



HARPENDEN TOWN COUNCIL

CLOSER TO THE COMMUNITY

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

BE/jb/E4a/34504

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Dear Sir

St Albans Strategic Local Plan Publication Consultation

- 1.1 These representations are made by Harpenden Town Council (HTC) in respect of the St Albans Strategic Local Plan (SLP) Publication Consultation.
- 1.2 HTC firstly wishes to make clear that all of the representations it made at the Regulation 18 consultation stage in November 2014 still [apply](#). It is extremely disappointing that none of the comments made, which were intended to assist St Albans District Council (SADC) in achieving a sound plan, have been reflected in the Publication Draft (outside of matters of fact). HTC therefore continues to have concerns over the soundness of the SLP, particularly in respect of infrastructure provision to support the deliverability of housing growth.

Economic development

- 1.3 In its representations on the Consultation Draft SLP in November 2014, HTC stated that Policy SLP15 should be more flexible by allowing mixed use development on industrial sites. The reason that these representations were made was because, for Harpenden, this is extremely important to its future prosperity. Harpenden is increasingly becoming a commuter town, with most residents commuting out in the morning and lower skilled jobs within the town being filled by people commuting in every day from lower cost locations.
- 1.4 Harpenden is not an industrial town. Its light industrial economy is largely based around providing local services for the community. This can be serviced by the existing business base but there is nothing in the SADC evidence base underpinning the SLP to suggest that the economy of Harpenden is going to grow significantly through a programme of

expanding light industrial uses. Indeed, the evidence justifying the employment strategy is based solely on the London Arc Employment Study which is six years old. The commercial base and economy not just of Harpenden, but nationally, has moved on substantially due to economic circumstances.

- 1.5 Industrial sites such as at Coldharbour Lane and Batford Mill do not represent viable B1 employment locations for inward investment by new companies or developers. The policy framework in the SLP therefore represents a lost opportunity to both provide much needed housing on brownfield sites and also offer small scale employment opportunities through the provision of workshops or shared office space. The latter is generally a growth sector, with increasing numbers of self-employed people seeking shared work/office space in order to maintain social and professional networks, as opposed to working out a home office. This is particularly prominent in Harpenden:
- In 2011, 19.1% of residents aged 16 to 74 were in self-employment, compared to 12.6% across St Albans district and 9.8% nationally.
 - Self-employment without employees is particularly high in Harpenden, at 14.3% compared to 9.7% across St Albans district and 7.5% nationally
 - Since 2011, nearly 100 residents aged 16 to 74 per annum have become self-employed.
- 1.6 The SLP needs to recognise this economic reality and plan for it appropriately. Without this, there are other threats that will result in the loss of these opportunities. Specifically, the Housing and Planning Bill, which is currently at an advanced stage, is proposing that local planning authorities maintain a brownfield register of sites. The danger is that these sites will be lost to solely housing schemes which will not only perpetuate the pressure on infrastructure in Harpenden but also represent missed opportunities to provide an effective mix of uses that contributes towards the delivery of modern employment needs in a high skilled, predominantly residential area.
- 1.7 A policy approach that creates the opportunity to provide flexible workspace, well integrated into a mixed use area (as opposed to being 'zoned' on an industrial estate) is far more likely to address the employment needs of the local community whilst creating diversity in the physical environment. Policy SLP15 creates a barrier to that opportunity.

Housing size

- 1.8 We note that Policy SLP10 requires dwelling sizes to reflect the latest SHMA only in the broad locations. In other locations, specific needs can be addressed. HTC welcomes this and intends to ensure that, if the joint neighbourhood plan it is taking forward with Harpenden Rural chooses to allocate sites for housing development (or propose sites for removal from the green belt), then these will be to address the specific needs of Harpenden.
- 1.9 In particular, this relates to the needs of older people, a wider issue recognised by the SLP. The broad location at North West Harpenden is not considered to be a location that is sustainable in providing a significant proportion of development to address the needs of older people. Locations that are more suitable would need to be closer to the centre of Harpenden town and the range of services it offers. It is appreciated that it is anticipated this issue will be addressed through delivery of a neighbourhood plan which will identify potential small sites for development. These sites would likely be more centrally located.

Strategic infrastructure and deliverability

- 1.10 HTC wishes to reiterate and reinforce the representations it made to the Consultation Draft SLP in November 2014 regarding infrastructure provision and the deliverability of the proposed strategy. HTC does not consider that the strategy in the SLP has been demonstrated as being deliverable; as such, the plan is unsound.
- 1.11 In respect of the proposed broad location at North West Harpenden, there is considerable concern regarding infrastructure provision to support the development of 500 dwellings. Of greatest concern is the lack of clarity over education provision to support this and the wider growth of Harpenden. This is a need specifically identified in Policy SLP13c for the land for a 2.5FE primary school and the provision of a 1FE school on the site. The costs of this would be considerable and, as stated in our previous representations, HTC does not consider that developer contributions from the 500 dwellings at North West Harpenden would be anything like sufficient to address these costs. Contributions from other strategic developments are unlikely to be made available to cross-subsidise this because they will have their own infrastructure needs to address.
- 1.12 The SLP provides no evidence that Hertfordshire County Council (HCC), as the education authority, is able to deliver what has been established as a critical need in terms of school places. It is also not clear what engagement there has been between SADC and HCC on this matter. There is growing expectation generally that new school provision will be made through free schools. However, when planning at a strategic scale there must be certainty that key infrastructure can be delivered and such an approach provides no such certainty. This also applies to transportation issues and modelling under the stewardship of HCC.
- 1.13 It is still the considered opinion of HTC that Policy SLP30 on infrastructure delivery and the related policies on the strategic locations need to be stronger in requiring the key strategic infrastructure items to be secured before a significant quantum of development comes forward. It cannot be the case that development comes and then the expected infrastructure does not come with it, as happened historically with development in Batford. In Harpenden this would be disastrous for the effective functioning of the town.
- 1.14 HTC repeats its concern about the issue of water supply in Harpenden. The existing infrastructure is ageing and there have been issues with water supply/disposal around the Town. Adding this density of properties to a system that already has issues will serve to only exacerbate the situation. At the same time, water supply in the District is subject to drought and lack of supply. Adding substantially to the population will make this situation worse.
- 1.15 It is anticipated that the Examination in Public (EIP) of the SLP will identify whether there has been adequate co-operation between SADC and HCC, in accordance with Section 110 (4)(b) of the Localism Act 2011, to consider the provision in the SLP to meet calculated educational and transportation needs and demand. If this is not the case, then the SLP must be considered unsound.
- 1.16 In the absence of a clear framework for delivery of the broad location at North West Harpenden, HTC considers that the SLP is unsound. If these issues are not clarified at Submission Stage then HTC is concerned they will only be properly addressed at the EIP

of the SLP. If this is the case then HTC would wish to be directly involved in that EIP process.

Community infrastructure

- 1.17 Policy SLP7 specifically directs the provision of “new and enhanced sport and recreational facilities” as part of major residential development at Broad Locations. HTC, in its November 2014 representations, identified the specific need for a full-sized, 3G floodlit football pitch in Harpenden. The broad location at North West Harpenden may be the most suitable location for such provision. However, this should be addressed as part of a wider review of community infrastructure provision across Harpenden, which will be undertaken as part of the joint Neighbourhood Plan with Harpenden Rural.
- 1.18 HTC is concerned that the policy, as worded, is directing provision of such needs to the broad locations and that if this cannot be provided at North West Harpenden then there is the potential it will not be delivered at all. HTC has raised its concern over the deliverability of strategic infrastructure such as education at this broad location, so it is unlikely that the delivery of the site will also be able to support new community provision as well. This is also the case given the doubts raised by HTC in its November 2014 representations in respect of the physical ability to deliver 500 dwellings and a school on a site of that size without significantly breaching the defensible green belt boundaries.
- 1.19 HTC therefore would wish for Policy SLP7 to be more explicit in ensuring that other locations than the broad locations may be more suitable places for new community infrastructure.

Next steps

- 1.20 Following submission of the SLP to the Planning Inspectorate, there will be an EIP. HTC wishes to state at this stage that if there is a specific EIP session on Harpenden and the broad location at North West Harpenden it would wish to be a direct participant in that session. HTC also reserves the right to request to be a direct participant at other sessions.

Yours faithfully



**Cllr Brian Ellis
Town Mayor**