

St Albans Strategic Local Plan 2011 - 2031 Publication 2016 Representation Form

Date:
Ref:
Ack:
(For official use only)

The best way for you to make representations is using the Spatial Planning online consultation portal.

Please return representations to the Spatial Planning Team by **5pm on 19th February 2016**.

By online consultation portal: www.stalbans.gov.uk/slp

By post to: St Albans Council Offices, St Peters Street, St Albans, AL1 3JE

By e-mail to: slp@stalbands.gov.uk

This form has two parts –

Part A – Personal Details (You need only submit one copy of Part A)

Part B – Your representation(s). **Please submit a separate sheet** for each representation you wish to make.

Before completing this representation form please refer to the attached guidance notes.

Part A – Submit only one copy of this

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name, Organisation and asterisked boxes below but complete the full contact details of the agent in 2.*

Title	Mr	
First Name	Steve	
Last Name	Baker	
Job Title (where relevant)	Planning Manager	
Organisation (where relevant)	CPRE Hertfordshire	
Address Line 1*	31a Church Street	
Address Line 2		
Post Town*	Welwyn	
County	Herts	
Post Code*	AL6 9LW	
Telephone Number	01438 717587	
E-mail Address	office@cpreherts.org.uk	

St Albans Strategic Local Plan Publication 2016 - Representation Form

Part B – Please use a separate sheet for each representation

Name or Organisation : Campaign to Protect Rural England (CPRE) Hertfordshire

3. Please give the number or name of the Paragraph or Policy your comment relates to. Documents can be found at the following links:

- Strategic Local Plan Publication Draft 2016 – www.stalbans.gov.uk/slp
- Sustainability Appraisal Report - www.stalbans.gov.uk/slp

Paragraph Policy

4. Do you believe the Strategic Local Plan &/or its sustainability appraisal is:

(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
(2) Sound	Yes	<input type="text"/>	No	<input type="text"/>
(3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

If you have entered No to 4.(2), continue with Q5, otherwise please go straight to Q6

5. Do you consider the Strategic Local Plan is **unsound** because it is **NOT**:

- | | |
|---|--------------------------------|
| (1) Positively Prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements) | <input type="text"/> |
| (2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base) | <input type="text" value="√"/> |
| (3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities) | <input type="text"/> |
| (4) Consistent with national policy | <input type="text" value="√"/> |

6. Please give details of why you consider the Strategic Local Plan &/or its sustainability appraisal **is** or **is not** legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Strategic Local Plan &/or its sustainability appraisal or its compliance with the duty to cooperate, please use this box to set out your comments.

Although paragraph 7.21 of the Plan states that because this establishment is in the Green Belt that there is a need to 'plan carefully' for future change, taking into account 'the impact of buildings and activities on the openness of the Green Belt', Policy SLP17 goes much further than this, and indeed further than proposed in Policy SLP16 for the similar BRE Site in terms of what would be allowed in the Green Belt.

The vague wording supporting 'possible extension' of the site, and the statement that the Green Belt boundary 'may be adjusted' to facilitate 'appropriate redevelopment and expansion', in accordance with guidelines in the DLP 'or separately' clearly lack the necessary demonstration of existence of exceptional circumstances to justify such action. In the event that exceptional circumstances exist to justify inappropriate development at the site when the DLP is prepared, there will be an opportunity to approve such proposals at that time, but as worded the Policy is not consistent with National Green Belt Policy or the various statements in the Plan about the importance of protecting the Green Belt.

CPRE Hertfordshire is also concerned that the wording of Policy SLP17 would facilitate development by businesses moving to the site that do not need to locate there. This would be contrary to Green Belt Policy if it resulted in a greater impact on the openness of the Green Belt, and the wording of the Policy should therefore be amended to only allow such activities if they are demonstrated to be essential to the viability of Rothamsted.

(Continue on a separate sheet if necessary)

7. Please set out what modification(s) you consider necessary to make the Strategic Local Plan &/or its sustainability appraisal legally compliant or sound. Please have regard to any answer you have given at 5 and 6 above. (NB: Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Strategic Local Plan &/or its sustainability appraisal legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The words '*and possible extension*' should be deleted from the first sentence of Policy SLP17, and words '*that it is essential to have located within the site*' after '*research and development activities*' in the same sentence.

The second paragraph of Policy SLP17 should be deleted.

(Continue on a separate sheet if necessary)

Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support and justify the representation and the suggested change. There will not normally be a subsequent opportunity to make further representations.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No

Yes

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Participation is necessary to explain CPRE Hertfordshire's related objections to the Plan's proposals, and in particular how they affect the Green Belt in the context of relevant NPPF policy.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

10. Do you wish to be notified of any of the following? Please mark all that apply.	
(a) when the Strategic Local Plan has been submitted	√
(b) when the Inspector's Report is published	√
(c) when the Strategic Local Plan is adopted	√

Please note that all responses will be held by the Council in accordance with the Data Protection Act 1998. Your name, town and comments will be made available to the public on the consultation portal; in council committee papers and as otherwise considered appropriate by us. Your personal data i.e postal addresses, emails and telephone numbers will not be share with the public.

However, your contact details will be shared with the Programme Officer & Inspector for the purposes of the Public Examination. We will use your contact details to notify you about future stages of the plan process. By submitting this form you are agreeing to these purposes.

11. Signature:		Date:	19 th Feb 2016
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