

St Albans Local Plan 2020 - 2036 Publication 2018 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 17th October 2018**.

By online consultation portal: www.stalbans.gov.uk/localplan2018

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

By e-mail to: lp2018@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	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Steve"/>	<input type="text"/>
Last Name	<input type="text" value="Baker"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Planning Manager"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="CPRE Hertfordshire"/>	<input type="text"/>
Address Line 1*	<input type="text" value="31a Church Street"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Post Town*	<input type="text" value="Welwyn"/>	<input type="text"/>
County	<input type="text" value="Herts"/>	<input type="text"/>
Post Code*	<input type="text" value="SG3 6NP"/>	<input type="text"/>
Telephone Number	<input type="text" value="01438 717587"/>	<input type="text"/>
E-mail Address	<input type="text" value="office@cpreherts.org.uk"/>	<input type="text"/>

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Part B – Please use a separate sheet for each representation

Name or Organisation : 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:

- Local Plan Publication Draft 2018 – www.stalbans.gov.uk/localplan2018
- Sustainability Appraisal Report – www.stalbans.gov.uk/localplan2018

Paragraph

Policy

4. Do you believe the 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="checkbox"/>
(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 Local Plan is **unsound** because it is **NOT**:

- (1) Positively Prepared (it is not providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development)
- (2) Justified (it is not an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence)
- (3) Effective (not deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground)
- (4) Consistent with national policy (not enabling the delivery of sustainable development in accordance with the policies in this Framework)

6. Please give details of why you consider the 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 Local Plan &/or its sustainability appraisal or its compliance with the duty to cooperate, please use this box to set out your comments.

Whilst CPRE Hertfordshire supports a strategy for a hierarchy of settlements, and Categories 3 and 4 as set out in the Policy, we strongly object to the following elements of the Policy:

- 1) London Colney should not be included as a Category 1 'main settlement', but moved to Category 2, and the key diagram amended accordingly. Similar policies should be applied to London Colney as the other large villages in the District including Redbourn and Wheathampstead, commensurate with their services and infrastructure.
- 2) We oppose the creation of a new settlement at Park Street for the reasons set out in our representations on Policies S2, S4, and S6, and its inclusion as a Category 2 settlement. The proposal is not justified by exceptional circumstances that outweigh national policy as set out in the NPPF designed to constrain urban sprawl, protect the countryside from encroachment and prevent the merger of settlements in the Green Belt.
- 3) We strongly oppose the eastward expansion of Hemel Hempstead into the District and the inclusion of the town as a Category 1 settlement in St Albans. The expansion proposals are not justified by exceptional circumstances that outweigh national policy as set out in the NPPF designed to constrain urban sprawl and protect the countryside from encroachment.
- 4) The first sentence of the Policy for Category 2 villages should seek to influence the density of new development, and not just reflect the existing density of development. Please also see our representations on Policy L1 on density of development.

(Continue on a separate sheet if necessary)

7. Please set out what modification(s) you consider necessary to make the 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 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.

- 1) London Colney should be moved to Category 2 in the Policy.
- 2) Hemel Hempstead should be deleted from Category 1.
- 3) Park Street Village should be deleted from Category 2, and the Plan.
- 4) The policy for Category 2 settlements in column 3 (Broad Policy Approach) of the Table, should be amended to include the word 'new' before 'development', to read 'the scale and density of new development will generally be lower than in the Category 1 settlements.'

(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:

To explain our concerns about the lack of justification for the categorisation of settlements in the Policy their inconsistency with national 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 Local Plan has been submitted

Yes

(b) when the Inspector's Report is published

Yes

(c) when the Local Plan is adopted

Yes

Please note that all responses will be held by the Council in accordance with the General Data Protection Regulation 2018. Your name and comments will be made available to the public through an online consultation portal, in council committee papers and as otherwise considered appropriate by us.

Your address, email address and telephone number will never be able to be viewed by the public through the online consultation portal.

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.

To view St Albans City & District Council's full privacy notices please visit <http://www.stalbans.gov.uk/council-and-democracy/departmentsPoliciesPlans/data-protection/privacy-statments.aspx>

11. Signature:		Date:	12 th Oct 2018
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