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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 | All | Paragraph | All | Table |  |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| 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 |
| 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. | | | | |
| **Inadequate and incomplete consideration of Reg 18 Draft Local Plan consultation responses**  The Council’s consideration of the responses to the public consultation at the Regulation 18 stage appears to have been inadequate and incomplete. Specific major concerns were raised by CPRE Hertfordshire in its Reg 18 consultation submission which required a comprehensive response. The tabulation of consultation results presented to the Council’s Planning Policy and Climate Committee on 12th December 2023 listed a total of six minimal responses to specific issues raised, amounting to fifteen lines of text in a 190 page document.  We raised significant concerns including the formulation of housing targets, the role and significance of the countryside and the ineffectiveness of the Draft Local Plan in protecting the Green Belt from inappropriate development. The Draft Local Plan continues to incorporate policy and proposals based on an unjustified housing need calculation which is assumed to form the minimum housing requirement and this major concern has not been satisfactorily addressed, leading to non-compliance with national planning policy.  The lack of an appropriate response to the previous CPRE Hertfordshire submission may suggest that comprehensive responses from other institutions and individuals have been similarly dismissed which would indicate that legitimate concerns have not been considered adequately, thereby jeopardising the soundness of the Plan. Our further representations in this Reg 19 consultation identify specific inadequacies which lead to non-compliance of the Local Plan with national policy.  (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. | | | | |
| Significant amendments are required in Draft Local Plan policies to reflect national policy as indicated in previous consultation responses. Further details are provided in specific representations to policies and paragraphs.  (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)? | | | | |
|  | | | | |
|  |  | **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: | | | | |
|  | | | | |
| To explain our concerns about the inadequacy of appropriate consultation and the implications for the Draft Local Plan, and its inconsistency with 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 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