|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **A blue and white logo  Description automatically generated** | **Draft Local Plan 2041**  **Regulation 19 Publication**  Representation Form | | | | | | | **Ref:**  **(For official use only)** |
|
|
|  | | | | | | | | |
| **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) | | | | | | |  | |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **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, LG1, LG5, LG6, LG7.LG8, LG9 | Paragraph | Part A paragraphs 3.1 to 3.19; paragraphs 3.56 to 3.63 | Table |  |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Figure |  | Site |  | Policies Map |  |

|  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | |  |  | |  | 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 | | | | | | | | | | |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| 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 its inadequate treatment of the Green Belt**  The treatment of the Green Belt in the Draft Local Plan is inadequate to the extent that it jeopardises the soundness of the Local Plan. For a Local Planning Authority where over 80% of the total land area is covered by a statutory designation affecting future development, the omission of appropriate policy and proposals renders the Local Plan ineffective.  We note the justification provided by the Sustainability Appraisal for the policy options relating to the classification and allocations of sites and locations for development. However, policies relating to the Green Belt are limited to guidance relating to development outcomes in all cases; omitting any positive treatment of the countryside and associated rural activities which may constrain and influence development form and function.  In failing to address the implications of the five purposes of the Green Belt as they relate to the SACD area, the Council fails to plan adequately for its protection and the contribution that it can make to future development options. Paragraph 180 of the National Planning Policy Framework (NPPF) specifies the need to contribute and enhance the local environment by indicating a range of policy options.  Draft Local Plan policies relate only to development within the Green Belt and not its protection and enhancement as required by the NPPF and noted in the Local Plan Objectives. The Draft Local Plan states that the Spatial Strategy is effectively required to deliver housing figures provided by the Standard Method which in turn requires the use of Green Belt.  This is a fundamental misinterpretation of national Green Belt policy and challenge to the soundness of the Draft Local Plan. The Draft Local Plan refers to legal requirements for housing and employment growth (paragraph 3.11) which ignores the Council’s discretion to determine housing targets based on up to date information and national policy guidance, as provided in Paragraph 11b) and footnote 7 of the NPPF.  Paragraph 3.16 of the Draft Local Plan also implies, without evidence, that Green Belt protection inhibits development in sustainable locations. This assertion fails to recognise that development is likely to be more sustainable in urban areas than peripheral locations distant from town centres as proposed for Hemel Hempstead and elsewhere.  (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 Draft Local Plan should be re-structured to consider the role and function of the largest land use designation in the SACD i.e. the London Metropolitan Green Belt in appropriate detail. The lack of adequate consideration of the implications of this designation for physical development in the future renders the Local Plan unsound.  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)? | | | | |
|  | | | | |
|  |  | **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 lack of appropriate treatment of the Green Belt 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