



# WHY THE STRATEGIC LOCAL PLAN IS UNSOUND

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SOUNDNESS POINT 1

**THE IMPORTANCE OF HAVING EVIDENCE**

## SOUNDNESS POINT 1

### **National Planning Policy Framework §158:**

“Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area...”

## SOUNDNESS POINT 1

### **Planning Inspectorate Guidance Booklet**

#### **“Examining Development Plan Documents: Learning from Experience” §33:**

“The guiding principles are that the evidence should be proportionate and it should inform what is in the plan rather than being collected retrospectively in an attempt to justify the plan.”

## SOUNDNESS POINT 1

No up-to-date “Strategic Housing Land Availability Assessment”

- ▶ SHLAA produced in 2009
- ▶ 2015 “refresh” not completed or reported at time plan published
- ▶ Urban capacity figures in plan do not seem to take account of policy changes to allow office into residential conversions without permission

## SOUNDNESS POINT 1

No traffic modelling/assessment of traffic impact of proposals

- ▶ Have not carried out traffic modelling
- ▶ Said they would have “*detailed discussions*” with Herts CC before scoring the sites – but they didn’t
- ▶ Herts CC and Highways Agency critical of absence of evidence to support assertions made
- ▶ Said they would ask developers of Broad Locations to pay for traffic modelling – but they didn’t
- ▶ Herts CC is carrying out own traffic modelling, but it isn’t ready yet



SOUNDNESS POINT 2

**THE SCORING OF GREEN BELT SITES  
IS IRRATIONAL**

## SOUNDNESS POINT 2

- ▶ 2009 SADC say NW Harpenden and N of St Albans both raise congestion issues
- ▶ 2009 Herts CC say both would exacerbate congestion, full investigation needed of network capacity, access and sustainability
- ▶ 2011 Harpenden Urban Transport Plan: a “congestion town”, with A1081 congestion a “key issue”
- ▶ 2014 NW Harpenden scores 9/10 – “traffic impact likely to be acceptable” - “relatively straightforward access position”
- ▶ 2014 N of St Albans scores 2/10 – “number of potentially difficult problems to solve”





SOUNDNESS POINT 3

**NW HARPENDEN –  
MISSION: IMPOSSIBLE**

## SOUNDNESS POINT 3

### Policy SLP 13c – NW Harpenden Broad Location – Principally Housing

- Retain listed building at Cooters End Farm
- Retain small woodland in east corner
- Circa 500 dwellings
- Overall net density 40 dwellings per hectare
- Recreation space and public open space
- 2.5ha primary school site
- Potential to stop at Cooters End Lane removed at very last minute

## WHAT CAN I DO?

- ▶ Use the online consultation portal at [www.stalbans.gov.uk/slp](http://www.stalbans.gov.uk/slp) **OR**
- ▶ Go to [www.harpendengreenbelt.org.uk](http://www.harpendengreenbelt.org.uk), click tab “2016 Consultation”
- ▶ Download a blank or partially-completed official form and fill it in
- ▶ Give your reasons in box 6 – use HGBA’s extension sheet if you like; amend or add to as you wish
- ▶ Post to St Albans Council Offices, St Peters St., St Albans AL1 3JE
- ▶ Or email to [slp@stalbans.gov.uk](mailto:slp@stalbans.gov.uk)
- ▶ **REPRESENTATIONS MUST BE IN BY 19 FEBRUARY AT 5pm**



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