

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 type="text"/>
(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.

Please also see representations on the Plan’s Strategy and the other Broad Locations in the Plan.

Like the adjacent East Hemel Hempstead (North) site, this location was ranked joint 7th in the SKM Green Belt Review Sites & Boundaries Study (February 2014), which was the lowest ranking of the 8 strategic sub-areas evaluated. The strategic sub-area considered by the Council’s consultants, SKM, comprised land enclosed by east Hemel Hempstead and the M1 motorway, and was divided into site 2(a) to the north of the A414 Breakspear Way, and site 2(b) to the south. The indicative layout in Figure 4.3 of the SKM study shows the potential development area for release from the Green Belt extending over site 2(a) and 2(b) as far as a line extending from the existing alignment of development in Leverstock Green to the motorway.

SKM found that this sub-area contributed significantly to the Green Belt purpose of safeguarding the countryside from encroachment, and made a partial contribution towards preventing merging and maintaining the existing settlement pattern. They took the view that the sub-area was relatively free of built development and represented an open landscape, but that urban influences were strong as the sub-area is enclosed by clear and visually prominent physical settlement edges including Hemel Hempstead industrial estate and commercial development as well as the M1 motorway. They concluded that a reduction in the size of the Green Belt sub-area would not significantly compromise the primary functions of the Green Belt or the separation of existing settlements.

As with the East Hemel Hempstead (North) Broad Location, the Council's Development Site and Strategy Options Evaluation (DSSOE) skewed the result of the evaluation of the EHH(South) site by giving it maximum score for the economic criteria of settlement hierarchy and mixed-use development. The result was that the EHH (South) site was promoted from the lowest tier of the strategic sub-areas to first place.

We consider that the DSSOE methodology was flawed and that the Council's scoring system did not take full account of some of the disadvantages of developing the site. The northern part of the site is adjacent to the Maylands business park/industrial estate, including the Buncefield oil depot, and forms a natural buffer between that area and the M1 motorway. Contrary to the assertion in SLP paragraph 6.69, we do not believe that the site would form an urban extension that would integrate well with the Maylands estate and the proposed Spencer's Park development. Such an urban development would be isolated from the other residential areas of Hemel Hempstead, and would suffer from its proximity to the industrial estate and the oil depot in particular. Only the northern part of site 2(b) would integrate well with the existing residential area of Leverstock Green.

It is clear from draft Policy SLP13(b) that the Council has not really thought through how the EHH(South) Broad Location might be developed. The objective is stated as being to provide a major urban extension of Hemel Hempstead to meet the needs of the housing market area and sub-regional economic development objectives, but the Council has not demonstrated how this provides the necessary exceptional circumstances to justify taking the land out of the Green Belt. The proposals include significant scale provision of office space, research and development, light industrial and logistics, providing in the order of up to 8,000 jobs, but no evidence is presented in the SLP as to whether there is an overriding need for this scale of development in addition to the potential employment provision already available in the existing Maylands estate.

Policy SLP13(b) calls for a substantial urban extension of at least 1,000 dwellings at an overall net density of 40 dwellings per hectare, but no indication is given as to where in the designated Broad Location this residential development would occur.

Policy SLP13(b) goes on to say that potentially the Broad Location would include provision of reserve land for long-term housing development post 2031. Given the constraints on development in the site 2(a) part of the Broad Location, this can only mean that further urban development and release from the Green Belt is envisaged for the wedge of Green Belt land extending from Leverstock Green along the A4147 Hemel Hempstead Road as far as the junction of the M1 and former M10 motorways. This would represent a major incursion into the Green Belt, encroaching significantly into the countryside and reducing the strategic gap between Hemel Hempstead and St Albans.

CPRE Hertfordshire strongly objects most to the inclusion of this Broad Location in the SLP, and consider it to be unsound in the absence of the demonstration of exceptional circumstances for its removal from the Green Belt for the reasons set out above and in representations on the Plan's Strategy in Chapter 4.

(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 paragraph 6.71 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:

19th Feb 2016