

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

Date:
Ref:
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(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	

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 checked="" type="text" value="√"/>
(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 checked="" 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 checked="" type="text" value="√"/>
(4) Consistent with national policy	<input checked="" 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.

Paragraph 6.20 states that the Broad Locations for development have been selected on the basis that development will cause least damage to Green Belt purposes and that new housing is well located for ready access to services, but the same sentence states that they have been chosen on the basis that they are best able to support economic development objectives in the Plan's Strategy. As stated in CPRE Hertfordshire's response to Policy SLP1(b), the selection of the East Hemel Hempstead Broad Locations is clearly based on the latter objectives despite the harm caused to the Green Belt, not based on an approach of causing the least harm to it.

We comment further on the impact of the proposed Broad Locations in our representations on Policies SLP13a)-d).

The first sentence of paragraph 6.21 is at the heart of the approach to housing provision in the Plan that CPRE Hertfordshire objects to. It states that the Council has assessed housing needs 'to establish appropriate local targets'. Paragraph 6.24 goes on to state that the assessment of housing needs 'must then be balanced against the importance of securing appropriate and long-term sustainable development', but this approach is flawed, as explained in CPRE Hertfordshire's representations on the Plan's Strategy (paragraph 4.3) of the Plan, because it totally ignores the key step required by paragraph 14 of the NPPF, and guidance in the NPPG, that relates to a different balancing exercise. The necessary task is to determine a housing target in the context of the specified constraints that apply, in this case the district's Green Belt location. Failure to do this means that the wording directly conflicts with national planning policy, and the same applies to the similar statement in paragraph 6.25, where it is set out as a principle behind the Plan's Strategies,

There is no text in the Plan to show that the Council has carried out the correct balancing exercise, and without this the Council's Housing Target and all the proposals for Greenfield Green Belt development totalling 4,000 houses are unsound. They are unjustified by reasoned evidence, are in conflict with the NPPF by failing to apply the key requirement of paragraph 14, and would also be ineffective in achieving the stated Green Belt objectives of the Plan.

(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.

CPRE Hertfordshire considers that to make the Plan sound in respect of the Housing section of Chapter 6, the Council would need to re-assess its Housing Target taking full account of the conflict between meeting full objectively assessed housing needs and applying national Green Belt Policy. The wording of the text in both Chapters 4 and 6 would also need to be amended to state that this exercise has been carried out.

(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 inter-related objections to the Plan's Strategy, Housing Target, development proposals, and relevant text in the context of NPPF policy, particularly for the Green Belt.

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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