

## St Albans Local Plan 2020 - 2036 Publication 2018 Representation Form

Date:  
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(For official use only)

### St Albans Local Plan Publication 2018 - Representation Form

#### 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](http://www.stalbans.gov.uk/localplan2018)
- Sustainability Appraisal Report – [www.stalbans.gov.uk/localplan2018](http://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)	<input type="text"/>
(2) Justified (it is not an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence)	<input checked="" type="checkbox"/>
(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)	<input type="text"/>
(4) Consistent with national policy (not enabling the delivery of sustainable development in accordance with the policies in this Framework)	<input checked="" type="checkbox"/>

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.

CPRE Hertfordshire supports most of the provisions in this lengthy Policy, but strongly objects to the wording of the section on St Albans City Football Club (SACFC).

- 1) The Policy states that 'it is likely that *the* community benefits' would carry considerable weight, but this should be amended to refer to '*demonstrable*' community benefits, which are yet to be demonstrated.
- 2) Enabling development for a new stadium must be shown to be the minimum necessary to make stadium construction and operation viable, subject to public scrutiny of the viability assessment, and in addition if the proposed site is within the Green Belt, subject to the whole development providing demonstrable benefits to the wider community that outweigh the harm to the Green Belt.
- 3) The criteria set out in the Policy as factors 'that might contribute to very special circumstances' are insufficient to ensure compatibility with national Green Belt policy, and none of them are circumstances that would justify casting aside Green Belt policy. This reference should be deleted from the Policy.
  - a) Criterion 1 should in any event require that there are no suitable alternative locations beyond the District boundary in a neighbouring area, or a suitable Green Belt site where there would be less harm to the Green Belt.
  - b) Criterion 2 should recognise that any such development would have a severe impact on the Green Belt irrespective of measures to minimise this and this cannot be a 'very special circumstance' for permitting a new stadium and associated development.
  - c) Criterion 3 should in any case be amended to require the scale of the overall development to be minimised.
  - d) Public scrutiny of any viability assessment would need to be a non-negotiable requirement.
  - e) A location with 'sustainable transport opportunities' does not require anything of substance. The criterion should be amended to require the primary public access to any such stadium when in use by SACFC or the community on non match days, to be by sustainable transport modes, guaranteed through legal agreements or obligations.

(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.

Please see our suggested changes to Policy L22 above under question 6.

(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 current Policy wording and the inconsistency of this with national Green Belt 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 <sup>th</sup> Oct 2018
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