

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
- Sustainability Appraisal Report – www.stalbans.gov.uk/localplan2018

Paragraph

Policy

S2

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

(1) Legally compliant

Yes

No

(2) Sound

Yes

No

(3) Complies with the Duty to co-operate

Yes

No

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)

(2) Justified (it is not an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence)

(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)

(4) Consistent with national policy (not enabling the delivery of sustainable development in accordance with the policies in this Framework)

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.

The Development Strategy set out as Policy S2 is flawed and is neither consistent with national planning policy as set out in the NPPF, nor justified by current circumstances. CPRE Hertfordshire has the following specific objections to the elements of the Policy relating to Housing Development:

- 1) The first paragraph wrongly refers to 'Government figures for housing need' creating 'the exceptional circumstances that necessitate the major development' proposed in the Green Belt in the Plan. National household projections and the Government's standard method of calculating housing need do not create exceptional circumstances for removing land from the Green Belt. They are simply a projection of current trends adjusted by a mathematical factor reflecting average earnings in the District relative to its average house price, but without any adjustment to take account of national policy constraints such as Green Belt, that are required by the NPPF, and in particular paragraph 11. Furthermore, the basis for the calculation of housing need that the Plan has to consider has changed very significantly since the Plan was prepared for consultation. Please also see our representations on Policy S4 in respect of housing targets.
- 2) We also object to the second paragraph stating that all Category 1 settlements and Chiswell Green (Category 2) will be expanded, and a new Category 2 settlement built at Park Street, when these proposals are neither justified nor consistent with national policy for the protection of the Green Belt.
- 3) The statement in the third paragraph that exceptional circumstances exist for development at the specific locations in the Green Belt listed in Policy S6 is not justified by evidence sufficient to outweigh national policy as set out in paragraph 11 of the NPPF, in the context of up to date information on housing need and new policies in the NPPF for making effective use of land.

(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.

Policy S2 should be amended to place more emphasis on the steps sought by national Planning policy to make better use of urban and other brownfield land, including through regeneration and greater density of housing, rather than through peripheral expansion of existing settlements into the Green Belt and a new settlement in the Green Belt.

The Policy should also set out a strategy to only remove land for development in the Green Belt that is essential in the context of paragraph 11 of the NPPF and accepted criteria for determining whether exceptional circumstances apply for the scale of housing and other inappropriate development proposed in the Green Belt.

The Key diagram and policies map need to be amended accordingly.

(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

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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 lack of justification for the Policy and its inconsistency with key national Planning 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 th Oct 2018
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