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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 | HOU2 | Paragraph | Part A paragraphs 4.7 to 4.9 | 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 |
| 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 treatment of affordable housing including social housing**  The promotion of “social housing” as a key priority in the St Albans City and District Council Plan 2024-2029 is inappropriately addressed by the Draft Local Plan, in a local planning authority with the highest land values in the country. According to L and C Mortgages research, St Albans is ranked second to the City of Westminster in terms of average house price and the Draft Local Plan fails entirely to address how “social housing” can be provided in such a context.  The suggestion that full satisfaction of Local Housing Need (LHN) will provide affordable housing at any level in St Albans is flawed. The Draft Local Plan allocates designated protected land (Green Belt) for private market housing which does not provide “social housing” and never can.  The justification for housing numbers in the Draft Local Plan is based on providing affordable housing which is unachievable in present conditions.  Recent analysis of average house prices and average household incomes in the County indicates the present inability of market housing to address in any meaningful way the demand for housing by average earning households in both St Albans and indeed Hertfordshire as a whole.  Given that the definition of affordable housing has become effectively irrelevant with regard to house purchase or rent by an average earning household in Hertfordshire, it is inappropriate to promote affordable housing as providing justification for use of the Green Belt for this purpose.  (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. | | | | |
| Revisions of text and recalculation of housing requirement to reflect accurately the operation of the housing market in the SACD area, and its implications for Green Belt release, affordable housing and for “Social housing” as identified in the Council Plan.  (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: | | | | |
|  | | | | |
| To explain our concerns about the inadequate treatment of affordable housing and “social housing” in 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