of trips to the area and needing to provide highway focused Mitigation. National Highways are keen to support this approach.

National Highways encourage and support the current collaboration between HGC, the local authorities and key stakeholders including ourselves.

Overall, the Transport Vision and Strategy document is a well informed piece of work

highlighting the currently benefits and disbenefits of the town.

National Highways agree with the principles listed to date and we look forward to continuing working with you to agree the monitoring and evaluation methodology and outcomes.

- 2.26 In January 2024, National Highways wrote to the HGC Transport Sub Group (See Appendix 2.9) outlining support for the Hemel Hempstead Modal Shift Study Report (HGC 05.03)

National Highways agree with the principles listed to date and we look forward to continuing working with you to agree the testing and modelling of the interventions.

Question 3 – What is the current position regarding a Statement of Common Ground with National Highways?

- 3.1 – This is set out at paragraphs 2.3-2.4 and the signed DtC SoCG is at Appendix 2.2.
- 3.2 As set out at paragraph 2.3, the Council is conscious that the Duty To Cooperate is judged at the point in time of Submission of the Plan, in this case 29 November 2024, but there has also been a lot of progress in recent times with detailed transport modelling work and associated activities. The intention for this work is to resolve the ‘soundness’ concerns raised by National Highways at Regulation 19 stage, leading to a more detailed updated SoCG to assist the Hearing Sessions indicated for “the summer” 2025 where more detailed Transport matters will be addressed. It is not unusual for there to be further refinement of transport work after Submission of a Plan.
- 3.3 The workstreams below came from National Highways requests on 18 December 2024. HCC and their transport consultants WSP sent data to National Highways as a direct result of that meeting. These workstreams with HCC and National Highways and recent work / information supplied to National Highways to address soundness matters has included:

Data

(i) Confirmation of source and justification for the employment trip rates sent to National Highways 8.11.24 and which National Highways have accepted (as at Appendix 3.1 and Appendix 3.1a).

(ii) Additional detail on the impact of growth on the SRN network - including detail at individual junctions sent to National Highways 28.1.25 (see SRN Traffic Flows NH meeting draft 24.01.25 at Appendix 3.2).

(iii) Further information on absolute flow levels and junction entry flows sent to National Highways 29.1.25 (at Appendix 3.3a and Appendix 3.3b)

(iv) Further evidence and confirmation of case studies used to underpin the mode shift assumptions in the Opportunity to Shift Modes work sent to National Highways 7 February 2025. (At Appendix 3.4)

Meetings/Workshops

(i) 18.12.24 - SADC / National Highways / HCC
See HCC draft Meeting Note at Appendix 3.5. See also National Highways slightly amended version of the Meeting Note at Appendix 3.6

(ii) 19.12.24 - HGC Transport Workshop (two attendees from National Highways)
See Meeting Notes at Appendix 3.7

(iii) 29.1.25 - SADC / National Highways / HCC - Follow-up to 18.12.24

(iv) 30.1.25 – HGC Transport Working Group – 2 NH attendees
See draft Meeting Notes at Appendix 3.8

Question 4 – The Statement of Common Ground with Central Bedfordshire states that “Some cross boundary impacts within Central Bedfordshire have been identified, the extent of which are being considered through the provision of additional information from the COMET model. Once this has been received and reviewed, Central Bedfordshire Council hope to update their position on this matter”. How has this cross-boundary issue been considered through the plan-making process as part of the duty to cooperate?

- 4.1 The Council has engaged with Central Bedfordshire Council (CBC) on this strategic cross-boundary matter in the preparation of the Plan since the start of the Plan’s creation. As set out in LPCD 06.01 Duty to Cooperate Statement of Compliance:

2021

3.6 Councillor (Portfolio Holder) level DtC meetings with surrounding authorities and Hertfordshire County Council between January – March 2021

Appendix C – September 2022 Workshop Notes

Organisations in attendance: Name Organisation

...

*Gianluca Guerriero Central Bedfordshire Council
Lynsey Hillman-Gamble Central Bedfordshire Council*

2023

3.13 At Regulation 18 stage in September 2023 another round of DtC Councillor meetings were held with all adjoining / nearby Councils

2024

3.16 At Regulation 19 stage in October 2024 another round of DtC Councillor meetings were held with all adjoining / nearby Councils.

- 4.2 The most recent SADC Local Plan Regulation 19 DtC meeting with CBC was held on 28 October 2024. The SADC Draft Meeting Notes were sent to CBC on 5 November 2024 and can be seen at Appendix 4.1. These Meeting Notes concisely reflect the discussion that was had regarding the strategic cross-boundary issue of transport and the COMET transport modelling and set up a subsequent meeting to address COMET outputs as they affect Central Bedfordshire in more detail. As the Meeting Notes set out CBC officers considered that the SADC COMET report was “really helpful”.
- 4.3 There was a previous SADC Local Plan Regulation 18 DtC meeting with CBC on 18 September 2023. The SADC Draft Meeting Notes were sent to CBC on 2 February 2024 and can be seen at Appendix 4.2. These Meeting Notes concisely reflect the discussion that was had regarding the strategic cross-boundary issue of transport and the COMET transport modelling. As the Meeting Notes set out “SADC has signed up with HCC for a ‘Comet 7.1 run’ of the HCC’s Transport model to support the LP Reg 19”.
- 4.4 There was a previous SADC Local Plan DtC meeting with CBC on 3 February 2021. The agreed Meeting Notes can be seen at Appendix 4.3. These Meeting Notes concisely reflect the discussion that was had regarding the strategic cross-boundary

issue of transport including identifying transport as a potential strategic cross-boundary matter and looking at transport in more detail in section 4 (d).

- 4.5 As a follow up to the 28 October 2024 meeting set out above, an SADC / HCC / WSP / CBC Comet meeting was held on 8.11.24. At the meeting with CBC colleagues there was discussion regarding the detail of the COMET modelling results on the CBC highway network. This included identification of the parts of their network which are over capacity without SADC Local Plan growth and the relatively marginal changes with the SADC Local Plan growth. There was also discussion regarding the distribution of trips from the NE and NW Harpenden Broad Locations and how many were heading north, the wider distribution of traffic on their network and changes in journey time and delay focussed on the A1081 and B653.
- 4.6 A slide pack was prepared by HCC/WSP in advance in response to CBC's questions and shared on screen and discussed on 8 November 2024, as at Appendix 4.4.
- 4.6 Overall there are relatively limited impacts on the highway network within CBC's area arising from SADC's Local Plan growth.

Question 5 – The Statement of Common Ground with Central Bedfordshire also relates to traveller provision in Planning Policy for Traveller Sites, December 2024. Noting that appropriate traveller accommodation provision is part of ‘effective outcome 6’ of the Council’s Duty to Cooperate Compliance Statement of 29 November 2024 (LPCD06.01), please can you confirm how this matter was addressed at a cross-boundary level?

- 5.1 The Council has engaged with Central Bedfordshire Council (CBC) on this strategic cross-boundary matter in the preparation of the Plan since the start of the Plan’s creation. This is as set out in LPCD 06.01 Duty to Cooperate Statement of Compliance as addressed at paragraph 4.1 above.
- 5.2 It can be noted that there is specific mention of addressing Gypsy and Traveller provision in: the concise Meeting Notes from the SADC/CBC DtC meeting on 28 October 2024 at section 3 (b) (as at Appendix 4.1); the concise Meeting Notes from the SADC/CBC DtC meeting on 18 September 2023 at sections 2 (c) and 3 (b) (as Appendix 4.2); the concise Meeting Notes from the SADC/CBC DtC meeting on 3 February 2021 at section 4 (b) (as at Appendix 4.3).
- 5.3 NB: The Statement of Common Ground with Central Bedfordshire doesn’t directly reference traveller provision and Central Beds are not named as a party to the ‘effective outcome 6’ of the Council’s Duty to Cooperate Compliance Statement of 29 November 2024 (LPCD06.01). Whilst an important topic for consideration between the two LPAs and which clearly has been addressed directly all the way through the creation of the Plan, traveller provision ultimately wasn’t considered by SADC or CBC to be a strategic cross-boundary matter.

Question 6 – The Statement of Common Ground with Richborough (Examination Document ED26) states that “*there are currently no matters of general disagreement*”. However, concerns are expressed regarding the extent of the evidence provided in respect of the Duty to Cooperate, especially regarding cross-boundary dialogue with Dacorum Borough Council. Please can the Council point to the evidence which demonstrates constructive, active cooperation on this matter?

- 6.1 Whilst not directly referenced, this question is taken as referring to the section in Richborough’s Local Plan Regulation 19 response (at Appendix 6.1, also can be found at LPCD 20.03 - Reg 19 Responses By Submission (2024) and LPCD 20.04 - Reg 19 Responses By Consultation Point (2024)) in the passage at paragraph 2.3:

On the matter of cross-boundary growth locations. The Site boundary for allocation B3 currently excludes a small area of land adjoining the M1 motorway (see Site Location Plan at Appendix 2) [please see attached document] as it is located within Dacorum Borough Council's (DBC) administrative boundary. This small parcel represents a logical inclusion as part of the proposed allocation B3 and Richborough will be engaging with and submitting representations to DBC’s Regulation 19 consultation for the removal of this parcel from the Green Belt. SADC should also engage with DBC on this matter through the DtC to ensure opportunities for cross-boundary housing delivery are maximised and a bilateral Statement of Common Ground prepared on the matter. This should be done in advance of the submission of the Local Plan for Examination.

- 6.2 The Council has engaged with Dacorum Borough Council (DBC) on potential development near LPA boundaries as a cross-boundary matter in the preparation of the Plan since the start of the Plan’s creation. This is as set out in LPCD 06.01 Duty to Cooperate Statement of Compliance at:

2021

3.6 Councillor (Portfolio Holder) level DtC meetings with surrounding authorities and Hertfordshire County Council between January – March 2021

...

2023

3.13 At Regulation 18 stage in September 2023 another round of DtC Councillor meetings were held with all adjoining / nearby Councils

...

2024

3.16 At Regulation 19 stage in October 2024 another round of DtC Councillor meetings were held with all adjoining / nearby Councils.

- 6.2 The most recent SADC Local Plan Regulation 19 DtC meeting with DBC was held on 1 November 2024. The SADC Draft Meeting Notes were sent to DBC on 5 November 2024 and can be seen at Appendix 6.2.
- 6.3 There was a previous SADC Local Plan Regulation 18 DtC meeting with DBC on 6 September 2023. The SADC Draft Meeting Notes can be seen at Appendix 6.3. These Meeting Notes concisely reflect the discussion that was had including consideration at 4 (d) of “Potential sites near LPA boundaries”.

- 6.4 There was a previous SADC Local Plan DtC meeting with DBC on 5 February 2021. The agreed Meeting Notes can be seen at Appendix 6.4. These Meeting Notes concisely reflect the discussion that was had including consideration at 4 (j) of “Potential sites near LPA boundaries”.
- 6.5 As set out in HGC 01.01 - HGC Evidence Paper for the Inspector:
- 1.2. Collaborating as a partnership (The HGC Partners) St Albans City and District Council (SADC), Dacorum Borough Council (DBC)*
- ...
- 2. Progress to date*
- Since 2018, the HGC partnership has been progressing work to develop a strategic approach to ensure the homes, employment opportunities and new infrastructure is transformative to the whole town of Hemel Hempstead and the wider area. This includes: • November 2018 - a Hemel Garden Communities bid was submitted to the Ministry for Housing, Communities and Local Government (MHCLG). The bid was prepared by the three authorities, alongside Hertfordshire LEP, Herts IQ and The Crown Estate.*
- 6.6 DBC are one of the three key partners in HGC and are involved in all the key work strands, sub groups and evidence base.
- 6.7 From SADC’s evidence base work, including the Green Belt Review 2023 and work on the Draft Local Plan Regulation 18, officers were already aware of the scale and location of the area of land within Dacorum adjoining B3 West of Redbourn referred to by Richborough. It is considered important to bear in mind that the potential development parcel is only 0.17 Hectares in size and is in an area compromised by its location, immediately adjacent to the M1.
- 6.8 In response to previous representations at the draft Local Plan Regulation 18 stage in 2023 by Pegasus on behalf of Pennard Bare Trust & Ulvir Limited (the same landowners for Broad Location B3, who now have Richborough as a development partner) SADC officers informally discussed the relevant parcel of land with DBC officers in late 2023, after the DtC meeting on 18 September 2023 referred to at paragraph 6.2 and 6.3 above. DBC officers indicated that their evidence base and their emerging Spatial Strategy did not favour development at that location for allocation in their Local Plan. This was particularly relevant bearing in mind the fact that the potential development parcel is only 0.17 Hectares in size and is in an area compromised by its location, immediately adjacent to the M1.
6. In answering the questions above, the Council should have regard to paragraph 35 of the Framework. It states that Plans are effective where they are deliverable over the plan period, and, are based on effective joint working on cross-boundary strategic matters “...*that have been dealt with rather than deferred*”.
7. It is also noted from the recently submitted Statements of Common Ground with landowners and developers (Examination Documents ED3-ED27) that several of the relevant parties “generally support” the policies in the Local Plan. However, in places the representations suggest that the submitted Plan is unsound and modifications are required.

8. To assist the examination, it would be useful for the Council to set out in more detail where matters are not agreed, and whether it is common ground that any main modifications are necessary for soundness. That could be achieved by adding the Council's position alongside the 'issue raised by' column of the table under section 6 of the Council's Regulation 22(c) Statement (LPCD05.01).