

Draft Strategic Local Plan Consultation 2014

Event Name	Draft Strategic Local Plan Consultation 2014
Comment by	Central Bedfordshire Council (Central Bedfordshire Council)
Comment ID	DSL5314
Response Date	21/11/14 11:41
Consultation Point	Policy SLP 13 c) Policy SLP 13 c) – North West Harpenden Broad Location – Principally Housing (View)
Status	Processed
Submission Type	Email
Version	0.3

Let us know what you think of this SLP Policy and supporting text. Have we missed anything?

Comments?

We support the identification of broad locations for development set out in Policies SLP 13a, b, c and d. We specifically support the identification of land North West Harpenden for residential development, and we welcome further Duty to Cooperate discussions with yourselves regarding delivery of the site. The Council is also of the view that extending this proposal into Central Bedfordshire could have mutual benefits for both authorities, and we would welcome the opportunity to discuss this with you also.

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Event Name	Draft Strategic Local Plan Consultation 2014
Comment by	Central Bedfordshire Council (Central Bedfordshire Council)
Comment ID	DSL5313
Response Date	21/11/14 11:38
Consultation Point	Policy SLP 13 a) Policy SLP 13 a) - East Hemel Hempstead (North) Broad Location - Mixed Use (View)
Status	Processed
Submission Type	Letter
Version	0.3

Let us know what you think of this SLP Policy and supporting text. Have we missed anything?

Comments?

With regard to East Hemel Hempstead (north) (Policy SLP 13a) and East Hemel Hempstead (south) (Policy SLP 13b) whilst we support the release of Green Belt land to accommodate a major urban extension of Hemel Hempstead, we question the assumption set out in Policy SLP 13a that the development would meet the needs of the St Albans housing market area only, particularly given it's location immediately adjacent to the Dacorum housing market area. We urge you to re-examine this assumption. It would also be helpful if site plans showing the broad locations for development were included within the Draft Plan.

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Event Name	Draft Strategic Local Plan Consultation 2014
Comment by	Central Bedfordshire Council (Central Bedfordshire Council)
Comment ID	DSL5312
Response Date	21/11/14 11:30
Consultation Point	Policy SLP 8 Policy SLP8 – Local Housing Requirement /Target and Provision (View)
Status	Processed
Submission Type	Email
Version	0.4

Let us know what you think of this SLP Policy and supporting text. Have we missed anything?

Comments?

Objectively Assessed Housing Need

The Council's 'Independent Assessment of Housing Needs and Strategic Housing Market Assessment: St Albans City and District Council (December 2013) provides an independent and objective assessment for housing in the St Albans City and District Plan area. This assesses a number of alternative scenarios for household formation, and concludes that the recommended scenario is a migration-led 5 years scenario. It is surprising then that the Policy SLP8 (Local Housing Requirement/Target and Provision) proposes a housing target considerably lower than this, with little justification for this approach. Housing need will inevitably be one of the main areas of consideration at examination. If the Council is unable to justify its housing requirement this will put St Albans in a weak and possibly indefensible position. We therefore highly recommend you strengthen your justification for the SLP8 housing target.

Duty to cooperate

In addition to meeting its own housing need St Albans should also be mindful of its responsibilities under the Duty to Cooperate. Whilst the draft Local Plan is, first and foremost, a plan for St Albans City and District nevertheless, the National Planning Policy Framework (NPPF) makes it clear that plans should consider how to respond to unmet need from elsewhere. One of the tests of soundness relates to whether the plan is "positively prepared", meaning: "the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;" (NPPF, para 182).

Although there is not an absolute requirement to provide housing for other areas, recent Inspector's conclusions on a number of local plans across the country have made it clear unmet need from elsewhere must be fully considered and authorities must cooperate on plan-making. We are therefore surprised that the draft Plan does not address the potential for St Albans City and District Council to accommodate an element of unmet need from other authorities in the area, including Luton. Whilst St Albans is not within the Luton Housing Market Area, the close proximity of the two areas and the influence of one upon the other, mean that the Council should at least consider how it can assist. As you are aware Luton's unmet housing need is likely to be substantial. Our Submission Development

Strategy makes provision for 5,400 homes to help meet this figure. This is a considerable contribution but it will not be possible by any means for Luton's unmet need to be wholly provided for within Central Bedfordshire. Although we believe Luton could do more to meet its own need within its boundaries, nonetheless a significant element will remain to be accommodated elsewhere.

In this context we would take this opportunity to again remind you of this issue and ask that your Council gives full and proper consideration to St Albans' role in helping Luton meet its housing needs.