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| **A blue and white logo  Description automatically generated** | **Draft Local Plan 2041**  **Regulation 19 Publication**  Representation Form | | | | | | | **Ref:**  **(For official use only)** |
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| **Please** **return to** [**planning.policy@stalbans.gov.uk**](mailto:planning.policy@stalbans.gov.uk)**, or post to Spatial Planning, Civic Centre, St Peter’s Street, St Albans, AL1 3JE BY 10am, 8 November 2024**  *NB - Please note that comments received during public consultation will be made public. The Council will, however, redact certain information such as residents’ addresses and signatures. If you include supporting documents they will be redacted and made publicly available. View our privacy notices at* [*https://www.stalbans.gov.uk/privacy-notice*](https://www.stalbans.gov.uk/privacy-notice) *and* [*https://stalbans-consult.objective.co.uk/kse/terms/tnc*](https://stalbans-consult.objective.co.uk/kse/terms/tnc) *.* | | | | | | | | |
| This form has two parts –  Part A – Personal Details: need only be completed once.  Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make. | | | | | | | | |
| **Part A** | | | | | | | | |
| 1. Personal Details\* | |  |  |  |  |  | 2. Agent’s Details (if applicable) | |
| \**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable)*  *boxes below but complete the full contact details of the agent in 2.* | | | | | | | | |
| Title | | Mr | | |  | |  | |
|  | | | | | | |  | |
| First Name | | Chris | | |  | |  | |
|  | | | | | | |  | |
| Last Name | | Berry | | |  | |  | |
|  | | | | | | |  | |
| Job Title | | Planning Manager | | |  | |  | |
| (where relevant) | | | | | | |  | |
| Organisation | | CPRE Hertfordshire | | |  | |  | |
| (where relevant) | | | | | | |  | |
| Address Line 1 | | 31a Church Street | | |  | |  | |
|  | | | | | | |  | |
| Line 2 | | Welwyn | | |  | |  | |
|  | | | | | | |  | |
| Line 3 | | Hertfordshire | | |  | |  | |
|  | | | | | | |  | |
| Line 4 | |  | | |  | |  | |
|  | | | | | | |  | |
| Post Code | | AL6 9LW | | |  | |  | |
|  | | | | | | |  | |
| Telephone Number | | 07973 550339 | | |  | |  | |
|  | | | | | | |  | |
| E-mail Address | | planning@cpreherts.org.uk | | |  | |  | |
| (where relevant) | | | | | | |  | |

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| **Part B – Please use a separate sheet for each representation** | | | | | |
| Name or Organisation: | | | | | |
| 3. To which part of the St Albans Local Plan to 2041 does this representation relate? | | | | | |
|  | | | | | |
| Policy | SP1, SP3 | Paragraph | Part A paragraphs 3.8 to 3.20 | Table |  |

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| Figure |  | Site |  | Policies Map |  |

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|  | |  |  | |  | Sustainability Appraisal | | |  | | |
|  | | | | | | | | | | |
| 4.(1) Be Legally compliant  4.(2) Be Sound (positively prepared, justified, effective and consistent with national policy) | | | Yes  Yes | | |  |  | | No  No | X |
|  |  |
|  | X |
| 4 (3) Have complied with the  Duty to Co-operate Yes No | | | | | | | | | | |
| Please tick as appropriate | | | | | | | | | | |

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| 5. Please give details of why you consider the Local Plan is, or is not, legally compliant, sound, or compliant with the Duty to Co-operate. | | | | |
| **The Draft Local Plan is neither legally compliant nor sound due to the omission of critical national policy guidance on constraints re housing targets.**  The application of policy constraints to the formulation of housing targets, included at para 3.16 in the 2023 Regulation 18 Draft Local Plan, has been removed from the Reg 19 version, specifically the reference to paragraph 11 (which includes footnote 7) of the National Planning Policy Framework (NPPF) which identifies designated land including Green Belt and National Landscapes (formerly Areas of Outstanding Natural Beauty (AONB)) as comprising policy constraints relating to the formulation of housing targets for Local Plans.  This jeopardises the soundness of the Draft Local Plan, together with further inconsistences in the treatment of housing figures and their implications. Notwithstanding the present consideration of amendments to the NPPF and associated proposed planning reforms by the Government, the critical requirements of the NPPF are increasingly over-ridden by Local Planning Authorities, in both local plan-making and decision-making on planning applications, and by Planning Inspectors in planning inquiries and appeals decisions.  (Continue on a separate sheet /expand box if necessary) | | | | |
| 6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan 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 Plan should include reference to policy constraints relating to the formulation of housing targets as set out in paragraph 11 (which includes footnote 7) of the National Planning Policy Framework (NPPF), as previously referenced in the Reg 18 Draft Local Plan para 3.16.  The total local housing need figure in policies SP1 and SP3 should be treated as a starting point and then be subject to reduction to reflect the application of Green Belt constraints as required by para 11(b) footnote 7 of the NPPF.  (Continue on a separate sheet /expand box if necessary) | | | | |
|  | | | | |
| ***Please note*** *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*  ***After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.***  7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? | | | | |
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|  |  | **No**, I do not wish to  participate in  hearing session(s) | X | **Yes**, I wish to participate in  hearing session(s) |
|  | | | | |
| 8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: | | | | |
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| To challenge the omission of critical national policy guidance in the formulation of housing targets for the Draft Local Plan. | | | | |
| ***Please note*** *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in*  *hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.* | | | | |

9. **YES** - I would like to be notified about the submission of the St Albans Local Plan for Independent Examination

10. **YES** - I would like to be notified about the publication of the report of the Inspector appointed to carry out the examination

11. **YES** - I would like to be notified about the adoption of the Local Plan