

**Response to the  
St Albans City & District Council Draft Local Plan 2041 Regulation 18 Public Consultation  
From  
Hertfordshire Innovation Quarter and Hertfordshire Local Enterprise Partnership**

## **Background**

Hertfordshire Innovation Quarter (Herts IQ) is the enterprise zone for Hertfordshire, tasked with delivering employment growth, especially in environmental technologies such as sustainable construction and agricultural technology, within six designated sites on or adjoining Maylands employment area, plus BRE research campus and Rothamsted research campus. Herts IQ was formed in 2017 and runs to the 31<sup>st</sup> March 2042 (a total of 25 years).

Hertfordshire Local Enterprise Partnership (Herts LEP) is one of 38 Local Enterprise Partnerships across the country tasked by Government to accelerate economic growth. Herts LEP is a business-led, multi-sector partnership focused on accelerating sustainable economic growth, job creation and raising workforce skills within the local area. Since its formation in 2011, the LEP has played a pivotal role in determining and addressing local economic priorities by driving the local economy through boosting inward investment, key sector, clean and inclusive growth. The boundary of the LEP is co-terminus with that of the Hertfordshire county boundary.

The LEP has a remit to grow the economy as a whole across the county, and has a particular focus on current and high growth sectors such as life sciences (including agri-tech), film, TV and digital, advanced engineering/manufacturing, sustainable construction, and clean growth (including low carbon environmental goods and services). Other high value sectors such as financial services are also encouraged.

## **Overview**

We welcome very much the draft Reg 18 Local Plan for St Albans since we consider that it is critical both for the future well-being of St Albans and district but also to enable the city and district to grow in a manner that is both measured and controlled, to the benefit of its residents, businesses and visitors. We are pleased that SADC has set out an ambitious but clear timeframe for adoption of the draft Local Plan.

1.9 In particular we welcome the over-arching principles of: combating the climate emergency, delivering more social housing, supporting the local economy, enhancing its cultural offer, and promoting equality, inclusion and fairness.

1.13 We are very pleased to note that SADC is working closely with neighbouring authorities under the auspices of the South-West Hertfordshire Joint Strategic Plan since the council has much to gain by delivering change and growth that complements rather than conflicts with adjoining areas. This is especially the case with Dacorum Borough and the development of Hemel Garden Communities which sits in both Dacorum and St Albans administrative boundaries.

## **Vision and Objectives**

1.30 We consider that the vision for St Albans through to 2041, namely 'A thriving, inclusive and sustainable community which is a great place to live and work and has a vibrant economy', is clear and sets the right level of ambition. We agree that it is thankfully succinct.

## The Spatial Strategy

1.36 We support the idea of a settlement hierarchy, and we are pleased to see that the proposed extension to the east of Hemel Hempstead (but within SADC district) is included as a Tier 1 settlement. We are also pleased to see that increased density and height will be considered, where appropriate. This is a sensible way of optimising existing land use.

### Strategic Policy SP1

P13 While we support the proposal for 15,096 net additional new houses, we note that the proposal for 888 homes per annum is very ambitious. Although perhaps beyond the scope of the Local Plan, this speed of delivery may require stream-lining of processes, sharing of resources with adjoining areas, and a significant increase in the use of off-site manufacturing to improve the quality and delivery of new homes.

P14 In terms of SP1 bullets:

- Raising standards and requirements for sustainability of all new buildings – **we suggest that this includes the use of offsite manufacturing where the sustainability of materials, energy use, and manufacturing processes can be better controlled**
- Significant new employment space provision – **of a quality and type suited to the needs of local residents and businesses**
- Significantly increasing tree cover in the District due to the role of trees in mitigating Climate Change emissions and providing other biodiversity and wellbeing benefits
- Community infrastructure – provision of new and improvements to existing facilities, including schools, healthcare and for recreation;
- Biodiversity Net Gain (10% +) for relevant new development – **suggest for all new development**
- Green Belt compensatory improvements - including significant new country parks, better access to the countryside via new and improved rights of way, new and improved habitat connectivity; Significantly improved infrastructure for walking, cycling and public transport;
- Renewable energy provision, including large scale solar power generation at East Hemel Central Broad Location, primarily using commercial building rooftops – **plus harvesting of waste energy from uses that create surplus energy (e.g. data centres)**
- Broad Locations will have to provide a comprehensive approach to renewable energy such as wind and solar – **yes support this entirely**

### Strategic Policy SP2

P16 Where appropriate, development proposals will need to – **we suggest removal of the words *where appropriate* since we think that this may give developers the opportunity to avoid this obligation**

- a) Demonstrate mitigation and adaptation to climate change, including pursuing the reduction of carbon dioxide emissions
- b) Prioritise the development of previously developed land
- c) Be designed to improve resilience to climate change, including resilience to increasing temperatures, more frequent drought, more intense storms and wind speeds and heavy rainfall events

- d) Use the most sustainable locations for growth and so minimising the need to travel while encouraging use of walking, cycling and public transport
- e) Provide on-site renewables, high standards of energy efficiency, and low carbon energy
- f) Support the use of sustainable and active transport modes of travel in new and existing developments
- g) Deliver biodiversity net gain
- h) Tree planting at scale

**Do all these bullets apply to a development? If they do we suggest that it is more explicit**

### **Sustainable Design, Construction and Building Efficiency**

2.5 The mention of various sustainable design standards is welcome. We suggest that this includes the Hertfordshire Development Charter as well since this covers similar ground.

2.9 We welcome policies CE1, CE2 and CE3 very much. As mentioned previously we would like to see the mention of off-site manufacturing as we believe that this offers both the opportunity to deliver these policies (especially CE1) and may offer commercial opportunities for district and Herts businesses.

### **Policy LG2 – Support for Transformation of Hemel Hempstead**

P31 We fully support Policy LG2.

P31 We suggest that the wording for Herts IQ is amended slightly to read: ...with the Hertfordshire Innovation Quarter leading the way for new employment opportunities and the creation of *up to* 8,000 jobs. The reason for this qualification is that, because of the changes to working behaviours and commercial conditions, there is no longer total certainty that this level of employment can be delivered.

### **LG3 - Hemel Garden Communities Place Principles**

#### **P34 Pillar 3 - Self-sustaining Economy**

- Digital infrastructure on and off-site including ultra-fast fibre-optic broadband to premises – ***we suggest adding or similar cutting edge information technology as it becomes available***
- Delivery of remote office hubs, starter units / incubator space, alongside training and higher education facilities in key destinations including local centres – ***we suggest adding grow-on space***

### **Chapter 4 – Housing**

We have no comments on this chapter.

### **Chapter 5 – Economy and Employment**

5.1 We support very much the broad objectives, namely: Encourage strong and resilient economic growth, employment and skills opportunities; including supporting growth in green and creative sectors; and supporting new ways of working across the District.

5.5 We would comment that Building Research Establishment (BRE) and Rothamsted Research are both research institutions of national significance (in some areas of research possibly global). BRE is leading the way in new sustainable construction technologies and standards (such as BREEAM) that are being adopted in other countries while Rothamsted is carrying out agri-tech research that could help address the impact of climate change at a global level. We agree with your comment that R&D and science-based sectors account for a higher share of employment in the District compared to neighbouring authorities.

5.13 You are right to recognise the effect that the COVID-19 pandemic has had on working practices and the impact this has had on homeworking and hybrid working. While there may continue to be demand for office space, we wonder if you need to future-proof the Local Plan by providing for flexibility should the demand fall, possibly for relatively ease change of use to other high value employment uses? For instance some town centres are seeing the replacement of office uses with laboratory uses (with appropriate controls).

5.14 We note the significant loss of industrial space in St Albans over the last 10 years or so, for a variety of reasons including PDR. Because of its excellent strategic location, we consider the District, and especially St Albans itself and East Hemel, are vulnerable to B8 warehousing/logistics uses. To help protect the industrial space that remains, and to encourage new industrial space that offers good employment prospects, we would like to see restrictions on the level of B8 space available on employment sites across the Districts, both as sites in their entirety and within larger employment sites.

#### **P51 Strategic Policy SP5 - Employment and the Local Economy**

- a) Protected Employment Areas – we support the policy of Protected Employment Areas, as set out in Table 5.1.
- b) New industrial and business locations will be designated as follows: i. 55 ha of Employment land at East Hemel Hempstead (Central) providing for a range of uses including offices, research and development, light industrial and distribution, with 10% of any new development or redevelopment required to contain units for Small Medium Enterprises and expansion/ Grow-On units – **we consider that the amount of B8/distribution should be restricted to an agreed %age, and that the amount of SME expansion/grow-on space should be a minimum of 25%**

5.19 We support the Protected Employment Areas schedule as set out in Table 5.1 and policy EMP1.

5.25 Herts LEP is the Hertfordshire Local *Enterprise* Partnership. Herts IQ does *not* include The University of Hertfordshire's Centre for Climate Change Research.

P55 Policy EMP4 - Hertfordshire Innovation Quarter (Herts IQ) – unsurprisingly we support this policy!

P55 Policy EMP5 – Employment Skills – we support this policy.

#### **Chapter 6 – City, Town and Village Centres and Retail**

We have no comments on this chapter.

#### **Chapter 7 – Community Infrastructure**

We have no comments on this chapter.

## Chapter 8 – Transport

8.5 We are pleased to note that the Local Plan endorses the HCC Local Transport Plan 2018-2031 (LTP4) which promotes sustainable modes of transport and related infrastructure, encourages change in travel behaviour and seeks to reduce the need to travel. We consider that these are sound principles, together with the transport hierarchy, that align closely with the climate change principles elsewhere in the Plan.

8.7 We especially support Strategic Policy SP8 - Transport Strategy and the bullet points therein.

### Major Transport Schemes

8.10 We note that in policy TRA2 – *Major Transport Schemes The Council supports the delivery of the following transport schemes: ... ii. M1 Junction 8 (M1 J8) Enhancement in association with Hemel Garden Communities (HGC).* While we broadly agree with this, we consider that it would be more useful to refer to Project Breakspear which is a package of transport improvements (sustainable and non-sustainable) including provision of a foot/cycle bridge over the A414, replacement of the Phoenix Gateway roundabout with traffic lights, construction of a spine road serving the new commercial development and a new bridge over the M1 direct into the new commercial development site. We also urge SADC to qualify their support by adding *should it be required*.

P77 Policy TRA3 – Development Generating New Lorry Movements. Under the section *To reduce impact on the environment and congestion in both towns and rural areas, major development proposals should: i. Encourage Heavy Goods Vehicles to use the primary route network* we suggest you replace *encourage* with *require*.

## Chapter 9 – Utilities Infrastructure

P83 Policy UIN1 – Broadband. We suggest that you supplement *The council considers that full fibre broadband is essential infrastructure and vital to the delivery of sustainable development with or similar cutting edge information technology as it becomes available.*

## Chapter 10 – Natural Environment and Biodiversity

We have no comments on this chapter.

## Chapter 11 - Historic Environment

We have no comments on this chapter.

## Chapter 12 – High Quality Design

P108 We support the Objective to achieve high quality, innovative, well designed and locally distinctive developments in existing and new places, but we have no specific comments.

## Chapter 13 – Public Health and Wellbeing

We have no comments on this chapter.

**Strategic Policy SP14 - Delivery of Infrastructure**

P125 We support this policy since we consider that it is important for developers to fund the level of (hard and soft) infrastructure needed to deliver their development.

*Herts IQ and Hertfordshire LEP  
19<sup>th</sup> September 2023*