

HARPENDEN TOWN COUNCIL

CLOSER TO THE COMMUNITY



Spatial Planning Team (slp@stalbens.gov.uk)
St Albans Council Offices
St Peters Street
St Albans
AL1 3JE

Ref: NL/BE/ps/E4a/34613
Date: 14 June 2016

Dear Sir

Statement by Harpenden Town Council to the SADC Planning Policy Committee Meeting on 14th June 2016

1. On 1st March 2016, Central Bedfordshire Council wrote to SADC saying, 'We specifically support the identification of land at North West Harpenden for residential development, and we welcome further Duty to Co-operate discussions with you regarding delivery of the site'.
2. Between February and April 2016, Central Bedfordshire Council (CBC) undertook a call for sites. The list of sites submitted was published on 25th May 2016. One of these sites (land adjoining Thrales End Farm, reference NLP228), is on the district boundary with St Albans. This land is under the same ownership as land at North West Harpenden.
3. There is therefore the potential that, if CBC were to allocate the land adjoining Thrales End Farm at a point in the future after the SADC Strategic Local Plan (SLP) has been adopted, then this could result in a severe detrimental impact on Harpenden. One possible implication of the statement made by CBC on 1st March would be that such an opportunity to allocate this land adjoining Thrales End Farm is a significant one that it will consider thoroughly.
4. Harpenden Town Council (HTC) has substantial concerns about the implications of any failure by the two local planning authorities to fully and properly assess the implications of what could be a 1,400-dwelling strategic urban extension to Harpenden as opposed to the 500-dwelling urban extension currently proposed in the SLP. A potential scenario of two neighbouring sites on either side of the boundary effectively forming a single development but brought forward as part of the emerging local plans of two different authorities would represent a failure of effective plan-making and a mockery of the Duty to Cooperate (DTC). Representations to the SLP process in 2014 and 2016 by HTC have made clear

Town Hall • Leyton Road • Harpenden • Herts • AL5 2LX

Tel: 01582 768278 Fax: 01582 760026

Email: Harpenden.Town.Council@harpenden.gov.uk Website: www.harpenden.gov.uk

that it does not consider that 500 dwellings and a new school can be accommodated on the Broad Location at North West Harpenden without the site extending up to the district boundary, i.e. beyond Cooters End Lane. The land adjoining Thrales End Farm would therefore undoubtedly represent a very convenient extension of the site.

5. In its representations to the Draft SLP in November 2014 and the Publication Draft SLP in February 2016, HTC has raised concerns over the deliverability of the infrastructure required to support a 500-dwelling development at North-West Harpenden. We note that on the 14th June Planning Policy Committee agenda is an update report on the Infrastructure Delivery Plan. This makes clear that work is still ongoing, noting in particular the continuing modelling work in respect of transport and waste water. This still does not provide evidence that such fundamental matters have been resolved which is of general concern to HTC in respect of the deliverability of the 500-dwelling allocation at North West Harpenden and specifically the deliverability of other infrastructure for this site such as education.
6. However, this situation does offer an opportunity for the modelling to consider a 1,400-dwelling development reflecting the potential for further growth on the land adjoining Thrales End Farm. For such work to not be undertaken would be of considerable concern to HTC. Given that this modelling work has yet to be completed, there can be little justification for not completing this. HTC wishes to make clear that, if this opportunity which it has identified is not taken forward by SADC, then it will have significant doubts over the DTC process between it and CBC.
7. Clearly at a plan-wide level both SADC and CBC are mindful of the requirements that DTC places upon them. In the case of SADC, the allocation of land east of Hemel Hempstead inevitably will be expected to meet some of Dacorum Borough Council's housing needs – it is growth of Hemel Hempstead in St Albans district in the same way that the land adjoining Thrales End Farm would be Harpenden growth in Central Bedfordshire. For CBC, the abandonment of its previous draft Local Plan was, in part due to DTC issues with Luton Borough Council. HTC considers that these experiences and the national planning practice guidance on carrying out the DTC signposts very clearly the need for SADC and CBC “...to make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Local Plans for examination”¹. SADC must therefore work with CBC to assess the sustainability of a 1,400-dwelling strategic site at North West Harpenden in order to meet with the requirements of the DTC.
8. Notwithstanding the need to assess the implications of a larger strategic development, HTC wishes to express its concerns to SADC over the impact on the landscape of a larger development. Policy SLP 13c of the Publication Draft SLP states that one of the site constraints of the North West Harpenden Broad Location is its relationship with the wider countryside to the north. However, explicit reference to this impact being particularly acute if development were to extend beyond Cooters End Land is not included in the policy or supporting text. Whilst

¹ Planning Practice Guidance, Reference ID: 9-001-20140306

CBC has not specifically invited comment on the sites submitted to its Call for Sites process, the clear implications over CBC taking forward the land adjoining Thrales End Farm for development and the importance of carrying out the DTC means that SADC should raise concerns over this issue at the earliest possible stage with CBC. This should ensure that more detailed landscape impact work relating to any larger strategic allocation straddling the district boundaries is undertaken as a matter of urgency.

9. HTC respectfully requests that the SADC Planning Policy Committee carefully considers the points made in this statement and discusses them fully.

Yours faithfully



**Councillor Mrs Nicola Linacre
Town Mayor**