

# 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<br>(where relevant)    | Planning Manager        |  |
| Organisation<br>(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 6.69 – 6.70

Policy SLP13(a)

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

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

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="checkbox"/>            |
| (2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)  | <input checked="" type="checkbox"/> |
| (3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)               | <input type="checkbox"/>            |
| (4) Consistent with national policy   | <input checked="" type="checkbox"/> |

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.

The following specific comments are additional to those made in respect of the Proposed Broad Locations in the Strategy Chapter (4) of the Plan.

The East of Hemel Hempstead (North) site was ranked joint 7<sup>th</sup> in the Council's consultants' (SKM) Green Belt Review Sites & Boundaries Study (February 2014), which was the lowest ranking of the 8 strategic sub-areas evaluated. It was assessed by SKM as contributing significantly towards safeguarding the countryside from encroachment and exhibited high landscape sensitivity.

The sub-area of Green Belt of which the site forms part (Strategic Parcel GB21A stretching from the eastern edge of Hemel Hempstead to the M1 motorway) was also considered to make a partial contribution towards preventing merging and maintaining the settlement pattern. In particular, it helps to maintain the gap between Hemel Hempstead on one hand and Harpenden and Redbourn on the other.

This is of course additional to the contribution that all Green Belt sites make to the encouragement of regeneration in urban areas, one of the principal purposes of the Green Belt.

The SKM study suggested however, that the reduction in size of the sub-area to the site proposed in the Plan for urban development and removal from the Green Belt in Figure 3.3 would not significantly compromise the primary functions of the Green Belt or the separation of existing settlements. CPRE Hertfordshire disagrees with this conclusion. Development of the site would cause significant encroachment into the countryside and would have a serious impact on the openness of the landscape

between Cherrytree Lane and the M1 motorway. This impact would be exacerbated by the scale of development proposed – around 1,500 dwellings together with a new primary school, possibly a secondary school, new neighbourhood and local centres, and other community facilities proposed.

The impact on the openness of this part of the Green Belt and the character of the countryside would not be ameliorated by the proposed planting and landscaping, or by using the power lines that run through the middle of the sub-area, as a barrier along the eastern edge of the site. This would not form a defensible boundary to the Green Belt. Cherrytree Lane forms the natural defensible boundary to the Green Belt in this area, and development should not be allowed to extend east of it.

The Council's Development Site and Strategy Options Evaluation (DSSOE) had a major effect on the relative rankings of the strategic sub-areas considered. This evaluation scored each sub-area against economic, social and environmental criteria. In doing so however, CPRE Hertfordshire considers that the Council failed to give due weight to the impact on the Green Belt and national policy for the Green Belt in the NPPF.

CPRE Hertfordshire disagrees with other aspects of the DSSOE. Appendix 7 shows that the East Hemel Hempstead (North) site is the farthest from a railway station, at 6.4 kilometres from its nearest edge, and that a journey by public transport to either the town centre or the railway station would take around 30 minutes. This illustrates that the site is relatively distant from the facilities and services available in Hemel Hempstead and that it does not relate well to the town.

Policy SLP13(a) indicates that potentially part of the site should be reserved for long term housing development post 2031. According to the Council's Housing Trajectory, the EHH(N) site is planned to provide 1,500 dwellings by 2031, which suggests that development after 2031 would be on the remainder of the strategic sub-area, up to the M1 motorway. This would have a severely detrimental impact on the gap between Hemel Hempstead and Harpenden/Redbourn, contrary to the purpose of maintaining the existing settlement pattern, described in Table 5.2 of the SKM Green Belt Purposes Assessment (October 2013).

For these reasons, taken together with the unjustified Housing Target in the Plan on which separate objections have been submitted, the proposed allocation is not justified and is contrary to national planning policy and is therefore unsound.

(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 proposed allocation and related text in paragraphs 6.69 and 6.70 should be deleted from the Plan.

(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 Strategy, Housing Target, development proposals and relevant text in the context of NPPF policy 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<sup>th</sup> Feb 2016