

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 S6

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="checkbox"/>
(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="checkbox"/>
(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 objects to Policy S6 for the designation of 11 Broad Locations for a range of categories of inappropriate development in the current Green Belt and for their removal from the Green Belt. Some of the locations include proposals for secondary schools which are inappropriate development, as pointed out in our representations on Policy S3. Others include major transport infrastructure that may also be inappropriate, but on which limited information exists at present, as noted in our representations on the Policies Map.

All of the individual locations listed in the Policy are unsound because exceptional circumstances for their removal from the Green Belt have not been demonstrated by the Council in the context of the latest relevant information on housing need and supply and paragraph 11 of the new NPPF. In the absence of any comparative assessment of the 10 individual locations proposed for housing development on the Green Belt, and the reduced need and demand for housing revealed by the 2016-based household projections of some 3,400 dwellings during the Plan period, all of which the Plan states should be built in the Green Belt broad locations, such exceptional circumstances have not been demonstrated.

Policy S6 (ii) relates to a 55 hectare 'Broad Location' in the Green Belt for employment land east of Hemel Hempstead, which has similarly not been justified by exceptional circumstances, and is also inconsistent with national planning policy, as noted in our representation on Policy S5.

Please see also our representations on Policies S2 (development strategy) and S4 (housing target), the latter of which set out the relevant provisions of paragraph 11 of the NPPF that should underpin proposals for development in the Plan.

(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.

In order to be make Policy S6 sound, there would need to be fundamental changes to the Policy to remove some of the locations completely, or to reduce the areas they occupy in order to minimise the adverse impact on the Green Belt, and to optimise the development potential of the locations retained in the Policy following the review of housing need and supply that we consider to be necessary (please see our representations on Policy S4).

There will also need to be amendments to remove locations from the Policies Map and the Key Diagram.

(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 major development allocations proposed in the Plan and the lack of justification for the Policy given the consequences for, and the inconsistency with national policy for, the protection of 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 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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