

# 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 19<sup>th</sup> February 2016**.

By online consultation portal: [www.stalbans.gov.uk/slp](http://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](mailto: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	

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**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](http://www.stalbans.gov.uk/slp)
- Sustainability Appraisal Report - [www.stalbans.gov.uk/slp](http://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.

Bullet point 4 of paragraph 4.3 demonstrates the key flaw in the Council's Strategy and application of national policy. The text refers to a balance between meeting need and achieving sustainable development. Firstly, all development proposed in the Plan should be sustainable, whether it meet development needs or not. Secondly, the requirement of national Planning Policy is that Local Plans meet development needs unless *policies indicate development should be restricted* (NPPF 14). This is the balance that the Plan should address in setting targets and making proposals for specific development.

The starting point for the distribution of new development is the capacity of existing commitments, development in the pipeline and other likely developments to meet the need identified by the Council, but there is no statement in the text of the Strategy chapter or the Housing Chapter which shows the reasonable extent of such Housing Supply capacity, or any up to date figures for this.

CPRE Hertfordshire considers that the Council has underestimated housing supply for the Plan period by more than 1,000 dwellings, with a large part of this number resulting from changes of use facilitated by recent relaxation of planning restrictions on changes of use, now made permanent and being extended to a wider range of land uses. CPRE Hertfordshire is compiling a list of potential sites not included in the Council's SHLAA, and monitoring windfall additions to the housing stock to assist discussion on this matter at the Plan's examination.

Without an accurate and reasonable estimate of housing supply without recourse to the use of Green Belt land, any proposal for the removal of land from the Green Belt is unjustified and contrary to national planning policy, and CPRE Hertfordshire therefore objects to the developments proposed at the four Broad Locations and considers that the Council has failed to minimise changes to the Green Belt as the stated intention in paragraph 4.3

Please see also objections to paragraph 6.24 on Housing Targets which identify issues in respect of proposed housing provision.

(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 final sentence in paragraph 4.3 should be amended to read '*Minimising the changes to Green Belt boundaries necessary to achieve an appropriate balance between seeking to meet objectively assessed development needs and the constraints imposed by nationally important policy designations including the Green Belt.*'

The text should be amended to set out the contribution that will be made by Housing supply and any balance that would be needed to make up a reduced Housing Target.

(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:


This objection is closely related to CPRE Hertfordshire's objections to other aspects of the Plan related to Housing development and the Green Belt, and is one of the main bases for those objections.

**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.

<b>10. Do you wish to be notified of any of the following? Please mark all that apply.</b>	
(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 <sup>th</sup> Feb 2016
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