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Dear James

St Albans District Council (SADC) Strategic Local Plan – Highway Authority Concerns

Following recent meetings between our respective authorities it has become apparent that concerns we have previously raised with your authority regarding the evidence base required to support the Strategic Local Plan (SLP) have not been addressed.

The Local Plan Protocol which all authorities have signed up to was developed to enable districts to understand the role and expectations of the County Council (HCC - in its capacity as Local Highway Authority), throughout the Local Plan process. The intention of the protocol is to set out the level of information expected by the Local Highway Authority (LHA) at each stage of the plan making process to ensure that a consistent approach is applied across the county. In particular there is a section on Local Plan Evidence Requirements which sets out the level of detail required by the LHA to support emerging development strategies and infrastructure planning processes within Hertfordshire. The aim of this is for the technical assessment work to ultimately give HCC as LHA, a reasonable level of confidence that development related highways issues can be overcome and that there are no severe impacts associated with the delivery of the plan or other major 'show stoppers' to the delivery of critical infrastructure items prior to the Examination In Public of emerging Local Plans.

The County Council's response (dated 28th November 2014, and attached for reference) to the 2014 draft Strategic Local Plan consultation 2014 advised the following:

Summary

Due to the scale and location of the broad locations listed in the Spatial Strategy (Part b) there is a requirement for traffic modelling to be carried out to allow the highway authority to fully assess the impact of the proposals on the local road network. There is also a requirement to prepare sustainable

transport studies which will also lead to specific mitigation. The modelling and sustainable transport planning will help identify and design specific infrastructure which can inform the supporting IDP. At this stage the highway authority are not aware of this level of detail being prepared for any of the sites.'

In December 2015 a meeting was convened with officers from SADC and HCC to discuss the impending consultation on the Strategic Local Plan (SLP). It became apparent at this meeting that SADC had not addressed to any substantive degree the highway concerns raised in the County Council's November 2014 correspondence, in particular the requirement for traffic modelling to be carried out to allow the highway authority to fully assess the impact of the proposals on the local road network. Essentially, SADC had not commissioned any modelling work themselves and no further work was identified to address this requirement. In light of this, HCC suggested that the County Wide Strategic Transport Model (COMET), which we were in the process of developing at that time, could potentially provide the basis for investigating potential issues, and that St Albans could make use of this tool to inform thinking.

In addition, the County Council has also been involved with separate meetings with the developers of Oaklands College and Harpenden to commence discussion around the potential impact on the network of these respective developments and to understand what mitigations were being considered.

The County Council's response to the draft SLP in February 2016 (dated 19th February, attached for reference) once again highlighted the need for traffic modelling to be commissioned by SADC to provide the evidence to enable the County Council to fully assess the impact of the growth proposals on the local road network and any suitable mitigation measures prior to submission of the Local Plan. Below are a couple of extracts from that response.

'2. Modelling

Modelling of Local Plan Growth

In its response to the consultation in November 2014, the County Council indicated that there was a need for the Local Plan to be supported by transportation modelling of the impacts of growth upon the highway network. The County Council understands that has not happened.

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...We would also expect St Albans to undertake a standalone test of their Local Plan sites (including any identified mitigation schemes from developers or other sources). Ideally this would be undertaken prior to submission to provide us with evidence to help us formulate our highways response.'

These concerns were reiterated in a meeting of the two authorities on 26th January 2016. This meeting included attendance by Derrick Ashley Executive Member responsible for Environment, Planning & Transport, Leader of SADC [REDACTED] and [REDACTED] Spatial Planning Manager

COMET has produced its first forecast outputs and the County Council had been expecting to be approached by your authority to take up the offer of using COMET to enable identification and resolution of potential highway issues, having provisionally envisaged some form of additional model run in May 2016.

Having not been contacted, the HCC officers made contact and a meeting took place between the authorities on 27 April 2016, with consultants AECOM in attendance. It became apparent that SADC is still intending to keep to the timescale of submitting the Local Plan in June 2016, with no modelling work having been undertaken to inform it. Nevertheless, the two authorities and AECOM agreed that some evidence could realistically be gathered in that timescale. However, it would only be possible to interrogate the existing COMET forecast for 2031 to identify the constraints on the network and start undertaking a "desk top" study of potential solutions. The limitation of this piece of work is that it wouldn't be able to demonstrate whether any of the indicative mitigations were either feasible or deliverable in advance of submission. In reference to the Local Plan Protocol this is normally a piece of work likely to be done as a precursor to developing mitigations for testing in a model. In other Districts and Boroughs this stage has been completed long before reaching this point in the process.

In terms of the three strategic sites within the plan (East Hemel Hempsted Oaklands and North West Harpenden) the developers have started to look at the junctions immediately in the vicinity of their own sites. Whilst this is part of the process it does not address all of the "Hot Spots" on the network which are currently not yet being investigated. Furthermore, the solutions being explored in certain locations do not appear to deal with all the junctions that those developments impact upon. Through analysis of COMET we are starting to have these discussions with developers. Similarly, at present some of the proposed mitigations do not fully take account of the cumulative growth and will need more work to see if indeed mitigation is achievable.

To facilitate an evidence-based analysis of highways matters at Examination the County Council will need to have seen evidence that the constraints on the network have been identified along with suitable, deliverable mitigations. A potential way forward could involve the following (though assumptions have been made around timescales and availability of AECOM to undertake the work, given other District Councils have already planned and booked its services: -

- Complete the piece of work currently being briefed i.e. interpret the existing 2031 COMET model forecast run to provide intelligence on highway (and Transport) network problems with high level suggestions of potential solutions (4 weeks).
- Further develop high level solutions to establish whether they are feasible and deliverable with suitable detail to enable them to be modelled in COMET (4-6 weeks).
- Code mitigations into COMET and rerun in order to inform St Albans for their Local Plan submission (4-6 weeks).

Given the pressing timescales to which you are working and the significant extent of what we believe to be outstanding work, I would suggest that you and I, with our respective colleagues, meet in the very near future to absolutely clarify what further

evidence is needed, what programme you will be working to and how we can co-ordinate our processes with yours

Please get in touch if you feel this approach or alternatives would be helpful.

Yours sincerely

A handwritten signature in black ink, appearing to read 'R. Smith', written in a cursive style.

Rob Smith
Deputy Director – Environment (Highways)

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