

# 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	

**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 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.

Paragraph 6.28 states that the SLP makes 'limited' provision for Green Belt boundary change to allow building on green-field Green Belt land and that the SLP Development Strategy will meet development needs with '*minimum impact on the Green Belt* and best prospects for delivery of appropriate social, economic and environmental objectives and specific community benefits'.

The proposed scale of provision in the Green Belt is far from 'limited'. Out of the approximately 9,000 dwellings proposed to be delivered in the Plan period, 4,000 (nearly 45%) are proposed in the four Green Belt 'Broad Locations'. A further 500 dwellings (over 5%) are expected to come from small-scale Green Belt boundary changes and rural exception sites (paragraph 6.32). This is over half of the District's housing during the period to 2031 on current Green Belt land.

This scale of development in the Green Belt is unjustified and inconsistent with both national Green Belt Policy as set out in the NPPF, and with the Plan's stated objective of protecting the Green Belt.

There is no explanation in how the Council has balanced the need for housing with constraints in order to determine how much housing should be built in the District in the Plan period, and no demonstration in this part of the Plan that exceptional circumstances exist for removal of land from the Green Belt for this purpose.

The first sentence of Paragraph 6.32 'assumes some small-scale green-field Green Belt residential developments where directly supported by local communities'. Local support for such development other than under the 'rural exception' policy for affordable housing, does not comprise an 'exceptional circumstance' that would justify removal of a site from the Green Belt, or 'very special circumstances' that would justify planning permission. The text conflicts with national Green Belt Policy as set out in the NPPF and should be deleted.

(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 text of paragraphs 6.28 to 6.32 need to be amended to delete references to the proposed Broad Locations for housing, and to reflect national Green Belt policy, in the context of a revised housing target.

The first sentence of paragraph 6.32 should be deleted.

(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.

<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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