

Local Plan: Publication Document
SADC Regulation 22 (c) Consultation
Statement

March 2019

This statement has been prepared to demonstrate the consultation process undertaken by St Albans City and District Council for the Local Plan 2020-2036 is in compliance with regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This requires a statement setting out –

- I. Which Bodies and persons the local planning authority invited to make a representation under regulation 18
- II. How those bodies and persons were invited to make representations under regulation 18
- III. A summary of the main issues raised by the representations made pursuant to regulation 18.
- IV. How any representations made pursuant to regulation 18 have been taken into account
- V. If representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations and;
- VI. If no representations were made pursuant to regulation 20, that no such representations were made.

This statement should be read alongside the adopted Statement of Community Involvement (SCI) and the Statement of Compliance with the Duty to Cooperate.

The purpose of this statement, and attached Addendum is to demonstrate how the Local Plan has developed in response to representations received. This includes the following:

- Report of Local Plan Regulation 18 consultation, April 2018, covering which bodies and persons the local planning authority invited to make representations, under regulation 18, how these bodies were invited to make representations, and a summary of the main issues raised.
- Planning Policy Committee report dated 17th April 2018 incorporating draft report of Regulation 18 consultation.
- Planning Policy Committee Report dated 12th December 2018 providing an overview of responses to the publication of the Local Plan under Regulation 19, the number of representations made and a summary of the main issues raised.
- Planning Policy Committee Report dated 15th January 2019 summarising the responses to the publication of the Local Plan under Regulation 19.
- Planning Policy Committee Report dated 13th March 2019 summarising representations received. Appendix 1 of this report provides a summary of the contents of the representations received and recommended officer responses. This report also provides a statement on how representations from Regulation 18 were taken into account.

St Albans City & District Local Plan 2020-2036

Have your say!

Report of Local Plan Regulation
18 Consultation

April 2018



St Albans
City & District Council

January 2018

St Albans City and District Council

Local Plan Regulation 18 Consultation

Report of 2018 Consultation

April 2018

Draft Local Plan

Report of Local Plan Regulation 18 Consultation

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Draft Local Plan

Report of Local Plan Regulation 18 Consultation

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Appendix 1 – Local Plan Regulation 18 Consultation document

Appendix 2 - Notification email sent to all individuals/organisations registered on Objective

Appendix 3 – Deposit Points Covering Letter

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1. Introduction and Purpose of Report

This report records the process undertaken for, and the results obtained from, St Albans City and District Council's (SADC) Local Plan Regulation 18 Consultation in 2018.

The Local Plan Regulation 18 Consultation document (see Appendix 1) was published 9 January 2018 and consulted on between 9 January 2018 and 21 February 2018.

Full consultation documents are available at:

<http://stalbins-consult.limehouse.co.uk/portal/>

To assist in understanding the report it is important to note that the following terminology is used throughout:

- *Respondents*: a generic term for any individual or body responding to the consultation.
- *Responses*: the answers/comments submitted by respondents to the consultation.

2. Consultation Process

The Local Plan Regulation 18 Consultation document was consulted on under the provisions of the Town and Country Planning (Local Planning) (England) Regulations 2012 (Regulation 18: Preparation of a local plan). This requires notification “of the subject of a local plan which the local planning authority (LPA) propose to prepare” and an invitation for “representations”.

The specific form of the consultation is for the LPA to decide. Consultation at this stage is usually on issues, ideas for the plan and possibly an initial draft plan. In this case SADC presented a Local Plan Regulation 18 Consultation document. The document is attached at Appendix 1 and can also be viewed at:

[St Albans District Council - Local Plan Regulation 18 Consultation document](#)

All interested parties were invited to respond to the consultation by prioritising/ranking and indicating their feelings on options contained within 9 questions. These questions related to ‘Getting our priorities right’, ‘Building homes in the right places’, ‘Building the right kind of homes’, ‘Providing local jobs’, ‘Protecting the Green Belt’, ‘Protecting historic buildings, wildlife sites and areas of natural beauty’, and ‘Getting the transport, schools and other infrastructure that’s needed’.

The SADC web consultation portal uses specialist ICT software (Objective) that allows responses to consultations to be made online in varying levels of detail. This method of response was encouraged in all advertisement and publicity material. This is in part because using the portal aids efficient summary analysis of responses. All responses are also viewable, in full, by any interested party.

Responses could also be made using the hard copy document and by letter or email. Such responses were added to the portal by SADC. The portal therefore holds a comprehensive and searchable record of full responses that is accessible to any interested party at any time.

All the individual consultation responses are viewable through the document link provided above.

2.1 Details of the Consultation Plan and Programme

SADC's aim was to consult in a way that created a high level of awareness of the Local Plan Regulation 18 Consultation document and thus reasonably maximise the response from interested parties. In order to achieve this, the consultation was widely publicised and all interested parties were offered a range of opportunities to engage.

SADC's Planning Policy Committee (PPC) agreed a Local Plan Regulation 18 Consultation programme at its meeting 7 November 2017. The Local Plan Regulation 18 Consultation programme set out the process for both publicising and conducting the consultation.

The main elements of the consultation were agreed as follows:

Publication of a Local Plan Regulation 18 Consultation document as well as supporting documents

The Local Plan Regulation 18 Consultation document was published along with the associated Sustainability Appraisal (SA) Working Note. These could be accessed via a dedicated Local Plan consultation webpage at <https://www.stalbans.gov.uk/planning/thelocalplan.aspx>. On this webpage, links were included to the Evidence Base and Planning Policy Committee reports.

A copy of the Local Plan Regulation 18 Consultation document was also posted to all residential addresses (approximately 60,000) in the District.

Web consultation portal publication of the Local Plan Regulation 18 Consultation document with facility to comment online on the questions within the Local Plan Regulation 18 Consultation document

The text within the document above was published on the web consultation portal (see introductory text above). Respondents were given the opportunity to answer 9 specific questions by prioritising/ranking and indicating their feelings on options contained within these 9 questions. They were also given free text boxes for providing further comments if they wished. These questions related to 'Getting our priorities right', 'Building homes in the right places', 'Building the right kind of homes', 'Providing local jobs', 'Protecting the Green Belt', 'Protecting historic buildings, wildlife sites and areas of natural beauty', and 'Getting the transport, schools and other infrastructure that's needed'.

Formally consulting specific (statutory) and general (non-statutory consultees) Duty to Cooperate Bodies and those registered on the Council's consultation database

In order to ensure all relevant bodies were directly consulted on the Consultation document, SADC followed Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

In addition to consulting the specific consultation bodies SADC considered to have an interest in the subject of the Local Plan Regulation 18 Consultation document, SADC also consulted directly with the relevant bodies identified in Regulation 2 of

the Town and Country Planning (Local Development) (England) Regulations 2012.
This covered:

- Local Members of Parliament
- Internal departments at St. Albans City and District Council and Hertfordshire County Council
- County Councillors representing St. Albans City and District wards
- Other Local Authorities
- National & Regional Conservation / Preservation Groups
- Local Conservation, Preservation, Sustainability and Amenity Groups
- Ethnic Minority Groups
- Housing / Design Interest Groups
- House builders / Developers
- Local Residents Associations
- Co-opted members of the City Neighbourhood Committee
- Planning Agents
- Youth groups, schools, colleges
- Disability Groups
- Local Businesses / Business Groups
- Older Persons Groups
- Other National / Regional Organisations
- Other Local Organisations
- Public transport operators
- Public transport Users Groups
- Recreational User Groups
- Local Constabulary

Web consultation portal based notifications to interested parties

As well as formally consulting all the bodies noted above, every individual or organisation who was previously registered on the web consultation portal, (i.e. had participated in previous consultations or who had registered in advance of future consultations), received an automatic email informing them that the Local Plan Regulation 18 Consultation was open and inviting them to respond (see Appendix 2). Those individuals or organisations registered on the web consultation portal without an email address were sent a copy of the Local Plan Regulation 18 Consultation document in the post.

Web consultation portal based response system that allows open viewing of submissions made once processed

SADC offered respondents a variety of ways of responding to the Local Plan Regulation 18 Consultation (see further information below). It was however considered vital that all responses could be viewed and considered by other respondents, potential respondents and interest parties. Therefore all responses, no matter how they were received, have been published in full on the web consultation portal where they are available for all.

Deposit of printed documents with libraries and town and parish councils

Consultation packages were distributed around the District and to Leverstock Green Library (as requested, within Dacorum Borough). These contained:

- 15 copies of the Local Plan Regulation 18 Consultation document

- Sustainability Appraisal Working Note
- Poster advertising local exhibition venue and dates(s)
- Additional posters for the Parish Councils

A covering letter outlining details of the consultation was included (see Appendix 3):

The consultation package was also supplied to St Michael Parish Council and Harpenden Rural Parish Council. These were retained for record purposes but not for distribution as neither Parish Council had the resources for residents to view the documents.

Newspaper advertisements

A comprehensive series of advertisements were placed in local newspapers. These are free newspapers delivered to most households every week. Examples of the advertisements are included at Appendix 4.

An article also appeared in the Winter 2017 edition of the Council's Community News publication which is posted to all residential addresses. This can be viewed at https://www.stalbans.gov.uk/Images/Community-News-Magazine-Winter-2017-W_tcm15-62324.pdf

Use of an online video and the use of social media such as the use of the Council's Twitter account

An online video was created and made available to view on the Council's website and on YouTube. In total, the video was viewed this way 2,227 times. Subtitles were available.

Two comments were posted regarding the video on YouTube. The first stated "*A great explanation of what's involved and how local residents can contribute towards future planning. Looking forward to hearing what other locals think*". The second stated "*Excellent idea to consider expanding to build houses to face the housing crisis into green belt area. It can be done under what is known as Paragraph 55 of the National Planning Policy Framework. It is not straightforward, but neither is it impossible.*"

The video has been 'liked' five times with no 'dislikes'.

The video was also part of a month long Facebook campaign. This ran within a 12 mile area of central St Albans. There were:

54,805 impressions (the number of times the video appeared on a screen)
22,003 reach (number of unique people who were offered the video)

4,513 people watched at least 10 seconds of the video
385 people watched at least 25% of the video
230 people watched at least 50% of the video
179 watched at least 75% of the video
139 people watched at least 95% of the video

Regular information was provided to the media, especially local newspapers and this resulted in some good coverage. An example is:

<http://www.hertsad.co.uk/news/herts-ad-comment-why-we-must-not-bury-our-heads-in-the-sand-over-st-albans-local-plan-1-5350187>

There were regular updates on the SADC official Twitter account.

Following best practice on direct engagement by holding public exhibitions and consultation surgeries, staffed by officers, across the District

SADC undertook direct engagement across the District through 14 exhibition events across the District during the six week consultation period. The exhibitions were staffed by officers, with additional Member support at a number of the exhibitions.

A total of 680 people attended these exhibitions.

Exhibition Date/Location	Attendees
16 th Jan Redbourn	85
17 th Jan Colney Heath	24
18 th Jan Wheathampstead	40
20 th Jan St Albans (Sat)	45
22 nd Jan Bricket Wood	43
23 th Jan St Albans	47
24 th Jan St Albans	22
27 th Jan Harpenden (Sat)	64
30 th Jan Harpenden	57
31 st Jan Harpenden	64
8 th Feb London Colney	36
9 th Feb London Colney	42
10 th Feb London Colney (Sat)	27
12 th Feb Marshalswick	82
Total	680

An additional informal consultation event was undertaken by Members, in the Sopwell area of St Albans, with approximately 20 attendees.

2.2 Methods of responding to the Consultation

To further ensure the consultation was accessible to all interested parties, SADC provided a wide range of ways to respond to the consultation:

- The Web Consultation Portal
 - Respondents could respond directly online via the Web Consultation Portal.
 - The Web Consultation Portal used was the Objective system which is an online system embedded in the SADC website. It stores and references all the responses made to the consultation (on an external server).
- Paper Consultation Document
 - The Local Plan Regulation 18 Consultation document was posted to all residential addresses (approximately 60,000) in the District, and was made available at the exhibitions and deposit points. The document included instructions on completion and return to SADC.
- Emailed responses
 - Respondents could make email responses to a dedicated consultation inbox at lp@stalbans.gov.uk.
- Letters
 - Respondents could send in letters using any format they wished.

3. Consultation Responses

3.1 Consultation Format

The Local Plan Regulation 18 Consultation document asked respondents to make representations on 9 questions (see Appendix 1). Further free text comments were also able to be made in relation to each question.

The format of the Web Consultation Portal replicated that of the Local Plan Regulation 18 Consultation document as closely as possible. Respondents answered the same questions and were given the same opportunities to provide any other comments as they were in the hard copy document.

The 9 questions to 'Getting our priorities right', 'Building homes in the right places', 'Building the right kind of homes', 'Providing local jobs', 'Protecting the Green Belt', 'Protecting historic buildings, wildlife sites and areas of natural beauty', and 'Getting the transport, schools and other infrastructure that's needed'. These questions required either a number to be inputted to prioritise or rank an option, or a tick to be inputted to indicate if the respondent felt that they 'Strongly Disagreed', 'Disagreed', 'Neither Disagreed nor Agreed', 'Agreed', or 'Strongly Agreed' with each option. The hard copy document showed the 'feeling' options as pictorial sad to happy faces, whereas the Web Consultation Portal used the text "Strongly Disagreed", 'Disagreed', 'Neither Disagreed nor Agreed', 'Agreed', 'Strongly Agreed'.

Respondents were also offered the opportunity to provide 'any other comments' on the questions.

Neither the questions nor the additional comment free text boxes were compulsory to complete and respondents could choose which questions they wanted to answer and which free text boxes they wanted to complete.

The ranking/prioritising questions encouraged respondents to choose which of the options were most important to them through to which one was the least important. It therefore encouraged the use of a different number each time, 1-5,1-8 etc. The Objective system and hard copy document however allowed for respondents to answer the same number for multiple options e.g. putting '1' for all the options. Some respondents also put 1,2,3 as a 'top 3' and didn't answer for other priorities. Some put 5,5,5,5,5 etc. This was anticipated and the weighted ranking of the questions in Section 5 addresses this.

As expected, there were a small number of respondents (circa 25) who had difficulty in using the Objective system. They were offered support to use it by officers or alternatively were able to respond via the booklet or via email. Some comments were made regarding the presentation of the information on Objective, which were responded to by minor changes during the consultation itself. Some comments were also made on the capabilities of the software, which have been collated and brought to the attention of the software providers for future consideration.

3.2 Instant Feedback

It was agreed by PPC at its meeting 7 November 2017 that visitors to the public exhibitions would have the opportunity to give 'instant feedback'. This was facilitated by having the booklet pages put on boards. Visitors were able to write instant feedback on post it notes and stick them to the relevant sections of the boards.

Although the majority of visitors indicated that they would be responding online or via the consultation booklet, 17 instant feedback post it notes were received. The use of instant feedback was not even across the exhibitions. The large majority were made in London Colney. These stated:

- 'My main concern is St Albans will be GRIDLOCKED both east and south. RAILFREIGHT will be a disastrous development. A414 will not take more traffic – already bad'
- 'Any plan must include affordable (really affordable) not just a percentage of the market price reduction'
- 'People didn't know about exhibition'
- 'How is the London Colney site in the right place – limited services within the village'
- 'Area is well used by local people'
- 'Build homes in the right place – London Colney already struggles with expansion – we are a village and want to stay one!'
- 'Stop allowing ugly modern houses next to London Colney conservation area and alongside attractive Victorian terraces'
- 'Important to protect all – wildlife, historic streets – it's what makes the place unique don't encourage more traffic on the A414'
- 'Roads in and out of London Colney cannot cope already – rush hour shows this!'
- 'Re-open London Colney Secondary School – closed in 1984!'
- 'Preserve what is left of London Colney – it's been spoilt enough – don't let it 'merge' with other areas'
- 'I oppose the 'land at London Colney' proposed due to impact on the village environment'

- ‘No more erosion of the Green Belt. London Colney is already the largest village in the UK’
- ‘Homes for older people – aging population with increasing issues in living satisfactorily’
- ‘Social housing – big issues already here as a result!’
- ‘Talk to us about affordable housing outcomes not targets’
- ‘Do not expand villages – they are just that- not mini towns!’

3.3 Overall Response Level

A total of 2,413 people responded to the consultation. The breakdown was:

	Consultees (Total)	Consultees (%)
Directly onto Web Consultation Portal	1,387	57.5%
Hard Copy Booklet	906	37.5%
Emailed responses	104	4.3%
Letters	16	0.7%
All responses	2413	100%

The use of the Web Consultation Portal was actively promoted by the Council as the most effective tool by which to submit comments on the consultation. A higher proportion used the Web Consultation Portal than the 31.5% for the previous DLP consultation, however, this was still lower than the 70.5% for the previous Draft Strategic Local Plan consultation. One of the reasons for this is likely to be due to the high availability of the hard copy booklet as it was posted to all residential addresses in the District.

There were a large number of newly created logins for the consultation. These were both created by respondents directly themselves and created by officers for responses via the booklets, emails and letters. This means that a large proportion of the respondents (well over half) were new, i.e. people who had not responded to previous consultations.

3.4 Process for Dealing with Responses

Irrespective of the medium through which the responses were submitted, all have been placed onto the Web Consultation Portal (Objective) so that they could be easily viewed and considered by respondents and other interested parties.

Any responses received via letter or email were manually added to the Web Consultation Portal. Any numerical/ticked answers to the ranking/prioritising/feelings questions were added to the relevant questions. Free text provided as ‘any other comments’ was added to the text box attached to the relevant question.

If a response related to more than one question, the response was duplicated and attached to each relevant question.

Where respondents (often landowners/developers) replied with additional/supporting documents, these documents were added to the Web Consultation Portal as attachments.

As is best practice, a process for identifying 'inadmissible' responses was established. Where part of a response was deemed inappropriate it was redacted. The redacted responses were then processed to appear on the Web Consultation Portal. Such responses have therefore been included in this summary of consultation.

In determining inadmissible comments, a judgement was made on the basis of the following guidelines:

- Comments that are overtly racist, sexist, homophobic or discriminatory in any other way will be inadmissible
- Comments that contain offensive language will be inadmissible
- Comments that make inappropriate specific reference to another individual (including potentially vulnerable relatives) or their actions will be inadmissible

In total 10 responses were part redacted as they included content that was deemed inadmissible because it fitted the above criteria. This was primarily because potentially vulnerable relatives might have been inadvertently identified.

Where respondents submitted duplicate responses, for example on both the Web Consultations Portal and by email, only one response has been recorded for the respondent and reflected in this summary of consultation. Where two different responses were received to the same ranking/priorities/feelings questions, the most recent response was recorded, with the older responses being made 'inadmissible'. Where multiple answers were given in relation to the same free text box, these responses were combined into one.

Sixty-two hard copy responses were received where no name was given. Although respondents were asked to provide their name, anonymous responses have also been included as these respondents had answered some or all of the questions. They were clearly filled out individually and were substantially different from each other. There was no evidence of 'co-ordinated' anonymous responses or anything similar. The anonymous responses were given the 'name' HCA (hard copy anonymous) and a number e.g. HCA1.

3.5 Analysing the Responses

The quantitative data resulting from the answers to the questions are shown in tables and graphs in Section 5 – Results of Consultation.

A weighted ranking was applied to the answers to the rank/prioritise questions. This was to determine the overall rank number and therefore the overall order of priority of the options.

Each answer given was weighted according to the ranking it was given. Where the options had to be ranked, the ranking number was used. Where the question asked for a respondents' feelings on an option, the weighting applied was 5-Strongly Disagree, 4-Disagree, 3-Neither Disagree nor Agree, 2-Agree, 1-Strongly Agree. The resultant figures were added together and then divided by the total number of respondents who answered that question. The options were then able to be ranked.

Taking option 'Build Homes in the Right Place' from Question 1 as a worked example:

	Ranked 1	Ranked 2	Ranked 3	Ranked 4	Ranked 5	Ranked 6	Total
Number of people giving each Rank	486	400	369	360	319	197	2,131
Weight to be applied	x 1	x 2	x 3	x 4	x 5	x 6	
Equals	486	800	1,107	1,440	1,595	1,182	6610
							6,610/2,131 = 3.10

When this process was then carried out for all of the options in Question 1, an overall rank could be determined:

	Weighted Rank	Overall Rank
Build homes in the right place	3.10	4
Build the right kind of homes	3.16	5
Provide local jobs	4.39	6
Protect the Green Belt	3.05	3
Protect our historic buildings, wildlife sites and areas of natural beauty	2.97	2
Get the transport, schools and other infrastructure we need	2.77	1

The main themes within the free text boxes attached to each question have been extracted from the responses and the table and graph in Section 5 provides further detail on this.

Responses from specific groups and bodies

A list of key respondents is included below. Key respondents included MPs, town/parish councils, local authorities, interest groups, home builders, developers and those with a landowner interest.

Parish/Town Councils

Redbourn Parish Council
Harpenden Town Council
London Colney Parish Council
Colney Heath Parish Council
St Stephen Parish Council
Wheathampstead Parish Council
Sandridge Parish Council

Local Authorities

Hertfordshire County Council (Public Health, Development Services, Environment Department)
Dacorum Borough Council
Watford Borough Council
Greater London Authority
Luton Borough Council

Members of Parliament

Anne Main MP (St Albans)
Bim Afolami MP (Hitchin and Harpenden)

National organisations and local interest groups

Environment Agency
Health and Safety Executive
Herts and Middlesex Wildlife Trust
Highways England
Harpenden Green Belt Association
Harpenden Society Committee
Herts GATE
Building Research Establishment
Sport England
Harpenden and District Local History Society
Home Builders Federation
Thames Water
St Albans and District Footpaths Society
St Albans Chamber of Commerce
CPRE Hertfordshire
Historic England
Network Rail
The Ramblers Association
Ver Valley Society
Sopwell Residents Association
St Albans District Green Party
Marshalswick North Residents Association
Verulam Residents Association
The Woodland Trust
Herts & Middlesex Badgers
Herts Against the Badger Cull
Abbey Precincts Residents Association
Abbey Flyer Users Group
St Albans Civic Society
Natural England

Home builders/developers/landowner interest

Oaklands College
Adrian Irving (Trustee) and Alban Developments Ltd.
London Colney Ltd.
Hallam Land Management Ltd. & St Albans School
CEG
Legal & General
Crest Strategic Projects and Bloor Homes
Gorhambury Estates Company Ltd.
Gallagher Estates
CP Holdings
Mr Ronnie Peiris
Constable Homes Ltd.
Burhill Developments Ltd.
Mr W and Mrs V Barr
Aldwyck Housing Group
CBRE Global Investors
Hilton House Properties
Pennard Holdings Ltd.
Comer Group
Intrasales Ltd.
Mr W. Fairweather
Taylor Wimpey Strategic Land
ERLP 1 Sarl
Sassoon Developments Ltd.
Northern Trust
Tarmac
Grand Union Investments
Longbourn Estates
Stackbourne Ltd.
Bloor Homes and Department of Health and Social Care
Castleoak Care Developments
Hertfordshire County Council (Development Services)
Rentplus UK Ltd.
Eskmuir Properties Ltd.
Martin Grant Homes and Kearns Land Ltd.
Thakeham Homes
Hightown Housing Association
Mr Pete Hutchinson
Hill Residential
Mr Ian Hardy
U+I Group Plc
Chris and Allison Mitchell
Nascot Homes
King & Co.
Hunston Properties Ltd.
Countrywide
Peter Rice Developments
Beechwood Homes
Owners of Old Orchard
Hertfordshire Land Ltd.
Jarvis Homes
Moult Walker
Minister Court Frogmore Ltd.

CWC Group
 CALA Group Ltd.
 Goodman
 Gladman Developments Ltd.
 Mr and Mrs Barba
 Mrs Pearson and Mrs Priestland
 Crown Estate
 Breheny Group
 D'Arblay Investments
 The Trustees of G A Simons Family Trust
 The Trustees of Mrs M E Simons 1999 Discretionary Settlement and R Wimms Blair
 Shonleigh Nominees
 Ivory

3.6 Profile of Respondents

As part of the consultation all respondents were asked to provide their age and address/postcode. These details were not made publically available on the Web Consultation Portal. This information allowed SADC to see how representative the respondents to the consultation were of the District's population. This was considered by comparing the ages and locations provided to the relevant aspects of the demographic make-up of the District, taken from the 2011 Census.

Age

Of the 2,413 respondents who replied to the Consultation, 2,033 respondents (84.3%) provided their age.

The ages provided through the Web Consultation Portal and in the consultation document responses showed that all age groups under 44 years old were under-represented. It should however be noted that 13 people in the 16-24 age group responded, which is an increase compared to the 0 responses to both the SLP and DLP in this age group. There was also an increase in respondents in the 25-34 age group (5.9%) when compared to the SLP (3.5%) and DLP (2.2%).

All the age groups 45 years old and above were overrepresented, especially those residents aged over 65 years old.

Age Group	Consultation Responses	Consultation Responses (%)	District Population	Representation of population
16-24	13	0.6%	11.2%	-10.6%
25-34	119	5.9%	15.5%	-9.6%
35-44	278	13.7%	20.3%	-6.6%
45-54	369	18.2%	18%	+0.2%
55-64	438	21.5%	15.6%	+5.9%
65+	816	40%	19.4%	+20.6%

Geography of Respondents

Of the 2,413 respondents who replied to the Consultation, 2,310 respondents (95.7%) provided location information.

The location of residents was identified through the details provided through the Web Consultation Portal and from consideration of the email and letter responses. This

information is very important as it allows the identification of over/under-represented areas, meaning the results of the consultation can then be considered in this context.

St Albans was overrepresented, Harpenden was exactly represented, and Redbourn was slightly under-represented. Other parts of the District were under-represented. It should be noted that a number of residents of areas such as Chiswell Green, How Wood and Napsbuy Park gave their location as 'St Albans'. Whilst the more accurate location has been included where full address details were given, it is likely that this will have boosted the 'St Albans' representation numbers and lowered the 'Other' numbers somewhat.

	Consultation Responses	Consultation Responses (%)	District Population	Representation of Population
St. Albans	1520	65.8%	52%	+13.8%
Harpenden	481	20.8%	20.8%	+/-0%
Redbourn	46	2%	4.4%	-2.4%
Other	263	11.4%	23%	-11.6%

5. Results of Consultation

The results are recorded question by question, followed by a summary of the key general themes raised in the free text boxes.

Getting our Priorities Right – Question 1

Getting our priorities right

Here are 6 things the Local Plan aims to do.

Q1 Enter the numbers 1 to 6, where you think 1 is the most important and 6 is the least important.

Build homes in the right place

Build the right kind of homes

Provide local jobs

Protect the Green Belt

Protect our historic buildings, wildlife sites and areas of natural beauty

Get the transport, schools and other infrastructure we need

The results

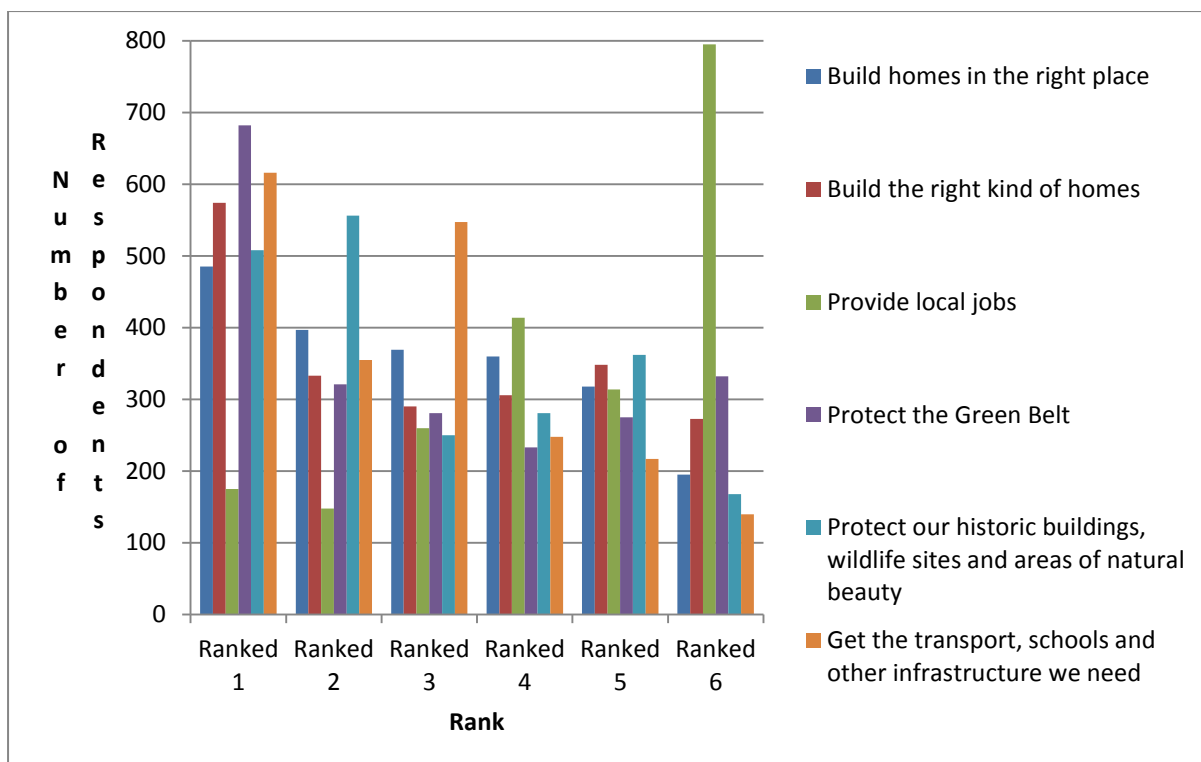
In total, 2,147 respondents answered Question 1.

The overall order of priority given to the options was:

1. Get the transport, schools and other infrastructure we need
2. Protect our historic buildings, wildlife sites and areas of natural beauty
3. Protect the Green Belt
4. Build homes in the right place
5. Build the right kind of homes
6. Provide local jobs

Further details are set out below. The respondents ranked the options as follows:

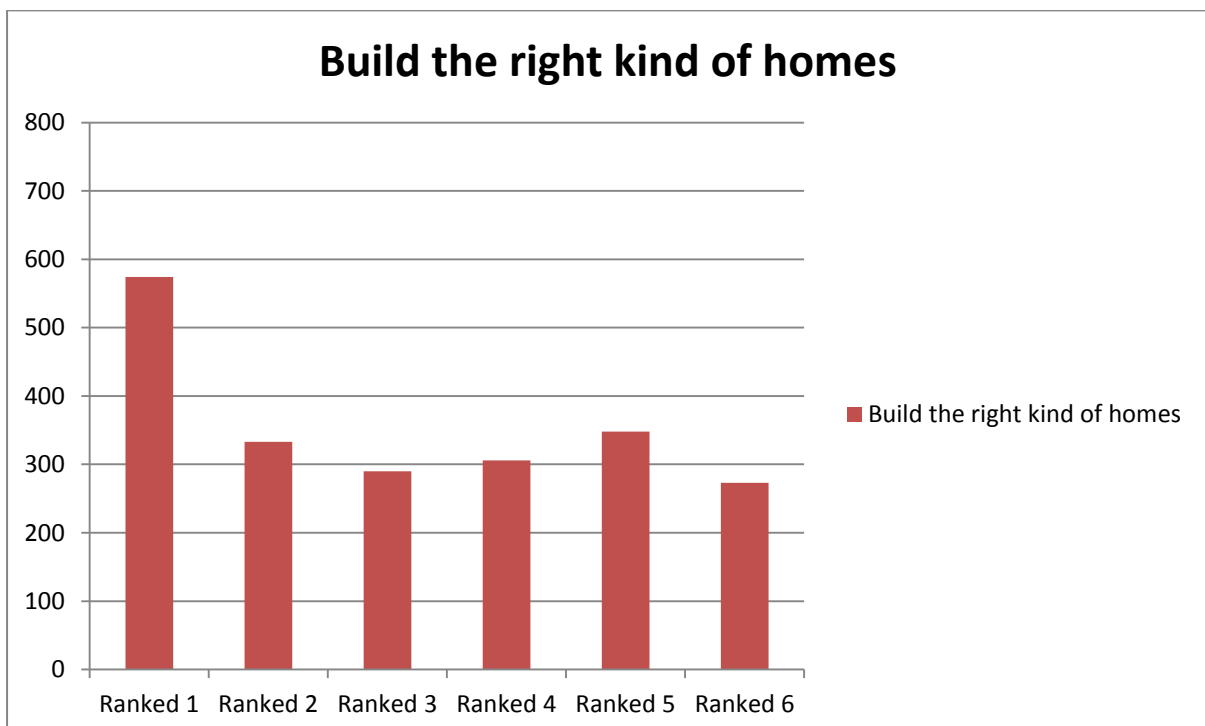
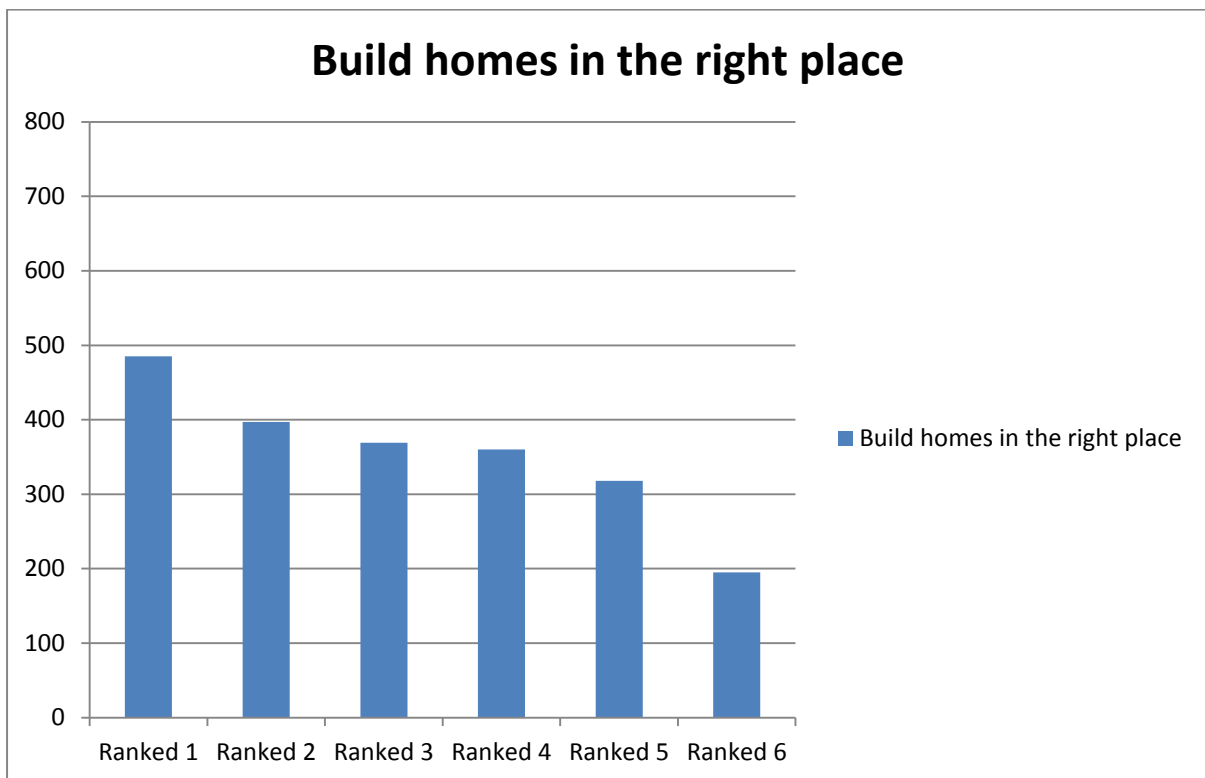
	Ranked 1	Ranked 2	Ranked 3	Ranked 4	Ranked 5	Ranked 6	Total
Build homes in the right place	485	397	369	360	318	195	2,124
Build the right kind of homes	574	333	290	306	348	273	2,124
Provide local jobs	175	148	260	414	314	795	2,106
Protect the Green Belt	682	321	281	233	275	332	2,124
Protect our historic buildings, wildlife sites and areas of natural beauty	508	556	250	281	362	168	2,125
Get the transport, schools and other infrastructure we need	616	355	547	248	217	140	2,123
Total	3,040	2,110	1,997	1,842	1,834	1,903	

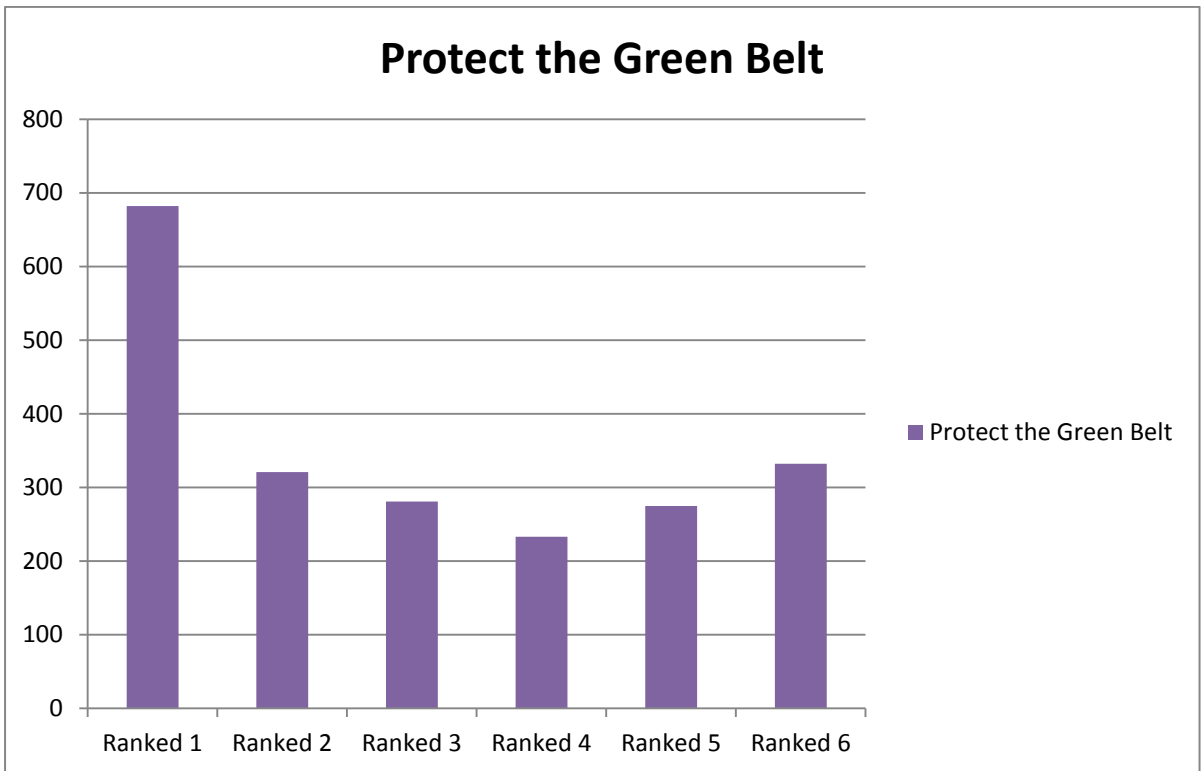
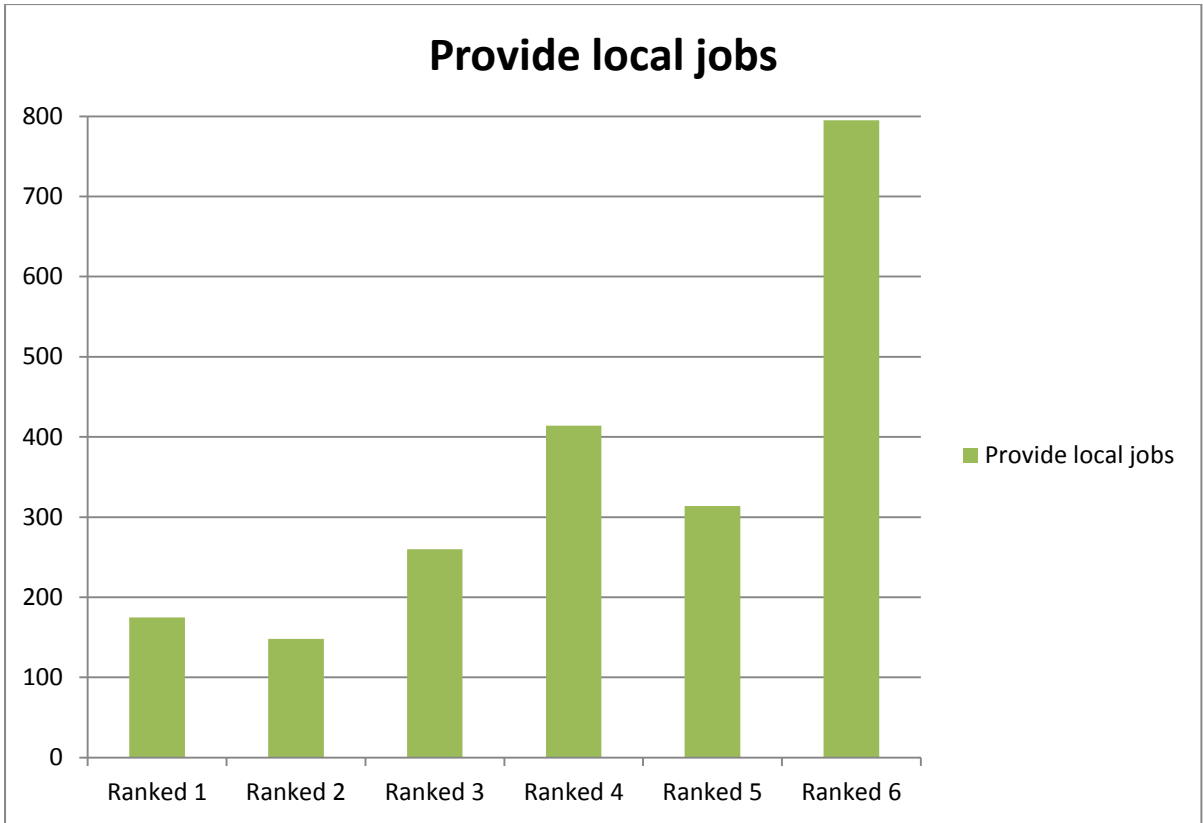


Each answer given has been weighted according to the ranking it was given. The resultant figures were added together and then divided by the total number of respondents who answered that question. The options were then able to be ranked.

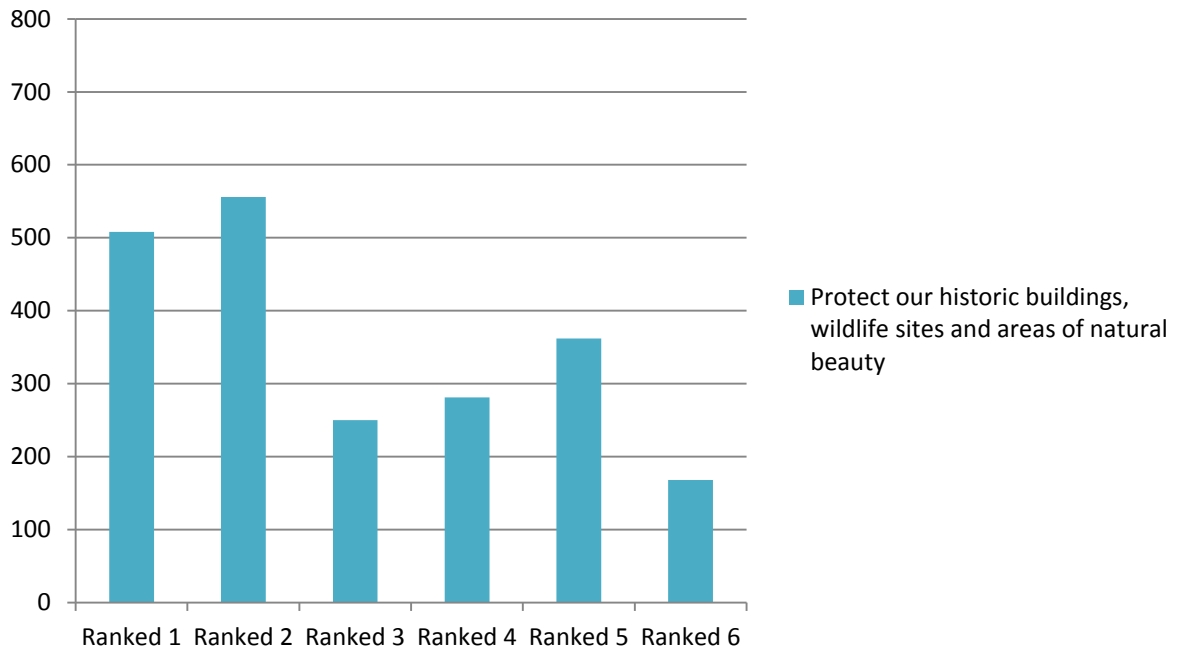
	Weighted Rank	Overall Rank
Build homes in the right place	3.10	4
Build the right kind of homes	3.16	5
Provide local jobs	4.39	6
Protect the Green Belt	3.04	3
Protect our historic buildings, wildlife sites and areas of natural beauty	2.97	2
Get the transport, schools and other infrastructure we need	2.77	1

The breakdown of responses per option is set out in the following charts:

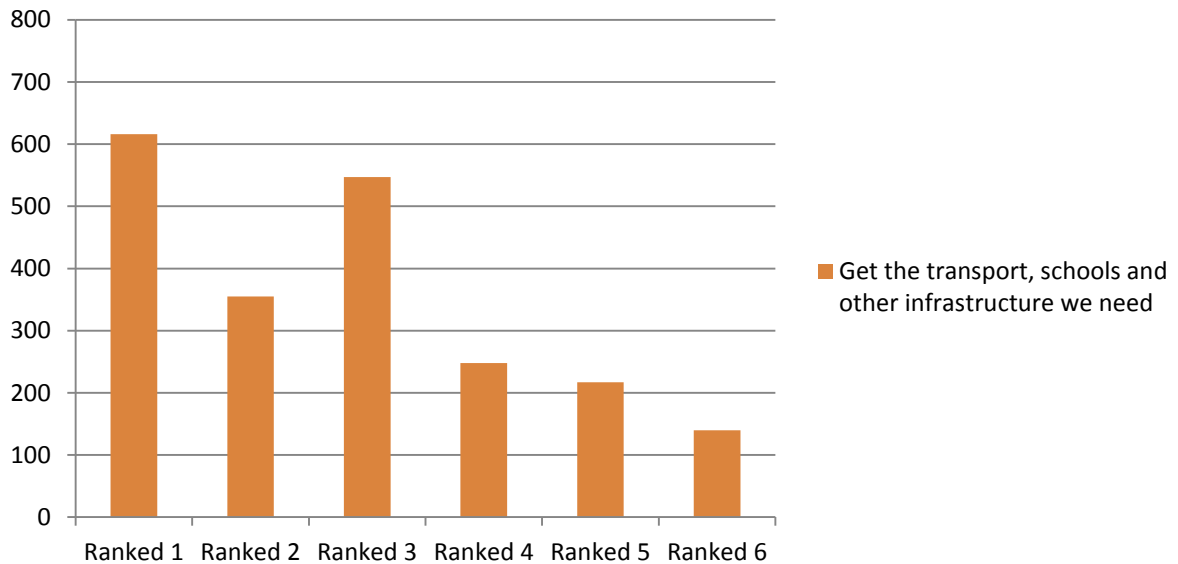




Protect our historic buildings, wildlife sites and areas of natural beauty





























Get the transport, schools and other infrastructure we need



Build Homes in the Right Place – Questions 2 and 3

Here are 5 ways we can build more homes.

Q2 - Enter the numbers 1 to 5, where you think 1 is the best idea and 5 is the worst		Q3 - Circle how you feel about each idea, like this 				
Add more homes into existing built-up areas						
Build on 8 areas that least meet Green Belt purposes (see map on back page)						
Expand existing villages into the Green Belt						
Further expand existing towns into the Green Belt (500 – 5,000 homes)						
Create new 'Garden Village(s)' in the Green Belt (1,500 – 10,000 homes)						

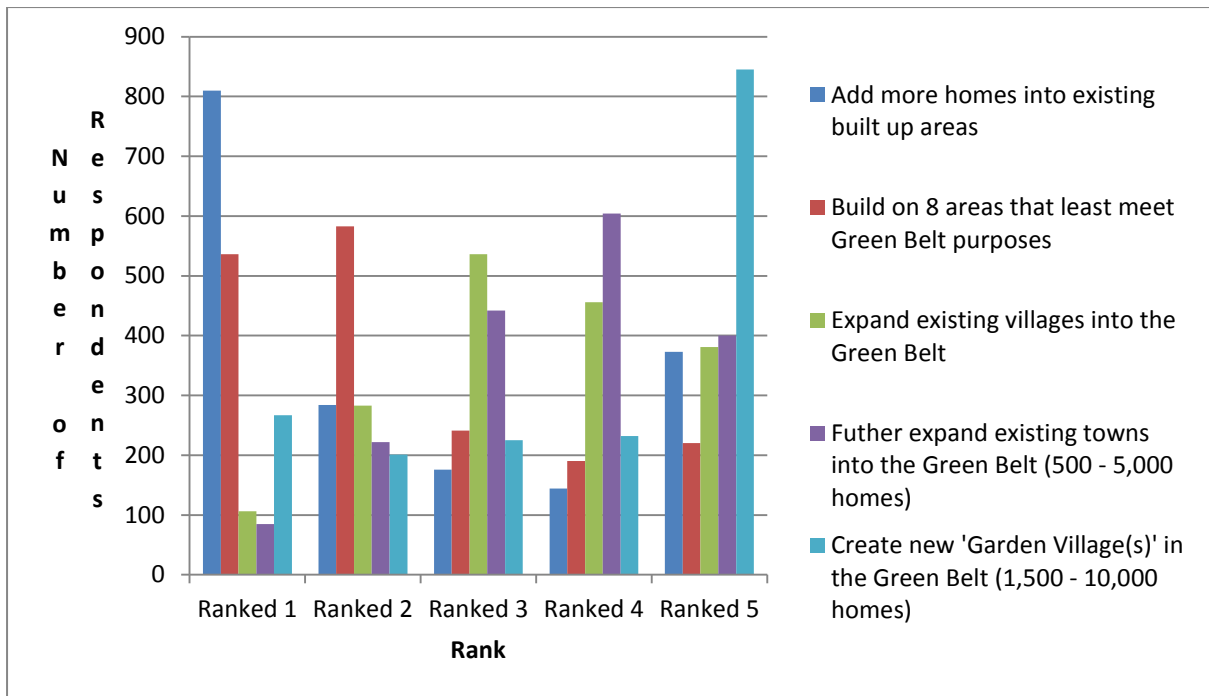
In total, 1,811 respondents answered Question 2.

The overall order of priority given to the options was:

1. Build on 8 areas that least meet Green Belt purposes
2. Add more homes into existing built up areas
3. Expand existing villages into the Green Belt
4. Further expand existing towns into the Green Belt (500-5,000 homes)
5. Create new 'Garden Village(s)' in the Green Belt (1,500-10,000 homes)

Further details are set out below. The respondents ranked the options as follows:

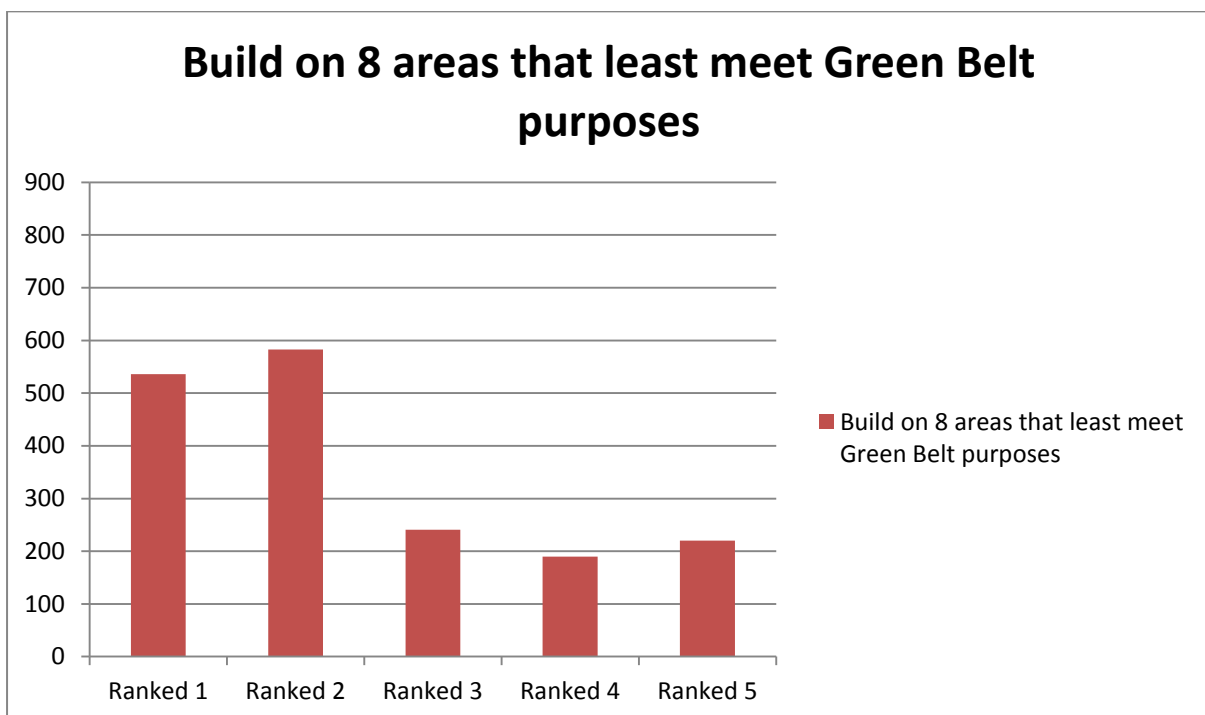
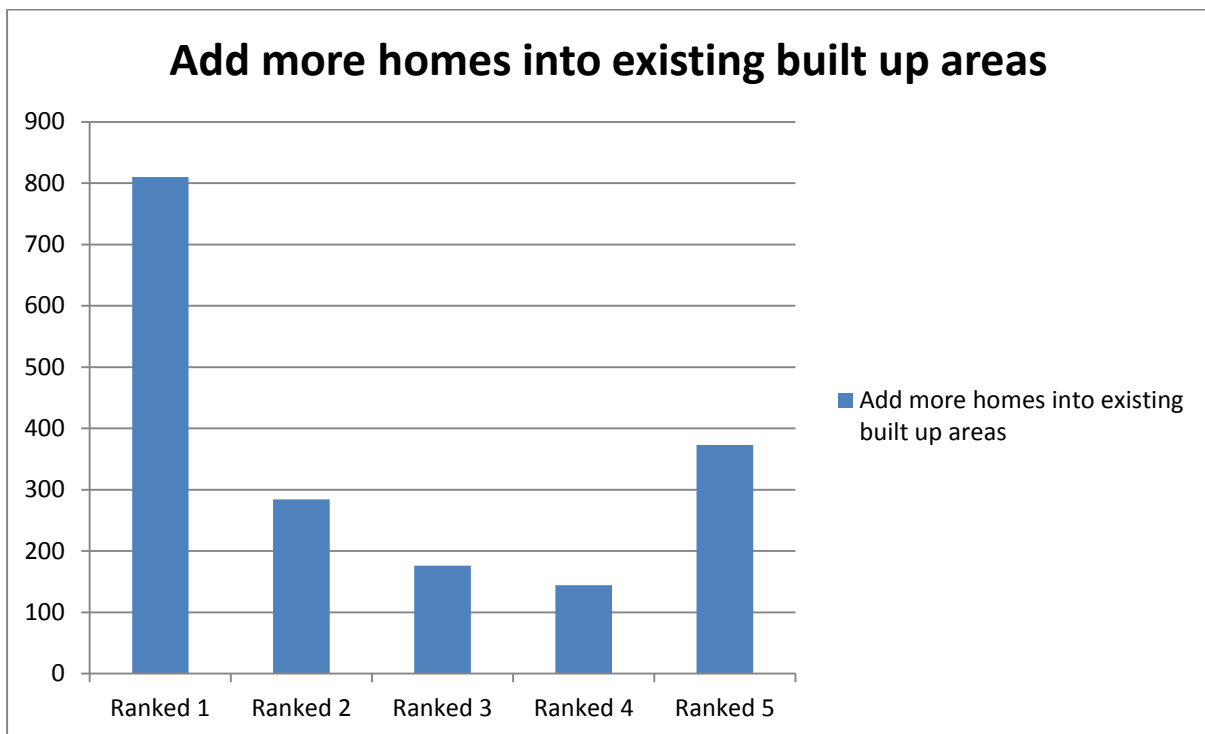
	Ranked 1	Ranked 2	Ranked 3	Ranked 4	Ranked 5	Total
Add more homes into existing built up areas	810	284	176	144	373	1,787
Build on 8 areas that least meet Green Belt purposes	536	583	241	190	220	1,770
Expand existing villages into the Green Belt	106	283	536	456	381	1,762
Further expand existing towns into the Green Belt (500 - 5,000 homes)	85	222	442	604	400	1,753
Create new 'Garden Village(s)' in the Green Belt (1,500 - 10,000 homes)	267	201	225	232	845	1,770
Total	1,804	1,573	1,620	1,626	2,219	



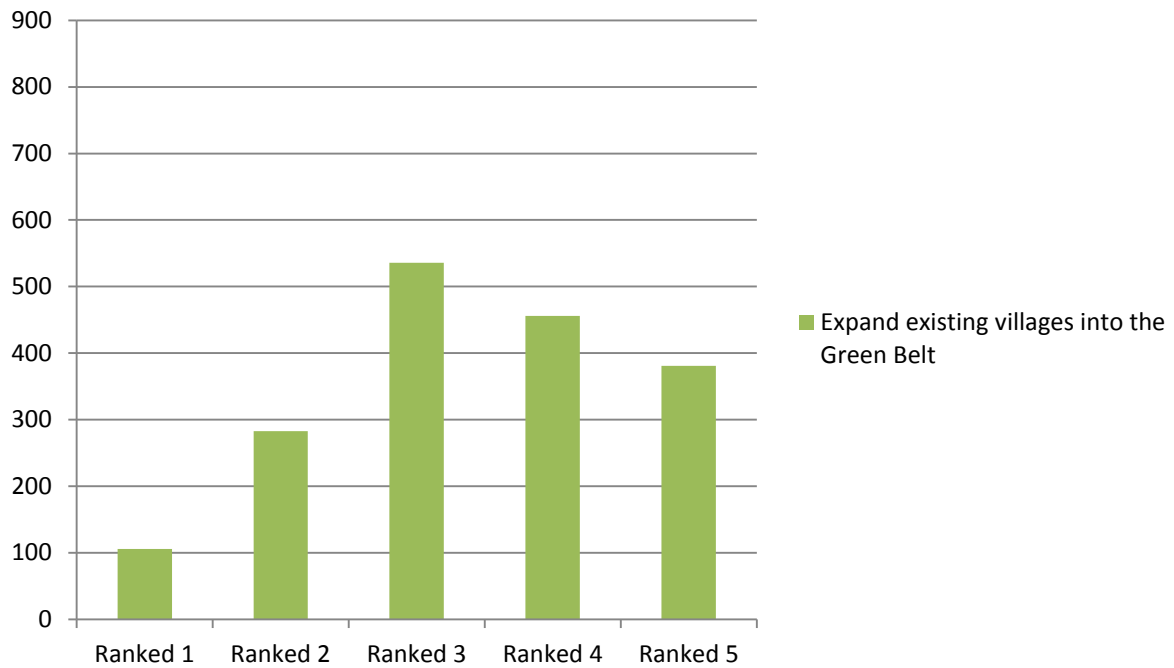
Each answer given has been weighted according to the ranking it was given. The resultant figures were added together and then divided by the total number of respondents who answered that question. The options were then able to be ranked.

	Weighted Rank	Overall Rank
Add more homes into existing built up areas	2.43	2
Build on 8 areas that least meet Green Belt purposes	2.42	1
Expand existing villages into the Green Belt	3.41	3
Further expand existing towns into the Green Belt (500 - 5,000 homes)	3.58	4
Create new 'Garden Village(s)' in the Green Belt (1,500 - 10,000 homes)	3.67	5

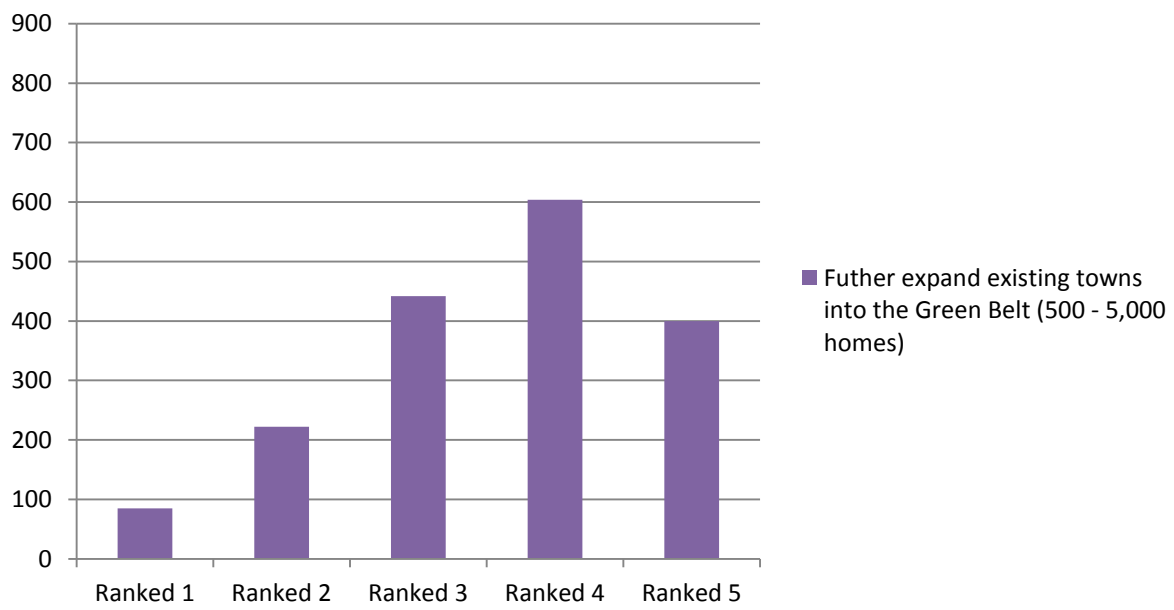
The breakdown of responses per option is set out in the following charts:



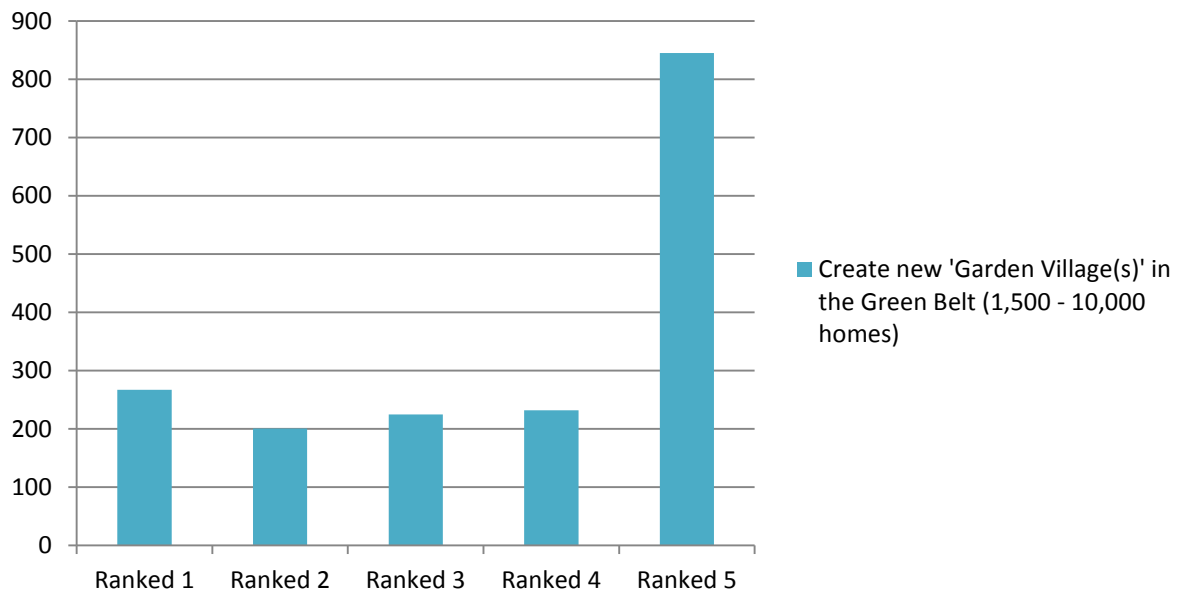
Expand existing villages into the Green Belt



Futher expand existing towns into the Green Belt (500 - 5,000 homes)



Create new 'Garden Village(s)' in the Green Belt (1,500 - 10,000 homes)



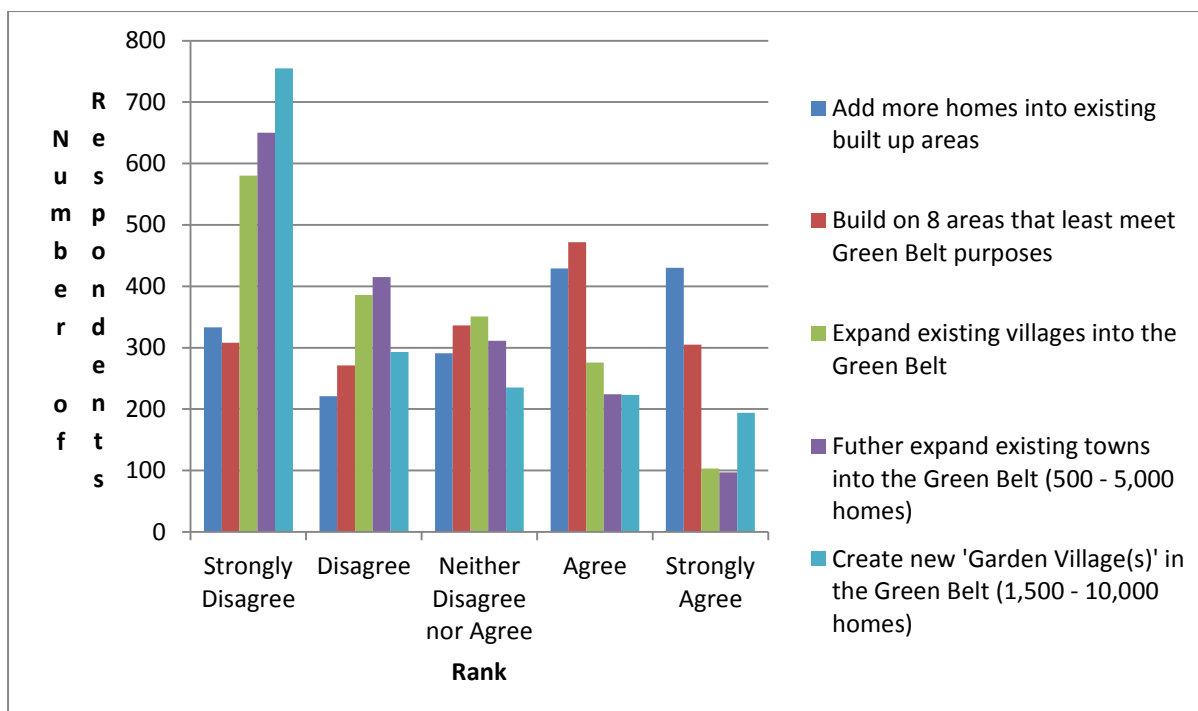
In total, 1,734 respondents answered Question 3.

The overall feelings in relation to each option were:

- Add more homes into existing built up areas – Neither Agree nor Disagree
- Build on 8 areas that least meet Green Belt purposes– Neither Agree nor Disagree
- Expand existing villages into the Green Belt - Disagree
- Further expand existing towns into the Green Belt (500-5,000 homes) – Disagree
- Create new 'Garden Village(s)' in the Green Belt (1,500-10,000 homes) - Disagree

Further details are set out below. The respondents had feelings about the options as follows:

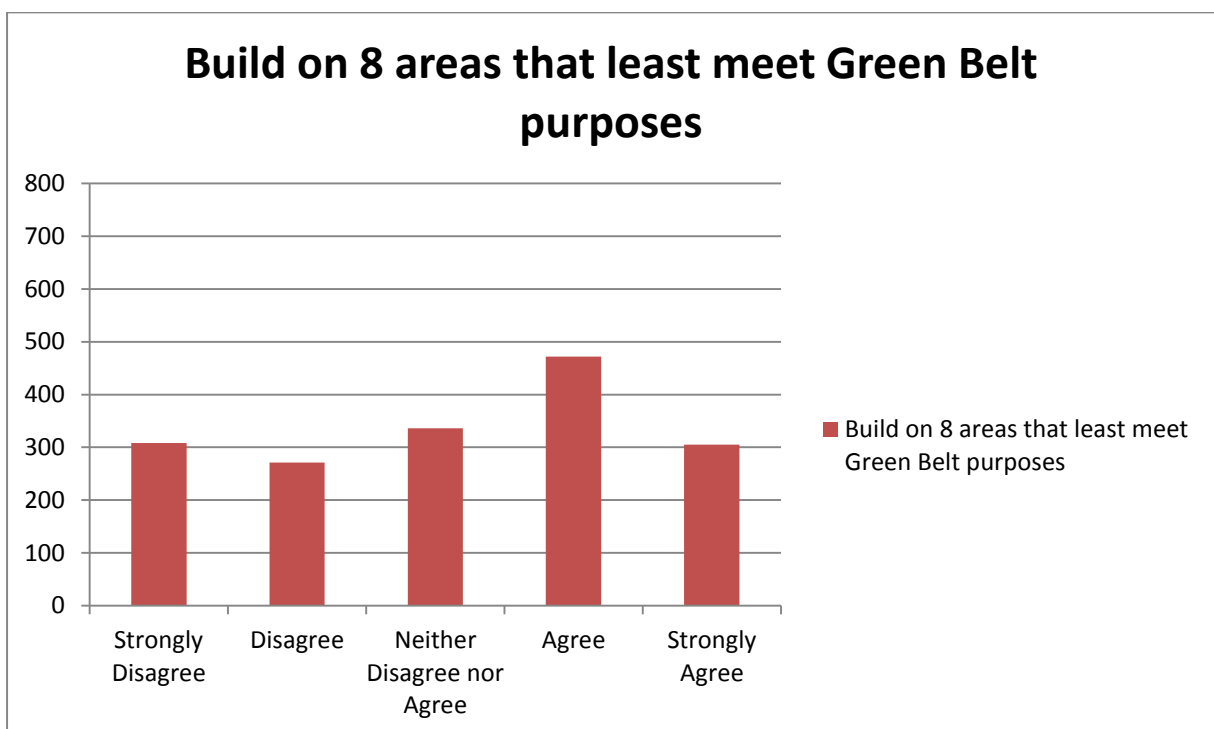
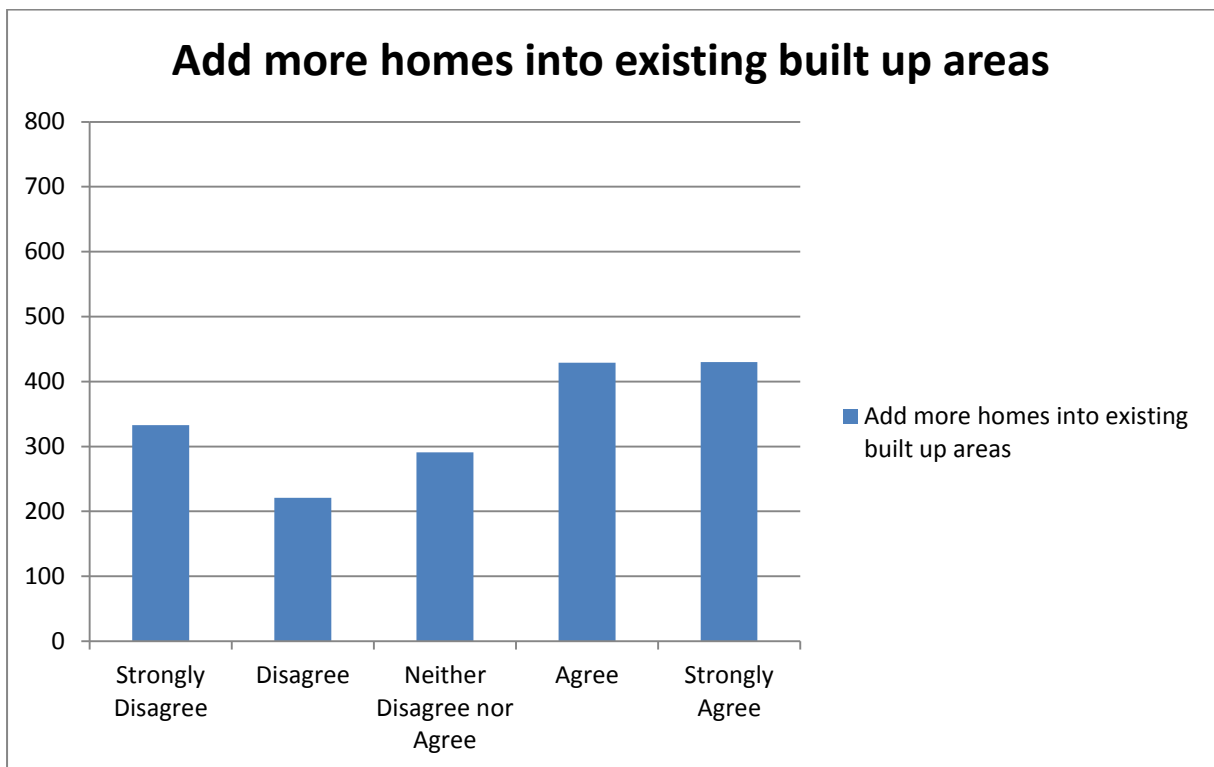
	Strongly Disagree	Disagree	Neither Disagree nor Agree	Agree	Strongly Agree	Total
Add more homes into existing built up areas	333	221	291	429	430	1,704
Build on 8 areas that least meet Green Belt purposes	308	271	336	472	305	1,692
Expand existing villages into the Green Belt	580	386	351	276	103	1,696
Further expand existing towns into the Green Belt (500 - 5,000 homes)	650	415	311	224	97	1,697
Create new 'Garden Village(s)' in the Green Belt (1,500 - 10,000 homes)	755	293	235	223	194	1,700
Total	2,626	1,586	1,524	1,624	1,129	



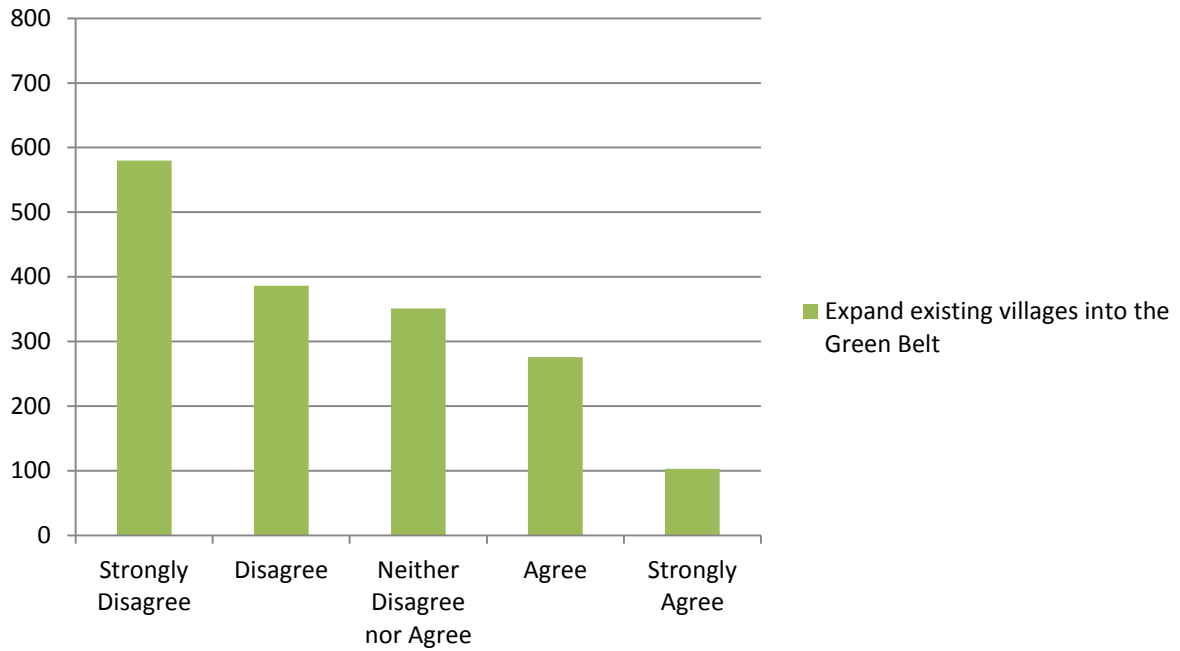
Each answer given has been weighted according to the feeling it was given: 5-Strongly Disagree, 4-Disagree, 3-Neither Disagree nor Agree, 2-Agree, 1-Strongly Agree. The resultant figures were added together and then divided by the total number of respondents who answered that question. The options were then able to be given an overall feeling.

	Weighted Total	Overall Feeling
Add more homes into existing built up areas	2.76	Neither Disagree nor Agree
Build on 8 areas that least meet Green Belt purposes	2.88	Neither Disagree nor Agree
Expand existing villages into the Green Belt	3.63	Disagree
Further expand existing towns into the Green Belt (500 - 5,000 homes)	3.76	Disagree
Create new 'Garden Village(s)' in the Green Belt (1,500 - 10,000 homes)	3.70	Disagree

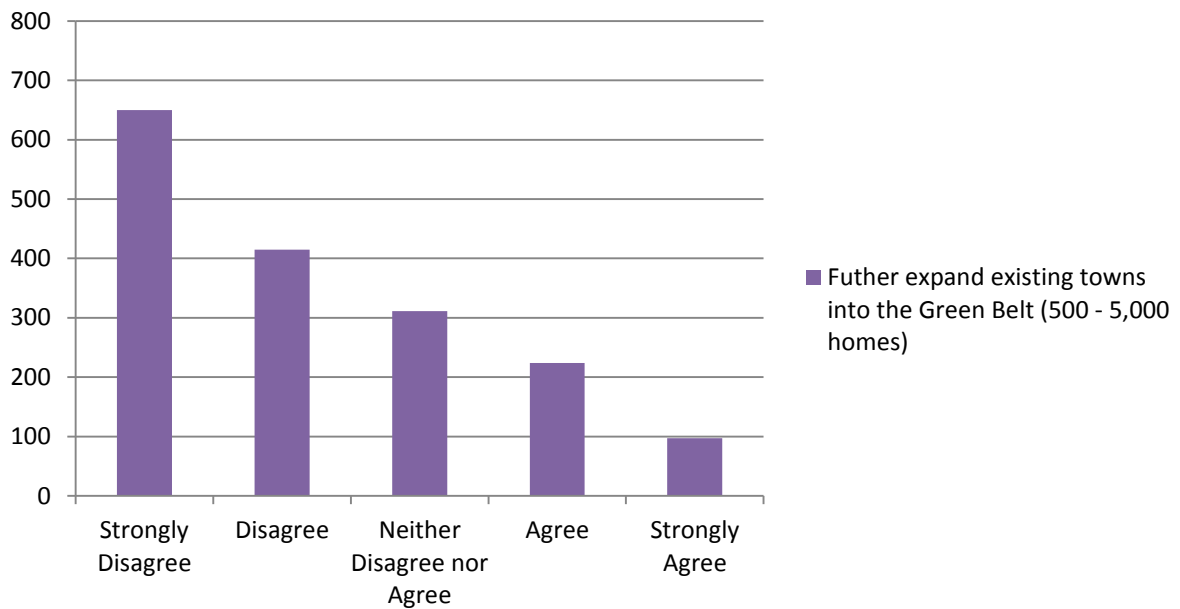
The breakdown of responses per option is set out in the following charts:



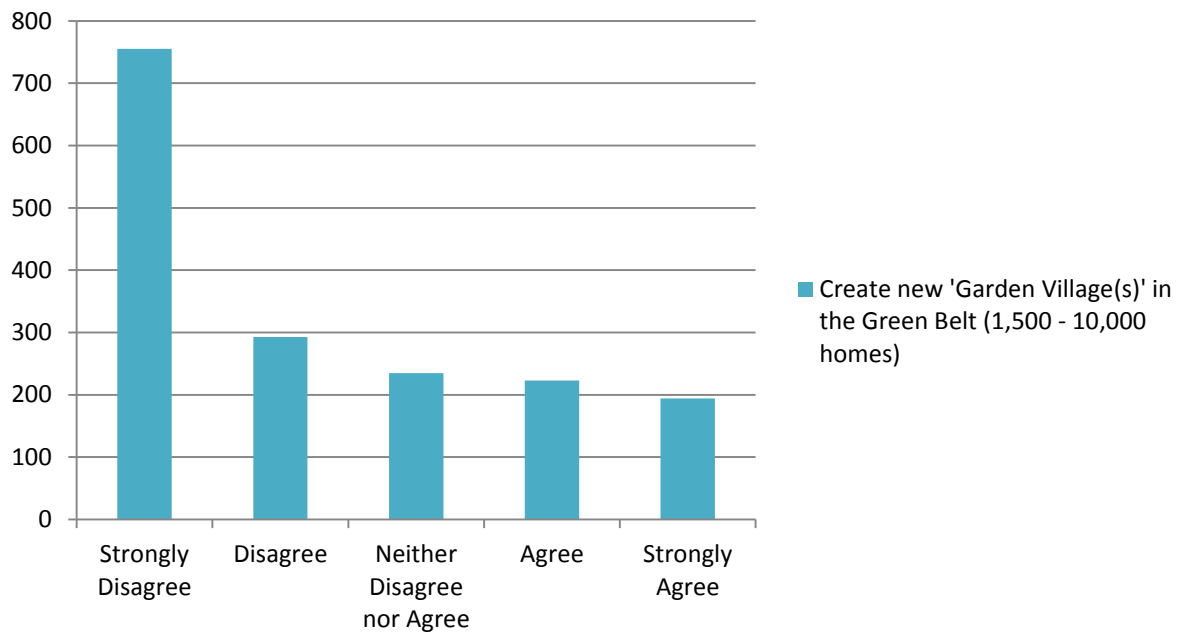
Expand existing villages into the Green Belt



Futher expand existing towns into the Green Belt (500 - 5,000 homes)



Create new 'Garden Village(s)' in the Green Belt (1,500 - 10,000 homes)



Build the Right Kind of Homes– Questions 4 and 5

Here are 8 kinds of home we need to provide.

Q4 Enter the numbers 1 to 8, where you think 1 is the most important and 8 is the least		Q5 Circle how you feel about each kind of housing being built 				
Social rented housing (60% of market rent)						
Affordable rented housing (80% of market rent)						
Part-buy / part-rented housing						
Small first-time buyer flats						
Small/medium sized family homes						
Homes for people downsizing						
Homes for older people (flexi-care, nursing homes, residential care homes)						
Self-built homes						

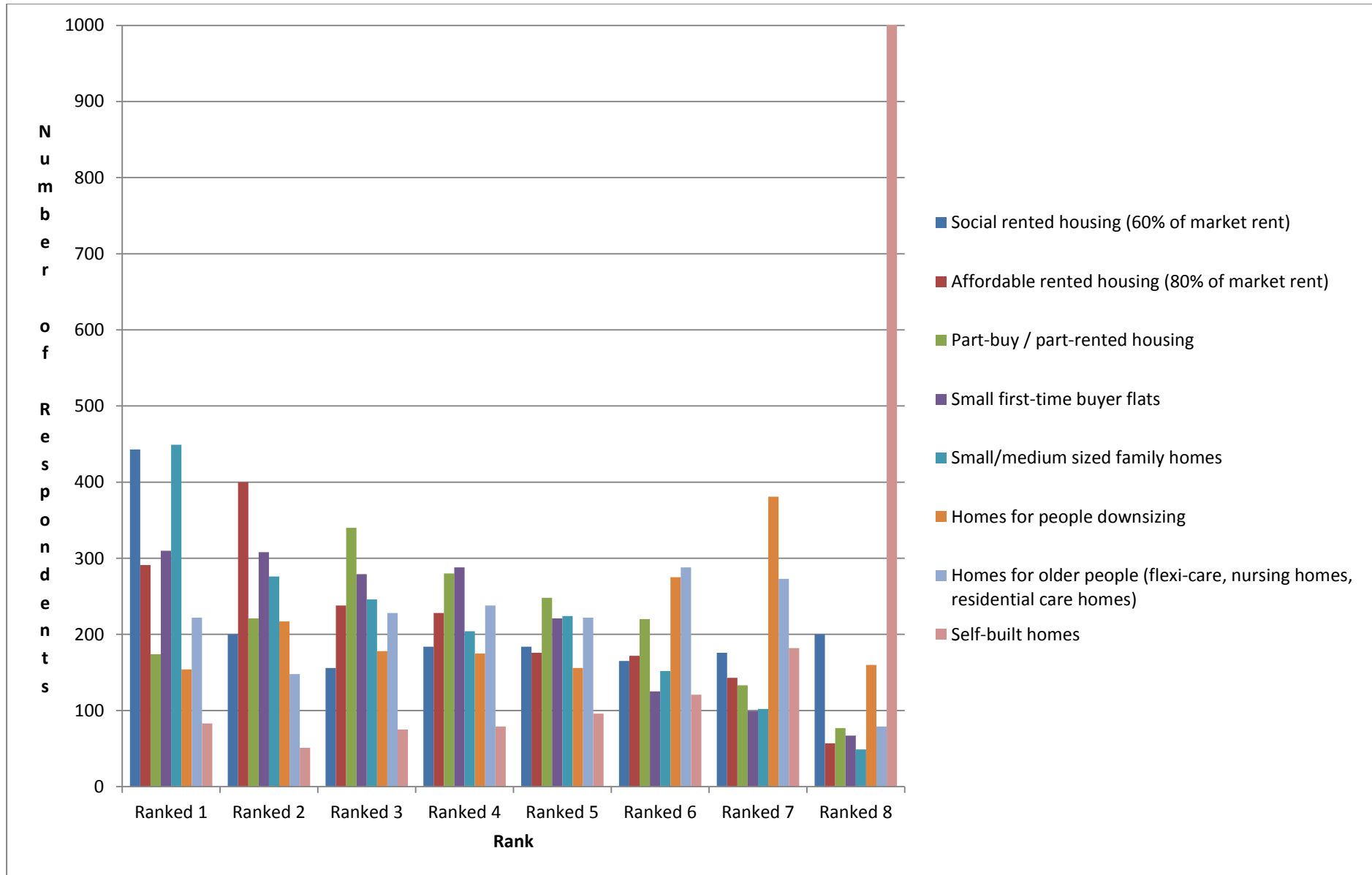
In total, 1,733 respondents answered Question 4.

The overall order of priority given to the options was:

1. Small/medium sized family homes
2. Small first-time buyer flats
3. Affordable rented housing (80% of market rent)
4. Social rented housing (60% of market rent)
5. Part-buy/part-rented housing
6. Homes for older people (flexi-care, nursing homes, residential care homes)
7. Homes for people downsizing
8. Self-built homes

Further details are set out below. The respondents ranked the options as follows:

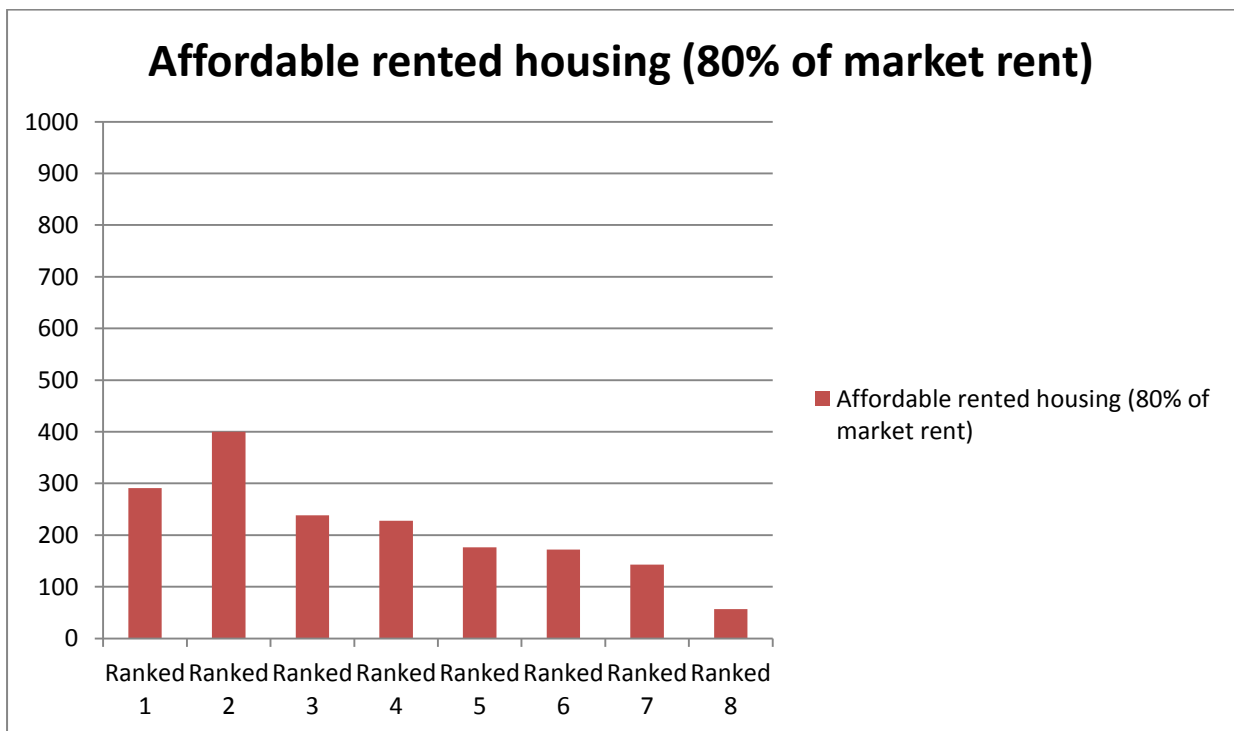
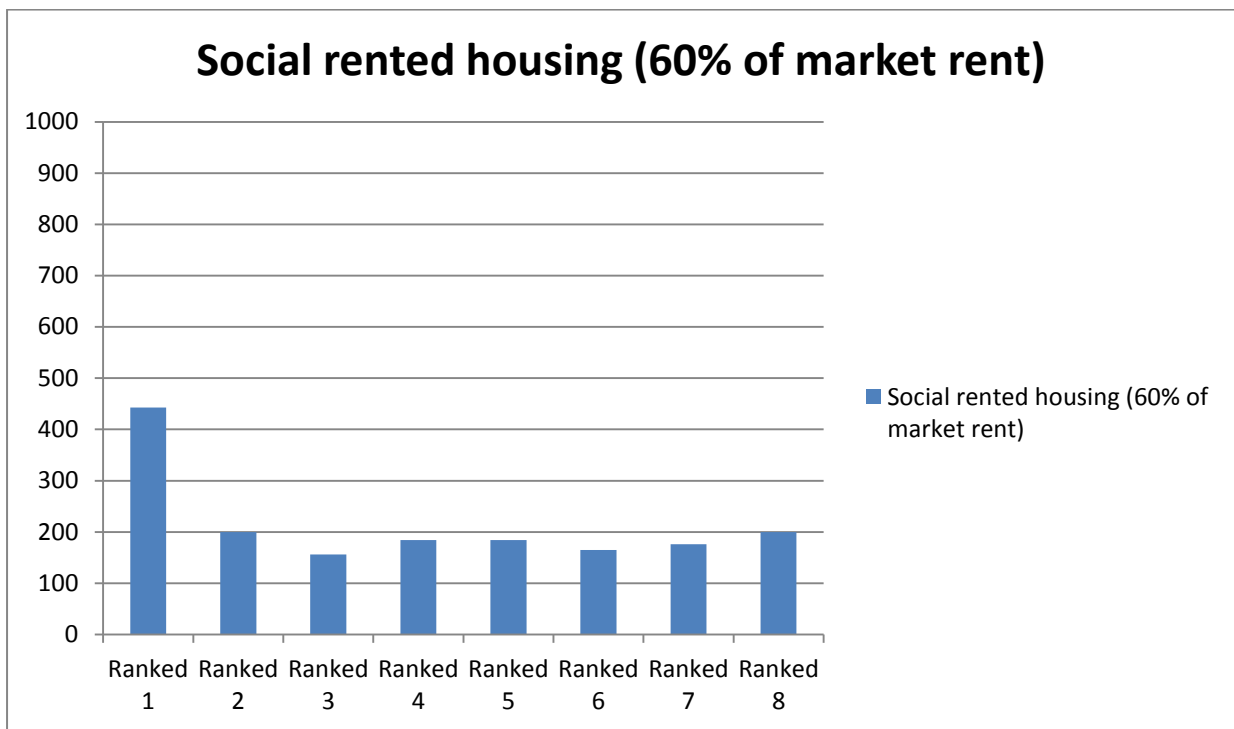
	Ranked 1	Ranked 2	Ranked 3	Ranked 4	Ranked 5	Ranked 6	Ranked 7	Ranked 8	Total
Social rented housing (60% of market rent)	443	200	156	184	184	165	176	200	1,708
Affordable rented housing (80% of market rent)	291	400	238	228	176	172	143	57	1,705
Part-buy / part-rented housing	174	221	340	280	248	220	133	77	1,693
Small first-time buyer flats	310	308	279	288	221	125	99	67	1,697
Small/medium sized family homes	449	276	246	204	224	152	102	49	1,702
Homes for people downsizing	154	217	178	175	156	275	381	160	1,696
Homes for older people (flexi-care, nursing homes, residential care homes)	222	148	228	238	222	288	273	79	1,698
Self-built homes	83	51	75	79	96	121	182	1001	1,688
Total	2,126	1,821	1,740	1,676	1,527	1,518	1,489	1,690	



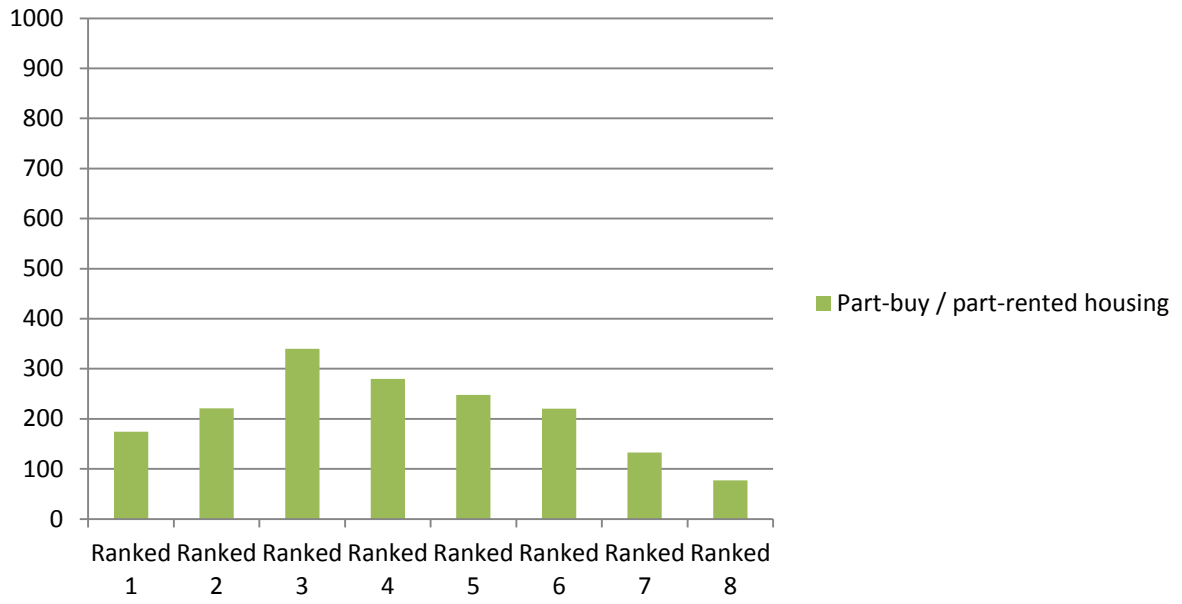
Each answer given has been weighted according to the ranking it was given. The resultant figures were added together and then divided by the total number of respondents who answered that question. The options were then able to be ranked.

	Weighted Rank	Overall Rank
Social rented housing (60% of market rent)	3.97	4
Affordable rented housing (80% of market rent)	3.57	3
Part-buy / part-rented housing	4.05	5
Small first-time buyer flats	3.54	2
Small/medium sized family homes	3.34	1
Homes for people downsizing	4.83	7
Homes for older people (flexi-care, nursing homes, residential care homes)	4.44	6
Self-built homes	6.64	8

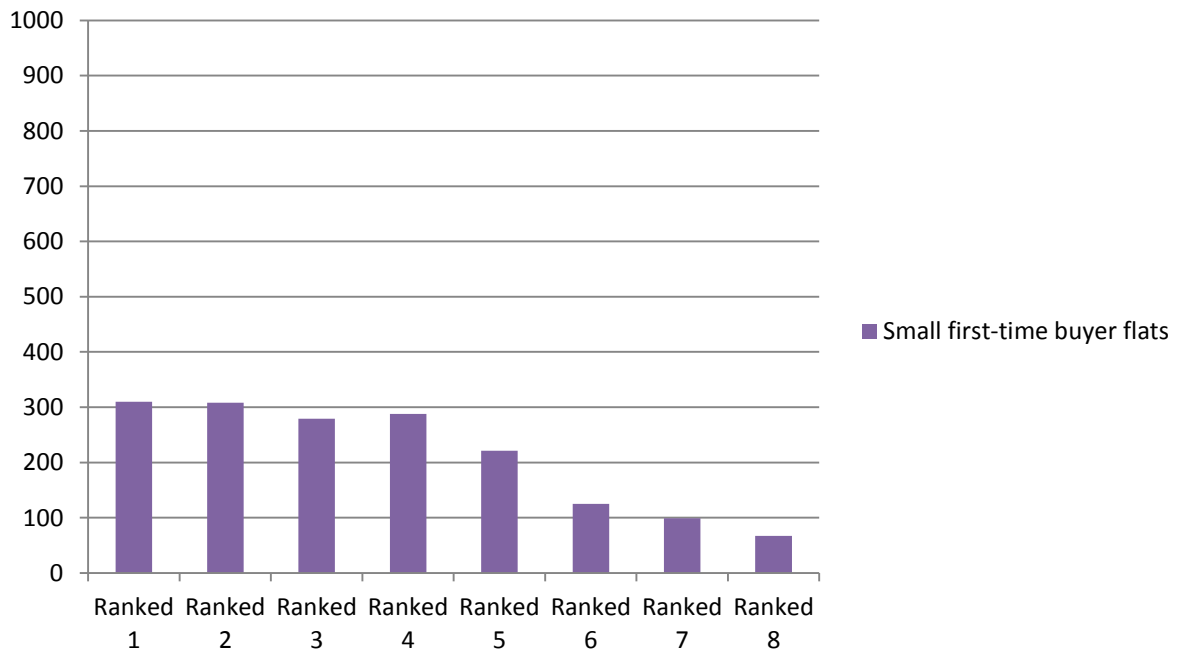
The breakdown of responses per option is set out in the following charts:



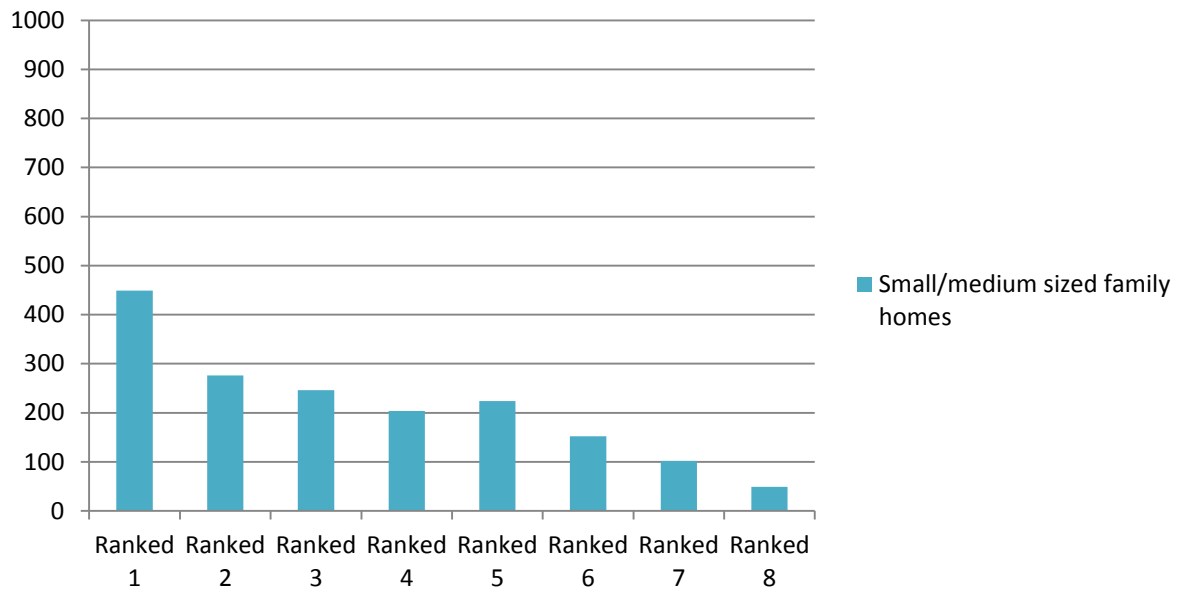
Part-buy / part-rented housing



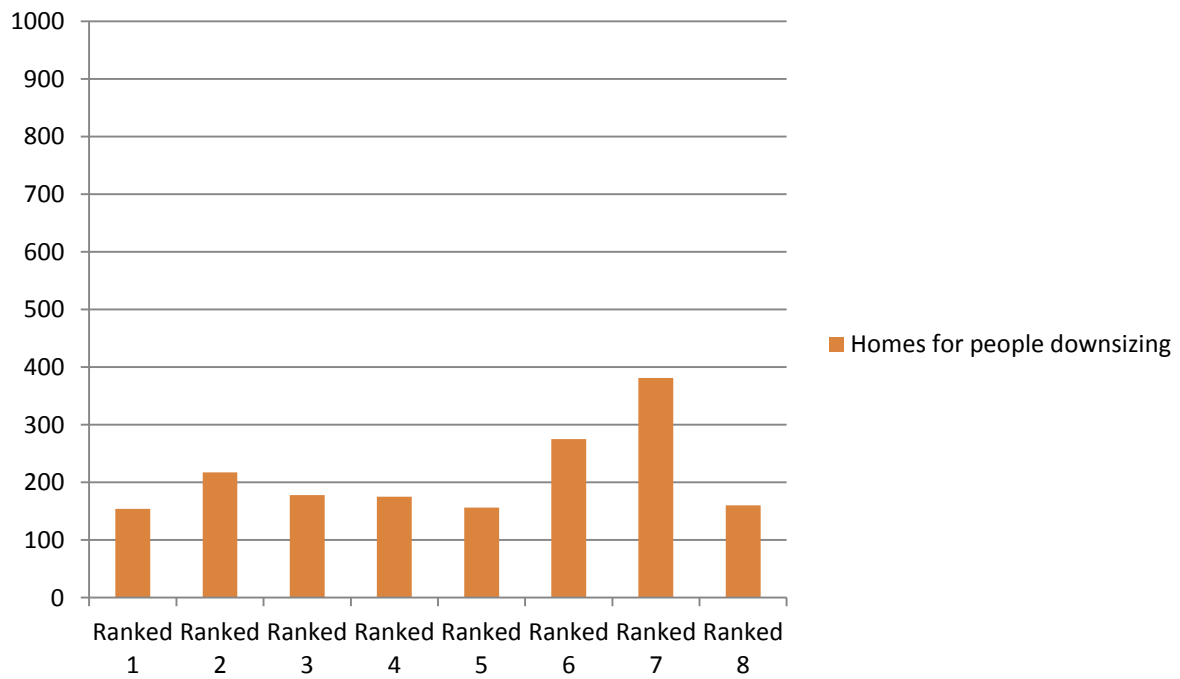
Small first-time buyer flats



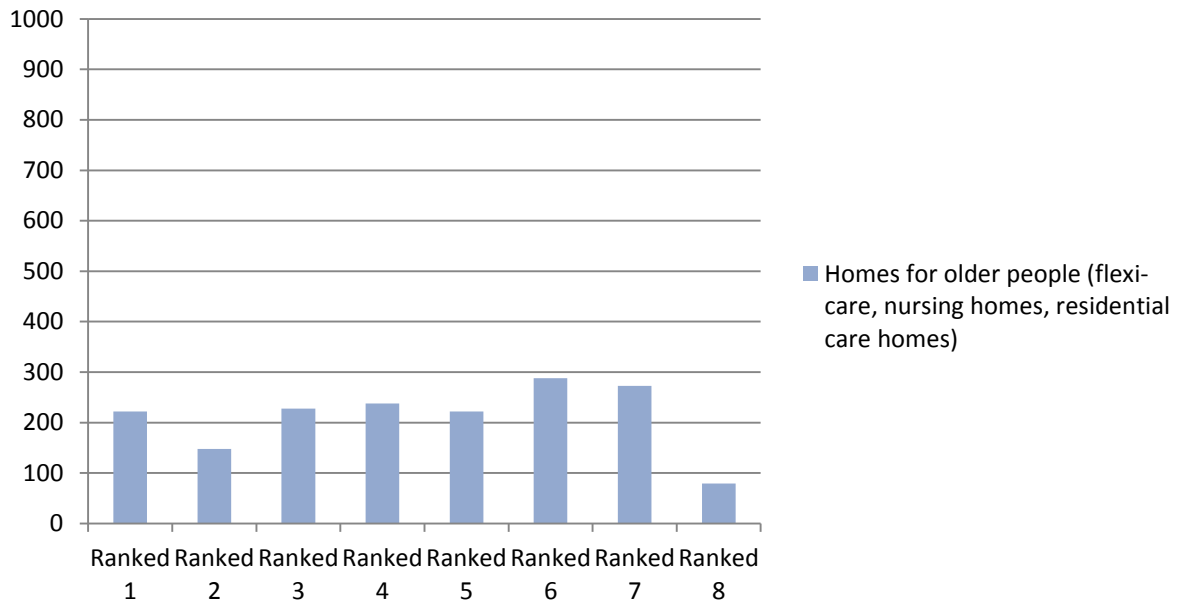
Small/medium sized family homes



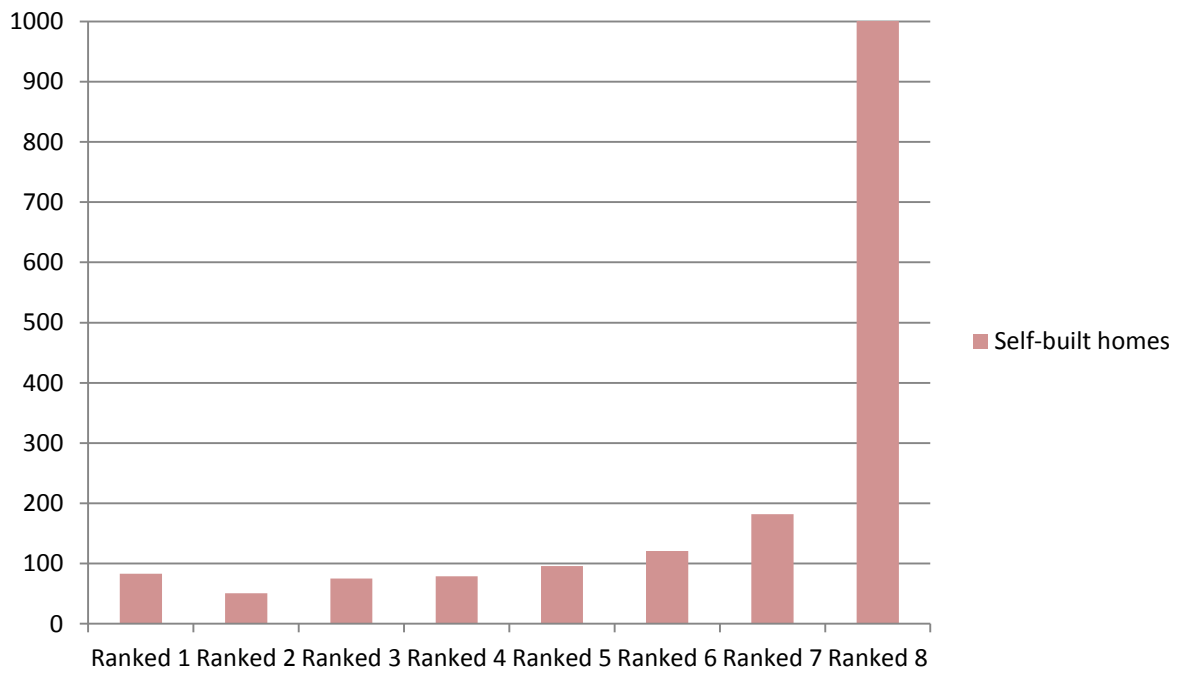
Homes for people downsizing



Homes for older people (flexi-care, nursing homes, residential care homes)



Self-built homes



In total, 1,519 respondents answered Question 5.

The overall feelings in relation to each option were:

- Social rented housing (60% of market rent) – Neither Disagree nor Agree
- Affordable rented housing (80% of market rent) - Agree
- Part-buy / part-rented housing - Agree
- Small first-time buyer flats - Agree
- Small/medium sized family homes – Agree
- Homes for people downsizing - Neither Disagree nor Agree
- Homes for older people (flexi-care, nursing homes, residential care homes) - Agree
- Self-built homes - Neither Disagree nor Agree

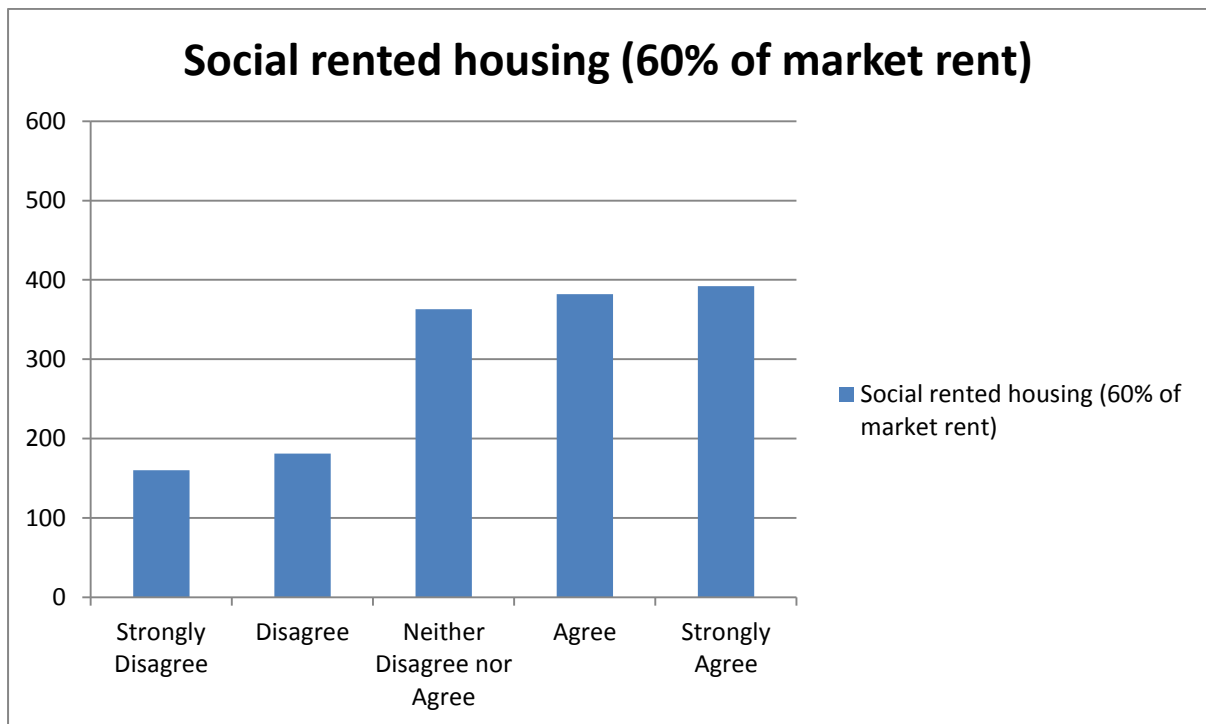
Further details are set out below. The respondents had feelings about the options as follows:

	Strongly Disagree	Disagree	Neither Disagree nor Agree	Agree	Strongly Agree	Total
Social rented housing (60% of market rent)	160	181	363	382	392	1,478
Affordable rented housing (80% of market rent)	92	138	328	546	375	1,479
Part-buy / part-rented housing	74	131	478	527	254	1,464
Small first-time buyer flats	84	118	317	553	396	1,468
Small/medium sized family homes	39	101	321	571	441	1,473
Homes for people downsizing	106	195	457	442	270	1,470
Homes for older people (flexi-care, nursing homes, residential care homes)	46	98	416	556	355	1,471
Self-built homes	304	315	532	190	121	1,462
Total	9,05	1,277	3,212	3,767	2,604	

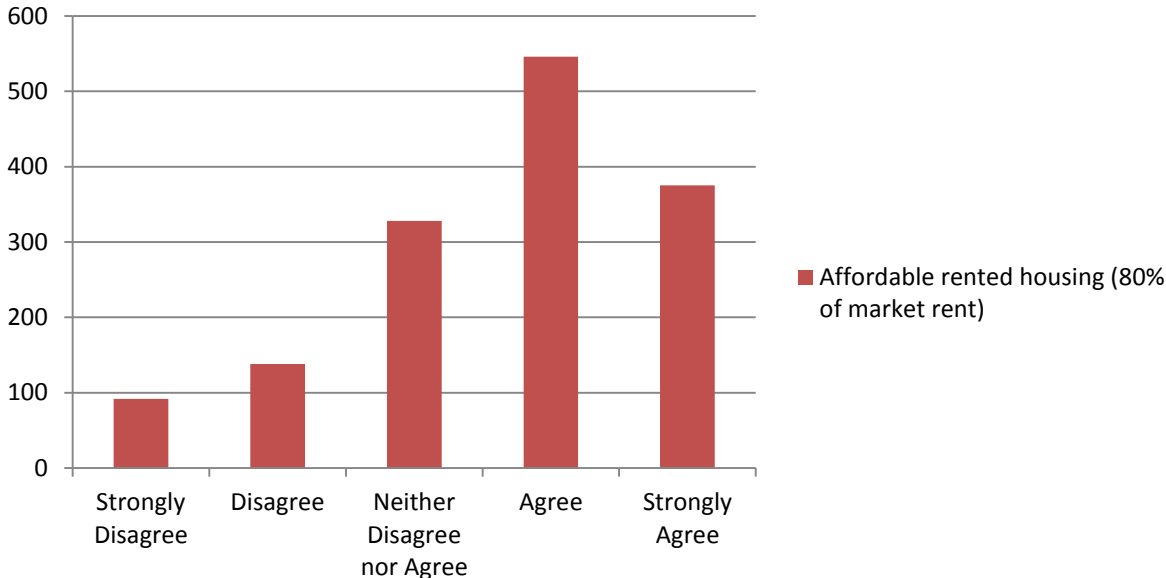
Each answer given has been weighted according to the feeling it was given: 5-Strongly Disagree, 4-Disagree, 3-Neither Disagree nor Agree, 2-Agree, 1-Strongly Agree. The resultant figures were added together and then divided by the total number of respondents who answered that question. The options were then able to be given an overall feeling.

	Weighted Total	Overall Feeling
Social rented housing (60% of market rent)	2.55	Neither Disagree nor Agree
Affordable rented housing (80% of market rent)	2.34	Agree
Part-buy / part-rented housing	2.48	Agree
Small first-time buyer flats	2.28	Agree
Small/medium sized family homes	2.14	Agree
Homes for people downsizing	2.61	Neither Disagree nor Agree
Homes for older people (flexi-care, nursing homes, residential care homes)	2.27	Agree
Self-built homes	3.34	Neither Disagree nor Agree

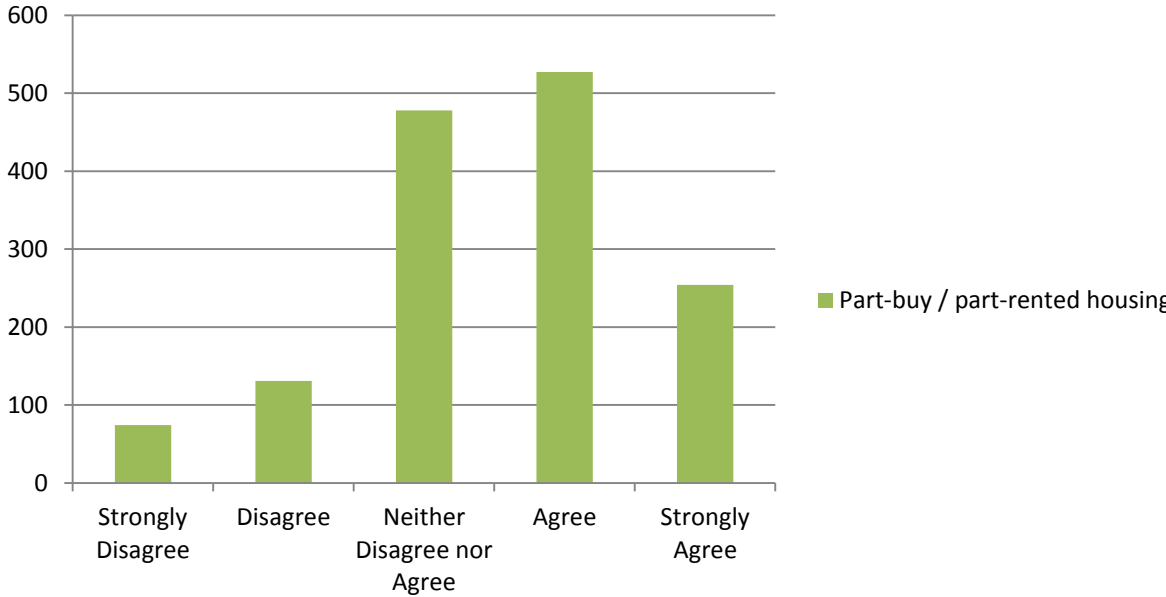
The breakdown of responses per option is set out in the following charts:

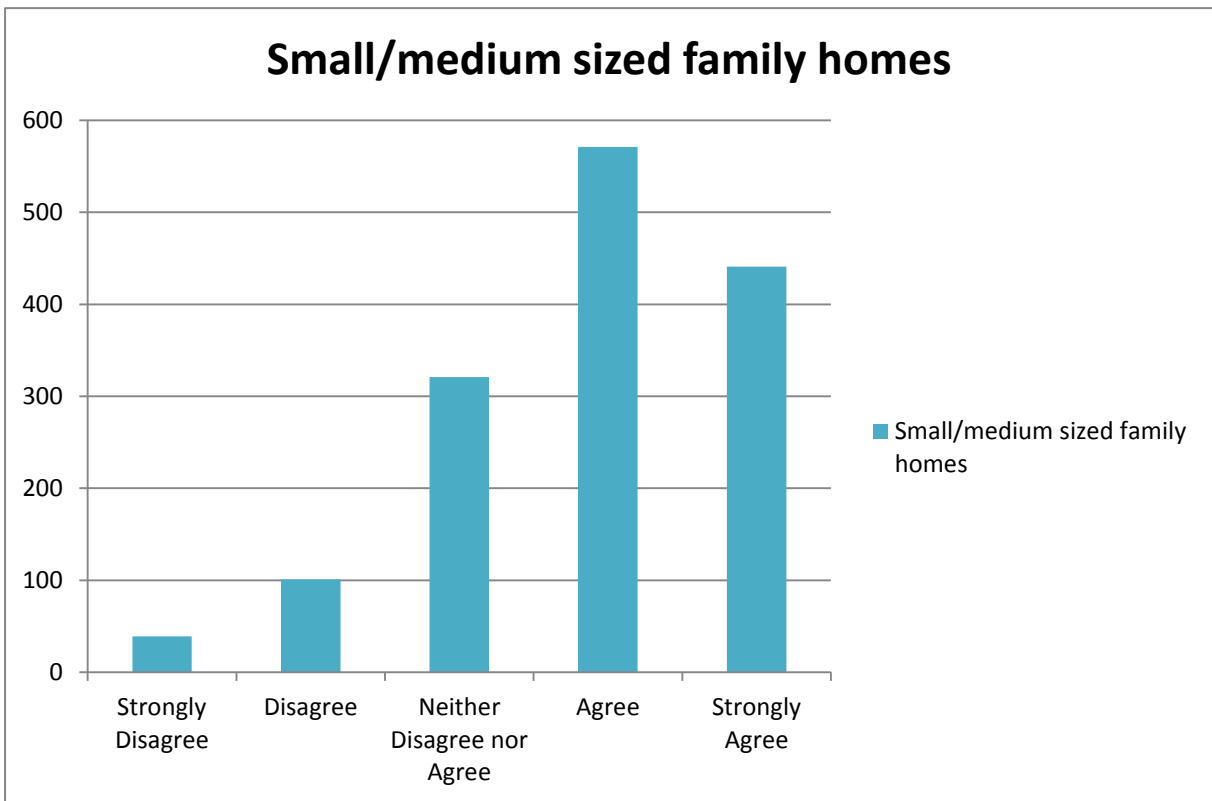
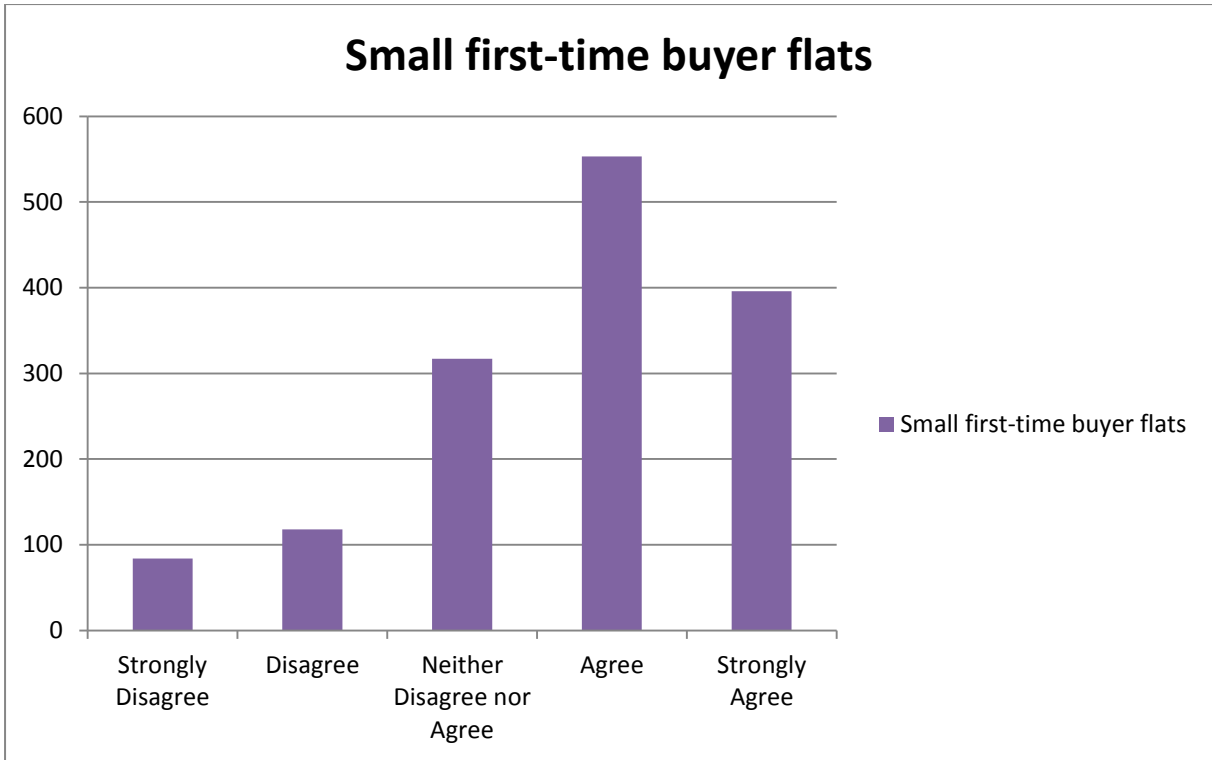


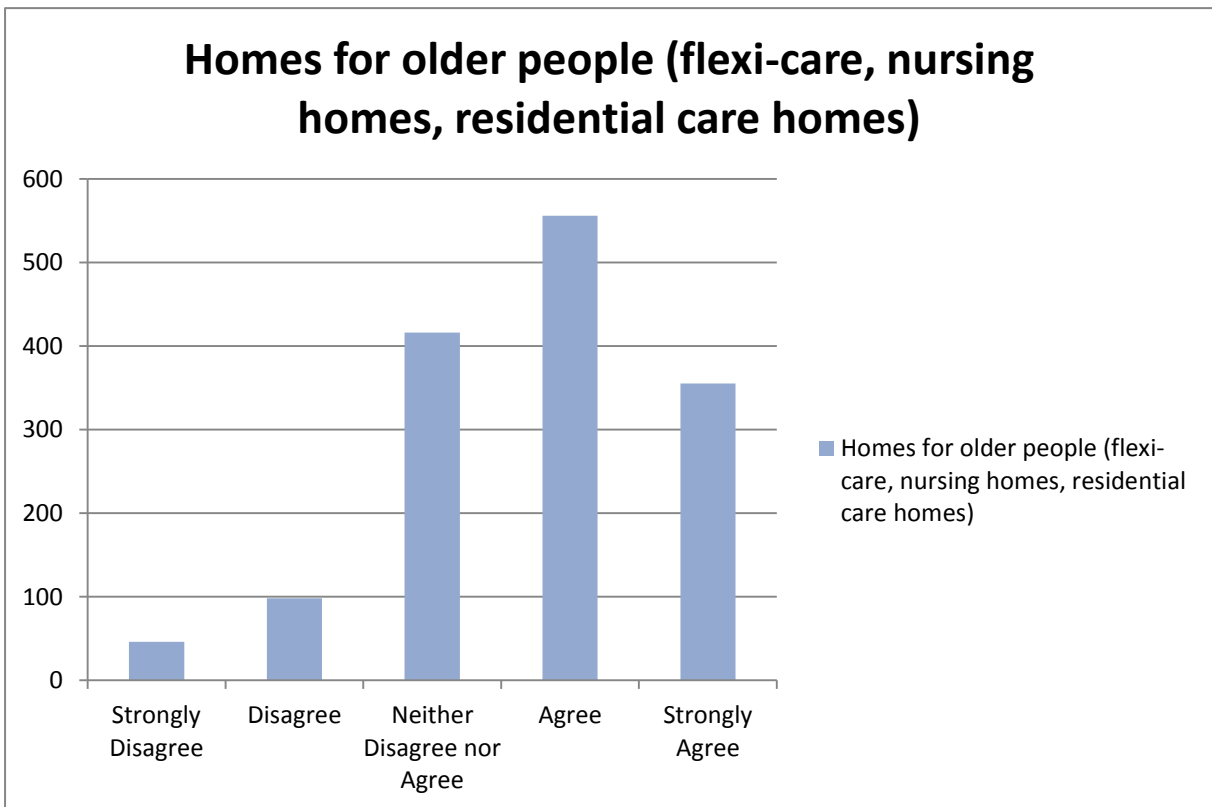
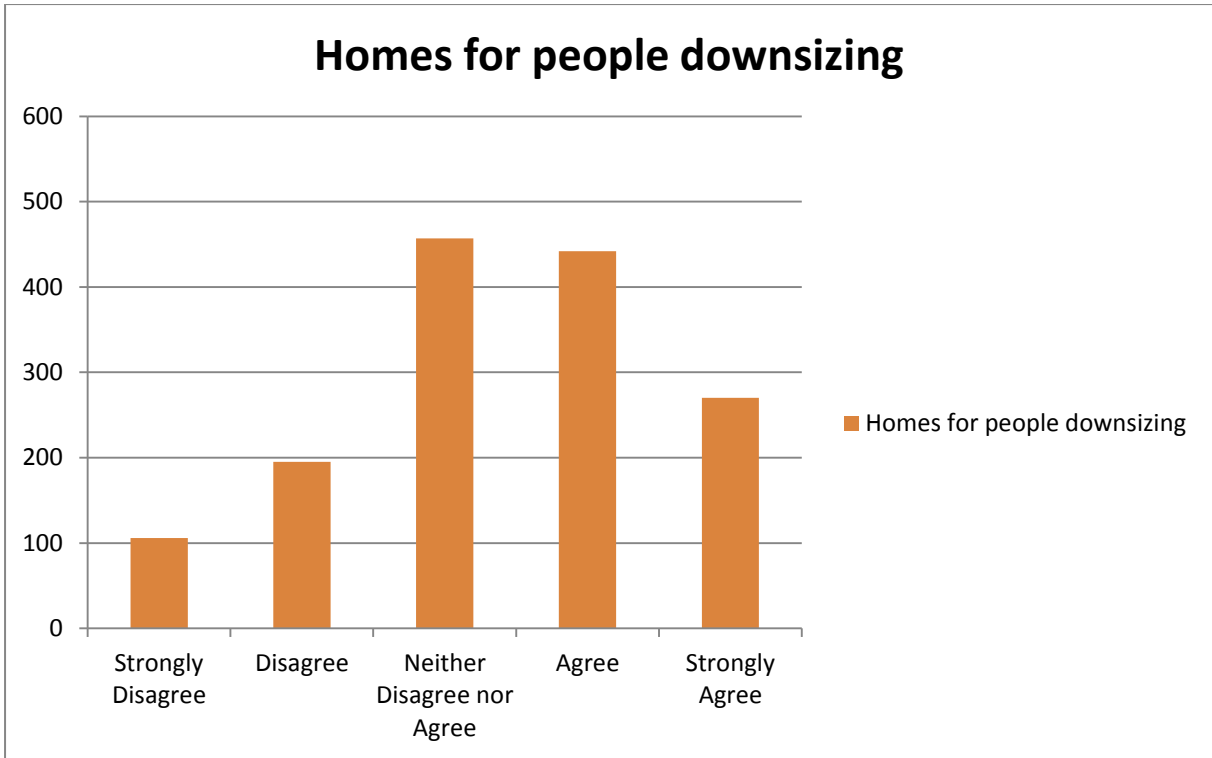
Affordable rented housing (80% of market rent)

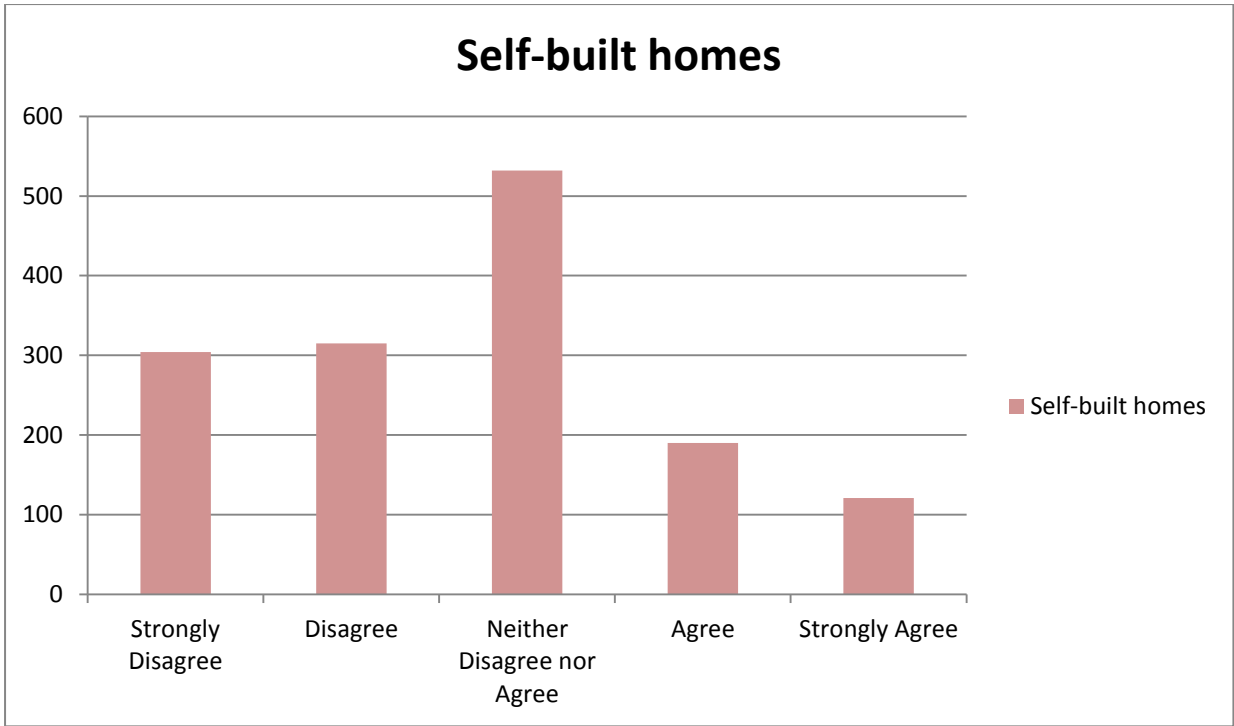


Part-buy / part-rented housing









Provide Local Jobs – Question 6

Q6 Circle, like this 😊 how you feel about this approach to local jobs.



In total, 1,795 respondents answered Question 6.

The overall feeling in relation to the approach to local jobs was – Agree

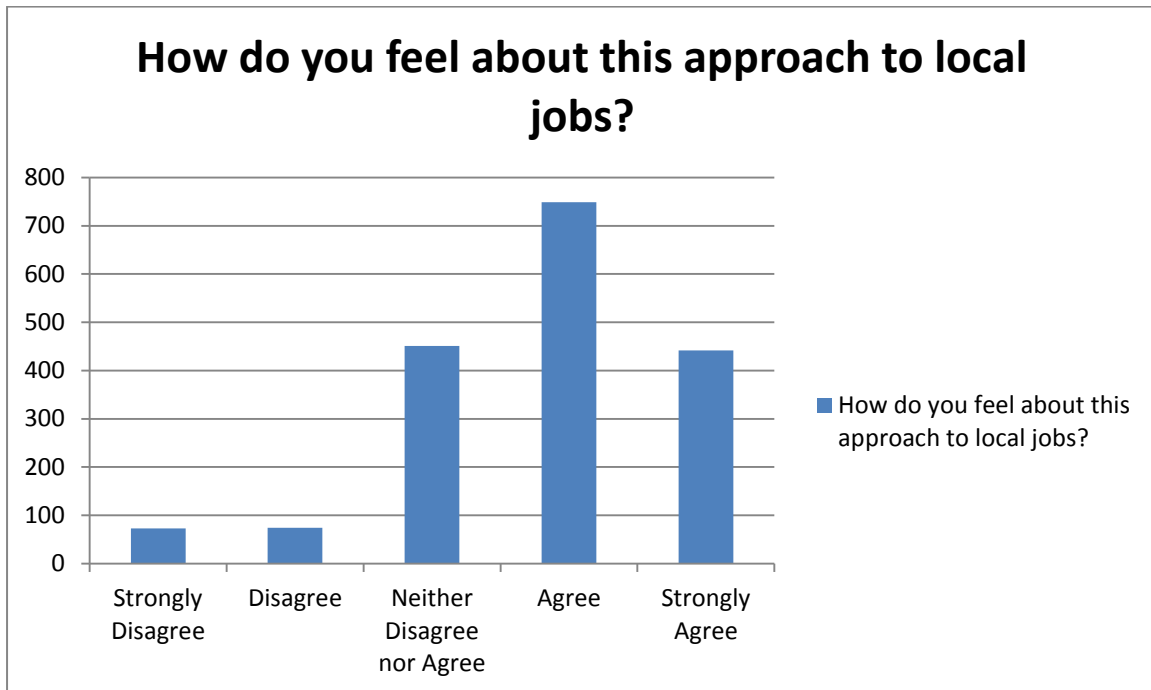
Further details are set out below. The respondents had feelings about the approach as follows:

	Strongly Disagree	Disagree	Neither Disagree nor Agree	Agree	Strongly Agree	Total
How do you feel about this approach to local jobs?	73	74	451	749	442	1,789

Each answer given has been weighted according to the feeling it was given: 5-Strongly Disagree, 4-Disagree, 3-Neither Disagree nor Agree, 2-Agree, 1-Strongly Agree. The resultant figures were added together and then divided by the total number of respondents who answered the question. The approach was then able to be given an overall feeling.


	Weighted Total	Overall Feeling
How do you feel about this approach to local jobs?	2.21	Agree

The breakdown of responses for this question is set out in the following chart:



Protect the Green Belt – Question 7

Q7 Circle like this, 😊 how you feel about this approach to identifying potential land for building in the Green Belt.



In total, 1,749 respondents answered Question 7.

The overall feeling in relation to the approach to identifying potential land for building in the Green Belt was – Neither Disagree nor Agree

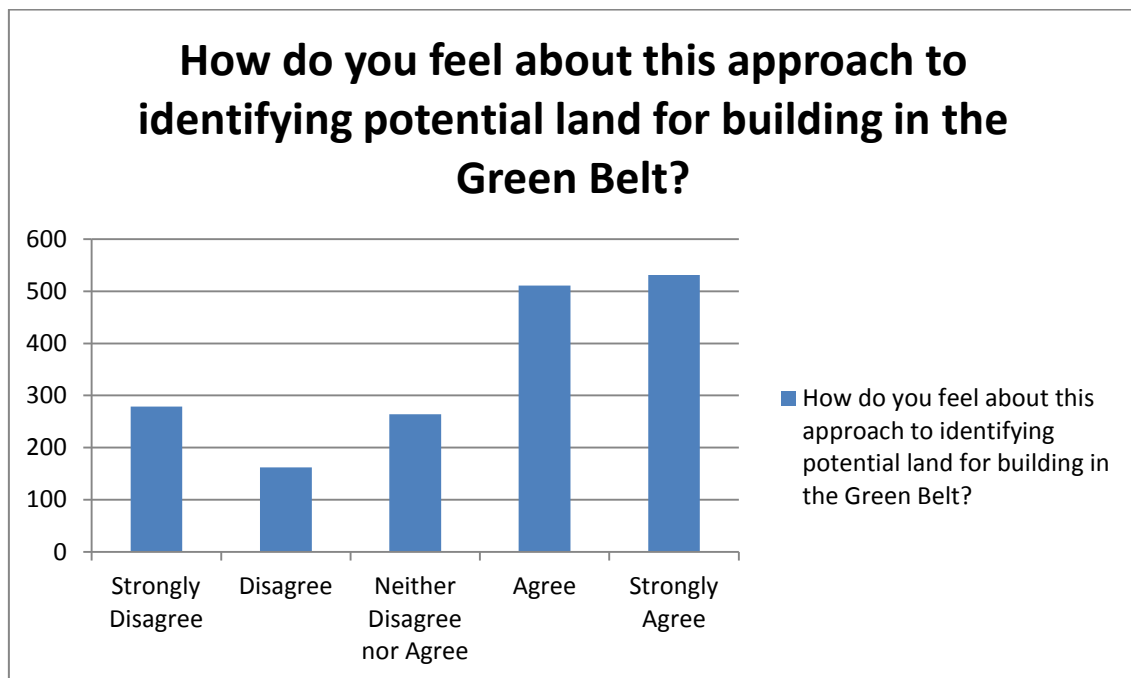
Further details are set out below. The respondents had feelings about the approach as follows:

	Strongly Disagree	Disagree	Neither Disagree nor Agree	Agree	Strongly Agree	Total
How do you feel about this approach to identifying potential land for building in the Green Belt?	279	162	264	511	531	1,747

Each answer given has been weighted according to the feeling it was given: 5-Strongly Disagree, 4-Disagree, 3-Neither Disagree nor Agree, 2-Agree, 1-Strongly Agree. The resultant figures were added together and then divided by the total number of respondents who answered the question. The approach was then able to be given an overall feeling.

	Weighted Total	Overall Feeling
How do you feel about this approach to identifying potential land for building in the Green Belt?	2.51	Neither Disagree nor Agree

The breakdown of responses for this question is set out in the following chart:



Protect our Historic Buildings, Wildlife Sites and Areas of Natural Beauty – Question 8

Q8 Circle how you feel about protecting these things. 					
Historic streets and buildings					
Wildlife sites					
Areas of natural beauty					

In total, 1,833 respondents answered Question 8.

The overall feelings in relation to each option were:

- Historic streets and buildings – Strongly Agree
- Wildlife sites – Strongly Agree
- Areas of natural beauty – Strongly Agree

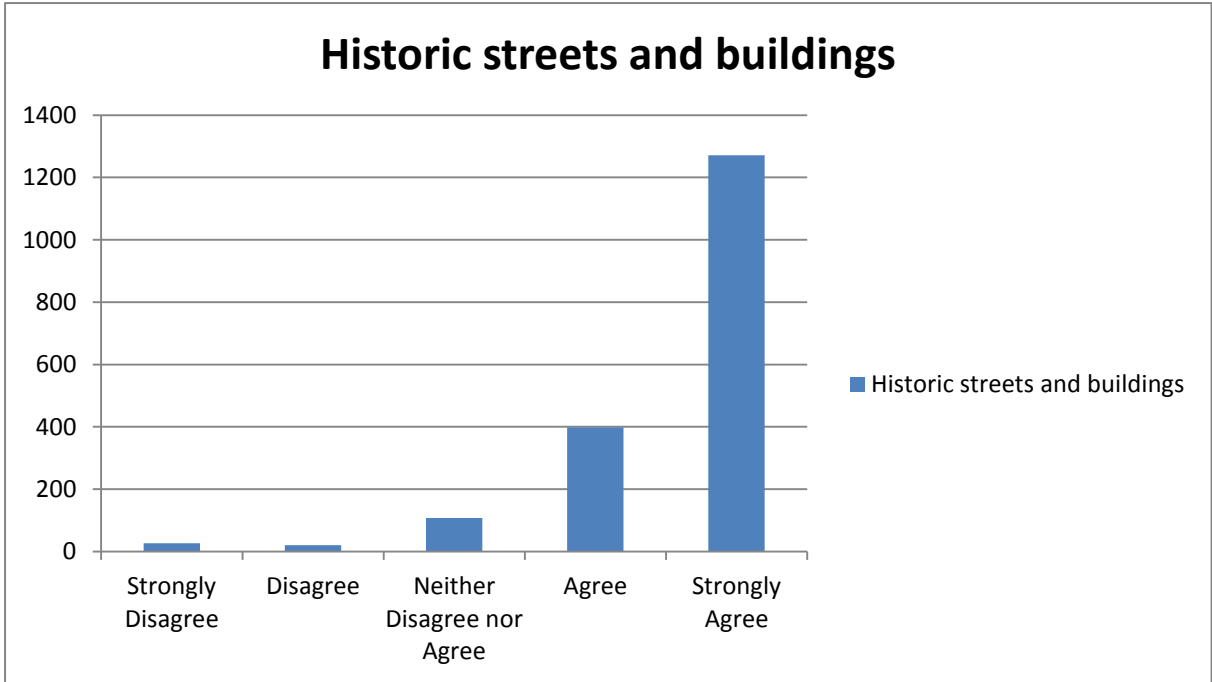
Further details are set out below. The respondents had feelings about the options as follows:

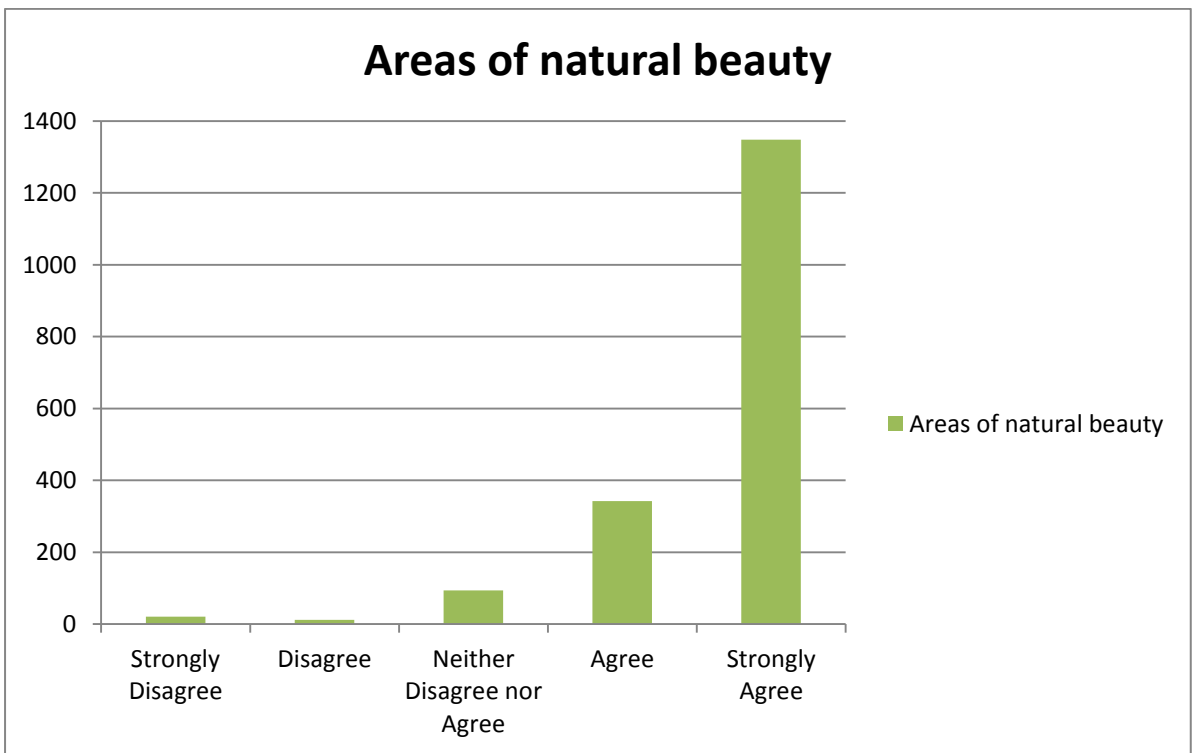
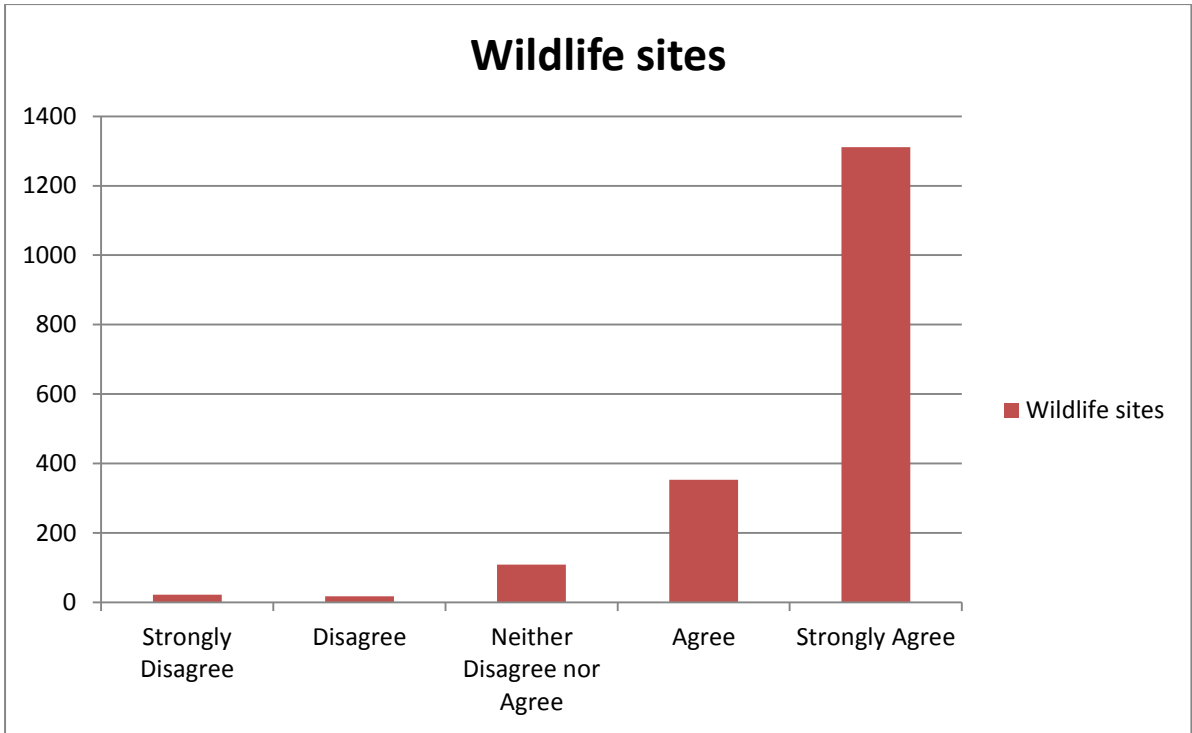
	Strongly Disagree	Disagree	Neither Disagree nor Agree	Agree	Strongly Agree	Total
Historic streets and buildings	26	20	108	398	1271	1,823
Wildlife sites	22	18	109	353	1311	1,813
Areas of natural beauty	21	12	94	342	1348	1,817
Total	69	50	311	1,093	3,930	

Each answer given has been weighted according to the feeling it was given: 5-Strongly Disagree, 4-Disagree, 3-Neither Disagree nor Agree, 2-Agree, 1-Strongly Agree. The resultant figures were added together and then divided by the total number of respondents who answered that question. The options were then able to be given an overall feeling.

	Weighted Total	Overall Feeling
Historic streets and buildings	1.43	Strongly Agree
Wildlife sites	1.39	Strongly Agree
Areas of natural beauty	1.36	Strongly Agree

The breakdown of responses per option is set out in the following charts:





Get the Transport, Schools and Other Infrastructure We Need – Question 9

Here are 8 kinds of infrastructure we might need.

Q9 Enter the numbers 1 to 8, where you think 1 is the most important and 8 is the least	
Better public transport, including trains and buses	
New or improved roads and junctions	
More car parking	
New or improved cycling and walking facilities	
Extra primary and secondary schools	
New parks, allotments, playing fields	
New GP and other healthcare facilities	
New neighbourhood centres, shops and other community facilities	

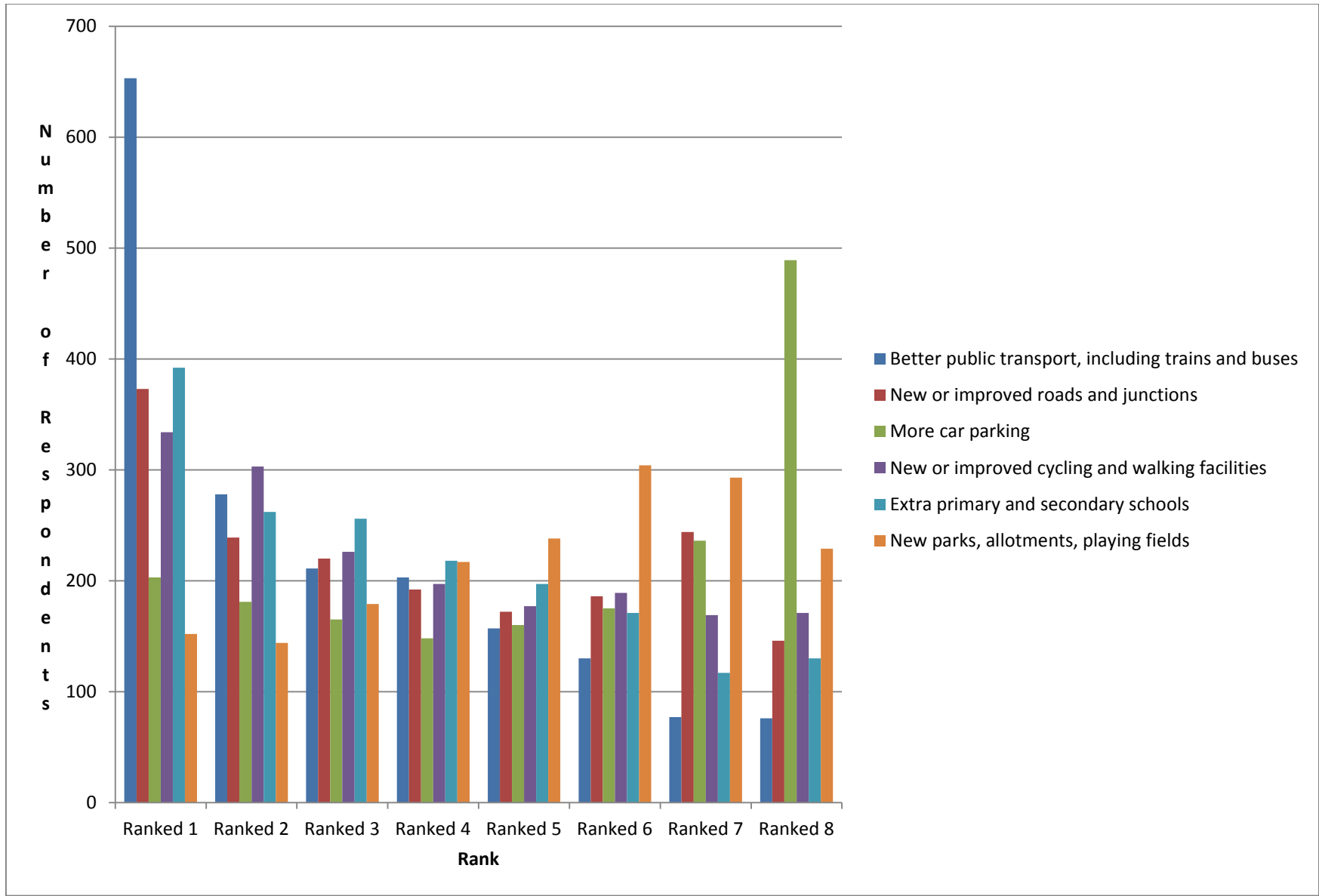
In total, 1,812 respondents answered Question 9.

The overall order of priority given to the options was:

1. Better public transport, including trains and buses
2. New GP and other healthcare facilities
3. Extra primary and secondary schools
4. New or improved cycling and walking facilities
5. New or improved roads and junctions
6. New parks, allotments, playing fields
7. New neighbourhood centres, shops and other community facilities
8. More car parking

Further details are set out below. The respondents ranked the options as follows:

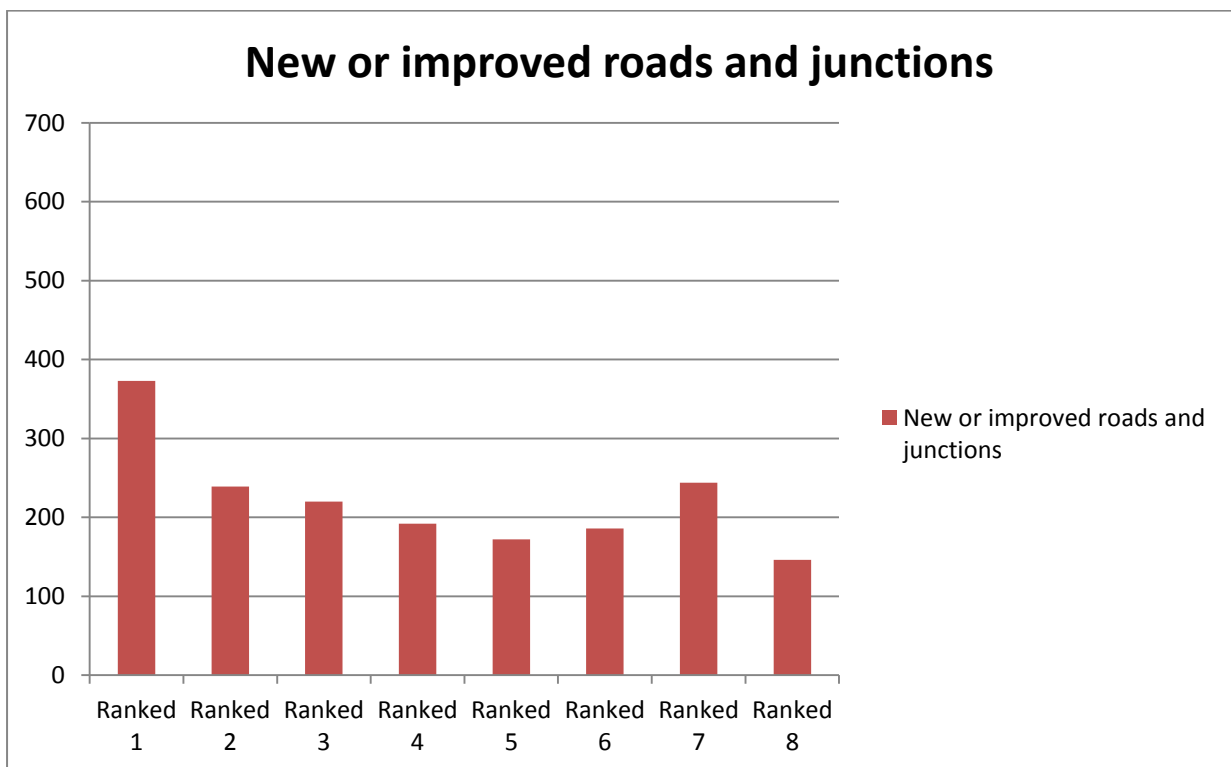
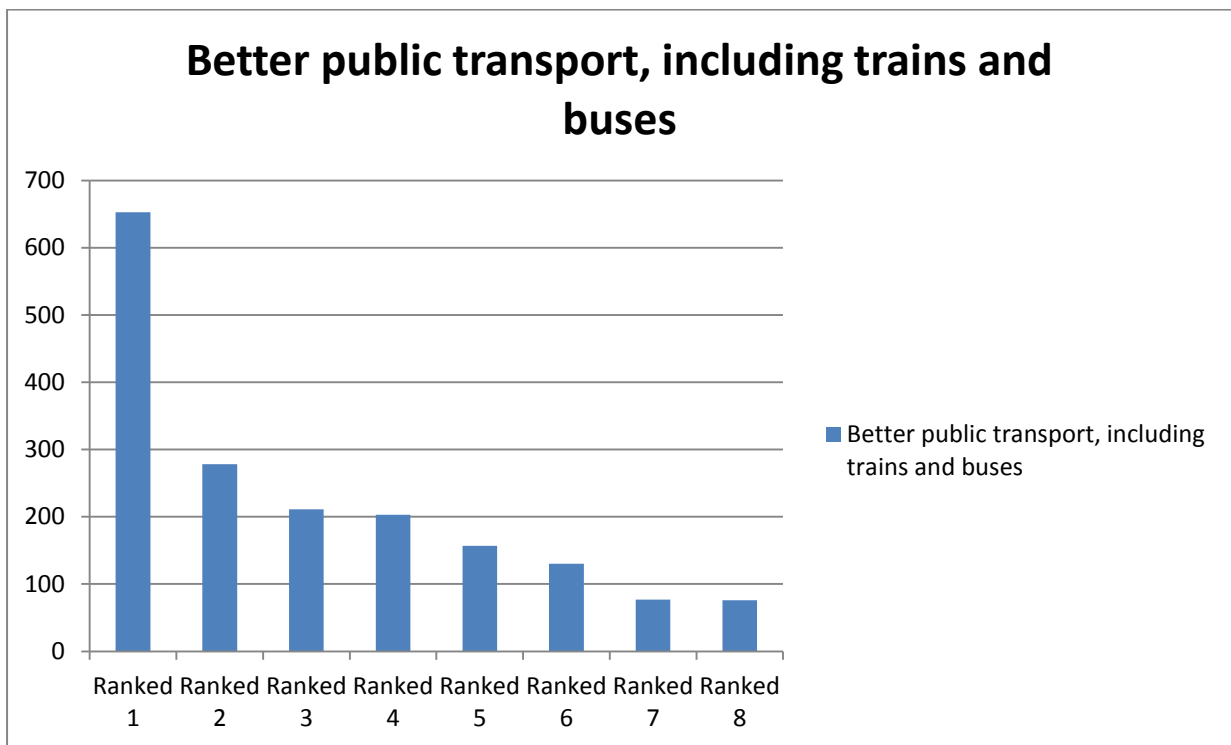
	Ranked 1	Ranked 2	Ranked 3	Ranked 4	Ranked 5	Ranked 6	Ranked 7	Ranked 8	Total
Better public transport, including trains and buses	653	278	211	203	157	130	77	76	1,785
New or improved roads and junctions	373	239	220	192	172	186	244	146	1,772
More car parking	203	181	165	148	160	175	236	489	1,757
New or improved cycling and walking facilities	334	303	226	197	177	189	169	171	1,766
Extra primary and secondary schools	392	262	256	218	197	171	117	130	1,743
New parks, allotments, playing fields	152	144	179	217	238	304	293	229	1,756
New GP and other healthcare facilities	360	300	289	270	236	149	117	44	1,765
New neighbourhood centres, shops and other community facilities	135	136	206	244	238	243	242	311	1,755
Total	2,602	1,843	1,752	1,689	1,575	1,547	1,495	1,596	

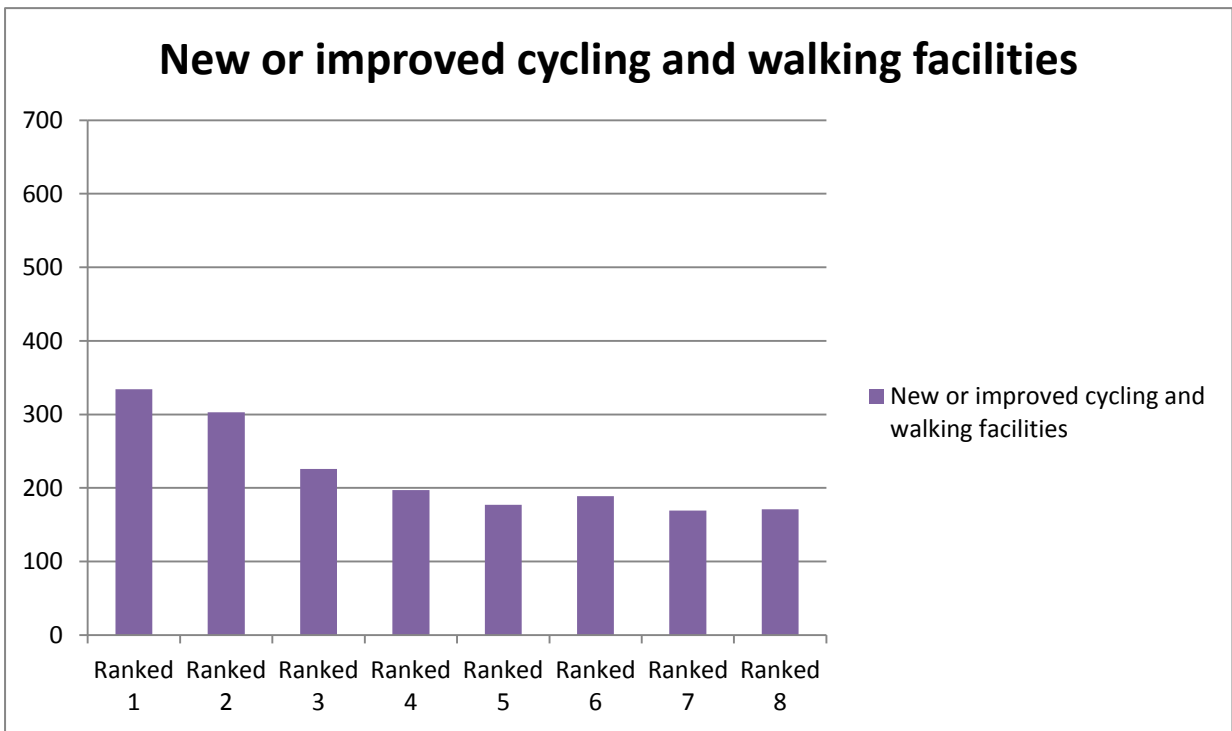
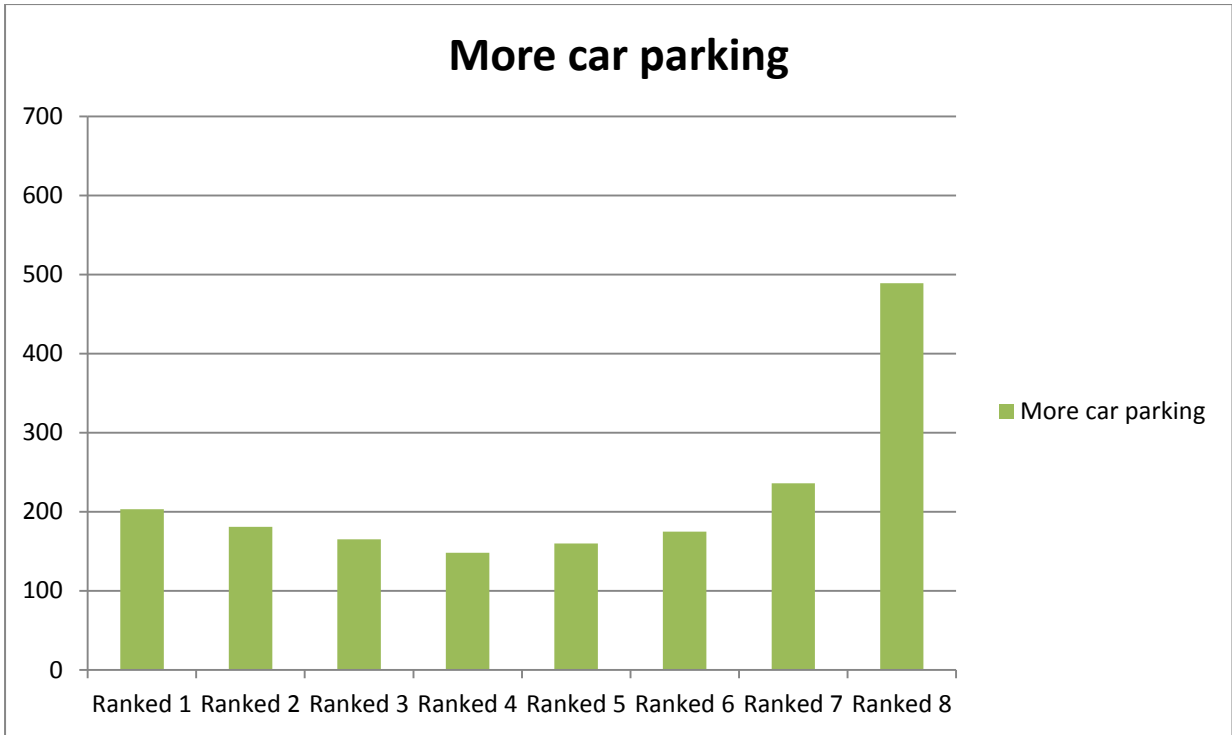


Each answer given has been weighted according to the ranking it was given. The resultant figures were added together and then divided by the total number of respondents who answered that question. The options were then able to be ranked.

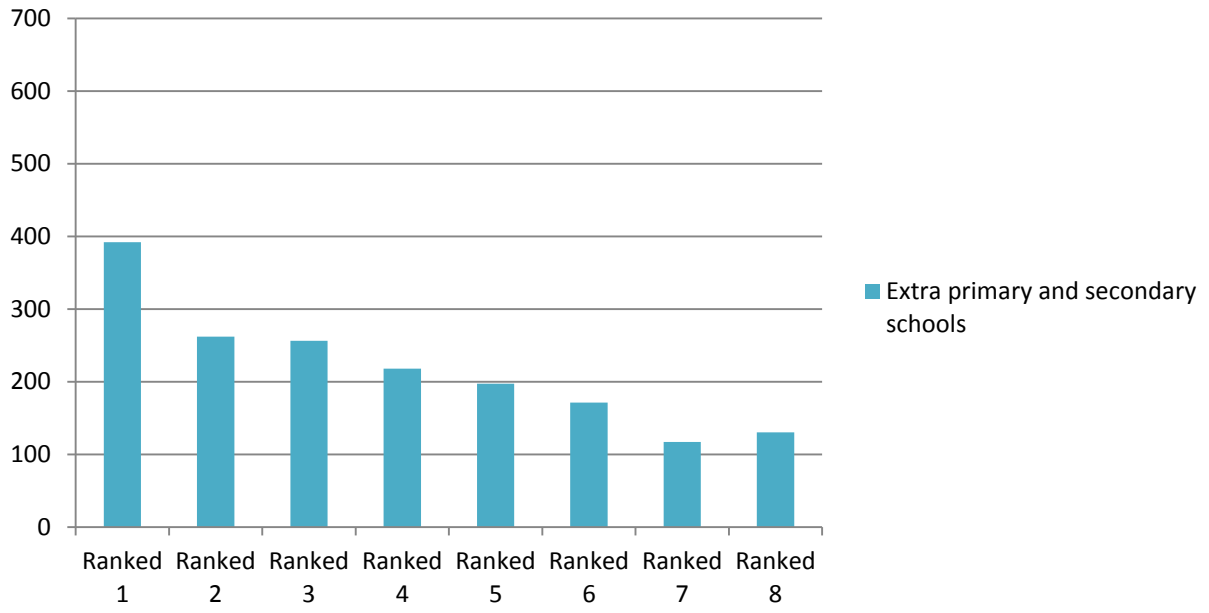
	Weighted Rank	Overall Rank
Better public transport, including trains and buses	3.01	1
New or improved roads and junctions	4.02	5
More car parking	5.16	8
New or improved cycling and walking facilities	3.95	4
Extra primary and secondary schools	3.69	3
New parks, allotments, playing fields	4.98	6
New GP and other healthcare facilities	3.49	2
New neighbourhood centres, shops and other community facilities	5.03	7

The breakdown of responses per option is set out in the following charts:

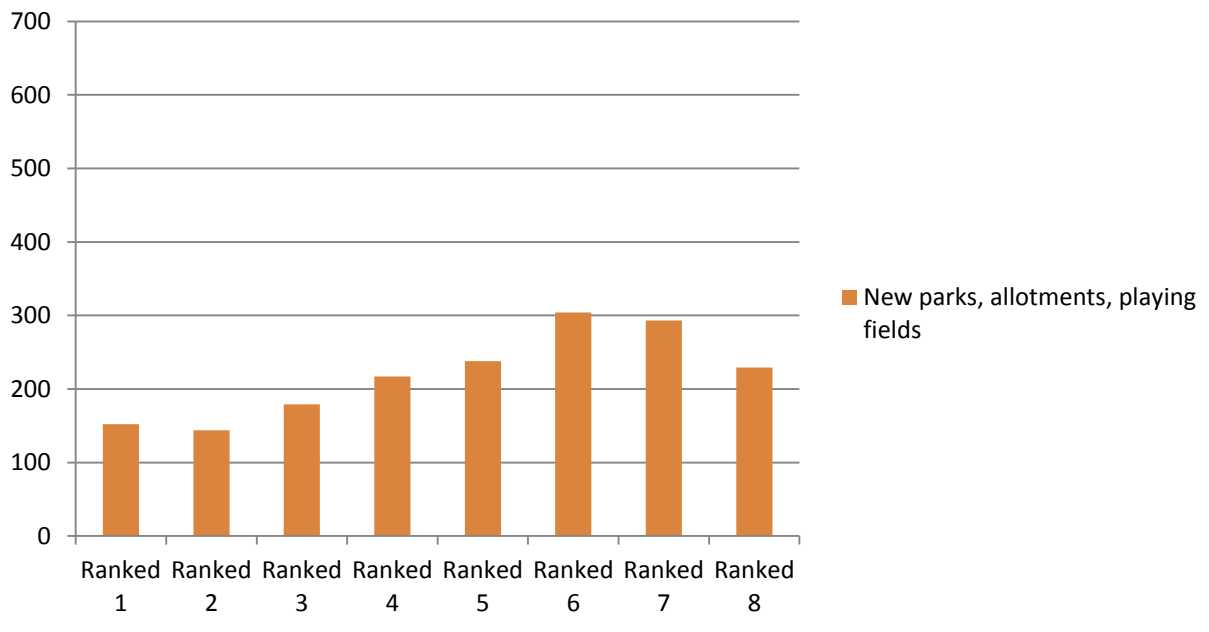




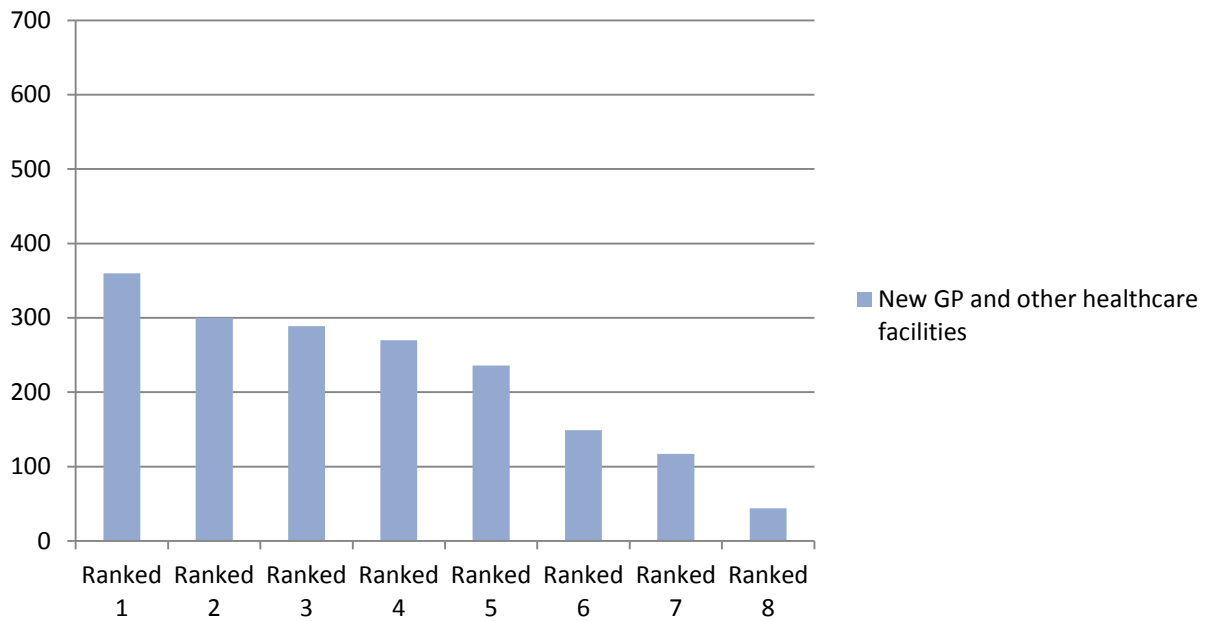
Extra primary and secondary schools



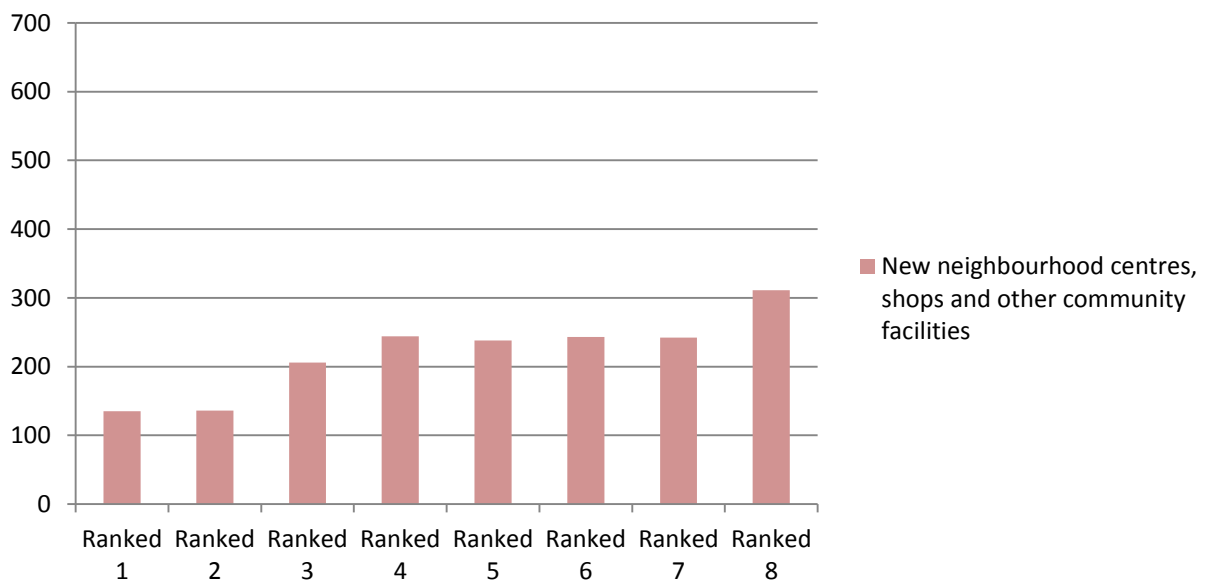
New parks, allotments, playing fields



New GP and other healthcare facilities



New neighbourhood centres, shops and other community facilities



Text Boxes

As well as having the option to rank/prioritise/indicate how they felt about the aims/approaches, respondents were able to 'add any other comments'. In total 5,355 responses were received with further comments on the Local Plan 2018 Consultation document. Using best practice, coding was applied to the responses to determine the most common general themes raised and to allow for quantitative data to be extracted. Of the 5,355 responses, 2,304 were able to be coded in this way.

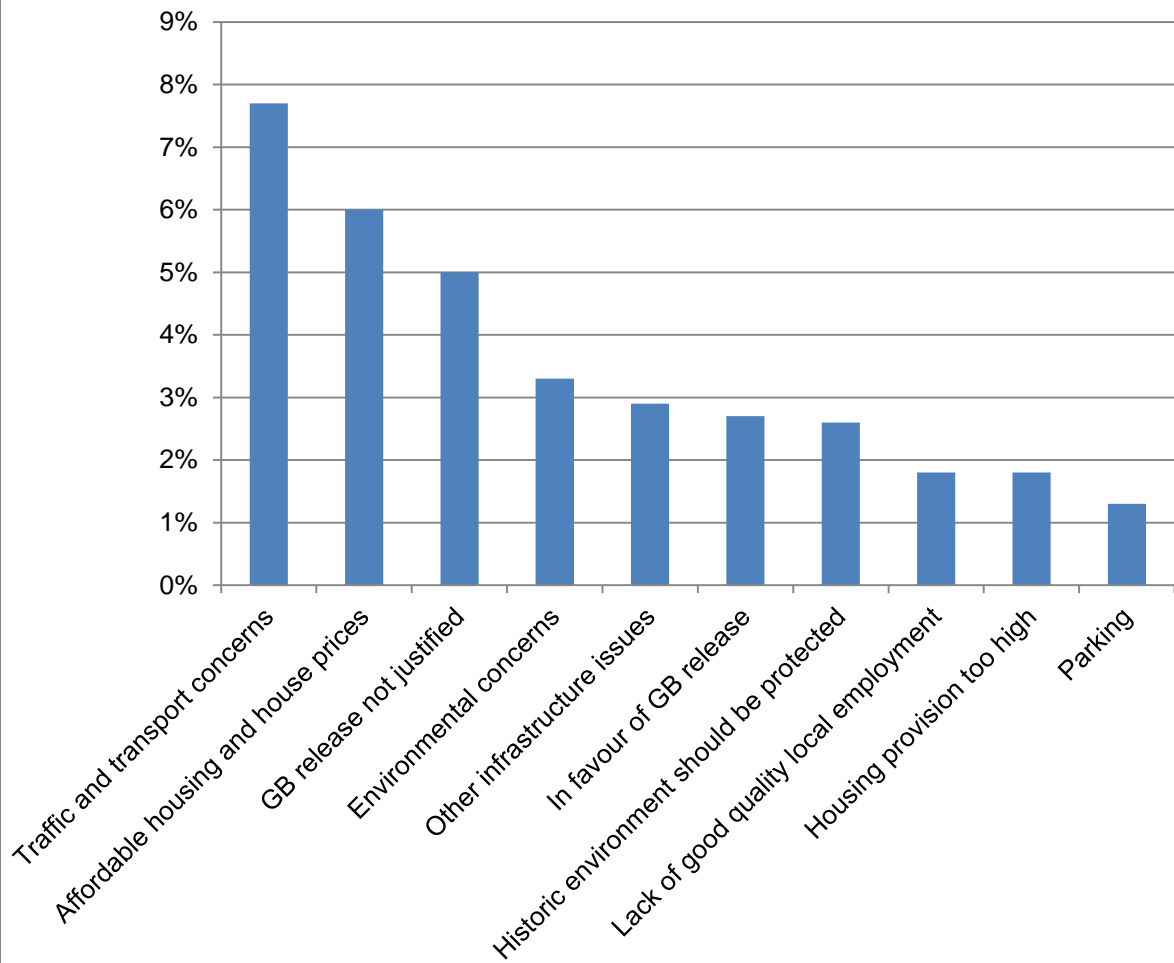
The responses were assigned to as many general themes as were applicable. To understand the richness and diversity of the responses, and the specific detail of the responses from particular consultees, the full responses can be read using the online consultation portal.

It should be noted that a number of the responses repeated the information provided in the ranking/prioritising/feelings questions and therefore did not provide additional information to be coded.

The points raised most frequently are set out in the following table and chart:


Overall rank	General theme	Number of coded comments	Percentage of total text responses (5355 responses)
1	Traffic and transport concerns, including points relating to volume of existing traffic, traffic generation of new developments, need for junction improvements, rail travel, cycle ways, bridleways	414	7.7%
2	Affordable housing and house prices, including points relating to supporting the provision of affordable housing, house prices being too high and that people should be able to buy not rent	320	6%
3	GB release not justified, including points relating to using brownfield sites and derelict sites/buildings, and to not building on the Green Belt	270	5%
4	Environmental concerns, including points relating to air quality	177	3.3%
5	Other infrastructure issues, including points relating to water supply, leisure facilities, flooding	156	2.9%
6	In favour of GB release, including points relating to new homes needing to be built in the Green Belt	146	2.7%
7	Historic environment should be protected	137	2.6%
8	Lack of good quality local employment opportunities, including points relating to apprenticeships, and opportunities for low skilled as well as highly skilled workers	99	1.8%
9	Housing provision too high, including points relating to the District being full and more homes are not need	98	1.8%
10	Parking, including points relating to the need for more parking in new developments, issue with current parking provision and requests for a park and ride	70	1.3%

Text Box coded comments - Top 10 themes



Appendix 1 – Local Plan Regulation 18 Consultation document

St Albans City & District Local Plan 2020-2036 Have your say!



St Albans
City & District Council

January 2018

Have your say

Your Council is writing a new Local Plan. It will show what can be built, and where, up to 2036.

With you, we need to make some very difficult decisions. Where should new building be located? What sort of homes do we need? How can we support business growth? What about infrastructure such as transport, schools and green spaces?

We need your views, to make sure we make the right decisions.

We are asking you about your views in the six weeks from 9 January to 21 February 2018.

There will be exhibitions about the Plan and we have put detailed information online, including a video.

Please tell us what you think, by filling in our online questionnaire. If you prefer, you can fill in this paper version and send it to us.

We will keep working on the Local Plan during 2018 so that it will be ready by March 2019.

Every resident who responds will improve the quality of the finished plan.

Thank you for taking part.

1

How to have your say

If possible, please fill in the online version of this questionnaire.
Go to www.stalbans.gov.uk/localplan2018

Why go online?

It's quick and easy.
It gives you more – view and download extra information.
It's social – see what others have said.
It saves you a stamp and your comments won't get lost in the post.

If you can't get online, or prefer not to, you can fill in this paper version and post it to us. See page 17.

We will publish your name (organisation if applicable) and comments online, but no other contact details. This applies whether you respond online or by post.



2

Why do we need a Local Plan?

Our current Local Plan dates from 1994. It is one of the oldest in the country, and needs to be replaced.

Our new Plan will help us deal with issues like these:

- Building the homes and businesses our growing population needs
- Protecting our Green Belt as much as we can
- Making it easier for local people to afford to live here
- Building affordable homes that stay affordable so key workers like teachers, firefighters and nurses can hope to live near to where they work
- Building social housing for families on our housing list, and to reduce homelessness

The government has set out how we have to develop the new Local Plan. We explain this online.

An independent Planning Inspector must examine and approve the Local Plan. They will make sure it meets all the legal requirements.

3

Getting our priorities right

Here are 6 things the Local Plan aims to do.

Q1 Enter the numbers 1 to 6, where you think 1 is the most important and 6 is the least important.

- Build homes in the right place
- Build the right kind of homes
- Provide local jobs
- Protect the Green Belt
- Protect our historic buildings, wildlife sites and areas of natural beauty
- Get the transport, schools and other infrastructure we need

Please add any other comments.



























Build homes in the right place

Local homes are increasingly expensive. Local people are being driven out of the local market. Young people can no longer afford to buy their first home. There are large waiting lists for social housing. We need to build more homes. Where we build those homes is a difficult decision and we would like your views.

It's worth knowing:

- There is limited brownfield land in the District and we have already planned to allow building on this.
- Adding more homes in built-up areas puts pressure on existing infrastructure like schools, parking and doctors' surgeries.
- 81% of the land in the District is Green Belt. The rest includes homes, businesses, commons, parks, and green spaces.
- Large-scale development on Green Belt generates the money and land that provides new infrastructure like roads, schools, shops, and parks.
- Our 2016 draft Plan said we would build 436 homes a year. It included a total of 4,000 homes in the Green Belt. The government now says we should build 913 homes a year. This would mean about 9-10,000 homes in the Green Belt.

Here are 5 ways we can build more homes.

Q2 - Enter the numbers 1 to 5, where you think 1 is the best idea and 5 is the worst		Q3 - Circle how you feel about each idea, like this 				
Add more homes into existing built-up areas	<input type="text"/>					
Build on 8 areas that least meet Green Belt purposes (see map on back page)	<input type="text"/>					
Expand existing villages into the Green Belt	<input type="text"/>					
Further expand existing towns into the Green Belt (500 - 5,000 homes)	<input type="text"/>					
Create new 'Garden Village(s)' in the Green Belt (1,500 - 10,000 homes)	<input type="text"/>					

Please add any other comments.

Build the right kind of homes

In our District, local people need more of certain types of housing.

We need to provide:

- Affordable housing – for sale or rent to people who need it. This includes social rented (60% or less of market rent), affordable rented (80% or less of market rent) and part-buy-part-rent housing (including key worker housing).
- Small first-time buyer flats (1-2 beds).
- Small/medium sized first family homes (2-3 beds).
- Homes for people downsizing.
- Homes for older people (flexi-care, nursing care homes, residential care homes).
- Self-built homes.



Here are 8 kinds of home we need to provide.

Q4 Enter the numbers 1 to 8, where you think 1 is the most important and 8 is the least		Q5 Circle how you feel about each kind of housing being built				
Social rented housing (60% of market rent)		☹️	😞	😐	😊	😄
Affordable rented housing (80% of market rent)		☹️	😞	😐	😊	😄
Part-buy / part-rented housing		☹️	😞	😐	😊	😄
Small first-time buyer flats		☹️	😞	😐	😊	😄
Small/medium sized family homes		☹️	😞	😐	😊	😄
Homes for people downsizing		☹️	😞	😐	😊	😄
Homes for older people (flexi-care, nursing homes, residential care homes)		☹️	😞	😐	😊	😄
Self-built homes		☹️	😞	😐	😊	😄

Please add any other comments.

Provide local jobs

The Local Plan will give the local economy and jobs a high priority. It aims to make it easier for people to work locally, while noting that many local people work in London. The Plan's approach is:

- Support a healthy and varied local economy, with a focus on knowledge and creative industries, financial and business services, green technology and tourism.
- Offer employers a highly skilled and flexible workforce and individuals the very best opportunities to learn, train, start businesses, develop entrepreneurial opportunities and improve their employability.



The Local Plan supports the Hertfordshire Enviro-Tech Enterprise Zone.
This zone seeks to:

- Develop the economy in the M1/M25 corridor.
- Harness the Green Triangle of local expertise in environmental technology.
- Help regenerate Hemel Hempstead.

The zone covers the area to the east of Hemel Hempstead. It also covers Rothamsted Research in Harpenden for agriculture and the Building Research Establishment in Bricklet Wood for the built environment.

Q6 Circle, like this ☺️ how you feel about this approach to local jobs.



Please add any other comments.

Protect the Green Belt

Green Belt is open land around towns and villages, where building is restricted. 81% of the District's land is Green Belt. Green Belt is there to do 5 things:



1. Stop large built-up areas from growing in an uncontrolled way.
2. Stop neighbouring towns merging into one another.
3. Protect the countryside from being spoiled.
4. Preserve the setting and special character of historic towns.
5. Help to bring life to urban areas, by encouraging developers to reuse derelict and other urban land.



Many of our homes in the District were built in the Green Belt from the 1950s to the 1980s. We need to consider doing this again. An approach would be to build on land that is the least good at doing the 5 things above.

To find these places, independent consultants carried out a Green Belt Review for us. The review found 8 areas. These areas are in yellow on the back page.

Q7 Circle like this, 😊 how you feel about this approach to identifying potential land for building in the Green Belt.



Please add any other comments.

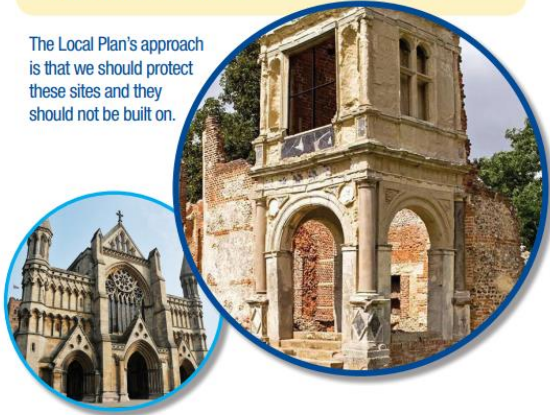
12

Protect our historic buildings, wildlife sites and areas of natural beauty

Our District has many areas that make it unique:

- Historic streets, including lots of 'Conservation Areas' where changes are more restricted.
- Nationally and locally protected buildings including St Albans Cathedral
- Important wildlife sites including the very rare chalk streams at the River Lea and River Ver.
- Areas of natural beauty like Gorbambury and Nomanstand.

The Local Plan's approach is that we should protect these sites and they should not be built on.



13

Q8 Circle how you feel about protecting these things. 😊

Historic streets and buildings	😡	😞	😐	😊	😄
Wildlife sites	😡	😞	😐	😊	😄
Areas of natural beauty	😡	😞	😐	😊	😄

Please add any other comments.

14

Get the transport, schools and other infrastructure we need

To support new homes and businesses, we need to invest in much more infrastructure.

Here are 8 kinds of infrastructure we might need.

Q9 Enter the numbers 1 to 8, where you think 1 is the most important and 8 is the least

Better public transport, including trains and buses	
New or improved roads and junctions	
More car parking	
New or improved cycling and walking facilities	
Extra primary and secondary schools	
New parks, allotments, playing fields	
New GP and other healthcare facilities	
New neighbourhood centres, shops and other community facilities	



15

What kinds of new infrastructure do you need in your area?

Sending us your comments

If possible, please fill in the online version of this questionnaire.

Go to www.stalbans.gov.uk/localplan2018

If you prefer to fill in this paper version, please enter your details opposite, then post to:

Local Plan Questionnaire
St Albans City & District Council
Civic Centre
St Peters Street
St Albans
AL1 3JE

Or email to: LP2018@stalbens.gov.uk

You can get extracts of this document in braille, large print, on audio tape, by email or in different languages. Call the Council on **01727 866100**.



About you

Full Name:

Email Address:

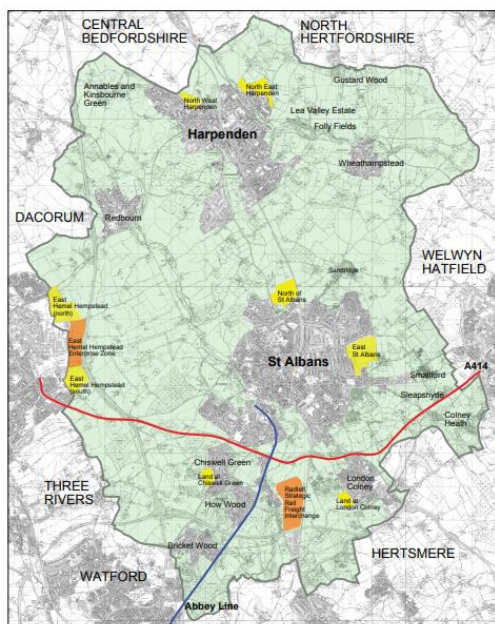
Postal address including post code:

Age Range (please tick)

- 16-24
- 25-34
- 35-44
- 45-54
- 55-64
- 65+

Responses received will be put online for all to see.

Your name (and organisation if applicable) will appear but no other personal or contact details. Petitions (even those with hundreds of names) will be considered as one response.



Draft Local Plan 2020-2036 Existing Evidence Base Diagram

- SADC District Boundary
- Green Belt
- Green Belt Review Broad Locations
- Employment Land - Enterprise Zone at East Hemel / Government Permitted Radlett Strategic Rail Freight Interchange
- Emerging Hertfordshire County Council key opportunities for transport improvement - A414
- Emerging Hertfordshire County Council key opportunities for transport improvement - Abbey Line

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Appendix 2 – Notification email sent to all individuals/organisations registered on Objective

Subject: St Albans District Council: New event available

Dear Sir/Madam

St Albans Local Plan Consultation 2018

Your Council is writing a new Local Plan. It will show what can be built, and where, up to 2036.

With you, we need to make some very difficult decisions. Where should new building be located? What sort of homes do we need? How can we support business growth? What about infrastructure such as transport, schools and green spaces?

We need your views, to make sure we make the right decisions.

The consultation period runs for six weeks between Tuesday 9 January 2018 and Wednesday 21 February 2018. Full information on the Local Plan process and the current consultation can be found at <http://www.stalbans.gov.uk/localplan2018>

Hard copies of the Local Plan consultation booklet will also be made available to view at the District, Parish and Town Councils offices as well as libraries throughout the District (details shown below).

How do I make a representation?

If possible, please fill in the online version of this questionnaire. Go to <http://www.stalbans.gov.uk/localplan2018>

Why go online?

- It's quick and easy.
- It gives you more - view and download extra information.
- It's social - see what others have said.
- It saves you a stamp and your comments won't get lost in the post.

If you prefer not to comment online, you can post your comments to us. We will publish your name (organisation if applicable) and comments online, but no other contact details. This applies whether you respond online or by post.

Please return representations to the Spatial Planning Team by 5pm on 21 February 2018:

- by online consultation system: <http://www.stalbans.gov.uk/localplan2018>
- by email to: LP2018@stalbands.gov.uk
- by post to: St Albans City & District Council, Civic Centre, St Peters Street, St Albans, AL1 3JE

If you have any queries about this consultation stage, you can contact us using the email address above.

What happens next?

At the close of the consultation all views and comments will be considered and these will help inform the next stages of the Local Plan process.

The deadline for submitting comments is 5pm on 21 February 2018.

We look forward to receiving your responses.

Yours sincerely,

Spatial Planning Team

St Albans City and District Council

Locations where hard copies of the documents can be viewed (and normal opening hours)

St Albans

- St Albans District Council Office, St Peters Street, St Albans, AL1 3JE: Mon - Thurs (8.45am - 5pm) Fri (8.45am - 4.30pm)
- St Albans Library, The Maltings, AL1 3JQ: Mon, Wed, Thurs and Fri (10-6), Tues (10am-7pm) Sat (10am-5pm) and Sun (12-4pm)
- Sandridge Parish Council Office, Marshalswick Community Centre, The Ridgeway, St Albans, AL4 9TU Mon – Fri (by appointment only)
- Marshalswick Library, The Ridgeway, AL4 9TU: Mon and Thurs (10am-6pm), Tues and Fri (1-6pm), Sat (10am-5pm)

Harpenden

- Harpenden Town Council Office, Town Hall, Leyton Road, AL5 2LX: Mon, Wed and Fri (10am-2pm)
- Harpenden Library, 27 High Street, AL5 2RU: Mon (9am-6pm), Tues (1pm-6pm), Thurs (9am-7pm), Fri (1pm-6pm); Sat (9am-5pm)

Colney Heath

- Colney Heath Parish Council, Windfall House, D1, The Courtyard, Alban Park, AL4 0LA: Mon – Fri by appointment only)

London Colney

- Parish Council Offices, London Colney Community Centre, Caledon Road, AL2 1PU: Mon - Fri (9am-2pm)
- London Colney Library, Caledon Road, AL2 1PU: Mon, Tues, Thurs and Fri (2-6pm), Sat (9am-1pm)

Redbourn

- Redbourn Parish Council Office, Redbourn Parish Centre, The Park, AL3 7LR: Mon- Thurs (10am-4pm), Fri (10am-1pm)
- Redbourn Library, Lamb Lane, AL3 7BP: Mon, Tues, Wed and Fri (2pm -6pm), Sat(9am-1pm)

Bricket Wood

- St Stephen Parish Centre, Station Road, Bricket Wood, AL2 3PJ: Mon – Fri (9am-12noon)

Wheathampstead

- Wheathampstead Parish Council Office, The Memorial Hall, Marford Road, AL4 8AY: Mon – Fri (9am-12.30pm)
- Wheathampstead Library, Memorial Hall, Marford Road, AL4 8AY: Mon-Thurs (2-6pm), Sat (9am-1pm)

This e-mail has been automatically generated by the Consultation software.

The information contained in this e-mail or in any attachments is confidential and is intended solely for the named addressee only. Access to this e-mail by anyone else is unauthorised. If you are not the intended recipient, please notify the administrator and do not read, use or disseminate the information. Opinions expressed in this e-mail are those of the sender and not necessarily the company. Although an active anti-virus policy is operated, the company accepts no liability for any damage caused by any virus transmitted by this e-mail, including any attachments.

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<http://stalbans-consult.limehouse.co.uk/common/unsubscribe.jsp?guid=11739A1E-2337-E7EA-2DD1-E6AA0C52BA09>

Appendix 3 – Deposit Points Covering Letter



Planning and Building Control
My ref: LP Reg 18 2018
Please ask for: Contact Centre Team
Telephone: 01727 866100
E-mail: LP2018@stalbans.gov.uk
Date: 9 January 2018

Dear Sir/Madam,

RE: Local Plan 2018 Consultation

The Council is inviting representations on its new Local Plan. The new Local Plan will cover topics such as housing, employment and infrastructure.

The consultation period runs for six weeks between Tuesday 9 January 2018 and Wednesday 21 February 2018.

Please find enclosed a number of documents related to the consultation (see list attached). All documents are for reference only; please could you ensure all documents are displayed throughout the consultation period which closes at 5pm on Wednesday 21 February 2018.

Exhibitions

The Council is also holding a number of exhibitions across the District where residents can get more information and speak directly with planning officers. A list of the exhibition venues and dates are given below:

Redbourn Main Hall, Redbourn Parish Council, The Park	<ul style="list-style-type: none">Tuesday 16 January, 2pm-8pm
Colney Heath Community Room, Colney Heath Village Hall, High Street,	<ul style="list-style-type: none">Wednesday, 17 January, 2pm-8pm
Wheathampstead Main Hall, Wheathampstead Memorial Hall, Marford Road	<ul style="list-style-type: none">Thursday, 18 January, 2pm-8pm
Bricket Wood Tennyson Hall, The Parish Centre, Station Road,	<ul style="list-style-type: none">Monday, 22 January, 2pm-8pm

St Albans City & District Council District Council Offices, St Peter's Street, St Albans, Herts AL1 3JE
Tel: 01727 866100  Textphone: 01727 819570 www.stalbans.gov.uk

 100% Recycled Paper

 INVESTOR IN PEOPLE

<p>St Albans</p> <p>Committee Room 1, District Council Offices, Civic Centre</p>	<ul style="list-style-type: none"> • Saturday, 20 January, 10am-1pm • Tuesday, 23 January, 2pm-8pm • Wednesday, 24 January, 2pm-8pm
<p>Marshalswick Community Centre, The Ridgeway</p>	<ul style="list-style-type: none"> • Monday, 12 February, 2pm-8pm
<p>Harpenden</p> <p>Harpenden Public Halls, Southdown Road, Harpenden,</p>	<ul style="list-style-type: none"> • Saturday, 27 January 10am-1pm • Tuesday, 30 January 2pm-8pm • Wednesday, 31 January 2pm-8pm
<p>London Colney</p> <p>Napsbury Park Sports Pavilion, Pegrum Drive, Napsbury Park, London Colney,</p>	<ul style="list-style-type: none"> • Thursday, 8 February, 2pm-8pm • Friday, 9 February, 2pm-8pm • Monday, 12 February 2pm-8pm

At the close of the consultation all views and comments will be considered and these will help inform the next stages of the Local Plan process.

The deadline for submitting comments is 5pm on **21 February 2018**.

We look forward to receiving your responses.

Yours faithfully,

Spatial Planning Team

St Albans City and District Council



Documents Included:

- 15 copies of Local Plan consultation booklet
- 4 posters advertising exhibition dates and venue
- 1 copy of the Sustainability Appraisal Working Note

Appendix 4 – Examples of Newspaper Advertisements

www.hertsad24.co.uk | Thursday, February 8, 2018
13

#SUFFRAGETTE100



“They fought for much more than the vote – they gave their lives and liberty in the search for equality and the right to education for their daughters and granddaughters. Voting gives us the power to create change. And we must become the change we want to see. We should all vote even if we don’t think our candidate will win. Leave your ballot blank if you don’t agree with any of the parties. Staying at home makes



Unity and purpose, not division and gender, should inspire us

St Albans MP Anne Main offers her personal take on the anniversary of women’s suffrage.

This year marks the centenary of the Representation of the People Act 1918, giving women the right to vote for the first time. Whilst it took a further decade to achieve full equality on voting rights for women, we cannot underestimate the gravity of the 1918 act.

At the time the establishment was appalled by the violence of suffragette movement, which culminated in the right of women to vote. But, there was also a peaceful and effective movement by the suffragists which I believe to be just as inspirational, and a more valuable message for today’s social media society.

The leader of the suffragist movement, Millicent Fawcett, said, “What draws men and women together is stronger than the brutality and tyranny which drive them apart.” What better message should we take to our young women today?

Life has moved on at a rapid pace over the last hundred years. We have seen a raft of equality legislation that makes it illegal



ministers in Scotland and Northern Ireland; and, we’ve got female head of the Met Police. In Parliament, we will now have a female Black Rod for the first time in over 650 years!

Society and technology has advanced rapidly. When I was first elected in 2005 there was no iPhone, and Facebook, Skype and Amazon had barely been conceived.

The advances in technology have improved people’s lives immeasurably – but there is an ugly side. Social media has created a pernicious platform for fake news, misleading memes, and faceless bullying.

When I speak in schools to our young women, I do not want them to be put off entering politics for fear of being screamed at electronically or receiving appalling messages in their inbox. Aggression is never the way to win an argument.

Millicent Fawcett’s words have never been truer. 100 years on, let’s encourage our young women to participate in public life by the inspirational message of unity and purpose – not division and gender.

for women to be discriminated against simply for their gender. In Britain we’ve had two female prime ministers; female first

you a statistic, become a voice for the disengaged.

“There are key areas of current policy that affect half of the population more profoundly than the other half and need attention, support and investment; health and social care, human trafficking and low pay are all fundamentally female issues. Choose one that motivates you and start to make a difference. When can women affect change? The time is now, the right time is always now.”

PLEASE HELP SHAPE OUR LOCAL PLAN



The population is growing. Where will people live? Where will they work?

Your Council is writing a new Local Plan for the District. It will show what can be built, and where, up to 2036.

With you, we need to make some important decisions. Where should new building be located? What sort of homes do we need? How can we support business growth? What about infrastructure such as transport, schools and green spaces?

FIND OUT MORE AT OUR PUBLIC EXHIBITIONS:

<p>BRICKET WOOD</p> <ul style="list-style-type: none"> • Mon 22 Jan, 2-4pm, The Parish Centre, The Parish Centre, Colney Heath, Bricket Wood, AL2 3PZ 	<p>COLNEY HEATH</p> <ul style="list-style-type: none"> • Wed 17 Jan, 2-4pm, Community Room, Colney Heath, Colney Heath, High Street, Colney Heath, AL4 6NS 	<p>ST ALBANS</p> <ul style="list-style-type: none"> • Sat 20 Jan, 10am-1pm, Committee Room 1, District Council Offices, Peters Street, St Albans, AL1 3JZ (use AL1 3JD for SatNav) • Tues 23 Jan, 10am-1pm, Committee Room 1, District Council Offices, Peters Street, St Albans, AL1 3JZ • Wed 24 Jan, 10am-1pm, Committee Room 1, District Council Offices, Peters Street, St Albans, AL1 3JZ • Mon 12 Feb, 2-8pm, Marshalswick Community Centre, The Ridgeway, St Albans, AL4 9TU 	<p>WHEATHAMPSTEAD</p> <ul style="list-style-type: none"> • Thurs 18 Jan, 10am-1pm, Parish Hall, Wheathampstead, Wheathampstead, AL4 8AY
<p>HARPENDEN</p> <ul style="list-style-type: none"> • Sat 27 Jan, 10am-1pm, London Public Halls, Southdown Road, Harpenden, AL5 1TE • Tues 30 Jan, 10am-1pm, London Public Halls (as above) • Wed 31 Jan, 10am-1pm, London Public Halls (as above) 	<p>LONDON COLNEY</p> <ul style="list-style-type: none"> • Thurs 8 Feb, 2-4pm, Napsbury Park Sports Pavilion, Pogrom Drive, Napsbury Park, London Colney, AL2 1GE • Fri 9 Feb, 2-8pm, Napsbury Park Sports Pavilion (as above) • Sat 10 Feb, 10am-1pm, Napsbury Park Sports Pavilion (as above) 	<p>REDBOURN</p> <ul style="list-style-type: none"> • Tues 16 Jan, 10am-1pm, Parish Centre, Redbourn, Redbourn, AL3 7LR 	

HAVE YOUR SAY!

PLEASE RESPOND BY 5PM ON WED 21 FEB

All documents are available on the website, and at libraries and District, Town and Parish Council offices.

Web: www.stalbans.gov.uk/localplan2018
Email: LP2018@stalbens.gov.uk
Tel: 01727 866100

MP praises support for refugees

AN MP has "lamented" Barmese treatment of the Rohingya refugees in Myanmar.

Mrs Main recounted the 'atrocious conditions' she witnessed during a recent visit to the refugee camps, and expressed her praise for the UK government's support for the refugees during a debate in Westminster.

More than half a million have fled the destruction of their homes and persecution in the northern Rakhine province of Myanmar for neighbouring Bangladesh since August 2017.

The St Albans MP welcomed the recent news of a delay in the implementing of the 'Memorandum of Understanding' between Bangladesh and Burma. This agreement has been widely criticised as 'rushed' and that it 'does not provide adequate safeguards' for the Rohingya refugees upon their return to Rakhine state.

"I am pleased that current repatriation plans are no longer being considered. The memorandum of understanding does not even mention the word "Rohingya". How can there be no voice for the Rohingyas at the negotiating table?"

Mrs Main added, "It is totally unacceptable that the oppressors, who are land-mining the border and driving people out with machine guns, and who have denied these people their rights since 1982, should be divvying up the role of the Rohingyas and their future."

Anne praised the 'humanity and love' shown by the Bangladeshi people during this crisis and urged the government to do everything it could to 'get a seat at the table' for the Rohingyas.

The UK government is the largest bilateral donor to the crisis with over £39 million being sent to the aid effort.



Nine disabled people have gone skiing in Austria thanks to Harpenden-based Jumbalance Trust

Charity helps disabled people go skiing

A charity that provides getaways for people with disabilities and serious illnesses has embarked on its annual ski trip.

Jumbalance Trust, which is based in Harpenden, headed to Austria on Saturday.

Nine people, along with carers, nurses, and special instructors

travelled to the Nisneran resort.

Francesca Goodwin, 30, from Eves says she "couldn't walk" to get going.

Mrs Goodwin, who has severe cerebral palsy, said: "This is an extreme sport I can do so I just can't wait to ski down the mountains at high speed and learn

to read the ski runs. The social side is also great, I really enjoy meeting friends."

The ski trips are made possible thanks to Jumbalance's partnership with Shanly Homes.

Its Shanly Foundation has donated almost £32,000 to the charity since 2008.

PLEASE HELP SHAPE OUR LOCAL PLAN



The population is growing. Where will people live? Where will they work?

Your Council is writing a new Local Plan for the District. It will show what can be built, and where, up to 2034.

With you, we need to make some important decisions. Where should new building be located? What sort of homes do we need? How can we support business growth? What about infrastructure such as transport, schools and green spaces?

We need your views to help us make the right decisions.

Our six week consultation runs until Wednesday 21 February.

We are running lots of public exhibitions, and delivering booklets to local homes too. To see our video and take part in the online consultation, please go to: www.stalbans.gov.uk/localplan2018.

FIND OUT MORE AT OUR PUBLIC EXHIBITIONS:

BRICKET WOOD

- Mon 22 Jan, 10am-12pm, Town Hall, The Parish Centre, Bricket Wood, AL2 3PJ

HARPENDEN

- Sat 27 Jan, 10am-12pm, Harpenden Public Halls, Southdown Road, AL5 1TE
- Tues 30 Jan, 10am-12pm, Harpenden Public Halls (as above)
- Wed 31 Jan, 2-4pm, Harpenden Public Halls (as above)

COLNEY HEATH

- Wed 17 Jan, 10am-12pm, Community Room, Colney House, Colney Heath, AL4 0NS

LONDON COLNEY

- Thurs 8 Feb, 2-8pm, Napsbury Park Sports Pavilion, Pegrum Drive, Napsbury Park, London Colney, AL2 1GE
- Fri 9 Feb, 2-8pm, Napsbury Park Sports Pavilion (as above)
- Sat 10 Feb, 10am-1pm, Napsbury Park Sports Pavilion (as above)

REDBOURN

- Tues 14 Jan, 10am-12pm, Town Hall, Redbourn Parish Centre, Redbourn, AL3 7LR

ST ALBANS

- Sat 20 Jan, 10am-12pm, Committee Room 1, District Council Offices, District Council Offices, High Street, St Albans, AL1 3JE (use AL1 3LD for SatNav)
- Tues 23 Jan, 10am-12pm, Committee Room 1, District Council Offices (as above)
- Wed 24 Jan, 10am-12pm, Committee Room 1, District Council Offices (as above)
- Mon 12 Feb, 2-4pm, Marshalswick Community Centre, The Ridgeway, St Albans, AL4 9TU

WHEATHAMPSTEAD

- Thurs 18 Jan, 10am-12pm, Town Hall, Wheathampstead Memorial Hall, Wheathampstead, AL4 6AY



All documents are available on the website, and at libraries and District, Town and Parish Council offices.

Web: www.stalbans.gov.uk/localplan2018 Email: LP2018@stalbans.gov.uk Tel: 01727 866100

ST ALBANS CITY AND DISTRICT COUNCIL

<u>REPORT TO :</u>	Planning Policy Committee
<u>DATE :</u>	17 April 2018
<u>REPORT TITLE :</u>	Draft Local Plan and Call for Sites - Report of Consultation
<u>WARDS :</u>	All
<u>PORTFOLIO HOLDER:</u>	Cllr Mary Maynard
<u>CONTACT OFFICER :</u>	Tracy Harvey - Head of Planning and Building Control

1.0 Purpose Of Report

- 1.1 To report the responses to the consultation on the Local Plan (LP) Regulation 18 consultation and the associated Call for Sites.

2.0 Recommendations

- 2.1 That finalisation and publication of the Local Plan Regulation 18 Report of Consultation is delegated to the Head of Planning and Building Control (HPBC); in consultation with the Chair. This will take into account any comments made by the committee and any comments made by email to the HPBC before Monday 23 April.

3.0 Background Information

- 3.1 As agreed at Planning Policy Committee (PPC) and Cabinet in November 2017, the draft Local Plan was consulted on for a period of six weeks from 9 January to 21 February 2018. The consultation was undertaken in accordance with the requirements of Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 3.2 Alongside this formal Local Plan consultation was a 'Call for Sites' seeking submissions from landowners/developers/promoters for potential development land. As agreed at PPC and Cabinet, this Call for Sites was focussed primarily on sites for residential development, but was also open to sites for other uses. This included sites for Employment, Health, Schools, Gypsy and Traveller and 'Other' uses.
- 3.3 At its March 2018 meeting the Committee received an overview report on the consultation (level of response, including exhibition attendance etc.).
- 3.4 This report presents analysis of the responses to the consultation on the Local Plan (LP) Regulation 18 consultation and the associated Call for Sites.

Analysis and Findings

Local Plan Consultation responses

- 4.1 The analysis is presented at Appendix 1 to this report. It is set out in sections, aligning with the questions in the LP consultation.
- 4.2 As requested by PPC and as designed by the Committee through shaping the consultation booklet, the information can largely be reported quantitatively.
- 4.3 As the Committee has noted on previous occasions, it is important to bear in mind that evidence is key in Local Plan preparation. Numbers of representations in favour of, or against, certain policies or approaches is informative. Ultimately, however, decisions on the content of the Local Plan will need to be informed by a range of evidence. Numbers of representations, the content of those representations and the evidence supplied with them, are only a part of that wider evidence base.
- 4.4 It can be noted that some of the report of consultation is different to those for the Strategic Local Plan (SLP) and Detailed Local Plan (DLP). This is because this Local Plan consultation was high level and did not contain specific draft policies or proposals. Therefore there is no equivalent section of the report to those from the SLP and DLP that set out 'proposed changes' or 'no change' to the Plan itself.
- 4.5 It is important to bear in mind when considering the analysis that responses are summarised briefly. To fully understand some of the more detailed responses, readers of the document may wish to refer back to the full text of the responses. These are all publically available in the Council's Consultation Portal.
- 4.6 Officers are grateful for the considerable time, effort and thought undertaken by numerous individuals and organisations in making their comments.

Call for Sites Consultation responses

- 4.7 The submissions are presented in Appendices 2 and 3 to this report.
- 4.8 As noted by the Committee in March, it is very important to bear in mind that the report simply sets out all the sites that have been submitted for consideration. No decisions have yet been taken on what will be included or excluded from the Local Plan itself. Based on previous submissions under the Call for Sites, it is indeed highly likely that a large proportion of the sites submitted will not be allocated for development.
- 4.9 As can be seen in the schedule of submitted sites 2018 (Appendix 2) and the map of submitted sites 2018 (Appendix 3), there is a widespread distribution of such sites across the District.

- 4.10 It should be noted that the Strategic Site Assessment process agreed by PPC will include sites submitted to previous 'call for sites' exercises as well. The large majority of sites that have previously been submitted have also been submitted in 2018 and are set out in Appendix 2 and 3. There are a small number of sites where submissions previously made were not made this time. Links to submissions made in 2009 and 2016 can be found at: https://www.stalbans.gov.uk/Images/SP_SHLAA_2008_App6_WholeDistrict_tcm15-12329.pdf and https://www.stalbans.gov.uk/Images/SP_SLP_SHLAA_001pWholeDistrictBackgroundMap2016_tcm15-55174.pdf

5.0 **Conclusion**

- 5.1 The contents of this report and the March 2018 PPC report will be combined and published on the Council's website as a 'Report of Consultation'. This will provide a formal record of the Draft Local Plan consultation – a statutory requirement (as part of the Regulation 18 stage of the Local Plan process).
- 5.2 The response rate from individuals and key organisations has been good, with representations received from key infrastructure providers, statutory consultees, MPs, interest groups and landowners. This provides a good basis on which to continue progress with the draft Local Plan.

6.0 **Implications**

- 6.1 This table provides a short statement of the impact of the recommendations in this report and / or a reference to the relevant paragraph/s in the report.

Will this report affect any of the following?	Yes/No	Impact/Reference
Vision and Priorities	Yes	Whole report relates to planning for the future. However there are no direct implications from this report because decisions are not required at this point.
Policy	Yes	As for Visions and Priorities above
Financial	No	As for Visions and Priorities above
Impact on the community	Yes	As for Visions and Priorities above
Legal and Property	No	As for Visions and Priorities above
HR/Workforce	No	As for Visions and Priorities above
Risk Assessment	No	As for Visions and Priorities above

Environmental Sustainability	Yes	As for Visions and Priorities above
Health and Wellbeing	Yes	As for Visions and Priorities above

7.0 **Further Information/Appendices**

7.1 Appendix 1 Draft Local Plan Report of Consultation

7.2 Appendix 2 Schedule of submitted sites 2018

7.3 Appendix 3 Map of submitted sites 2018

8.0 **Background Papers - Local Government (Access to Information) Act 1985**

ST ALBANS CITY AND DISTRICT COUNCIL

<u>REPORT TO :</u>	Planning Policy Committee
<u>DATE :</u>	12 December 2018
<u>REPORT TITLE :</u>	Draft Local Plan Publication (Regulation 19 Stage) consultation – Representations overview
<u>WARDS :</u>	All
<u>PORTFOLIO HOLDER:</u>	Cllr Mary Maynard
<u>CONTACT OFFICER :</u>	Tracy Harvey - Head of Planning and Building Control

1.0 **Purpose Of Report**

1.1 To provide an overview of the responses to the publication draft Local Plan (LP).

2.0 **Recommendations**

2.1 That the Committee notes the contents of this report.

3.0 **Background Information**

3.1 Having proceeded through Planning Policy Committee (PPC) and Cabinet, the draft LP was discussed at Full Council on 11 July 2018. Full Council agreed to proceed to publication stage under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

3.2 The publication period ran for 6 weeks between 4 September and 17 October 2018. The consultation was widely publicised and interested parties had a range of opportunities with which to engage in the process. This included:

- Formally consulting specific (statutory) and general (non-statutory consultees), Duty to Cooperate Bodies and those registered on the Council's consultation database
- Web consultation portal (Objective) publication of the draft Local Plan and associated documents, with facility to comment online
- Online video
- Associated availability of technical documents
- Web consultation portal based notifications to interested parties
- Web consultation portal based response system that allows open viewing of submissions made
- Deposit of printed documents with libraries and town and parish councils
- Media advertisements/coverage
- Social media

4.0 **Analysis and Findings**

Social Media and Online Video

- 4.1 The Local Plan video was available to view on the Council's website, on YouTube and as part of a Facebook campaign.
- 4.2 On Facebook, the video had a reach of 26,762 (number of unique people who were offered the video) and the video was viewed for at least 10 seconds on Facebook 11,798 times.
- 4.3 On the Council's website and on YouTube, in total, the video was viewed 289 times.
- 4.4 The video has been 'liked' three times and 'disliked' once.

Local Plan Consultation responses

- 4.5 Representations were received from local residents, specific (statutory) consultees, landowners/developers, amenity groups and infrastructure providers.
- 4.6 Representations were received from approximately 270 respondents, making approximately 1,777 comments.
- 4.7 One of the representations included a petition with 121 names. As agreed by the Planning Policy Committee (PPC), petitions against the Local Plan are treated as one representation, but with all copies attached. The details of the petitioners have also been added to the consultation database so that they can be kept informed of the Local Plan process.
- 4.8 The number of respondents by method of response were (NB: duplicate methods of response not counted):

People responded through consultation portal: 144

People responded by email: 112

People responded by letter: 14

TOTAL: 270

- 4.9 This total of 270 is similar to the total of 324 responses received for the 2016 former Strategic Local Plan (Regulation 19) Publication consultation.
- 4.10 Representations were received from key infrastructure providers to the consultation including:
- Hertfordshire County Council (transport, environment and public health)
 - Thames Water
 - NHS Herts Valley Clinical Commissioning Group
 - West Herts Hospital Trust
 - NHS Property Services Ltd

- Hertfordshire Enterprise Zone
- National Grid
- Network Rail

4.11 Neighbouring/nearby planning authorities also responded to the consultation, including:

- Bedford Borough Council
- Central Bedfordshire Council
- Dacorum Borough Council
- Hertfordshire County Council
- Hertsmere Borough Council
- Luton Borough Council
- North Hertfordshire District Council
- Watford Borough Council
- Welwyn Hatfield Borough Council

4.12 Other key stakeholders who responded included:

- Environment Agency
- Natural England
- Historic England
- Home Builders Federation
- Greater London Authority
- Department for Education
- Sport England

4.13 A number of other significant stakeholders responded to the consultation including local residents, residents associations, amenity groups, broad location landowner/developer teams, and other landowner/developers.

4.14 All representations have had to go through a process of 'initial screening' to fulfil the Council's responsibilities in regard to potential defamatory/unlawful content. They have also all had to go through a process of categorisation and logging in order to fulfil the Council's obligations under the Town and Country Planning (Local Planning) (England) Regulations 2012. This aims to ensure that in due course the independent Inspector at Examination in Public has all the relevant representations available to them and that they are all in the approved format.

4.15 All representations can be viewed on the Council's website at www.stalbans.gov.uk/localplan2018.

4.16 A contact number and email address were available for residents to use if difficulties were encountered. Officers were able to respond to and assist residents and stakeholders to deal with immediate issues. Approximately ten residents/stakeholders used this.

Equalities Monitoring Form

4.17 Of the 144 consultees that made representations directly through Objective, 92 (64%) completed the Equalities Monitoring Form (EMF). No EMFs were received by email or post.

4.18 Of the 92 consultees that completed the EMF:

Age range of respondents: 16-24 (2.2%), 25-34 (5.4%), 35-44 (15.2%), 45-54 (16.3%), 55-64 (29.3%), 65+ (31.5%)

The comparison for District residents is:

Age range of District residents: 16-24 (10.9%), 25-34 (14.9%), 35-44 (20.2%), 45-54 (19.1%), 55-64 (13.7%), 65+ (21.2%)

4.19 The geography of the respondents (Objective, email, post):

Geography: St Albans - 54%, Harpenden – 10.2%, Redbourn – 2.3%, Other – 33.5%

The comparison for District residents is:

Geography of District residents: St Albans - 52%, Harpenden - 20.6%, Redbourn – 4.4%, Other - 23%

4.20 At the Local Plan Regulation 18 stage, 2,033 respondents provided their age:

Age range of respondents: 16-24 (0.6%), 25-34 (5.9%), 35-44 (13.7%), 45-54 (18.2%), 55-64 (21.5%), 65+ (40%)

4.21 At the Regulation 18 stage, 2,310 respondents provided their location:

Geography: St Albans – 65.8%, Harpenden – 20.8%, Redbourn – 2%, Other – 11.4%

Representations - Initial Headlines

4.22 As addressed previously in PPC reports in 2016 and 2017, the 2016 draft SLP failed the 'Duty to Cooperate' (DtC) according to the Government's appointed Inspector. That view was sustained by the High Court. The Inspector's view was essentially based upon the DtC objections raised by some of the adjoining Local Authorities. These authorities had raised DtC objections at the SLP Reg 19 Publication stage and then maintained those objections at the SLP Initial Hearing. Officers note that no such DtC objections have been raised by adjoining/nearby Local Authorities (including HCC) to this Reg 19 Local Plan.

4.23 No other objections regarding the DtC have been raised by the other 'prescribed bodies' set out in the relevant Regulations.

- 4.24 It is important to note that some potentially significant ‘soundness’ issues have been raised by Local Authorities, stakeholders and residents. These will need full consideration by the committee and officers in due course. DtC and legal objections have also raised been by stakeholders and residents which will need full consideration by the committee and officers in due course
- 4.25 Officers have consulted with external Counsel, informing this initial high level review of responses.
- 4.26 A number of Portfolio Holder and officer meetings are being undertaken in order to make progress with addressing a number of issues raised by key consultees.

5.0 **Conclusion**

- 5.1 The response rate from key organisations has been good, with representations received from key infrastructure providers, statutory consultees, interest groups and landowners.
- 5.2 All of the representations have gone through the initial processing and are available to view on the Council’s website.
- 5.3 As set out in the current Work Programme on the Agenda, the responses to the consultation will be reported in detail to PPC at its January 2019 meeting. Officer recommended responses to those detailed comments will be reported to the March 2019 PPC meeting.

6.0 **Implications**

- 6.1 This table provides a short statement of the impact of the recommendations in this report and / or a reference to the relevant paragraph/s in the report.

Will this report affect any of the following?	Yes/No	Impact/Reference
Vision and Priorities	Yes	The whole report relates to planning for the future. There are however no direct implications from this report as decisions are not required at this stage.
Policy	Yes	The whole report relates to planning for the future. There are however no direct implications from this report as decisions are not required at this stage.
Financial	No	There are no financial implications arising from this report.
Impact on the community	Yes	The whole report relates to planning for the future. There are however no direct implications from this report as decisions are not required at this

		stage.
Legal and Property	No	There are no legal and property implications arising from this report.
HR/Workforce	No	There are no HR/Workforce implications arising from this report.
Risk Assessment	No	There are no risks arising from this report.
Environmental Sustainability	Yes	The whole report relates to planning for the future. There are however no direct implications from this report as decisions are not required at this stage.
Health and Wellbeing	Yes	The whole report relates to planning for the future. There are however no direct implications from this report as decisions are not required at this stage.

7.0 **Further Information/Appendices**

7.1 None

8.0 **Background Papers - Local Government (Access to Information) Act 1985**

Past Planning Policy Committee Reports / Minutes	Joanna Woof x 2663	St Albans City and District Council - Browse meetings - Planning Policy Committee
Publication Draft Local Plan Consultation Responses	Joanna Woof X 2663	LP Consultation Portal

ST ALBANS CITY AND DISTRICT COUNCIL

<u>REPORT TO :</u>	Planning Policy Committee
<u>DATE :</u>	15 January 2019
<u>REPORT TITLE :</u>	Draft Local Plan Publication (Regulation 19 Stage) Consultation - Detailed Representations.
<u>WARDS :</u>	All
<u>PORTFOLIO HOLDER:</u>	Cllr Maynard
<u>CONTACT OFFICER :</u>	Tracy Harvey - Head of Planning and Building Control

1.0 **Purpose Of Report**

1.1 To summarise representations received in response to the Draft Local Plan.

2.0 **Recommendations**

2.1 That the report be noted.

3.0 **Background Information**

3.1 At its meeting in December 2018 Planning Policy Committee (PPC) considered a report entitled Draft Local Plan Publication (Regulation 19 Stage) Consultation - Representations Overview.

3.2 This report provides more information on the content of the Representations.

3.3 The Table at Appendix 1 provides a summary of the content of the representations. It is organised in a standard format that records:

- Representation Point
- Representor(s) Raising Point - identified by a representor number. This can be used to identify and read the full representation in the Council's consultation portal. Where the representation is from a key organisation or body the representor title / name is also given.

The table is set out in order of policy (and other plan section) headings.

3.4 This analysis serves two main purposes:

- Local Plan Regulations require the Council to prepare a summary of the representations received at Publication (Regulation 19 stage) and include it as a submission (Regulation 22) document (see further information on statutory submission requirements at Appendix 2). There is no prescribed format for this, but the aim is to assist the Public Examination inspector and participants in the Public Examination (Regulation 24), by providing an organised, easily used, summary of the representations received.

- It allows PPC to consider the range of representations on the Plan before submission and to decide if it wishes to suggest any changes to Cabinet. This is not a statutory (legal Regulations) requirement, but is recommended in the relevant Planning Inspectorate Guidance (see Appendix 2).

4.0 **Analysis and Findings**

- 4.1 In accordance with the agreed Work Programme, the Appendix 1 Table format includes future headings, which will be filled out and reported to the March PPC meeting. The additional information will be the officer's recommended response and any related actions.
- 4.2 PPC, Cabinet and Council considered all of the available evidence and the content of the draft Local Plan in detail throughout 2018. There had been much detailed consideration of evidence before that time as well. Therefore, the reasonable expectation is that the majority of officer recommended responses will be 'no change' to the draft LP.
- 4.3 Any suggested changes can take the form of 'minor modifications' to the draft LP (updates, corrections or clarifications), or could potentially be more substantive points of change related to Plan soundness. Depending on the nature of any substantive changes, they may require further publication consultation under Regulation 19 and further Sustainability Appraisal/Strategic Environmental Assessment work. If fundamental matters concerning the Duty To Cooperate (DtC), legal requirements or 'soundness' of the Plan are accepted by the Council, a further whole Regulation 19 publication consultation or even a reversion to Regulation 18 stage may be required.
- 4.4 From initial reviews of the Regulation 19 submissions, it is currently envisaged that the March 2019 PPC Report will include officer recommendations for a series of 'minor modifications'.
- 4.5 As set out in reports to the December 2018 PPC meeting, no DtC objections have been raised by adjoining/nearby Local Authorities (including HCC) to this Reg 19 Local Plan. No other objections regarding the DtC have been raised by the other 'prescribed bodies' set out in the relevant Regulations.
- 4.6 The main issues arising are all related to plan 'soundness' and can be grouped (at a high level) as follows:
- Alternative development site promotions
 - South West Herts strategic planning position
 - Infrastructure
 - General policy wording detail / issues

4.7 It is important to note that at Regulation 19 stage, it is common for organisations, stakeholders and individuals who support the Plan not to comment. This is because the procedures for the Examination (which the Regulation 19 process leads towards) focus on identifying matters where there are ‘objections’ for the Inspector’s consideration.

4.8 There will be further officer refinement of the wording at Appendix 1 as it is taken forward to the March 2019 PPC meeting. This was always intended to be the case, but the issues discussed at the December 2018 PPC meeting regarding staff vacancies (and now staff long term illness absence as well) has resulted in a greater level of update being required. These updates will include taking into account any comments from the committee.

5.0 **Conclusions**

5.1 The report sets out the first stage of analysis of the detailed points that have been raised in representations on the Publication Draft Plan and assists the Committee to consider them and comment as necessary.

6.0 **Implications**

6.1 This table provides a short statement of the impact of the recommendations in this report and / or a reference to the relevant paragraph/s in the report.

Will this report affect any of the following?	Yes /No	Impact/Reference
Vision and Priorities	Yes	Whole report relates to planning for the future. However there are no direct implications from this report because decisions are not required at this point
Policy	Yes	As for vision and priorities above
Financial	No	
Impact on the community	Yes	As for vision and priorities above
Legal and Property	No	
HR/Workforce	No	
Risk Assessment	No	
Environmental Sustainability	Yes	As for vision and priorities above
Health and Wellbeing	Yes	As for vision and priorities above

7.0. **Further Information/Appendices**

7.1 **Appendix 1** - Publication Draft Local Plan - Initial Analysis of Issues Arising (January 2019)

7.2 **Appendix 2** – Statutory Submission Documents - Extract from Planning Inspectorate Guidance (paras 1.9-10) Summarising Regulations.

8.0 **Background Papers - Local Government (Access to Information) Act 1985**

<u>Bibliography</u>	<u>Custodian</u>	<u>File Location</u>
Past papers Planning Policy Committee	Jo Woof x2663	<u>Planning Policy Committee</u>

Appendix 2 – Statutory Submission Documents - Extract from Planning Inspectorate Guidance (paras 1.9-10) Summarising Regulations.

Certain prescribed documents must be submitted in accordance with Regulation 22:

- *The plan (and submission Policies Map if the adoption of the local plan would result in changes to the adopted Policies Map)*
- *The sustainability appraisal report*
- *Statement of Community Involvement (where one is adopted)*
- *Statement under Regulation 22(1) (c) (i-iv) setting out how the Council complied with Regulation 18 on participation in production of the plan showing:*
 - Who was invited to make representations*
 - How they were invited*
 - Summary of the main issues raised*
 - How these representations were taken into account*
- *Statement under Regulation 22(1)(c) (v-vi) relating to the formal representations procedure following publication of the plan and showing:*
 - The number of representations received*
 - Summary of the main issues raised*
- *Copies of the representations made in accordance with regulation 22(1) (d)*
- *Such supporting documents relevant to the preparation of the plan under Regulation 22(1)(e) including the evidence base.*

1.10. It is well worth investing the time in producing a focused and comprehensive statement of the main issues under Reg 22(1)(c)(v) as this will be the first introduction of the Inspector to the likely issues to be addressed in the examination. While not a legal requirement, it is also very helpful if the LPA briefly indicates its response to the representations, i.e. both to the main issues it has identified and to all the representations.

ST ALBANS CITY AND DISTRICT COUNCIL

<u>REPORT TO :</u>	Planning Policy Committee
<u>DATE :</u>	13 March 2019
<u>REPORT TITLE :</u>	Draft Local Plan Publication (Regulation 19 Stage) Consultation - Detailed representations and recommended responses
<u>WARDS :</u>	All
<u>PORTFOLIO HOLDER:</u>	Cllr Maynard
<u>CONTACT OFFICER :</u>	Tracy Harvey - Head of Planning and Building Control

1.0 **Purpose Of Report**

- 1.1 To summarise representations received in response to the Draft Local Plan and provide concise officer recommended responses.

2.0 **Recommendations**

- 2.1 That the report be noted.

3.0 **Background Information**

- 3.1 At its meeting in December 2018 Planning Policy Committee (PPC) considered a report entitled 'Draft Local Plan Publication (Regulation 19 Stage) Consultation - Representations Overview'.
- 3.2 At its meeting in January 2019 Planning Policy Committee (PPC) considered a report entitled 'Draft Local Plan Publication (Regulation 19 Stage) Consultation - Detailed Representations'. This report provides more information on the content of the Representations and also provides concise officer recommended responses.
- 3.3 The Table at Appendix 1 provides a summary of the content of the representations and the officer recommended reply and actions. It is important to note that many of the representations are very detailed and to fully capture the details of the points raised the original representation will need to be considered. Summaries of this kind are by their nature operating at a high level. The Table is organised in a standard format that records:
- Representation Point
 - Representor(s) Raising Point - identified by a representor number. This can be used to identify and read the full representation in the Council's consultation portal. Where the representation is from a key organisation or body the representor title / name is also given.
 - Outline Reply

- Recommended Reply
- Suggested Actions

The table is set out in order of policy (and other plan section) headings.

3.4 This analysis serves two main purposes:

- Local Plan Regulations require the Council to prepare a summary of the representations received at Publication (Regulation 19 stage) and include it as a submission (Regulation 22) document (see further information on statutory submission requirements at Appendix 2). There is no prescribed format for this, but the aim is to assist the Public Examination inspector and participants in the Public Examination (Regulation 24), by providing an organised, easily used, summary of the representations received.
- It allows PPC to consider the range of representations on the Plan before submission and to decide if it wishes to suggest any changes to Cabinet. This is not a statutory (legal Regulations) requirement, but is recommended in the relevant Planning Inspectorate Guidance (see Appendix 2).

4.0 **Analysis and Findings**

4.1 As discussed at PPC in January 2019, the draft of the first two columns from that meeting has been completed and updated. Additionally, the third, fourth and fifth columns have been completed.

4.2 As noted at PPC in January 2019, PPC, Cabinet and Council considered all of the available evidence and the content of the draft Local Plan in detail throughout 2018. There had been much detailed consideration of evidence before that time as well. Therefore, the reasonable expectation is that the majority of officer recommended responses will be 'no change' to the draft LP.

4.3 Any suggested changes can take the form of 'minor modifications' to the draft LP (updates, corrections or clarifications), or could potentially be more substantive points of change related to Plan soundness or legal compliance. Depending on the nature of any substantive changes, they may require further publication consultation under Regulation 19 and further Sustainability Appraisal/Strategic Environmental Assessment work. If fundamental matters concerning the Duty To Cooperate (DtC), legal requirements or 'soundness' of the Plan are accepted by the Council, a further whole Regulation 19 publication consultation or even a reversion to Regulation 18 stage may be required.

4.4 As indicated likely in the January 2019 PPC Report, the completed officer review set out at Appendix 1 sets out officer recommendations for a series of 'minor modifications'. Officers consider that there is no evidence that requires more substantive points of change and no evidence that requires a further Regulation 19 publication consultation (or reversion to earlier Plan stages).

- 4.5 In discussion at PPC in January 2019 the possibility was raised of Councillors requesting officers for more detailed replies to some responses. If required, it was agreed that these would be identified by Councillors (to officers) prior to the March PPC meeting. It was also agreed that any substantive correspondence with officers on these matters would be included in the evidence base. There have been no specific responses identified in this way and no substantive correspondence to publish.
- 4.6 The 'minor modifications' identified are intended to be collated and sent to the Secretary of State as part of the timetabled Local Plan submission. This is the standard approach to these non-substantive issues. The issue of Local Plan submission itself is subject to another report on this Agenda. It should be noted that it is highly likely that, as part of ongoing work during an Examination, further minor modifications will emerge.
- 4.7 As set out in reports to the December 2018 PPC meeting, no DtC objections have been raised by adjoining/nearby Local Authorities (including HCC) to this Regulation 19 Local Plan. No other objections regarding the DtC have been raised by the other 'prescribed bodies' set out in the relevant Regulations.
- 4.8 The main issues arising are all related to plan 'soundness' and can be grouped (at a high level) as follows:
- Alternative development site promotions
 - South West Herts strategic planning position
 - Infrastructure
 - Objections to development in the Green Belt
 - General policy wording detail / issues
- 4.9 It is important to note that at Regulation 19 stage, it is common for organisations, stakeholders and individuals who support the Plan (and/or specific elements of the Plan) not to comment. This is because the procedures for the Examination (which the Regulation 19 process leads towards) focus on identifying matters where there are 'objections' for the Inspector's consideration.
- 4.10 It is also important to note that all of the Regulation 19 responses will be available in full for consideration at the Examination stage by the appointed Inspector.

Regulation 18 consultation – report of consultation

- 4.11 A generally related matter regarding the Regulation 18 consultation was raised at PPC in January 2019, as set out in the draft Minutes:

Members asked for documentary evidence, such as a matrix, or a statement, to show how the responses to the Regulation 18 consultation had been addressed and incorporated into the Draft Local Plan. Officers agreed to refer back to previous reports on the Regulation 18 consultation and to check if this was sufficient or if more needed to be done to provide this evidence in order to assist the Inspector.

4.12 There was a PPC Report on 17 April 2018 entitled “Draft Local Plan and Call for Sites - Report of Consultation”. Appendix 1 to that report was a comprehensive report of consultation consisting of 79 pages setting out the Regulation 18 consultation process and the responses to it. Consideration of this report and the representations made/issues raised at this (and subsequent) meetings of PPC, Cabinet and Council meets the requirements set out in Appendix 2, as “How these representations were taken into account”.

4.13 As an example, the report of consultation set out that:

In total, 2,147 respondents answered Question 1. The overall order of priority given to the options was:

- 1. Get the transport, schools and other infrastructure we need*
- 2. Protect our historic buildings, wildlife sites and areas of natural beauty*
- 3. Protect the Green Belt*
- 4. Build homes in the right place*
- 5. Build the right kind of homes*
- 6. Provide local jobs*

4.14 Members have clearly ‘taken into account’ the prioritisation in the representations of infrastructure delivery in discussions at that PPC meeting and on a regular basis since. There has been direct ‘taking into account’ of the representations in this and other regards in the draft Local Plan itself. An example is the significant infrastructure requirements for the Broad Locations in Policy S6.

4.15 Following through with the initial query identified by Members in January, officers intend to add a short addendum to the Local Plan Regulation 18 ‘report of consultation’. This would be to set the above context at paragraphs 4.10-4.13 out for additional clarity for the Inspector.

5.0 **Conclusions**

5.1 The report sets out the concise analysis of the detailed points that have been raised in representations on the Publication Draft Plan and recommended replies and actions. It provides the opportunity for the Committee to consider them and comment as necessary.

5.2 It sets out officer recommendations for a series of ‘minor modifications’. Officers consider that there is no evidence that requires more substantive points of change and no evidence that requires a further Regulation 19 publication consultation (or reversion to earlier Plan stages).

6.0 **Implications**

6.1 This table provides a short statement of the impact of the recommendations in this report and / or a reference to the relevant paragraph/s in the report.

Will this report affect any	Yes	Impact/Reference
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of the following?	/No	
Vision and Priorities	Yes	Whole report relates to planning for the future. However there are no direct implications from this report because decisions are not required at this point
Policy	Yes	As for vision and priorities above
Financial	No	
Impact on the community	Yes	As for vision and priorities above
Legal and Property	No	
HR/Workforce	No	
Risk Assessment	No	
Environmental Sustainability	Yes	As for vision and priorities above
Health and Wellbeing	Yes	As for vision and priorities above

7.0. **Further Information/Appendices**

7.1 **Appendix 1** - Publication Draft Local Plan - Analysis of Issues Arising (March 2019)

7.2 **Appendix 2** – Statutory Submission Documents - Extract from Planning Inspectorate Guidance (paras 1.9-10) Summarising Regulations.

8.0 **Background Papers - Local Government (Access to Information) Act 1985**

<u>Bibliography</u>	<u>Custodian</u>	<u>File Location</u>
Past papers Planning Policy Committee	Jo Woof x2663	Planning Policy Committee

Appendix 2 – Statutory Submission Documents - Extract from Planning Inspectorate Guidance (paras 1.9-10) Summarising Regulations.

Certain prescribed documents must be submitted in accordance with Regulation 22:

The plan (and submission Policies Map if the adoption of the local plan would result in changes to the adopted Policies Map)

The sustainability appraisal report

Statement of Community Involvement (where one is adopted)

Statement under Regulation 22(1) (c) (i-iv) setting out how the Council complied with Regulation 18 on participation in production of the plan showing:

- Who was invited to make representations*
- How they were invited*
- Summary of the main issues raised*
- How these representations were taken into account*

Statement under Regulation 22(1)(c) (v-vi) relating to the formal representations procedure following publication of the plan and showing:

- The number of representations received*
- Summary of the main issues raised*

Copies of the representations made in accordance with regulation 22(1) (d)

Such supporting documents relevant to the preparation of the plan under Regulation 22(1)(e) including the evidence base.

1.10. It is well worth investing the time in producing a focused and comprehensive statement of the main issues under Reg 22(1)(c)(v) as this will be the first introduction of the Inspector to the likely issues to be addressed in the examination. While not a legal requirement, it is also very helpful if the LPA briefly indicates its response to the representations, i.e. both to the main issues it has identified and to all the representations.

Appendix 1 - Publication Draft Local Plan - Analysis of Issues Arising (March 2019)

1.2 – Neighbourhood Plans

Representation Point	Representor Raising Point (see below for list of abbreviations)	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Lack of strategic framework for Neighbourhood Plan making due to out of date 1994 Plan	Jarvis Homes (973180) CALA Group Ltd (977724) Albert Bygrave Centre (985070) Park Street BCh & Bloor Homes Ltd (985300) Rice Group (1058426) Beechwood Homes (1123837) Linden Homes (1153662) Hertfordshire Land (1159945) Aldwyck Housing Group (1186030) DB Rees (Builders) Ltd (1160056) Land at the Dak (1186131) Hilton House Properties (1057476)	Disagree	Cross reference to S2. The NPPF and draft Local Plan support Neighbourhood planning. Given the specific wording used in the final NPPF 2018 (after the Council decision on 11 July 2018 based on the draft NPPF) a minor modification should be made to make clear that if detailed local evidence justifies development at a neighbourhood scale, on land currently designated as Green Belt, it is supported in principle.	Minor modification to S2 If detailed local evidence justifies development at a neighbourhood scale, on land currently designated as Green Belt, it is supported in principle.

	<p>Owner of Land at Piggotshill Lane (1159948)</p> <p>Owners of Land South of Burydell Lane (1186128)</p> <p>1153651</p> <p>973643</p>			
<p>Not enough emphasis on promoting Neighbourhood Plan opportunities to deliver housing</p>	<p>Jarvis Homes (973180)</p> <p>CALA Group Ltd (977724)</p> <p>Albert Bygrave Centre (985070)</p> <p>Park Street BCh & Bloor Homes Ltd (985300)</p> <p>Rice Group (1058426)</p> <p>Beechwood Homes (1123837)</p> <p>Linden Homes (1153662)</p> <p>Hertfordshire Land (1159945)</p> <p>Owner of Land at Piggotshill Lane (1159948)</p> <p>Aldwyck Housing Group (1186030)</p>	<p>Disagree</p>	<p>The Local Plan deals with the overall need for new housing and is not reliant on NPs. NPs are supported and must conform with the NPPF and in due course the draft LP.</p>	<p>No change</p>

	<p>DB Rees (Builders) Ltd (1160056)</p> <p>Land at the Dak (1186131)</p> <p>Hilton House Properties (1057476)</p> <p>London Colney Limited (977496)</p> <p>Owners of Land South of Burydell Lane (1186128)</p> <p>973643</p> <p>115365</p>			
<p>Policy should enable Neighbourhood Plans to deliver housing on Green Belt</p>	<p>Jarvis Homes (973180)</p> <p>CALA Group Ltd (977724)</p> <p>Albert Bygrave Centre (985070)</p> <p>Park Street BCh & Bloor Homes Ltd (985300)</p> <p>Rice Group (1058426)</p> <p>Beechwood Homes (1123837)</p> <p>Linden Homes (1153662)</p> <p>Hertfordshire Land (1159945)</p>	<p>Noted</p>	<p>Cross reference to S2. The NPPF and draft Local Plan support Neighbourhood planning. Given the specific wording used in the final NPPF 2018 (after the Council decision on 11 July 2018 based on the draft NPPF) a minor modification should be made to make clear that if detailed local evidence justifies development at a neighbourhood scale, on land currently designated as Green Belt, it is supported in principle.</p>	<p>Minor modification to S2.</p> <p>If detailed local evidence justifies development at a neighbourhood scale, on land currently designated as Green Belt, it is supported in principle.</p>

	<p>Aldwyck Housing Group (1186030)</p> <p>Martin Grant Homes and Kearns Land (975683)</p> <p>DB Rees (Builders) Ltd (1160056)</p> <p>Land at The Dak (1186131)</p> <p>Hilton House Properties (1057476)</p> <p>London Colney Limited (977496)</p> <p>Owners of Land South of Burydell Lane (1186128)</p> <p>Owner of Land at Piggotshill Lane (1159948)</p> <p>1153651</p> <p>973643</p>			
No recognition of sites allocated in the Redbourn Neighbourhood Plan	Martin Grant Homes and Kearns Land (975683)	Disagree	Redbourn Neighbourhood Plan has not yet undergone an Examination process. The Local Plan deals with the overall need for new housing and is not reliant on NPs. NPs are supported and must conform with the NPPF and in due course the draft LP.	No change
Address the need for avoiding unnecessary policy duplication with	52064	Disagree	Local Plans contain district-wide policies, whereas NPs contain neighbourhood level policies. Not all areas will likely	No change

Neighbourhood Plans.			'produce 'made' Neighbourhood Plans. Some duplication may occur but should not prove problematic.	
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1.5 – Duty to Cooperate Neighbours – South West Hertfordshire

Representation Point	Representor Raising Point (see below for list of abbreviations)	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
London Colney will be overdeveloped by Hertsmere's proposals, therefore more co-operation for housing land allocation between authorities needed	1182733	Noted	There has been and will be ongoing joint working with neighbouring local authorities including the South West Herts Group. DtC considered to be met.	No change
A failure to co-operate with neighbouring councils on the Joint Strategic Plan (JSP) and the South-West Herts Group (SWHG)	334023 1144419	Disagree	There has been and will be ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met.	No change
St Albans has progressed too far ahead of the neighbouring authorities in the Joint Strategic Plan (JSP) that prevents cross boundary	Redbourn Parish Council (759908) Leverstock Green Village Association (1185907)	Disagree	There has been and will be ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met.	No change

working for housing allocations.				
Lack of a timetable/plan to address concerns from adjoining Authorities in particular East Hemel and Dacorum Borough Council	<p>Redbourn Parish Council (759908)</p> <p>Jarvis Homes (973180)</p> <p>CALA Group Ltd (977724)</p> <p>Albert Bygrave Centre (985070)</p> <p>Eaton Lodge (985289)</p> <p>Park Street BCh & Bloor Homes Ltd (985300)</p> <p>Rice Group (1058426)</p> <p>Beechwood Homes (1123837)</p> <p>Linden Homes (1153662)</p> <p>Hertfordshire Land (1159945)</p> <p>Aldwyck Housing Group (1186030)</p> <p>Department of Health & Social Care and Bloor Homes (1156886)</p> <p>Longbourn Estates (977635)</p>	Disagree	There has been and will be ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met.	No change

	<p>Leverstock Green Village Association (1185907)</p> <p>973643</p> <p>973659</p> <p>1144419</p> <p>1186108</p> <p>1159948</p> <p>1153650</p> <p>1153651</p>			
<p>St Albans has not met the housing needs of Dacorum Borough Council and other neighbouring authorities, therefore may need to concede more land</p>	<p>Redbourn Parish Council (759908)</p> <p>Jarvis Homes (973180)</p> <p>CALA Group Ltd (977724)</p> <p>Albert Bygrave Centre (985070)</p> <p>Eaton Lodge (985289)</p> <p>Park Street BCh & Bloor Homes Ltd (985300)</p> <p>Rice Group (1058426)</p> <p>Leverstock Green Village Association (1185907)</p> <p>Beechwood Homes (1123837)</p>	Disagree	<p>There has been and will be ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met.</p>	No change

	<p>CP Holdings (1158145)</p> <p>Linden Homes (1153662)</p> <p>Hertfordshire Land (1159945)</p> <p>Aldwyck Housing Group (1186030)</p> <p>Owners of Land South of Burydell Lane (1186128)</p> <p>1186108</p> <p>973643</p> <p>973659</p> <p>1153650</p> <p>1144419</p> <p>1153651</p> <p>1159948</p>			
<p>A Duty to Cooperate document should be published to illustrate how each LPA is meeting their housing need and how any unmet needs are addressed</p>	<p>Martin Grant Homes and Kearns Land (975683)</p>	<p>Noted</p>	<p>There has been and will be ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met.</p>	<p>No change</p>

<p>SADC should have had a Statement of Common Ground (SCG) published</p>	<p>Martin Grant Homes and Kearns Land (975683)</p> <p>M Scott Properties (1185993)</p> <p>ERLP 1 Sarl (1123561)</p> <p>Dacorum Borough Council (1186054)</p> <p>CWC Group (1153869)</p> <p>Department of Health & Social Care and Bloor Homes (1156886)</p> <p>Pennard Holdings Ltd (51983)</p> <p>London Colney Limited (977496)</p> <p>Longbourn Estates (977635)</p> <p>CEG (1158030)</p> <p>CP Holdings (1158145)</p>	<p>Noted</p>	<p>A Memorandum of Understanding has been agreed with the SWHG and a Statement of Common Ground.</p>	<p>No change</p>
<p>Lack of/no evidence of Joint Working/ Duty to Cooperate published</p>	<p>Martin Grant Homes and Kearns Land (975683)</p> <p>Harpenden Green Belt Association (866541)</p> <p>Jarvis Homes (973180)</p> <p>CALA Group Ltd (977724)</p>	<p>Noted</p>	<p>There has been and will be ongoing joint working with neighbouring local authorities including the South West Herts Group. DtC considered to be met. A Memorandum of Understanding has been agreed with the SWHG and a Statement of Common Ground.</p>	<p>No change</p>

	<p>Albert Bygrave Centre (985070)</p> <p>Eaton Lodge (985289)</p> <p>Park Street BCh & Bloor Homes Ltd (985300)</p> <p>Rice Group (1058426)</p> <p>Beechwood Homes (1123837)</p> <p>CP Holdings (1158145)</p> <p>Linden Homes (1153662)</p> <p>Hertfordshire Land (1159945)</p> <p>Aldwyck Housing Group (1186030)</p> <p>M Scott Properties (1185993)</p> <p>ERLP 1 Sarl (1123561)</p> <p>Batford Community Action Group (1185696)</p> <p>Colney Heath Parish Council (51891)</p> <p>Burhill Developments Ltd (977347)</p> <p>Aurora Properties Limited (1151817)</p>			
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	<p>Home Builders Federation Ltd (1156936)</p> <p>CWC Group (1153869)</p> <p>Wrenbridge Land Ltd (1187023)</p> <p>Gladman Developments Ltd (1187201)</p> <p>Pennard Holdings Ltd (51983)</p> <p>London Colney Limited (977496)</p> <p>Longbourn Estates (977635)</p> <p>Intrasales Ltd (1157383)</p> <p>Leverstock Green Village Association (1185907)</p> <p>Owners of Land South of Burydell Lane (1186128)</p> <p>1144419</p> <p>973643</p> <p>973659</p> <p>1153650</p> <p>1153651</p> <p>1159948</p>			
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	1186108 347648 1185714			
Plan fails to take into account the impact of proposed housing or contribution to housing targets in neighbouring councils	Berkhamsted Residents Action Group (BRAG) (1186012) 1153245 1186129	Disagree	There has been and will be ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met.	No change
Intentions of neighbouring authorities have had a big impact on plans for development within the district	1185955	Disagree	There has been and will be ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met.	No change
The Decision to include East St Albans Broad Location did not consider Welwyn Hatfield Borough Council Plans for development in the same area	Ellenbrook Area Residents Association Committee (1185802)	Disagree	There has been and will be ongoing joint working with neighbouring local authorities including the South West Herts Group and Welwyn & Hatfield. Duty to co-operate is considered to be met. Evidence on development strategy / site selection is available in full.	No change
Any expansion to Hemel Hempstead should be led by Dacorum Borough	Berkhamsted Residents Action Group (BRAG) (1186012)	Disagree	There has been and will continue to be ongoing collaboration with Dacorum Borough Council on masterplanning the urban extensions to Hemel Hempstead – cross reference with Policy S6.	No change

Council with SADC collaboration				
SADC has met its Duty to Cooperate, but Paragraph 1.5 should include additional wording to support this	Trustees of James Henry Frank Sewell Deceased (1185630)	Disagree	Already covered in the Plan. Will additionally be covered by the Duty to Cooperate Statement of Compliance.	Already covered in the Plan. Will additionally be covered by the Duty to Cooperate Statement of Compliance.
Evidence base/Plan should be updated to show cross-boundary issues being dealt with	Dacorum Borough Council (1186054) Watford Borough Council (1122500)	Disagree	There has been ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to cooperate is considered to be met. A Memorandum of Understanding has been agreed with the SWHG and a Statement of Common Ground will follow.	No change
An agreement is needed to agree housing and employment need between Dacorum Borough Council and SADC	Dacorum Borough Council (1186054) CWC Group (1153869)	Noted	A Memorandum of Understanding has been agreed with the SWHG and a Statement of Common Ground will follow.	No change
Duty to Cooperate has been met and any DtC issue between Dacorum Borough Council should be addressed as a soundness issue	Dacorum Borough Council (1186054)	Noted	Support noted	No change
Duty to Cooperate development need assessments should consider all sources	Burhill Developments Ltd (977347)	Noted	There has been ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-	No change

of housing land supply			operate is considered to be met. Evidence on development strategy / site selection is available in full.	
There is a lack of understanding from Neighbouring Authorities to deal with cross-boundary issues	Burhill Developments Ltd (977347)	Disagree	There has been ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met.	No change
Welwyn Hatfield Borough Council is not part of the Joint Strategic Plan for South-West Hertfordshire – Why?	Aurora Properties Limited (1151817)	Noted	This decision was determined as a result of the evidence from the SWHG research. Whilst not part of the South West Herts grouping, SADC acknowledges the existing cross-boundary relationship with Welwyn Hatfield Borough Council and will be maintaining this relationship through a wider Duty to Cooperate.	No change
There are sites Welwyn Hatfield Borough Council have assessed but omitted from their plan, which provide 1,826 dwellings. This can be used to provide for unmet need in SADC's plan	Aurora Properties Limited (1151817)	Disagree	There has been ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met. Evidence on development strategy / site selection is available in full. There is no reasonable prospect of Welwyn Hatfield providing for SADC's need.	No change
Site allocations are only viable once the Duty to Cooperate has been fulfilled	St Albans Civic Society (1156974)	Disagree	There has been ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met.	No change

Concerns over duty to co-operate; there is a lack of clarity between local authorities and HCC as there are no firm policies or spatial approaches set	St Albans Civic Society (156974) 52064	Disagree	There has been ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met.	No change
London Colney Parish Council has little influence to protect existing local infrastructure from overdevelopment coming from outside the District, therefore support discussion taking place to enable Duty to Cooperate to be agreed	London Colney Parish Council (52477)	Noted	Support noted	No change
Watford Borough Council supports progress on the Draft Plan and joint working between SADC and Watford Borough Council	Watford Borough Council (1122500)	Noted	Support noted	No change
Clarification needed to show types of strategic and cross boundary issues relevant to SADC	Watford Borough Council (1122500)	Disagree	There has been ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met. A Memorandum of	No change

that will be addressed through the Joint Strategic Plan			Understanding has been agreed with the SWHG and a Statement of Common Ground will follow.	
A review of the JSP should take place with SWHG once strategic issues have been identified and progressed	Watford Borough Council (1122500)	Disagree	There has been ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met. A Memorandum of Understanding has been agreed with the SWHG and a Statement of Common Ground will follow.	No change
WHBC welcome acknowledgement of joint working between SADC & WHBC in Draft Plan, even though not part of South West Housing Market Area and Functional Economic Market Area	Welwyn Hatfield Borough Council (52397)	Noted	Support noted	No change
WHBC suggest Para 1.5 makes clear that those not part of SWHG are Duty to Cooperate neighbours and that work will commence/be agreed for a Statement of Common	Welwyn Hatfield Borough Council (52397)	Disagree	Wider Duty to Cooperate relationships addressed in paragraph 1.5.	No change

Ground/Memorandum of Understanding				
WHBC have placed a number of holding objections that are hoped to be resolved with a Statement of Common Ground/Memorandum of Understanding once SADC has completed evidence gathering	Welwyn Hatfield Borough Council (52397)	Noted	SADC will continue to work with WHBC and other DC bodies.	No change
SADC should record all Duty to Cooperate (DtC) discussions and undertakings to demonstrate that DtC has been complied with	Crest Strategic Projects and Bloor Homes (1158079)	Noted	Records of Duty to Cooperate discussions have been maintained.	No change

1.7 – Plan Preparation

Representation Point	Representor Raising Point (see below for list of abbreviations)	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
St Albans has progressed too far ahead of the neighbouring authorities in the	Redbourn Parish Council (759908) Leverstock Green Village Association (1185907)	Disagree	There has been and will be ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met.	No change

Joint Strategic Plan (JSP) that prevents cross boundary working for housing allocations				
The Publication Draft of the Local Plan should be the intended Submission Local Plan, not a "Draft".	Aurora Properties Limited (1151817)	Disagree	The LP to be submitted is the Publication Draft.	No change
A Regulation 19 consultation is for the benefit of the Examination in Public. If the plan gets amended SADC should undertake a further Regulation 19 consultation before submission.	Aurora Properties Limited (1151817)	Disagree	The Local Plan will be carried out in accordance with the requirements of the relevant legislation.	No change
SADC should not repeat the same mistake as WHBC by submitting a plan that they know is manifestly flawed and not sound	Aurora Properties Limited (1151817)	Disagree	Disagree that the Plan is flawed and unsound.	No change
The plan has not been designed with	1034653	Disagree	SADC has carried out the necessary consultations at both Regulation 18 and Regulation 19 stages.	No change

the cooperation of local residents				
There is no evidence to suggest that SADC has engaged with the local community of Leverstock Green	Leverstock Green Village Association (1185907)	Disagree	SADC has carried out the necessary consultations at both Regulation 18 and Regulation 19 stages.	No change
The information contained within the SA reports has not influenced policies in the Plan relating to landscape, character, infrastructure, balance of sites in different settlements, broad location selection, environmental dimension of sustainable development	Martin Grant Homes and Kearns Land (975683) ERLP 1 Sarl (1123561) Stackbourne Limited (1153646) Redbourn Parish Council (759908) 1185775	Disagree	The vision of the Local Plan is based on a thriving community which includes long term sustainability.	No change

1.9 – Plan Evidence

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
The draft local plan has not been based on up to date evidence	Harpenden Green Belt Association (866541) Martin Grant Homes and Kearns Land (975683) The Environment Agency (1147557) Aboyne Residents Association (1181214) 51 Pegasus Ltd (1186098) Department of Health & Social Care and Bloor Homes (1156886) 334023 1185714	Disagree	Evidence supporting the Local Plan is available in full.	No change
Absence of evidence of effective joint working from the local plan evidence base	Martin Grant Homes and Kearns Land (975683) Hunston Planning Limited (1185622) Batford Community Action Group (1185696)	Disagree	There has been ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met. A Memorandum of Understanding has been agreed with the SWHG and a Statement of Common Ground.	No change

	<p>Helioslough Ltd (1182085)</p> <p>Gladman Developments Ltd (1187201)</p> <p>Owners of Land South of Burydell Lane (1186128)</p> <p>1186131</p> <p>1185714</p>			
Concerns that the local plan is not based upon proportionate and justified evidence as the policies are not accompanied by supporting text	<p>Martin Grant Homes and Kearns Land (975683)</p> <p>347648</p>	Disagree	Full and detailed justification is provided by evidence documents. It is not necessary to justify the Plan within the Plan document itself. To do so would result unnecessarily in a longer and more complex document.	No change
There is insufficient evidence to support the strategy for meeting the Council's housing requirement predominantly at these Broad Locations	<p>Martin Grant Homes and Kearns Land (975683)</p> <p>Redbourn Parish Council (759908)</p> <p>Leverstock Green Village Association (1185907)</p> <p>Owners of Land South of Burydell Lane (1186128)</p> <p>1186131</p>	Disagree	<p>Development need and site specific analysis in GB work provide exceptional circumstances for GB release. Evidence on development strategy / site selection is available in full.</p> <p>Concentrating development in larger sites that can effectively deliver infrastructure is a key part of the development strategy.</p>	No change
Further evidence required on the need for residential care	<p>Martin Grant Homes and Kearns Land (975683)</p>	Disagree	Evidence relating to care homes is available in full.	No change

homes/nursing homes	Signature Senior Lifestyle (1186910)			
SADC does not provide evidence or justification in support of the future supply of sites of 0.5ha or less	Martin Grant Homes and Kearns Land (975683)	Disagree	Evidence relating to small sites is available in full.	No change
Use of outdated retail study data as evidence for the retail policy	Aboyne Residents Association (1181214)	Disagree	Evidence on retail is available in full.	No change
Propose the inclusion of Brookbanks NW Harpenden Local Plan Transportation Study, Transport Position Statement, Vision Document and L&G/ CEG Regulation 19 response document as part of the Council's evidence base	Legal and General (1051022) CEG (1158030)	Disagree	Such documents would support the Broad Location in the masterplanning process and would not be Local Plan evidence documents.	No change
Difficulty in providing conclusive comments on the soundness of the plan as SADC is still compiling evidence	CEG (1158030) 347648	Disagree	Any further evidence is in the form of updates and are not new studies. Comments can be provided on the evidence base to date in conjunction with the draft Local Plan.	No change

Concerns that the policies in the plan rely to some extent on the views of certain long standing members rather than empirical data and evidence	347648	Disagree	Evidence supporting the Local Plan is available in full.	No change
Lack of evidence to suggest that the council has examined fully all other reasonable options for meeting their identified housing need.	1153268 Owners of Land South of Burydell Lane (1186128) 1186131	Disagree	Development need and site specific analysis in GB work provide exceptional circumstances for GB release. Evidence on development strategy / site selection is available in full. Concentrating development in larger sites that can effectively deliver infrastructure is a key part of the development strategy.	No change
Lack of consideration has been given to the proposed site as part of the LP's evidence on assessing sites for the release from the Green Belt.	Mr Pete Hutchison (1153268)	Disagree	Development need and site specific analysis in GB work provide exceptional circumstances for GB release. Evidence on development strategy / site selection is available in full. Concentrating development in larger sites that can effectively deliver infrastructure is a key part of the development strategy.	No change
The evidence base does not establish an up-to-date objective assessment of the need for employment land,	51 Pegasus Ltd (1186098)	Disagree	Existing SADC and SWHG evidence studies set out a clear evidence base that the LP approach is directly based on.	No change

given the new housing target.				
Local Plan appendices should be included on the planning policy evidence base webpages	CP Holdings (1158145)	Noted	The Local Plan and its appendices will be added to the Local Plan 2018 /19 Library of Documents.	The Local Plan and its appendices will be added to the Local Plan 2018 /19 Library of Documents.
The local plan fails to demonstrate and evidence an adequate five-year supply of housing	Owners of Land South of Burydell Lane (1186128) 1186131	Disagree	The NPPF and Plan evidence necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy. There are sufficient deliverable sites for years 1-5. This is confirmed in relevant developer representations.	No change
Section 1.9 does not specify which version of the NPPF the local plan complies with	Redbourn Parish Council (759908)	Disagree	The current wording reflects the approach actually taken to the structure of the LP. The new NPPF wording 2018 is generally similar and not contradictory to the approach taken.	No change
Absence of an updated Infrastructure Delivery Plan	Gladman Developments Ltd (1187201) Leverstock Green Village Association (1185907)	Agree	IDP will be updated on an ongoing basis.IDP will be updated on an ongoing basis.	IDP will be updated on an ongoing basis.
Up to date documents for the evidence base are not contained within the document library	CP Holdings (1158145)	Disagree	Evidence is available in full and where required has been updated. In some cases	No change

Paragraph 2.1 – Vision

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
The Plan vision does not promote long term sustainability in relation to the SA / SEA objectives, it prioritises economic development and resource use	Stackbourne Limited (1153646) 1153802	Disagree	The vision is based on a thriving community which includes long term sustainability.	No Change
The Plan vision provides no context and is not specific to the district	Stackbourne Limited (1153646) Theatres Trust (1179001)	Disagree	The vision is specific to the District.	No Change
The Plan vision should address housing affordability	M Scott Properties Ltd. (1185993)	Disagree	Covered by reference to a great place to live. Cross reference with Paragraph 2.2 and Policy L3.	No Change

Paragraph 2.2 – Strategic Policies

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
The strategic policies should address public health and wellbeing	Hertfordshire County Council (837689)	Disagree	Strategic policies are based on the draft NPPF and includes health.	No change

The plan should make reference to the revised NPPF	Historic England (929489)	Disagree	The current wording reflects the approach actually taken to the structure of the LP. The new NPPF wording 2018 is generally similar and not contradictory to the approach taken.	No change
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Paragraph 2.3 – Objectives

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
The objectives are too short and vague. They provide no context/are not specific to the District/fail to guide land allocations/not compatible with SA objectives	Stackbourne Limited (1153646) Theatres Trust (977496)	Disagree	The objectives provide an appropriate structure for the context and detail set out in the Policies later in the Plan.	No change
Protection of existing cultural and entertainment facilities should be an objective	Theatres Trust (977496)	Disagree	Already covered by Objectives 3, 4 and 5	No change
Support objective on conservation and enhancement of the historic environment.	Historic England (929489)	Noted	Support noted	No change
Support inclusion of affordable housing in objectives	1185775	Noted	Support noted	No change

Paragraph 2.4 – Local Policies

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Plan lacks site specific policies for small sites	Historic England (929489)	Disagree	Cross reference with L23 and L30 – provides design principles that must be applied to all development, including development on small sites.	No change

Paragraph 2.6 – Plan Period

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Plan commencement year lacks justification in relation to historic housing need / under delivery. 2018 should be the start for the Plan, not 2020, otherwise not accounting for two years of need	ERLP 1 Sarl (1123561) M Scott Properties (1185993) Gladman Developments Ltd (1187201) M Scott Properties (1185993) Andersons Group (1146719) Department of Health & Social Care and Bloor Homes (1156886)	Disagree	2020 is the earliest realistically possible date of adoption of the Plan and is therefore appropriate in the context of the new draft and final NPPF.	No change

Support the plan period with regards to the plan horizon	Andersons Group (1146719)	Noted	Support noted	No change
Plan submission will be after the NPPF transition date of 24 th January 2019 and should therefore be prepared in the context of the new NPPF / PPG	Department of Health & Social Care and Bloor Homes (1156886)	Agree	The new NPPF wording 2018 is generally similar to the 2012 NPPF and not therefore contradictory to the approach taken.	No change
Plan evidence is not available in relation to full plan period	Gladman Developments Ltd (1187201)	Disagree	Evidence is available in full and where required has been updated.	No change

Paragraph 2.7 – Plan Review

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Plan review (with clear timetable) should also be undertaken where housing delivery is below the annual requirement or where land supply is significantly below 5 years	Gladman Developments Ltd (1187201)	Disagree	Review will be in accordance with the requirements of the NPPF.	No change

Paragraph 2.8- Minerals and Waste

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Mineral Safeguarding Areas should be shown on the Policies Map	Hertfordshire County Council (837689)	Disagree	HCC's Minerals and Waste Plan forms part of the statutory Development Plan and includes the MSA on the Policies Map	Minor modification – HCC Mineral Safeguarding Areas added to list of 'Other GIS sources' at 1.10

Paragraph 3.1 – Using the Policies

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
The plan fails to distinguish between policy and supporting text	Crown Estate (51946) Historic England (929489)	Disagree	All text under the Policies is Policy. This is clear from the overall plan format.	No change
The policies are not accompanied by supporting text, meaning the necessary justification (i.e. in terms of planning law, national policy or the planning policy evidence base) of the policies is absent.	Martin Grant Homes and Kearns Land (975683) CP Holdings (1158145)	Disagree	Full and detailed justification is provided by evidence documents. It is not necessary to justify the Plan within the Plan document itself. To do so would result unnecessarily in a longer and more complex document.	No change

No clear differentiation between the policy wording and explanatory links is confusing and may not be correctly interpreted	CP Holdings (1158145)	Disagree	All text under the Policies is Policy. This is clear from overall plan format. Full and detailed justification is provided by evidence documents. It is not necessary to justify the Plan within the Plan document itself. To do so would result unnecessarily in a longer and more complex document.	No change
Plan should have full paragraph numbering	Crown Estate (51946)	Disagree	Policy numbering is sufficient to signpost the Policies section. Paragraph numbering of Policies would confuse rather than clarify presentation.	No change

Paragraph 3.2 – List of Policies

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Add a Strategic Rail Freight Policy under Chapter 4	Helioslough Ltd (1182085)	Disagree	The Broad Location is a greater priority for use of this site. The main site owner has promoted the site as available and deliverable for housing and confirmed policy requirements are deliverable.	No change

S1 Spatial Strategy and Settlement Hierarchy

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Query meaning of lower category scale 2	1144419	Noted	The scale and density of new development will be expected to be lower in the category 2 settlements than the scale and density of new development in the category 1 settlements.	No change

Need for medium sized sites in the category 2 villages	Martin Grant Homes and Kearns Limited (975683)	Disagree	Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.	No change
Object to approach to category 3 settlements which limits development	Canton Ltd (1057961)	Disagree	Category 3 settlements are located in the Green Belt, the aim of which is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.	No change
Don't burden development through controls on main settlements and towns	RF Sinclair and Sons (1058251) St Albans School (1187032) 52064	Disagree	The policy positively supports and does not prevent development in these settlements.	No change
SADC should not be putting new housing alongside expansion of Hemel Hempstead-oppose inclusion HH as category 1 settlement.	CPRE Hertfordshire (872572) Berkhamsted Residents Action Group (1186012) Lawes Agricultural Trust (1187615) 1158258	Disagree	Hemel Hempstead has a wide range of services and facilities and is a main urban settlement. It is clearly a category 1 settlement. Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.	No change

<p>London Colney is a large village and not a town. There is significant development on the edge London Colney within Hertsmere BC. Use land within existing settlement boundaries before greenfield site adjacent to Shenley Lane.</p>	<p>CPRE Hertfordshire (872572) London Colney Parish Council (52477) Aurora Properties Limited (1151817) 1185583 1185821 347648</p>	<p>Disagree</p>	<p>London Colney has grown to the stage where it is a small town in terms of its overall scale, population level and number of households.</p> <p>Housing requirement/targets are based on the standard methodology set out by the government – see S4.</p> <p>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.</p> <p>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p>	<p>No change</p>
<p>Plan should promote more small and medium sized sites in category 1 settlements rather than using green belt</p>	<p>Hill Residential (1158064)</p>	<p>Noted</p>	<p>The policy and other LP policies positively supports and does not prevent development in these settlements.</p>	<p>No change</p>
<p>Park Street Garden Village is not available for housing development and should be excluded from category 2 of the settlement hierarchy. Criteria for judgement (from Green Belt Review) ignored when looking at proposal. Hasn't been put</p>	<p>Butterfly World Project Ltd (1183965) CPRE Hertfordshire (872572) (1185775) St Stephen Parish Council (51804) Hertsmere Borough Council (51934)</p>	<p>Disagree</p>	<p>The main site owner has promoted the site as available and deliverable for housing. Considerations have taken into account the existing planning permission for an alternative use and other relevant factors.</p>	<p>No change</p>

forward with cooperation from London Colney. Very limited infrastructure and services.	Aurora Properties Limited (1151817) M Scott Properties (1185993)			
Broad policy approach to density of category 2 large villages should seek to influence and not just reflect existing density	CPRE Hertfordshire (872572)	Noted	Policy S1 and other LP policies requires development to make efficient use of land, including by increasing density and height of development. In existing settlements this should not however be to the detriment of the existing character.	No change
Opportunities exist adjacent to Redbourn and Wheathampstead	J W Pigott and Son (1183246) 1185775	Disagree	Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.	No change
East of St Albans site impact on Smallford doesn't count as 'small scale infilling'.	Ellenbrook Area Residents Association Committee (1185802)	Agree	Cross reference to S2 and S6. East of St Albans is a Broad Location for development. Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.	No change
LP should prioritise bulk of new development towards the first tier of the settlement hierarchy	Legal and General (1051022) CEG (1158030) CP Holdings (1158145)	Agree	The policy approach is for most larger scale development to be in/adjacent to the most accessible locations i.e. category 1 settlements.	No change

<p>Sequential approach is inflexible and unreasonable. Extensions to existing villages and towns is more consistent with NPPF.</p>	<p>Burhill Developments Ltd (977347)</p>	<p>Disagree</p>	<p>The policy does not include a sequential test but provides the broad policy approach that will be taken to the different categories of settlement. NPPF supports this approach.</p>	<p>No change</p>
<p>How Wood and Bricket Wood overlooked and have stations. Contrary to NPPF in that the approach does not actively manage patterns of growth to make the fullest possible use of public transport.</p>	<p>M Scott Properties (1185993)</p>	<p>Disagree</p>	<p>They have not been overlooked. Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.</p> <p>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p>	<p>No change</p>
<p>Evidence behind categorisation of settlements not available and concerns with assessment. Not possible for SADC to promote development in Dacorum.</p>	<p>Anderson Group (1146719) Longbourn Estates (977635)</p>	<p>Disagree</p>	<p>There are clear distinctions between the different categories of settlement in terms of accessibility and services/facilities. The policy notes that Hemel Hempstead is in Dacorum however there is planned expansion into the District. It is therefore necessary to categorise it. There is ongoing joint work with Dacorum in this area.</p>	<p>No change</p>

<p>Park Street Garden Village not well located to facilities and services needed for residential development. No justification to include proposal as a Garden Village</p>	<p>Anderson Group (1146719) Department of Health & Social Care and Bloor Homes (1156886) D'Arblay Investments (1187404)</p>	<p>Disagree</p>	<p>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p>	<p>No change</p>
<p>Some locations such as land at Boissy Close are just as sustainable as settlements that have been given category 2 status. Settlement hierarchy influenced by the strategic allocations rather than the settlement hierarchy influencing the site selection process.</p>	<p>Anderson Group (1146719)</p>	<p>Disagree</p>	<p>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p>	<p>No change</p>

<p>Sandridge and Smallford should be excluded from Green Belt and long term boundaries established around them consistent with NPPF. Should be classified as category 2 'large villages'.</p>	<p>Glinwell PLC (1187377) Longbourn Estates (977635) D'Arblay Investments (1187404)</p>	<p>Disagree</p>	<p>Sandridge and Smallford are small settlements with a very limited range of services and facilities within the Green Belt and are therefore category 3 settlements.</p>	<p>No change</p>
<p>'Excluded from the green belt' interpreted that any releases on the edge of these settlements would be contrary to strategy (which is the intent of the broad locations)</p>	<p>Crown Estate (51946)</p>	<p>Disagree</p>	<p>Cross reference to Policy S2 - sets out development strategy which provides for expansion at all category 1 and one category 2 settlement.</p>	<p>No change</p>
<p>Unnecessary to describe Redbourn as a large village. Policy is not positively worded to encourage appropriate and sustainable growth and appropriate development sites</p>	<p>Pennard Holdings Ltd (51983)</p>	<p>Disagree</p>	<p>The policy positively supports and does not prevent development in Redbourn and other settlements.</p>	<p>No change</p>

Recommend more land allocated around St Albans as the largest settlement and that Land South of Alban Way is allocated for residential development	London Colney Limited (977496)	Disagree	<p>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.</p> <p>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p>	No change
'Broad policy approach' column should state planning of development edge of Hemel Hempstead in SADC will be with full engagement with Dacorum BC	Dacorum Borough Council (1186054)	Disagree	Cross reference to paragraph 1.5 and Policy S6 – sets out engagement with Dacorum BC.	No change
Consideration of infill pockets of development that have existing infrastructure and facilities has not been considered	<p>Mr Antonio Barba (1187384)</p> <p>D'Arblay Investments (1187404)</p>	Disagree	<p>Where not in the Green Belt, infill is positively supported in the Plan, subject to design, context etc. Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.</p> <p>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p>	No change
Sites on brownfield register are close to public transport and should be developed before release of greenbelt.	D'Arblay Investments (1187404)	Noted	Positively bringing forward brownfield sites, subject to design, context etc. is part of the Plan strategy; but it is not possible to meet all need through this type of development.	No change

Council's approach to Green Belt is inconsistent in that it regards an industrial estate (Ventura Park) to be excluded from Green Belt but not entire village (Smallford /Sandridge)	D'Arblay Investments (1187404)	Disagree	Site is already located outside of the Green Belt	No change
'Development must make efficient use of land by increasing the density and height of development' should be clarified as development must be appropriate to the site context	Hertfordshire County Council (837689)	Disagree	Clarified in S1 in the broad policy approach column. Additionally cross reference to Policies L1 and L23.	No change
Emphasis should be on reduced travel demand instead of greater accessibility	Hertfordshire County Council (837689)	Disagree	Cross reference to Policy L18 which addresses sustainable transport infrastructure.	No change
Allocated Broad locations do not conform with Spatial Strategy	CP Holdings (1158145)	Disagree	Cross reference to Policy S2 - sets out development strategy which provides for expansion at all category 1 and one category 2 settlement	No change

S2 Development Strategy

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
<p>No evidence that harm to the Green Belt has been properly weighed against benefits of meeting the objectively assessed need for housing – housing need is too highly weighted</p>	<p>Ramblers Association (52420)</p> <p>Redbourn Parish Council (759908)</p> <p>London Colney Limited (977496)</p> <p>Intrasales Ltd (1157383)</p> <p>The British Horse Society (1187597)</p> <p>334023</p> <p>1185775</p>	<p>Disagree</p>	<p>Development need, overall Plan context and site specific analysis in GB work provide exceptional circumstances for GB release.</p>	<p>No change</p>
<p>Housing need (and an inability to meet Government figures for housing need) does not constitute exceptional circumstances that necessitate major development in Green Belt (as set out in NPPF para 137). The evidence /</p>	<p>Harpenden Green Belt Association (866541)</p> <p>St Albans & District Footpaths Society (723340)</p> <p>CPRE Hertfordshire (872572)</p> <p>Berkhamsted Residents Action Group (BRAG) (1186012)</p>	<p>Disagree</p>	<p>Development need, overall Plan context and site specific analysis in GB work provide exceptional circumstances for GB release.</p>	<p>No change</p>

justification available is inadequate	<p>Legal and General (1051022)</p> <p>Redbourn Parish Council (759908)</p> <p>CWC Group (1153869)</p> <p>Glinwell PLC (1187377)</p> <p>CEG (1158030)</p> <p>1153802</p> <p>1185523</p> <p>1019306</p> <p>1185714</p> <p>1153651</p>			
Hemel Garden Communities should be referred to in the policy	Dacorum Borough Council (1186054)	Disagree	HGC is a wider and evolving concept that is better set out and explained outside of the Local Plan.	No change
The development strategy relies too heavily on a limited number of large strategic allocations/is not appropriate as it does not include smaller sites	<p>RF Sinclair and Sons (1058251)</p> <p>Hill Residential (1158064)</p> <p>J W Pigott and Son (1183246)</p> <p>Rice Group (1058426)</p> <p>ERLP 1 Sarl (1123561)</p>	Disagree	Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.	No change

	<p>DB Rees (Builders) Ltd (1160056)</p> <p>Jarvis Homes 973180,</p> <p>Hilton House Properties (1057476)</p> <p>Wrenbridge Land Ltd (1187023)</p> <p>Trustees of G.A. Simons Family Trust (1187408)</p> <p>Taylor Wimpey Strategic Land (1187472)</p> <p>Gallagher Estates (1143916)</p> <p>M Scott Properties (1185993)</p> <p>Trustees of G.A. Simons Family Trust (1187408)</p> <p>Intrasales Ltd (1157383)</p> <p>Glinwell PLC (1187377)</p> <p>London Colney Limited (977496)</p> <p>D'Arblay Investments (1187404)</p> <p>Shonleigh Nominees (978420)</p> <p>CP Holdings (1158145)</p>			
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	1153650 1159948 1187384 498103 978427 52064 52552 977889			
Plan fails to consider sites that can come forward quickly to help maintain a 5 years supply of deliverable housing sites. Requirement of specific deliverable sites for years 1-5 is not met.	ERLP 1 Sarl (1123561) DB Rees (Builders) Ltd (1160056) Jarvis Homes 973180 Home Builders Federation Ltd (1156936) Ralph Catton Family Trust (1186119) Sandridge Parish Council (869186) Comer Group (872799) Anderson Group (1146719) Longbourn Estates (977635)	Disagree	The Plan necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy. There are sufficient deliverable sites for years 1-5. This is confirmed in relevant developer representations.	No change

	<p>Taylor Wimpey Strategic Land (1187472)</p> <p>SADC Community Services and Green Spaces (1200137)</p> <p>1153650</p> <p>1153651</p> <p>1159948</p>			
<p>Trajectory of delivery / development strategy unsatisfactory. Backlog of housing needs require to be addressed earlier in the plan period</p>	<p>ERLP 1 Sarl (1123561)</p> <p>DB Rees (Builders) Ltd (1160056)</p> <p>Jarvis Homes (973180)</p> <p>Home Builders Federation Ltd (1156936)</p> <p>Ralph Catton Family Trust (1186119)</p> <p>Comer Group (872799)</p> <p>Anderson Group (1146719)</p> <p>Longbourn Estates (977635)</p> <p>Taylor Wimpey Strategic Land (1187472)</p> <p>1153650</p>	Disagree	There is no backlog under Government standard methodology approach as additional provision is already incorporated.	No change

	1153651 1159948			
There are small and medium sized sites that would deliver under 500 dwellings which have not been robustly assessed as reasonable alternatives and which constitute 'exceptional circumstances' for Green Belt release	Canton Ltd (1057961) Hill Residential (1158064) Minister Court Frogmore (1185980) London Colney Parish Council (52477) ERLP 1 Sarl (1123561) Trustees of James Henry Frank Sewell Deceased (1185630) Jarvis Homes (973180) Burhill Developments Ltd (977347) Park Street BCh & Bloor Homes Ltd (985300) Home Builders Federation Ltd (1156936) M Scott Properties (1185993) Linden Wates (Bricket Wood) Limited (1186996)	Disagree	Evidence on development strategy / site selection is available in full.	No change

	<p>Thakeham Homes (1187005)</p> <p>Hilton House Properties (1057476)</p> <p>Anderson Group (1146719)</p> <p>CWC Group (1153869)</p> <p>Department of Health & Social Care and Bloor Homes (1156886)</p> <p>Wrenbridge Land Ltd (1187023)</p> <p>Glinwell PLC (1187377)</p> <p>Pennard Holdings Ltd (51983)</p> <p>London Colney Limited (977496)</p> <p>Longbourn Estates (977635)</p> <p>Mr Keith Hadley (1153539)</p> <p>Intrasales Ltd (1157383)</p> <p>Hallam Land Management Limited (1185998)</p>			
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	<p>Taylor Wimpey Strategic Land (1187472)</p> <p>Gallagher Estates (1143916)</p> <p>Castleoak Care Communities (1187716)</p> <p>Gorhambury Estates Company Limited (375996)</p> <p>1153650</p> <p>1159948</p> <p>52552</p> <p>978427</p> <p>1186046</p> <p>1019306</p> <p>1158213</p> <p>1153268</p> <p>52064</p>			
<p><i>Strategic and small sites put forward</i></p> <p>(see separate schedule)</p>	(see separate schedule)	Noted	<p>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.</p> <p>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p>	No change

<p>The site selection process/ Green Belt assessment/ranking of the broad locations is not justified/flawed</p>	<p>CWC Group (1153869) Harpenden Green Belt Association (866541) Helioslough Ltd (1182085) Burhill Developments Ltd (977347) Department of Health & Social Care and Bloor Homes (1156886) Lawes Agricultural Trust (1187615) Historic England (929489) Tarmac (1153600) London Colney Limited (977496) Taylor Wimpey Strategic Land (1187472) CPRE Hertfordshire (872572) Redbourn Parish Council (759908) Leverstock Green Village Association (1185907) CP Holdings (1158145)</p>	<p>Disagree</p>	<p>Site selection is firmly based on comprehensive GB work and the key development strategy points that larger settlements are most appropriate as locations and larger sites deliver greater community benefit.</p>	<p>No change</p>
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	1185714 789007 1055738 1185092 498103 1153539			
Support approach to site selection	Crown Estate (51946) Trustees of James Henry Frank Sewell Deceased (1185630)	Noted	Support noted	No change
Other Broad Locations for development should be considered and referenced	Hertsmere Borough Council (51934) Redbourn Parish Council (759908) Leverstock Green Village Association (1185907) Tarmac (1153600) Burhill Developments Ltd (977347) Comer Group (872799) Department of Health & Social Care and Bloor Homes (1156886) London Colney Limited (977496)	Disagree	Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.	No change

	Helioslough Ltd (1182085) CP Holdings (1158145)			
Alternative/additional strategic sites put forward as 'reasonable alternatives'	Tarmac (1153600) Burhill Developments Ltd (977347) Comer Group (872799) Gallagher Estates (1143916) Lawes Agricultural Trust (1187615) Department of Health & Social Care and Bloor Homes (1156886) London Colney Limited (977496)	Noted	Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.	No change
A regional approach to development strategy is required as there is a viable alternative development strategy - building a new garden town in North Herts/South Beds.	1185483	Disagree	This approach is not something that SADC can deliver. Though such an approach might provide additional development capacity it would not be sufficient to deal with the Government view of housing need at a District level.	No change
Should provide for a contingency of	Tarmac (1153600)	Disagree	Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.	No change

additional strategic sites				
The development strategy needs to be justified by a better / up to date evidence base	<p>Martin Grant Homes and Kearns Land (975683)</p> <p>Minister Court Frogmore (1185980)</p> <p>Watford Borough Council (1122500)</p> <p>CWC Group (1153869)</p> <p>Intrasales Ltd (1157383)</p> <p>Leverstock Green Village Association (1185907)</p> <p>Historic England (929489)</p> <p>Gorhambury Estates Company Limited (375996)</p> <p>CP Holdings (1158145)</p> <p>1153651</p> <p>1185775</p> <p>1153539</p>	Disagree	Evidence on development strategy / site selection is available in full.	No change

<p>The Plan / policy fails to provide guidance for Neighbourhood Plans that advocate additional housing (such as Redbourn Neighbourhood Plan)</p>	<p>Martin Grant Homes and Kearns Land (975683) Aldwyck Housing Group (1186030) Hilton House Properties (1057476)</p>	<p>Partly Agree</p>	<p>The NPPF and draft Local Plan support Neighbourhood planning. The Local Plan deals with the overall need for new housing and is not reliant on NPs. NPs must make their local own justification for additional housing provision (and for other uses); this is their intended role. Given the specific wording used in the final NPPF 2018 (after the Council decision on 11 July 2018 based on the draft NPPF) a minor modification should be made to make clear that if detailed local evidence justifies development at a neighbourhood scale, on land currently designated as Green Belt, it is supported in principle.</p>	<p>Minor modification If detailed local evidence justifies development at a neighbourhood scale, on land currently designated as Green Belt, it is supported in principle.</p>
<p>Plan fails to take into account the cumulative impact (environmental, Green Belt and infrastructure) of SADC and neighbouring council's housing allocations/proposals (Hertsmere and Welwyn Hatfield)</p>	<p>London Colney Parish Council (52477) 1182733 347648 1153245 1186046 1185955 1186129</p>	<p>Disagree</p>	<p>DtC arrangements ensure this is not the case. Development is being coordinated across boundaries under joint working and liaison arrangements. It is however acknowledged that the whole sub region will experience significant additional development to accommodate population / household change and growth (in accordance with Government policy - NPPF)</p>	<p>No change</p>
<p>Policy should emphasise that Brownfield should be developed first</p>	<p>CPRE Hertfordshire (872572) D'Arblay Investments (1187404) 1158213 1185945 1121386</p>	<p>Noted</p>	<p>This is a significant part of the Plan strategy; but it is not possible to meet all need through this type of development as the opportunities are limited (ref BLR). It is not possible to apply a rigid phasing policy in this respect.</p>	<p>No change</p>

Greater emphasis should be placed on development around London Colney/Napsbury Estate	Owners of Land North of Napsbury (1186783)	Disagree	Evidence on development strategy / site selection is available in full.	No change
Broad Locations should be more evenly distributed across the District	Colney Heath Parish Council (51891) London Colney Parish Council (52477) 498103	Disagree	Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. The key development strategy points that larger settlements are most appropriate as locations and larger sites deliver greater community benefit.	No change
There is no development strategy for City, towns and wider district	Park Street BCh & Bloor Homes Ltd (985300)	Disagree	Policies S1 and S2 set out a very clear approach	No change
Sustainable patterns of development have not been considered in the proposed development strategy	Park Street BCh & Bloor Homes Ltd (985300) CWC Group (1153869) Pennard Holdings Ltd (51983) Longbourn Estates (977635) Intrasales Ltd (1157383) Hill Residential (1158064)	Disagree	Policies S1 and S2 out a very clear approach based on accessibility of employment and high order facilities and services by modes other than the private car.	No change

	<p>Owners of Land North of Napsbury (1186783)</p> <p>Leverstock Green Village Association (1185907)</p> <p>867068</p> <p>1153802</p> <p>1153245</p> <p>1186129</p>			
SA and the Plan are not considered to be consistent with national policy as they don't aim to deliver sustainable development	Helioslough Ltd (1182085)	Disagree	The approach taken reflects the Plan's vision of providing a thriving community which includes long term sustainability.	No change
Loss of prime agricultural land	<p>759883</p> <p>498103</p> <p>1185704</p>	Noted	<p>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.</p> <p>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p> <p>Loss of higher quality agricultural land has been considered as a factor amongst others, such as Green Belt, in determining the Plan strategy.</p>	No change

Should include more employment locations. Disagree with a sole focus on the Enterprise Zone at the expense of other growth areas.	Goodman (1153774)	Disagree	<p>Specific plan provision of land is based on strategic planning factors.</p> <p>Policy S5 supports employment land provision appropriate to the settlements.</p> <p>The EZ has important functions supporting business start-ups and attracting UK and international investment.</p>	No change
Look forward to reviewing the strategic transport assessments for the Broad Locations and outcomes of the COMET modelling run to understand the potential cross-boundary transport impacts	Central Bedfordshire Council (861963)	Noted	A transport evidence workplan has been agreed with HCC. The next output is expected in early 2019 from the HCC COMET run.	No change
Further work needs to be carried out on transport – lack of understanding for HCC to confirm if sufficient. Would be willing to agree a MoU that sets out the work going forward and how any identified problems will be addressed.	Hertfordshire County Council (837689)	Noted	A transport evidence workplan has been agreed with HCC. The next output is expected in early 2019 form the HCC COMET run.	No change
Support the Broad Locations identified	Minister Court Frogmore (1185980)	Noted	Support noted	No change

	Trustees of James Henry Frank Sewell Deceased (1185630) 1182518 1184221 1185695 1185939 1186062			
'Broad Locations' should be renamed 'Strategic Housing Allocations'	Legal and General (1051022)	Disagree	Local Plan wording reflects NPPF wording	No change
Support allocation of PSGV for housing-led development	Minister Court Frogmore (1185980)	Noted	Support noted	No change
Support the inclusion of East and North Hemel Hempstead Broad Locations	Grand Union Investments Ltd. (977391)	Noted	Support noted	No change
Support inclusion of land at Holtsmere End Road as part of North Hemel Hempstead Broad Location	Mr and Mrs Bill and Valerie Barr (1157883)	Noted	Support noted	No change

Support the inclusion of North St Albans	Hallam Land Management Limited (1185998)	Noted	Support noted	No change
Concerns about loss of Green Belt and green environment as a result of development of North St Albans	840795	Noted	<p>Development need, overall Plan context and site specific analysis in GB work provide exceptional circumstances for GB release.</p> <p>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.</p> <p>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p>	No change
Support omission of land north-east of Redbourn	Ver Valley Society (826041)	Noted	Support noted	No change
Site at North East Redbourn should be considered/included as a Broad Location	<p>Helioslough Ltd (1182085)</p> <p>Lawes Agricultural Trust (1187615)</p> <p>1181750</p> <p>1185092</p>	Disagree	<p>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.</p> <p>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p>	No change
Concerns about loss of / harm to Green Belt as a result of strategic developments proposed at Harpenden	<p>Harpenden Green Belt Association (866541)</p> <p>1055683</p> <p>1185714</p>	Noted	<p>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.</p> <p>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p>	No change

Disagree with inclusion of North East Harpenden, particularly in relation to impact on infrastructure	789007	Disagree	<p>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.</p> <p>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p>	No change
Disagree with inclusion of East and/or North Hemel Hempstead Broad Locations, including due to proximity to Buncefield	<p>Redbourn Parish Council (759908)</p> <p>Leverstock Green Village Association (1185907)</p> <p>Berkhamsted Residents Action Group (BRAG) (1186012)</p> <p>759883</p> <p>498103</p> <p>334023</p> <p>1184569</p> <p>1158258</p> <p>1185704</p> <p>1034653</p>	Disagree	Development need, overall Plan context and site specific analysis in GB work provide exceptional circumstances for GB release.	
Plan relies too much on development at Hemel Hempstead	<p>Berkhamsted Residents Action Group (BRAG) (1186012)</p> <p>1185935</p> <p>1184750</p> <p>977889</p>	Disagree	<p>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.</p> <p>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p>	No change

<p>Concerns over impact on Redbourn and surrounding area's infrastructure, including roads, health services, train station</p>	<p>Redbourn Parish Council (759908) Leverstock Green Village Association (1185907) Hertfordshire County Council (837689) 759883 1181723 867312 1144419 1034653 1184569</p>	<p>Noted</p>	<p>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p>	<p>No change</p>
<p>Concerns over proximity to Redbourn and reduction of gap with Hemel Hempstead</p>	<p>1153741 759883 1181723 498103</p>	<p>Noted</p>	<p>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy. There will still be a very substantial green gap between Hemel and Redbourn which will be enhanced and made permanent by the Country Park.</p>	<p>No change</p>
<p>Growth at HH would place significant pressure on the main town, through higher use of infrastructure, local</p>	<p>Redbourn Parish Council (759908) Mr Antonio Barba (1187384) D'Arblay Investments (1187404)</p>	<p>Noted</p>	<p>Refer to S6 and L17 Concentrating development in larger sites that can effectively deliver infrastructure is a key part of the development strategy.</p>	<p>No change</p>

services and facilities			<p>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p> <p>This matter will be properly detailed and addressed through the masterplanning / planning application / EIA process, with appropriate consultation.</p>	
Limited evidence to support inclusion of East and/or North Hemel Hempstead sites	<p>Redbourn Parish Council (759908)</p> <p>Leverstock Green Village Association (1185907)</p>	Disagree	Evidence on development strategy / site selection is available in full.	
Concerns over viability and deliverability of East and North Hemel Hempstead	<p>Redbourn Parish Council (759908)</p> <p>Leverstock Green Village Association (1185907)</p>	Disagree	Evidence on development strategy / site selection is available in full.	
Concerns over deliverability of East and North Hemel St Albans	<p>Gorhambury Estates Company Limited (375996)</p>	Disagree	Evidence on development strategy / site selection is available in full.	
Disagree with inclusion of West of Chiswell Green	<p>Owners of Land North of Napsbury (1186783)</p> <p>1187590</p>	Disagree	Development need, overall Plan context and site specific analysis in GB work provide exceptional circumstances for GB release.	No change
Concerns about loss of / harm to Green Belt as a result of development proposed at West of Chiswell Green	<p>St Stephen Parish Council (51804)</p> <p>1182697</p> <p>1184271</p> <p>1184839</p>	Disagree	Development need, overall Plan context and site specific analysis in GB work provide exceptional circumstances for GB release.	No change

	1184864 1185244 1185478 1185479 1185481 1185482 1185633 1185640 863091 871923 1156288 1182480 1187008 977889			
Additional residential development in Chiswell Green is not acceptable. Will change character of Chiswell Green and pressure local road infrastructure and services, impact air pollution. No evidence as to why this designation	St Stephen Parish Council (51804) 1187590 1182697 1158536 1184271 1184839 1184864	Disagree	Development need, overall Plan context and site specific analysis in GB work provide exceptional circumstances for GB release. The BL was identified in the Green Belt Review.	No change

<p>included as an exception to the green belt.</p>	<p>1185244 1185478 1185479 1185481 1185482 1185469 1185633 863091 1185775 1156288 1182480 1185640 1187008</p>			
<p>Concerns with inclusion of West of London Colney, particularly impact on local infrastructure</p>	<p>London Colney Parish Council (52477)</p>	<p>Noted</p>	<p>Evidence on development strategy / site selection is available in full.</p> <p>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p>	<p>No change</p>
<p>Concerns about loss of / harm to Green Belt as a result of development proposed at West of London Colney</p>	<p>Sanders Laing (1183909)</p>	<p>Noted</p>	<p>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. Evidence on development strategy / site selection is available in full.</p>	<p>No change</p>

<p>Park Street Garden Village Broad Location should be removed from the development strategy as there is uncertainty over its availability/delivery for housing as it has consent for a rail freight interchange</p>	<p>RF Sinclair and Sons (1058251) Department of Health & Social Care and Bloor Homes (1156886) Helioslough Ltd (1182085) M Scott Properties (1185993) Butterfly World Project Ltd (1183965) Jarvis Homes (973180) CALA Group Ltd (977724) Albert Bygrave Centre (985070) Eaton Lodge (985289) Glinwell PLC (1187377) Trustees of G.A. Simons Family Trust (1187408) Home Builders Federation Ltd (1156936) Gallagher Estates (1143916)</p>	<p>Disagree</p>	<p>The main site owner has promoted the site as available and deliverable for housing. Considerations have taken into account the existing planning permission for an alternative use and other relevant factors.</p>	<p>No change</p>
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	<p>Hallam Land Management Limited (1185998)</p> <p>Park Street Baptist Church & Bloor Homes Ltd (985300)</p> <p>Rice Group (1058426)</p> <p>Beechwood Homes (1123837)</p> <p>Intrasales Ltd (1157383)</p> <p>Linden Homes (1153662)</p> <p>Hertfordshire Land (1159945)</p> <p>Aldwyck Housing Group (1186030)</p> <p>DB Rees Builders Ltd (1160056)</p> <p>Owners of Land East of Common Lane (1186108)</p> <p>Owners of Land South of Burydell Lane (1186128)</p> <p>Land at the Dak (1186131)</p>			
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	D'Arblay Investments (1187404) 973643 1153650 1153651 1159948 52064 347648 1181750 1187384 1181750 1185945 1185744 52552 977889			
Not clear if cross boundary sites and consequences of SRFI not being delivered have been discussed with neighbouring LAs/lack of evidence of effective joint	Helioslough Ltd (1182085)	Disagree	There has been ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met. Considerations have taken into account the existing planning permission for an alternative use and other relevant factors.	No change

working on cross boundary strategic priorities				
Park Street Garden Village not an efficient use give the rarity of a suitable site for a SRFI and longstanding national need for SRFIs.	Helioslough Ltd (1182085)	Disagree	The main site owner has promoted the site as available and deliverable for housing. Considerations have taken into account the existing planning permission for an alternative use and other relevant factors.	No change
The Plan fails to include a replacement SRFI site	Butterfly World Project Ltd (1183965)	Disagree	The specific provision of an 'SRFI site' is not a requirement for a Local Plan	No change
No details on what PSGV will deliver to meet garden village aspirations, or how easy accessibility to St Albans will be achieved	Helioslough Ltd (1182085)	Disagree	Cross reference with Policy S6 where high level Garden Village aspirations and access improvements (eg to the Abbey Line) are set out.	No change
Park Street Garden Village is identified within an area serving a strategic gap in the Green Belt. This will create a ribbon of built development, release of this land is contrary to the	Hill Residential (1158064) D'Arblay Investments (1187404), Trustees of G.A. Simons Family Trust (1187408) 52552	Disagree	Development need, overall Plan context and site specific analysis in GB work provide exceptional circumstances for GB release.	No change

Council's Green Belt strategy which aims to maintain existing settlement patterns	977889			
No justification/evidence to support inclusion of PSGV	Department of Health & Social Care and Bloor Homes (1156886) Gallagher Estates (1143916) Gorhambury Estates Company Limited (375996)	Disagree	Evidence on development strategy / site selection is available in full.	No change
Disadvantages of not providing the SRFI, including loss of new jobs, 334ha Country Park and reduction of greenhouse gases from shifting road to rail.	Helioslough Ltd (1182085)	Disagree	The main site owner has promoted the site as available and deliverable for housing. Considerations have taken into account the existing planning permission for an alternative use and other relevant factors.	No change
Plan has no consideration of cumulative impact between both current and proposed residential developments and quarrying activity within a small area	Ellenbrook Area Residents Association Committee (1185802)	Disagree	DtC arrangements ensure this is not the case. Development is being coordinated across boundaries under joint working and liaison arrangements. It is however acknowledged that the whole sub region will experience significant additional development to accommodate population / household change and growth (in accordance with Government policy - NPPF)	No change

Lack of evidence to support suitability and availability of Broad Location sites	CP Holdings (1158145)	Disagree	Evidence on development strategy / site selection is available in full.	No change
Meeting the housing target should be prioritised ahead of impact on the GB	CP Holdings (1158145)	Disagree	Development need, overall Plan context and site specific analysis in GB work provide exceptional circumstances for GB release	No change

S3 Metropolitan Green Belt

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
General concern at Green Belt loss to development	St Albans Civic Society (1156974) 1055683 1158258 1184569 1121386 1144419	Noted	Housing requirement/targets are based on the standard methodology set out by the government – see S4. Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.	No change
It is important that any development within the Green Belt remains subject to the ‘very special circumstances’ test in the NPPF	1182518	Noted	Cross reference to NPPF for very special circumstances for Green Belt development.	No change

<p>Educational development in the Green Belt is inappropriate</p>	<p>Ramblers Association (52420)</p> <p>Harpenden Green Belt Association (866541)</p> <p>St Albans & District Footpaths Society (723340)</p> <p>Beechwood Homes (1123837)</p> <p>CPRE Hertfordshire (872572)</p> <p>London Colney Parish Council (52477)</p> <p>Aurora Properties Limited (1151817)</p> <p>Department for Education (1186955)</p> <p>Linden Wates (Bricket Wood) Limited (1186996)</p> <p>St Albans School (1187032)</p> <p>Crown Estate (51946)</p> <p>The British Horse Society (1187597)</p> <p>Hertfordshire County Council (837689)</p>	<p>Disagree</p>	<p>Policy L21 /S3 / S6 set out a clear approach. Schools are a key element of infrastructure and have been successfully provided and maintained in the Green belt in numerous locations over many years.</p>	<p>No change</p>
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	334023 1185775			
Transport related infrastructure development can damage the Green Belt. The statement that transport infrastructure within the Green Belt is not inappropriate development and demonstrates 'very special circumstances' is not justified.	Ramblers Association (52420) St Albans & District Footpaths Society (723340) Legal and General (1051022) Aurora Properties Limited (1151817) The British Horse Society (1187597) CEG (1158030) 867587	Disagree	Transport infrastructure is essential to sustainable development, including at the Broad Locations. Policy S6 sets out the transport infrastructure required. Local transport infrastructure which can demonstrate a requirement for Green Belt location are not considered inappropriate development, as set out in para 146 of the NPPF.	No change
The inclusion of a Local Green Belt purpose in GBR evidence is not justified.	Canton Ltd (1057961)	Disagree	Based on longstanding approach to maintaining character and identity in District and beyond.	No change
Policy should propose absolute % of Green Belt to be built on which cannot be exceeded	1153802	Disagree	Policy S3 and the NPPF protects the large majority of the GB from development.	No change

<p>Greater recognition should be given to Green Belt protection of productive local sustainable farming and forestry</p>	<p>1153802</p>	<p>Disagree</p>	<p>GB land is protected by Policy S3 and productive and sustainable farming and forestry is specifically supported.</p>	<p>No change</p>
<p>The housing development proposed on Green Belt land does not conserve the natural environment, landscape or infrastructure. This directly contradicts the SA. Developments on Green Belt land should only be carried out on areas of land which already suffer from environmental degradation</p>	<p>867068</p>	<p>Disagree</p>	<p>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.</p>	<p>No change</p>
<p>The policy does not reference housing development, the broad locations or the Green Belt Review and is therefore inadequate</p>	<p>London Colney Limited (977496) 1153802</p>	<p>Disagree</p>	<p>Policy S2 deals with this.</p>	<p>No change</p>

and in conflict with S2				
Environmental capacity analysis should drive sustainable development in accordance with the NPPF	Intrasales Ltd (1157383) 1153802	Disagree	NPPF supports approach taken, where site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.	No change
The Plan should not rely on 2014 Green Belt Review; it should be updated.	Hill Residential (1158064) ERLP 1 Sarl (1123561) Stackbourne Limited (1153646) Redbourn Parish Council (759908) Department of Health & Social Care and Bloor Homes (1156886) Intrasales Ltd (1157383) Lawes Agricultural Trust (1187615) Historic England (929489) 1185714 977889	Disagree	NPPF supports approach taken, where site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.	No change

No need for a Green Belt policy at all as the NPPF already covers the matter extensively	St Albans School (1187032) 52064	Disagree	Green Belt Policy is consistent with the NPPF but adds local context and detail.	No change
There is a disproportionate amount of development / loss of Green Belt in the south of the District, exacerbated by Hertsmere to the south and Welwyn Hatfield to the east	Colney Heath Parish Council (51891) 347648	Disagree	NPPF supports approach taken, where site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. Sites are generally spread across the district. Sites outside the district are not included in the Plan, though acknowledged through DtC work and work on the SWH JSP.	No change
The policy refers to a settlement pattern which is not described or explained.	Aurora Properties Limited (1151817)	Disagree	The Policy refers to 'existing settlement pattern'.	No change
Paragraph 85 of the NPPF (2012) states that when defining boundaries local planning authorities should 'not include land which it is unnecessary to keep permanently open' i.e. those that make little contribution to the greenbelt	M Scott Properties (1185993)	Noted	Green Belt Policy is consistent with the NPPF.	No change

There is no safeguarded land for Green Belt releases or indication of need for boundaries to be altered post plan period 2036	Crown Estate (51946) 52552 978427	Noted	The Plan covers the time period to 2036 and the trajectory at Appendix 2 clearly shows substantial delivery of housing post 2036 on land excluded from the Green Belt.	No change
GBR evidence does not appear to have considered the release of existing settlements like Blackmore End or other small scale sub areas which make limited contribution to the greenbelt	North Hertfordshire District Council (1185674) Intrasales Ltd (1157383) 977889	Noted	Much of Blackmore End is outside the District Boundary. Overall development strategy has considered these issues. Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.	No change
Green Belt should be released to meet the health care infrastructure needs necessary to an increasing population (potentially for a new hospital site)	West Hertfordshire Hospitals NHS Trust (1183618)	Noted	No substantive evidence provided to support such an approach. Cross reference L22	No Change
Remove the area of Rothamsted Park designated as Town Centre from Green Belt	52064	Disagree	Green Belt Policy and approach for this area is consistent with the NPPF.	No change

S4 Housing Strategy and Housing Requirement/Target

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
<p>Revised 2016-based household projections were published in September 2018 and indicate lower rates of household growth over the plan period which need to be taken into account</p>	<p>Jarvis Homes (973180) Comer Group (872799) DB Rees Builders Ltd (1160056) Anderson Group (1146719) Glinwell PLC (1187377) Intrasales Ltd (1157383) Simons Family Trust (1187408) Lawes Agricultural Trust (1187615) Jarvis Homes (973180) CALA Group Ltd (977724) Albert Bygrave Centre (985070) Eaton Lodge (985289) Rice Group 1058426) Beechwood Homes (1123837)</p>	<p>Noted</p>	<p>The Plan is intended to address need as defined by Government through the 'standard methodology'</p>	<p>No change</p>

	<p>Linden Homes (1153662)</p> <p>Hertfordshire Land (1159945)</p> <p>Aldwyck Housing Group (1186030)</p> <p>CPRE Hertfordshire (872572)</p> <p>DB Rees (Builders) Ltd (1160056)</p> <p>Owners of Land East of Common Lane (1186108)</p> <p>Owners of Land South of Burydell Lane (1186128)</p> <p>Land at The Dak (1186131)</p> <p>London Colney Parish Council (52477)</p> <p>Trustees of James Henry Frank Sewell Deceased (1185630)</p> <p>Colney Heath Parish Council (51891)</p> <p>Hertsmere Borough Council (51934)</p>			
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	<p>Burhill Developments Ltd (977347)</p> <p>M Scott Properties (1185993)</p> <p>Department of Health & Social Care and Bloor Homes (1156886)</p> <p>North Hertfordshire District Council (1185674)</p> <p>Wrenbridge Land Ltd (1187023)</p> <p>Dacorum Borough Council (1186054)</p> <p>Welwyn Hatfield Borough Council (52397)</p> <p>CEG (1158030)</p> <p>Gallagher Estates (1143916)</p> <p>Castleoak Care Communities (1187716)</p> <p>973643</p> <p>1153651</p> <p>1159948</p> <p>978420</p> <p>978427</p>			
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	<p>977889</p> <p>1187384</p> <p>1187404</p> <p>973643</p> <p>347648</p> <p>1185971</p> <p>1019306</p> <p>1153650</p> <p>1153651</p> <p>1159948</p>			
<p>Housing targets are out of proportion with the expected rise in population over the plan period and ought to be lower</p>	<p>CPRE Hertfordshire (872572)</p> <p>London Colney Parish Council (52477)</p> <p>Trustees of James Henry Frank Sewell Deceased (1185630)</p> <p>Colney Heath Parish Council (51891)</p> <p>Department of Health & Social Care and Bloor Homes (1156886)</p> <p>867068</p> <p>867587</p>	<p>Disagree</p>	<p>Housing targets are based on the standard methodology set out by the government.</p> <p>Providing a higher amount of housing aims to accord with the Government's ambition to address the long term housing demand whilst taking into account the future demographic changes at a district level.</p>	<p>No change</p>

	1184784 1153802 1019306 1185956 1055683 1185971 347648			
Housing target should however be a “minimum” with the aim to achieve above these targets as per the Government’s aspirations as set out in the NPPF (2018)	Intrasales Ltd (1157383) Pennard Holdings Ltd (51983) Longbourn Estates (977635) Grand Union Investments Ltd (977391)	Disagree	Housing targets are based on the standard methodology set out by the government.	No change
Local Plan base date should align with the start of the plan preparation period and demonstrate 5 year supply of housing	Martin Grant Homes and Kearns Land (975683) Canton Ltd (1057961) Jarvis Homes (973180) CALA Group Ltd (977724) Albert Bygrave Centre (985070) Eaton Lodge (985289)	Disagree	2020 is the earliest realistically possible date of adoption of the Plan and is therefore appropriate in the context of the new draft and final NPPF. The Plan necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy. There are sufficient deliverable sites for years 1-5. This is confirmed in relevant developer representations.	No change

	<p>Park Street BCh & Bloor Homes Ltd (985300)</p> <p>Rice Group (1058426)</p> <p>Beechwood Homes (1123837)</p> <p>Linden Homes (1153662)</p> <p>Hill Residential (1158064)</p> <p>Hertfordshire Land (1159945)</p> <p>Minister Court Frogmore (1185980)</p> <p>Aldwyck Housing Group (186030)</p> <p>DB Rees (Builders) Ltd (1160056)</p> <p>Owners of Land East of Common Lane (1186108)</p> <p>Owners of Land South of Burydell Lane (1186128)</p> <p>Land at The Dak (1186131)</p> <p>ERLP 1 Sarl (1123561)</p>			
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	<p>Stackbourne Limited (1153646)</p> <p>Burhill Developments Ltd (977347)</p> <p>Aurora Properties Limited (1151817)</p> <p>Anderson Group (1146719)</p> <p>CWC Group (1153869)</p> <p>Department of Health & Social Care and Bloor Homes (1156886)</p> <p>Wrenbridge Land Ltd (1187023)</p> <p>Pennard Holdings Ltd (51983)</p> <p>London Colney Limited (977496)</p> <p>Longbourn Estates (977635)</p> <p>Home Builders Federation Ltd (1156936)</p> <p>Dacorum Borough Council (1186054)</p> <p>Lawes Agricultural Trust (1187615)</p>			
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	<p>Hallam Land Management Limited (1185998)</p> <p>Gorhambury Estates Company Limited (375996)</p> <p>Gallagher Estates (1143916)</p> <p>CP Holdings (1158145)</p> <p>1153650</p> <p>1153651</p> <p>973643</p> <p>1159948</p>			
<p>Concerns with using a stepped trajectory which has ambitious delivery levels in later years, does not address housing need within years 1-5 of the plan, and is not balanced with an affordability buffer to enable the prospect of achieving a rolling supply of homes.</p>	<p>Martin Grant Homes and Kearns Land (975683)</p> <p>Canton Ltd (1057961)</p> <p>RF Sinclair and Sons (1058251)</p> <p>Hunston Planning Limited (1185622)</p> <p>Jarvis Homes (973180)</p> <p>CALA Group Ltd (977724)</p> <p>Albert Bygrave Centre (985070)</p>	Disagree	<p>The Plan necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy. There are sufficient deliverable sites for years 1-5. This is confirmed in relevant developer representations. Housing trajectory includes the 20% buffer required by NPPF.</p>	No change

	<p>Eaton Lodge (985289) Park Street BCh & Bloor Homes Ltd (985300) Rice Group (1058426) Beechwood Homes (1123837) Linden Homes (1153662) Hill Residential (1158064) Hertfordshire Land (1159945) Minister Court Frogmore (1185980) Aldwyck Housing Group (1186030) CPRE Hertfordshire (872572) DB Rees (Builders) Ltd (1160056) Owners of Land East of Common Lane (1186108) Owners of Land South of Burydell Lane (1186128)</p>			
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	<p>Land at The Dak (1186131)</p> <p>Legal and General (1051022)</p> <p>Stackbourne Limited (1153646)</p> <p>Trustees of James Henry Frank Sewell Deceased (1185630)</p> <p>Burhill Developments Ltd (977347)</p> <p>Aurora Properties Limited (1151817)</p> <p>M Scott Properties (1185993)</p> <p>Sandridge Parish Council (869186)</p> <p>Comer Group (872799)</p> <p>Anderson Group (1146719)</p> <p>Intrasales Ltd (1157383)</p> <p>Wrenbridge Land Ltd (1187023)</p> <p>Owner Pound Farm & East of Sandridge (1187227)</p>			
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	<p>Pennard Holdings Ltd (51983)</p> <p>London Colney Limited (977496)</p> <p>Longbourn Estates (977635)</p> <p>Adrian Irving and Alban Developments Ltd (1156368)</p> <p>Home Builders Federation Ltd (1156936)</p> <p>Taylor Wimpey Strategic Land (1187472)</p> <p>Lawes Agricultural Trust (1187615)</p> <p>CEG (1158030)</p> <p>Crest Strategic Projects and Bloor Homes (1158079)</p> <p>Gorhambury Estates Company Limited (375996)</p> <p>Gallagher Estates (1143916)</p> <p>CP Holdings (1158145)</p>			
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	<p>Mr and Mrs Bill and Valerie Barr (1157883)</p> <p>52064</p> <p>973643</p> <p>1153650</p> <p>1153651</p> <p>1159948</p> <p>1157883</p> <p>1153268</p>			
<p>Suggest that “exceptional circumstances” are not expected to continue and no more than 0.5% greenbelt to be built on per 15 years</p>	<p>1153802</p>	<p>Disagree</p>	<p>Development need, overall Plan context and site specific analysis in GB work provide exceptional circumstances for GB release.</p>	<p>No change</p>
<p>Other small sites should be included as those identified will not address any percentage of the housing requirement because they will be built out before the start of the Plan</p>	<p>Hunston Planning Limited (1185622)</p> <p>Fairview New Homes Ltd (1185602)</p> <p>St Stephen Parish Council (51804)</p> <p>Anderson Group (1146719)</p>	<p>Disagree</p>	<p>The Plan necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy.</p> <p>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p>	<p>No change</p>

	Taylor Wimpey Strategic Land (1187472) Gallagher Estates (1143916) 52064			
The last SHLAA update to include any detailed site assessment was the 2016 update, although this was only a partial update and for many sites the assessment had not been revisited since the 2009 update,	Jarvis Homes (973180) 1153268	Disagree	Evidence on development strategy / site selection is available in full.	No change
The paragraph beginning "Small sites of half a hectare or less" is ambiguous and needs to be clarified to ensure that it will not provide grounds for piecemeal erosion of Green Belt boundaries	Ramblers Association (52420) St Albans & District Footpaths Society (723340) The British Horse Society (1187597)	Disagree	Development on small sites will have to satisfy relevant Local Plan policies and the NPPF, including demonstrating very special circumstances in the Green Belt if required.	No change
Para 68(a) of the NPPF requires 10% of housing requirements to be	Jarvis Homes (973180) CALA Group Ltd (977724)	Disagree	Housing coming forward on sites of 1 hectare has formed a large part of historic supply and will continue to form at least	No change

<p>met on sites of 1 hectare or less and therefore there is no sound evidence to support the position that only sites of 500 homes or more should be identified in the Local Plan</p>	<p>Albert Bygrave Centre (985070)</p> <p>Eaton Lodge (985289)</p> <p>Park Street BCh & Bloor Homes Ltd (985300)</p> <p>Rice Group (1058426)</p> <p>Beechwood Homes (1123837)</p> <p>Linden Homes (1153662)</p> <p>Hertfordshire Land (1159945)</p> <p>Aldwyck Housing Group (1186030)</p> <p>DB Rees (Builders) Ltd (1160056)</p> <p>Fairview New Homes Ltd (1185602)</p> <p>Owners of Land East of Common Lane (1186108)</p> <p>Owners of Land South of Burydell Lane (1186128)</p> <p>Land at The Dak (1186131)</p>		<p>10% of the housing requirement during the Plan period. This includes those sites set out at Appendix 5.</p>	
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	<p>Hertsmere Borough Council (51934)</p> <p>Hilton House Properties (1057476)</p> <p>Anderson Group (1146719)</p> <p>Intrasales Ltd (1157383)</p> <p>Owner Pound Farm & East of Sandridge (1187227)</p> <p>1187590</p> <p>973643</p> <p>1153650</p> <p>1153651</p> <p>1159948</p> <p>1153268</p>			
<p>Windfall allowance is not justified by the NPPF or analysis of past trends in either the SHLAA or AMR to explain or evidence the 105 dwellings per annum</p>	<p>Jarvis Homes (973180)</p> <p>CALA Group Ltd (977724)</p> <p>Albert Bygrave Centre (985070)</p> <p>Eaton Lodge (985289)</p> <p>Park Street BCh & Bloor Homes Ltd (985300)</p>	<p>Disagree</p>	<p>Paragraph 68 of the NPPF states the <i>“local planning authorities should support the development of windfall sites through their policies and decisions- giving great weight to the benefits of using suitable sites within existing settlements for homes.”</i> There is no conflict with NPPF.</p>	<p>No change</p>

	<p>Hunston Planning Limited (1185622)</p> <p>Rice Group (1058426)</p> <p>Beechwood Homes (1123837)</p> <p>Linden Homes (1153662)</p> <p>Hertfordshire Land (1159945)</p> <p>Minister Court Frogmore (1185980)</p> <p>Aldwyck Housing Group (1186030)</p> <p>CPRE Hertfordshire (872572)</p> <p>DB Rees (Builders) Ltd (1160056)</p> <p>Owners of Land South of Burydell Lane (1186128)</p> <p>Land at The Dak (1186131)</p> <p>Anderson Group (1146719)</p> <p>North Hertfordshire District Council (1185674)</p>			
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	<p>London Colney Limited (977496)</p> <p>Home Builders Federation Ltd (1156936)</p> <p>Lawes Agricultural Trust (1187615)</p> <p>Castleoak Care Communities (1187716)</p> <p>Owners of Land South of Burydell Lane (1186128)</p> <p>973643</p> <p>1153650</p> <p>1153651</p> <p>1159948</p> <p>1186131</p>			
There is no evidence of council owned sites that would deliver housing	<p>Jarvis Homes (973180)</p> <p>CALA Group Ltd (977724)</p> <p>Albert Bygrave Centre (985070)</p> <p>Eaton Lodge (985289)</p> <p>Park Street BCh & Bloor Homes Ltd (985300)</p> <p>Rice Group (1058426)</p>	Disagree	Ongoing Council programme has recently delivered and will continue to deliver housing	No change

	<p>Linden Homes (1153662)</p> <p>Hertfordshire Land (1159945)</p> <p>Hunston Planning Limited (1185622)</p> <p>Aldwyck Housing Group (1186030)</p> <p>DB Rees (Builders) Ltd (1160056)</p> <p>Owners of Land East of Common Lane (1186108)</p> <p>Owners of Land South of Burydell Lane (1186128)</p> <p>Owners of Land South of Burydell Lane (1186128)</p> <p>Land at The Dak (1186131)</p> <p>973643</p> <p>1153651</p> <p>1159948</p> <p>1186131</p>			
There is no evidence of sites that could be converted from	<p>Jarvis Homes (973180)</p> <p>CALA Group Ltd (977724)</p>	Disagree	Conversion of offices to residential using permitted development and applications have been a significant source of housing in recent years. This will however reduce as many	No change

<p>employment use to housing</p>	<p>Albert Bygrave Centre (985070)</p> <p>Eaton Lodge (985289)</p> <p>Park Street BCh & Bloor Homes Ltd (985300)</p> <p>Rice Group (1058426)</p> <p>Beechwood Homes (1123837)</p> <p>Linden Homes (1153662)</p> <p>Hertfordshire Land (1159945)</p> <p>Aldwyck Housing Group (1186030)</p> <p>DB Rees (Builders) Ltd (1160056)</p> <p>Owners of Land East of Common Lane (1186108)</p> <p>Owners of Land South of Burydell Lane (1186128)</p> <p>Land at The Dak (1186131)</p> <p>186131</p> <p>1153650</p> <p>1153651</p>		<p>of the conversions have now taken place. An appropriate approach has been taken.</p>	
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	1159948			
The target for residential care homes and flexi-care homes is too low, should not be included within the housing target and there is no indication of when they would be delivered.	Retirement Housing Group (1185738) Aurora Properties Limited (1151817) Dacorum Borough Council (1186054) Hallam Land Management Limited (1185998) Castleoak Care Communities (1187716)	Disagree	NPPF supports both appropriate provision of care homes and flexi-care and that such provision is included in housing targets. Evidence is available in full.	No change
The delivery of infrastructure does not reflect the growth of housing and there is no viability evidence demonstrating that it can be supported	M Scott Properties - 1185993 Anderson Group (1146719) 1152471 789007	Disagree	Evidence is available and landowner/developer teams have confirmed deliverability of Broad Location related infrastructure.	No change
It should be clarified whether the housing targets have considered unmet development needs from neighbouring authorities such as Dacorum or if the Council sought assistance from	CWC Group (1153869) Wrenbridge Land Ltd (1187023) Dacorum Borough Council (1186054) Lawes Agricultural Trust (1187615)	Noted	There has been and continues to be ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met. This has included consideration of potential unmet development needs from neighbouring authorities and their potential to provide for St Albans.	No change

adjoining councils to meet housing need.	Welwyn Hatfield Borough Council - 52397) Gorhambury Estates Company Limited (375996) Central Bedfordshire Council (861963) 1185583			
Support the inclusion of Residential Care Homes/ Nursing homes in policy S4	St Stephen Parish Council (51804)	Noted	Support noted	No change
Support standard methodology of 913 dwellings per annum	CP Holdings (1158145)	Noted	Support noted	No change

S5 Economic Development Strategy and Employment Land Provision

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Employment welcomed but job opportunities needed elsewhere in the south of the District and Hertsmere for new and existing villages	1182733	Disagree	Specific plan provision of land is based on strategic planning factors. Policy S5 supports employment land provision appropriate to the settlements, which include London Colney in the south of the District. Policy L16 supports a mixed use opportunity area within Colney Fields Retail Centre/Ridgeview for retail/services and offices.	No change

Support employment/provision of jobs	Grand Union Investments Ltd (977391) 51 Pegasus Ltd (1186098) 1185037	Noted	Support noted	No change
Economic approach should be more 'diverse' – more detail required on type of job and salary.	Colney Heath Parish Council (51891) 1055738	Disagree	<p>The Plan's main role is to provide sufficient land and property opportunities. It is more difficult to influence the type of job that is provided as this is determined by overall economic conditions / economic development.</p> <p>However the multi-site Hertfordshire Enviro-Tech Enterprise Zone is a significant opportunity in respect of the point raised. The EZ has important functions supporting business start-ups and attracting UK and international investment. Green technology is a business sector with strong growth potential to create jobs over the plan period in emerging industries. The proposed development at EHH (Central) will be required to develop enviro-tech business, and provide for a range of uses including offices, research and development, light industrial and logistics and new business park of B1 uses.</p>	No change
The precise boundaries of the Hertfordshire enviro-tech enterprise zone should be clarified and safeguarded to inhibit residential development.	1055738	Noted	The EZ is clearly delineated on the Policies Map. It does not affect existing residential uses. The site at EHH (Central) will be subject to masterplanning under Policy S6 ii) to establish the precise locations of the individual areas.	No change

A clear timescale should be set for achievement of new jobs	1055738	Disagree	<p>The Plan's main role is to provide sufficient land and property opportunities. It is more difficult to influence the timescale on which jobs are provided, as this is determined by overall economic conditions / economic development.</p> <p>The proposed employment growth will be over the timeframe of the LP namely 2020-2036.</p>	No change
Details of organisations using the Enterprise Zone required	1055738	Disagree	Not within planning remit	No change
Improve poor quality and safety of Maylands employment area, Hemel Hempstead before building on agricultural land for further employment development.	1185704	Disagree	<p>Additional employment land is needed long term.</p> <p>Dacorum Borough Council are working to improve the existing, important employment area.</p>	No change
Roehyde should be an employment broad location (with University links).	Goodman (1153774) 1185775 347648	Disagree	<p>An additional Green Belt employment location is not required. This site is not suitable for such development and is in part an existing waste site.</p> <p>BRE and Rothamsted Research are established areas of employment within the Green Belt and areas designated as part of the multi-site Hertfordshire Enviro-Tech Enterprise Zone supported by the Government. They have important functions supporting business start-ups and attracting UK and international investment. Whilst it is acknowledged the importance of teaching and research undertaken by the University of Hertfordshire, it is not incorporated within the Herts Enterprise Zone.</p>	No change

<p>Query deliverability of East Hemel Hempstead employment land allocation, (demand for and accessibility from St Albans & Colney Heath & London Colney).</p>	<p>London Colney Parish Council (52477) Goodman (1153774) 1185775 347648</p>	<p>Disagree</p>	<p>The location is highly accessible to the strategic road network and is likely to be attractive to development; particularly as an EZ.</p>	<p>No change</p>
<p>Plan economic evidence base not up-to-date</p>	<p>The Owners of Breakspears (973659) 51 Pegasus Ltd (1186098) Hertsmere Borough Council (51934) Watford Borough Council (1122500) Luton Borough Council (861967) Crown Estate (51946) Aurora Properties Limited (1151817) St Albans Civic Society (1156974) 498103 1019306</p>	<p>Disagree</p>	<p>The plan approach to employment is well evidenced. St Albans SW Hertfordshire Economic Study update published February 2019. Takes into account recent economic forecasts, the changes to the commercial property stock including that lost through PD, revisit growth scenarios and assesses demand and supply. Planned jobs to meet the needs of the estimated population over period 2020-2036 and serves a strategic role for the whole of SW Herts.</p>	<p>No change</p>

	1185704			
Plan should support future prosperity of Rothamsted Research by removing Townsend Lane from the Green Belt for residential development	Hill Residential (1158064)	Disagree	<p>Economic ambitions/needs of Rothamsted Research alone cannot determine Plan development strategy.</p> <p>Land at Townsend Lane does not fall within one of the Broad Locations for development within the LP 2018. There are two planned Broad Locations for development within Harpenden to the NE and NW of the town lying approx. 1.5-2 miles from Rothamsted Institute in proximity and accessible via a range of active transport.</p>	No change
Concern about shortage in supply of offices, impacting rent. Lack of allocations in Plan. Land adjacent Copsewood should be allocated for employment and removed from the green belt.	51 Pegasus Ltd (1186098)	Noted	<p>The plan makes substantial new land provision for office development.</p> <p>Policy S6 ii East Hemel requires delivery of a 17ha business park for Class B1 office uses. There are two strategic office locations designated on policies map at St Albans City Station and St Albans Abbey Station both subject to Article 4 direction.</p>	No change
All employment sites are remote from the city centre. There is a need for a new St Albans digital business park.	51 Pegasus Ltd (1186098) St Albans Labour Party Group (1183933)	Disagree	<p>There are two strategic office locations designated on policies map at St Albans City Station and St Albans Abbey Station. Policy L17 supports high speed broadband and next generation telecommunications. Policies L11 and BL at EHH (Central) seek improvements to active travel links and public transport.</p>	No change

Major employment allocation at East Hemel Hempstead is contrary to Green Belt policy– there are no exceptional circumstances	CPRE Hertfordshire (872572)	Disagree	The employment provision of 55ha forms part of the EHH (Central) broad location designation. Development need, overall Plan context and site specific analysis in GB work provide exceptional circumstances for GB release.	No change
More small and medium employment sites should be allocated within Broad Locations	347648	Disagree	Policy S5 supports employment opportunities within category one settlements of St Albans and Harpenden where there are four broad locations designated and provision for a large employment development in EHH. Policy L16 supports a mixed use opportunity area within Colney Fields Retail Centre/Ridgeview for retail/services and office in proximity to BL S6ix west of London Colney. There will be local centre employment opportunities with the Broad Locations	No change
Target of 55ha does not align with Enterprise Zone targets. Target for all 7 Zones is 8000 jobs whilst proposed EHH is for 10,000 jobs.	Hertfordshire Local Enterprise Partnership (1186903) Dacorum Borough Council (1186054)	Noted	The 10,000 jobs estimate for the Plan is justified in detailed evidence. This is not a rigid target. The more modest LEP target was prepared for a different purpose and covers a different time period. The Hertfordshire LEP Strategy covers the period from 2017-2030 whilst the LP covers the period up to 2036. EHH (Central) site will also be required to provide a business park of primarily B1 offices and new logistics and mixed industrial area.	No change
Plan has insufficient sites for digital employment	London Colney Parish Council (52477)	Disagree	Policy L17 supports high speed broadband and next generation telecommunications which will ensure that employment sites are desirable and attractive to those industries requiring faster broadband speeds and greater digital connectivity. The Connected Counties programme of which Hertfordshire is a partner, focuses on providing	No change

			superfast broadband infrastructure and extensions of fibre broadband coverage by 2019.	
Concern on impact take-up, delivery and viability of Luton strategic employment sites.	Luton Borough Council (861967)	Noted	<p>Both areas need to make provision for employment growth. The EZ approach in Hertfordshire is designed to target different aspects of employment growth to that in Luton. It serves the whole of SW Herts.</p> <p>The importance of the Luton/Dunstable conurbation and its economic role is acknowledged. Luton has a significant sub-regional role including due to the strategic importance of the airport and the aspirations for expansion.</p> <p>Commuting – it is acknowledged that the M1/M25 growth area extends through Luton into Bedfordshire. Whilst commuting patterns are increasingly diffused Luton has higher self-containment rate of workers than SADC and is not top destination for out-commuting from St Albans https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Local%20Plan/Growing%20Lutons%20economy/ECON%20013.pdf</p>	No change
Reducing need to travel not been considered (growth of home working).	Luton Borough Council (861967)	Disagree	<p>L18 (Transport Strategy) promotes sustainable modes and transport infrastructure. Travel Plans are required for all major developments which should set out measures to encourage people to use alternative modes of travel to car. Policy S5 supports a mix of employment uses and S6ii EHH site lies adjacent to BL for housing development. Evidence takes account of the trend to no location specific working by planning for a more limited level of land for employment use. The SW Herts Employment Study update 2019 further factors in home working effects into floorspace requirements. The success of Hertfordshire Connected Counties Programme may further influence transport systems and working at home.</p>	Publish SW Herts Economic study on website

<p>Some jobs in EHH BL should count towards Dacorum's job growth target.</p>	<p>Dacorum Borough Council (1186054)</p>	<p>Disagree</p>	<p>This is a matter for joint working within SWH structures and JSP preparation. Employment land provision follows the lead set by the SEP LEP and is strategic in nature, serving SW Herts as a whole.</p> <p>The Local Plan deliberately does not set a SADC area job growth target as it takes an opportunities based approach. If a specific quantitative jobs target is seen as needed / useful it should be related to the whole SWH FEMA through work on the JSP.</p>	<p>No change</p>
<p>Large scale office development not currently viable at East Hemel Hempstead. Maylands as existing is a different market and should be prioritised.</p>	<p>Dacorum Borough Council (1186054)</p>	<p>Disagree</p>	<p>Office uses are that the core of long term need for employment premises (as evidenced in SADC and SW Herts studies). The allocation of (a part only) of the land at this location for offices is a crucial part of the SWH approach to economic development, as there are limits on alternative locations available (alternative housing land use pressures).</p> <p>St Albans SW Hertfordshire Economic Study update published February 2019 confirms likely viability in medium term. Important role of EZ and SWH work in supporting viability.</p>	<p>No change</p>
<p>Amount of land required at Rothamsted reducing and some should be released for housing development to support the research activity financially – with associated economic</p>	<p>Lawes Agricultural Trust (1187615)</p>	<p>Disagree</p>	<p>Rothamsted Research is an established area of employment designated as part of the multi-site Hertfordshire Enviro-Tech Enterprise Zone supported by the Government. They have important functions supporting business start-ups and attracting UK and international investment. Green technology is a business sector with strong growth potential to create jobs over the plan period. The LP supports its future growth, but this does not justify a separate approach to housing development in the Green Belt.</p>	<p>No change</p>

development benefits				
WHBC Economy study (2015) indicates some of SADC lies within the Welwyn Hatfield functional economic area (FEMA) due to economic linkages and significant commuting flows	Welwyn Hatfield Borough Council (52397)	Disagree	There is no single approach or definitive answer to the definition of a FEMA. SADC has taken a view, supported by evidence, that a practical FEMA definition is SW Herts. All five SW Herts LPAS and HCC agree. Some cross-boundary relationships with Welwyn & Hatfield clearly exist and are acknowledged.	No change

S6 - Broad Locations for Development

Representation Point	Representor Raising Point (see below for list of abbreviations)	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Reference to joint working with neighbouring authorities required	Hertsmere Borough Council (51934)	Disagree	Cross reference to paragraph 1.5. No need to repeat here. There has been ongoing joint working with neighbouring local authorities including the South West Herts Group.	No change
Policy needs to ensure masterplanning does not delay delivery taking place as soon as possible and developer led masterplanning	Legal and General (1051022) Home Builders Federation Ltd (1156936)	Disagree	Policy S6 sets out a very clear approach. Masterplanning will be Council-led, in collaboration with developers, residents and other stakeholders.	No change
Requirement for masterplans may cause delays, particularly	M Scott Properties (1185993)	Disagree	Masterplans are required for sites of this scale to secure high quality development.	No change

where there is multiple ownership	Home Builders Federation Ltd (1156936)		There are sufficient deliverable sites for years 1-5. This is confirmed in relevant developer representations.	
Preamble should be more flexible to allow for changes arising through public consultation/ Planning application process	Crown Estate (51946)	Disagree	Policy S6 sets out a clear approach. This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change
Support community involvement in masterplanning	1185950	Noted	Support noted	No change
Stakeholders should include those providing infrastructure, including schools, public transport and health professionals	1185950	Noted	Masterplanning will indeed involve a range of stakeholders, including these and more	No change
Strategic maps of the sites, identifying key elements, would aid interpretation of the allocations. These could also be used to demonstrate the conceptual approach to development.	Watford Borough Council (1122500)	Noted	This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change
Important to consider how the proposed development areas will be reinforced and enhanced as part of Local Plan reviews	Watford Borough Council (1122500)	Noted	Refer to paragraph 2.1 which outlines the overall vision of the Local Plan. This is also applicable to the Broad Location sites. This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change

Could include a greater explanation of the long-term vision of the role of the Broad Locations	Watford Borough Council (1122500)	Disagree	Each S6 sub-policy (i), (ii) etc. sets out an overall objective.	No change
Support principles of policy	Crown Estate (51946)	Noted	Support noted	No change
Policy is inflexible – should refer to ‘should reflect’, not ‘must meet’	Crown Estate (51946)	Disagree	The policies provide a clear requirement which reflects the NPPF. The wording used aims to ensure that the requirements are met.	No change
Health Impact Assessment should be carried out at EIA scoping opinion stage	Hertfordshire County Council (837689)	Noted	This matter will be properly detailed through the EIA process, with appropriate consultation	No change

Policy S6 i) East Hemel Hempstead (North) Broad Location

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Strongly support the policy	Crown Estate (51946)	Noted	Support noted	No change
Built development boundary should be amended to be in line with SLR plan L2	Crown Estate (51946)	Disagree	The Plan boundaries are appropriate and reflect site constraints and the general findings of the GBR.	No change

Although it is inevitable that the development of Broad Location S6 (i) will lead to additional vehicular crossings of the Nickey Line which will cause some detriment, these will be mitigated as far as possible	Crown Estate (51946)	Noted	The Nickey Line footpath / cycleway is an important landscape, commuting and recreational route feature. As it will need to be crossed there will inevitably be some localised adverse impacts. There will also be considerable opportunities for enhancement. Masterplanning will consider damage mitigation, integration and maximising opportunities within and beyond the development.	No change
Point 1 should refer to development being materially in accordance with the masterplan	Crown Estate (51946)	Disagree	Already set out in overall S6.	No change
No justification for 3% self-build figure	Crown Estate (51946)	Disagree	Justification based on evidence including the Self Build Register. SADC are required to have regard to this as part of Self Build and Custom Housebuilding Act 2015.	No change
Should have an overarching Hemel Garden Communities Broad Location policy including reference to the charter, overall development scale, masterplanning approach, affordable housing, density, housing mix, key infrastructure, infrastructure standards and joint approach, and Strategic Sites Design Guidance	Dacorum Borough Council (1186054)	Disagree	HGC is a wider and evolving concept, much of it beyond SADC boundaries, that is better set out and explained outside of the Local Plan.	No change

Nickey Line mitigation measures indicated by the Crown Estate must be provided.	Friends of the Nickey Line (1184312)	Agree	The Nickey Line footpath / cycleway is an important landscape, commuting and recreational route feature. As it will need to be crossed there will inevitably be some localised adverse impacts. There will also be considerable opportunities for enhancement. Masterplanning will consider damage mitigation, integration and maximising opportunities within and beyond the development.	No change
Concerns over proximity to Buncefield - policies should include reference to the health and safety Development Proximity Zone Consultation Zones at Buncefield Oil Storage Depot.	Redbourn Parish Council (759908) 759883 498103 1144419 1185704	Disagree	The importance of this issue is acknowledged. The Plan development proposals already take account of the health and safety issues associated with the Depot. The Health and Safety Executive will be consulted as part of any planning application in proximity to the Buncefield DPZ. This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change
Concerns with road access, particularly from / to the M1.	1153741 498103 1184750	Disagree	Cross reference with Policies L 17 / 18. Infrastructure evidence (ref IDP / IDS) confirms that road access can be provided and the M1 junction improvement proposals are appropriate solutions. This matter can be properly detailed through the Masterplanning/ planning application process, with appropriate consultation.	No change
Improvements to the M1 Junction 8 insufficient, an additional junction should be considered	1153741	Disagree	Cross reference Policies L 17 / 18. Infrastructure evidence (ref IDP / IDS) confirms that road access can be provided and the M1 junction improvement proposals are appropriate solutions.	No change
Concerns development would provide	1184750	Disagree	Infrastructure evidence (ref IDP / IDS) confirms that road access can be provided and the M1 junction improvement proposals are appropriate solutions.	No change

opportunity for a Junction 8A				
Internal road/local roads would become a 'rat-run'	Redbourn Parish Council (759908) 498103	Disagree	The internal road is planned as a main distributor road, so it cannot reasonably be described as a rat run.	No change
Lower housing figure should be applied to allow for more green spaces and community facilities	498103	Disagree	Housing targets are based on evidence on local housing need and standard methodology set out by the government.	No change
Density will need to be higher than 40dph to provide the 1,650 dwellings as some land in private ownership, which would not be appropriate	Redbourn Parish Council (759908) 498103	Disagree	Some sub-areas will achieve higher density. Overall the land can accommodate the dwelling numbers in the Plan (reference Annex 1)	No change
Lack of green spaces in plans for EHH	498103	Disagree	Cross reference Policy L22 and L26 – 28. Substantial green space provision is planned. This matter can be properly detailed through the Masterplanning process / planning application / EIA processes, with statutory consultation.	No change
Lack of off-street parking provision in plans for EHH	498103	Disagree	Cross reference Policy L20 and appendix 1. There are clear standards in Plan policy.	No change
Lack of community facilities in plans for EHH	498103	Disagree	Cross reference Policy L22 and L26 – 28. Substantial community facility provision is planned.	No change

			This matter can be properly detailed through the Masterplanning process / planning application / EIA processes, with statutory consultation.	
Further work needs to be carried out on infrastructure, including highways, parking, water, sewerage	Hertfordshire County Council (837689) 498103 867312	Noted	These points are generally recognised. These matters can be properly detailed through the Masterplanning process / planning application / EIA processes, with statutory consultation.	No change
Health and safety aspects of building close to M1, pylons, oil pipeline, Buncefield Oil Depot and under Luton Airport flightpath need to be considered	498103 1144419 1185704	Noted	These points are generally recognised. This matter can be properly detailed through the Masterplanning process / planning application / EIA processes, with statutory consultation.	No change
There should be a joint Area Action Plan for EHH with DBC	498103 1185704	Disagree	This was an option considered. It has been replaced with a collaborative joint Masterplanning process which can address the issues more quickly in the context of the clear development requirements in the Plan and the requirements of the NPPF.	No change
Not explicitly clear what sports facilities to be provided	Sport England (824971)	Disagree	Cross reference Policy L22 and L26 – 28. The policy refers to strategic and local open space and recreation space and community facilities. Any specific reference to the type of specific sports facilities would be overly prescriptive and inflexible at this stage. This matter can be properly detailed through the Masterplanning process / planning application / EIA processes, with statutory consultation.	No change

No evidence base to inform need for sports provision	Sport England (824971)	Disagree	<p>Cross reference Policy L22 and L26 – 28.</p> <p>Baseline and further work since Regulation 19 has been undertaken to inform specific development proposals. Playing Pitch Strategy update 2019 provides baseline data.</p>	No change
Need for additional facilities at this location where facilities already at capacity	Sport England (824971)	Agree	<p>Cross reference Policy L22 and L26 – 28.</p> <p>The policy concurs stating that development will be required to deliver strategic and local open space and recreation space and community facilities</p> <p>This matter can be properly detailed through the Masterplanning process / planning application / EIA processes, with statutory consultation</p>	No change
Should include sports facility provision in proposal points	Sport England (824971)	Disagree	<p>Cross reference Policy L22 and L26 – 28.</p> <p>The policy states that development will be required to deliver strategic and local open space and recreation space and community facilities</p> <p>This matter can be properly detailed through the Masterplanning process / planning application / EIA processes, with statutory consultation</p>	No change
Unclear if public open space or recreation space refers to indoor or outdoor sports provision	Sport England (824971)	Disagree	<p>Cross reference Policy L22 and L26 – 28.</p> <p>The policy refers to strategic and local public open space. Open space is defined under the NPPF as all space of public value, land and water which offer important opportunities for sport and recreation. It is clear that this is therefore outdoor in nature. The policy also refers to recreation space and community facilities which would capture indoor sports facilities.</p>	No change

			This matter can be properly detailed through the Masterplanning process.	
Further consideration of strategic community sports facility provision is required across all EHH BLs	Sport England (824971)	Agree	<p>Cross reference Policy L22 and L26 – 28.</p> <p>The proposed Hemel BL's S6 i-iv (apart from S6ii as a major new Enviro-Tech business / employment land focused location) all require delivery of strategic and local public open space. The precise location and nature of the open spaces and community sport provision will be informed by ongoing joint work with Dacorum Borough Council. As per Policy L22 the Council would support new facilities in appropriate and sustainable locations and joint use of facilities near to new housing areas to meet sustainability objectives.</p> <p>This is part of the Masterplanning process.</p>	No change
Both strategic and local public space must be provided	<p>Ramblers Association (52420)</p> <p>St Albans & District Footpaths Society (723340)</p> <p>Hertfordshire County Council (837689)</p> <p>1184750</p>	Agree	This is set out in the policy and will be taken forward as part of the Masterplanning process	No change
Countryside access links must be provided	<p>Ramblers Association (52420)</p> <p>St Albans & District Footpaths Society (723340), 1157340</p>	Agree	This is set out in the policy and will be taken forward as part of the Masterplanning process	No change

Must provide / support the country park	Ramblers Association (52420) St Albans & District Footpaths Society (723340) 1184750 1185037 Hertfordshire County Council (837689)	Agree	This is set out in the policy and will be taken forward as part of the Masterplanning process	No change
Areas of the Country Park will be inaccessible to the public and has unclear management plans. Country Park is really an area for balancing ponds.	498103	Disagree	Provision of an accessible well managed public country park is a development requirement. This matter can be properly detailed through the masterplanning / planning application process, with appropriate consultation.	No change
Heritage environment /assets have not been considered at EHH and lack of criteria to protect assets	334023 Redbourn Parish Council (759908) Historic England (929489) Leverstock Green Village Association (1185907)	Disagree	Cross reference Policy L30 This supports conservation of heritage assets appropriate to their significance and seeks that development which may affect such assets is accompanied by a Heritage Statement. Such heritage assets form only a small proportion of the overall Broad Location, are acknowledged and will be treated appropriately as part of the Masterplanning / planning application processes.	No change
Heritage Impact Assessment required	Historic England (929489)	Disagree	Cross reference Policy L30	No change

and policy wording should reflect its findings			This is part of the masterplanning process	
Development, including landscaping, should be of a high standard of design	1184750	Agree	Cross reference Policy L29 This is part of the masterplanning process	No change
Further landscape and EIA work should be carried out	1184750	Noted	Cross reference Policy L29 This is part of the masterplanning and planning application process; including statutory consultation	No change
Sports/health/educational facilities must not encroach into country park land	1184750	Disagree	Cross reference Policy 26 - 28 Open space provision is very sizeable. The detailed masterplanning of the open space can allow for accommodation of all these uses and for appropriate country park / habitat creation.	No change
40dph too high	1184750	Disagree	This is an appropriate minimum density to make best use of land and to avoid further pressure on loss of greenfield land/ Green Belt. The NPPF supports optimisation of residential density.	No change
Alternatives to the overhead power lines should be considered	1184750	Noted	Undergrounding or diversion is unlikely to be practical or viable. However the development will be Masterplanned to avoid undesirable environmental and visual issues in the design of the new development.	No change
Important trees must be preserved	1184750 Hertfordshire County Council (837689)	Noted	Cross reference Policy L29 Retention of important trees is a requirement of the policy.	No change
Clarity needed on whether specific deliverables such as	St Albans & District Footpaths Society (723340)	Noted	Cross reference Policy L21 and Policies Map. Primary school within the area excluded from the green belt, secondary school within the Green Belt.	No change

school buildings will be accommodated in the Broad Location or Green Belt	The British Horse Society (1187597)			
Proposed secondary school will risk Redbourn children's access to Roundwood Park	1185037	Noted	School place catchment and allocations policies are not a planning matter.	No change
Support setting minimum housing number targets	Grand Union Investments Ltd (977391)	Noted	Support noted	No change
DBC and SADC are not collaborating, particularly with regard to number of houses allocated to SADC and DBC	1144419 1185704	Disagree	Cross reference Policy S2 / S4 SADC and DBC are clearly working together through ongoing Duty To Cooperate, including the SWH JSP process.	No change
Concerns that the development may not end up providing the required 40% affordable housing	1144419	Disagree	This is a specific policy requirement in the Plan. All requirements set out in the Broad Location policies, including a minimum 40% affordable housing, have been agreed as deliverable by the landowners/developers. Cross reference with L3.	No change
Support inclusion of Eaton Lodge in Broad Location	985289	Noted	This existing Eaton Lodge is included.	No change
Further clarity on some detailed aspects of the development can be provided as part of masterplanning process	985289	Noted	This is the approach being taken.	No change

The development should be required to deliver walking and cycling facility improvements and public transport links to promote car free access	1048449 Hertfordshire County Council (837689)	Agree	Cross reference Policy L18 This approach is integral to the policy.	No change
Dacorum should take control of planning for EHH	1185704	Disagree	Only SADC (as LPA) can plan for land within SADC's area, unless it agrees otherwise. SADC is committed to working jointly with DBC on planning for land at Hemel.	No change
HSE must be consulted on buffer zones/mitigations for Buncefield Oil Depot and pipelines	Environment Agency (1147557)	Noted	This is an important constraint that is noted in the S6 ii policy and will be taken into account in Masterplanning. The level of development / land available allow for the depot and pipelines constraints to be accommodated.	No change
Buffer zones / mitigation for Buncefield Oil Depot and pipelines might limit amount of development	Environment Agency (1147557)	Noted	This is an important constraint that is noted in the S6 ii policy and will be taken into account in Masterplanning. The level of development / land available allow for the depot and pipelines constraints to be accommodated.	No change
No information provided on strategy or delivery, just a wishlist	Aurora Properties Limited (1151817)	Disagree	The development requirements are clear and the Masterplan process will provide more specific proposals in due course.	No change
Clarify jargon e.g. community food zone	St Albans Civic Society (1156974)	Disagree	Term allows for allotments or other forms of growing space – urban farming or community gardens – to be agreed in detail through Masterplanning and planning applications	No change
No strategy for delivering 3% self-build homes	St Albans Civic Society (1156974)	Disagree	This is included as a specific policy requirement	No change
Strongly support allocation and safeguarding of land for schools	Department for Education (1186955)	Noted	Support noted	No change

School building areas should be removed from green belt	Department for Education (1186955) Hertfordshire County Council (837689)	Noted	Primary school site is in the land to be taken out of GB. Secondary school to be retained in the GB. Cross reference L21 and Policies Map.	No change
Policy should include indication of school site size required	Department for Education (1186955)	Noted	Add reference in IDP to HCC size requirements as set out in response to L21	IDP will be updated on an ongoing basis.
Overhead electricity transmission line is not a defensible boundary for the Green Belt.	Redbourn Parish Council (759908) Linden Wates (Bricket Wood) Limited (1186996)	Disagree	The large, longstanding long distance powerlines creates a clear physical line marking the edge of the Green Belt, as identified by consultants in the GBR.	No change
Residential development/sports pitches/education uses will extend beyond area recommended in the GBR for development	Redbourn Parish Council (759908) Leverstock Green Village Association (1185907)	Noted	Residential development site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.	No change
Support principles of major development at East and North Hemel Hempstead however these areas are being planned through a comprehensive masterplan and should therefore be one location. Amended text	DBC (1186054)	Disagree	The sites are split in the Plan to allow for explanation of development requirements and to indicate potential stages / phases of development and housing trajectory implications, which differ between BLs. Masterplanning and planning applications for all will clearly be considered in the context of each other.	No change

for an overarching policy suggested.				
School provision should take emerging Hemel Garden Communities masterplan and emerging education guidance for Garden Communities by MHCLG guidance into account	DBC (1186054)	Noted	Cross reference L17 Work on the education infrastructure evidence base has been ongoing and has informed the policy requirement.	No change
Institutional residential (C2) units should have a separate housing target and be excluded from dwelling trajectory figures	DBC (1186054)	Disagree	NPPF / PPG / Housing Delivery Test acknowledge that C2 institutional residential units contribute to housing provision.	No change
Secondary school should be 10FE – can be built as 8FE with flexibility to expand	Hertfordshire County Council (837689)	Noted	Work on the education infrastructure evidence base has been ongoing and has informed the policy requirement.	Minor modification – to acknowledge required flexibility to be able to expand to 10 FE.
Amend policy wording to include land size requirement for flexi-care home	Hertfordshire County Council (837689)	Disagree	Requirement as set out in Policy L2. Size requirements can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change
Broad Locations should use Design Codes	Harpenden Town Council (51870)	Disagree	This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change
Policy should consider social and pastoral needs of future	St Albans Deanery Synod (1185929)	Noted	Refer to Policy L22 which encourages opportunities for new provision of places of worship as part of development of the Local Centres in Broad Locations.	No change

occupants and include requirements for a community facility e.g. a community hall				
What masterplanning collaboration has there been?	St Stephen Parish Council (51804)	Noted	There has been ongoing joint working with Dacorum Borough Council, local communities and other stakeholders.	No change
Collaboration with neighbouring Councils needed	1181750 1182733	Noted	There has been ongoing joint working with neighbouring local authorities including Dacorum and the South West Herts Group. DtC considered to be met.	No change
Is there a need for the amount of flexi-care provision required?	St Stephen Parish Council (51804)	Noted	Evidence available in full, including in HCC documents and representations. Policy L2 sets out an appropriate approach.	No change
Have infrastructure requirements been viability tested to comply with national policy	Hertsmere Borough Council (51934)	Noted	Updated evidence regarding economic viability of development has been made available on the council website.	No change
Major infrastructure must be provided up front	Colney Heath Parish Council (51891) London Colney Parish Council (52477)	Noted	New infrastructure will be provided in association with new development. Further details can be found in IDP updates/ Masterplanning work / planning application process	No change
Be more specific with renewable energy/energy efficiency requirement	1181723	Disagree	Cross reference with Policy L25 which sets out the energy and environmental performance requirements of new developments. This addresses renewable energy.	No change

Policy S6 ii) East Hemel Hempstead (Central) Broad Location

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Support allocation of EHH (Central) to include industrial and logistics uses, given proximity to motorway network	Greater London Authority (1157729)	Noted	Support noted	No change
Support principle of employment allocation	Crown Estate (51946) Gorhambury Estates Company Limited (375996)	Noted	Support noted	No change
Support inclusion of Breakspears in the allocation	Owners of Breakspears (973659)	Noted	Support noted	No change
Should create a business park with well-designed open spaces	1184750 1184750	Noted	This approach is integral to the policy.	No change
Dacorum should take control of planning for EHH	1185704	Disagree	Only SADC (as LPA) can plan for land within SADC's area, unless it agrees otherwise. SADC is committed to working jointly with DBC on planning for land at Hemel.	No change
HSE must be consulted on buffer zones/mitigations for Buncefield Oil Depot and pipelines	Environment Agency (1147557)	Noted	This is an important constraint that is noted in the S6 ii policy and will be taken into account in Masterplanning. The level of development / land available allow for the depot and pipelines constraints to be accommodated.	No change

Buffer zones / mitigation for Buncefield Oil Depot and pipelines might limit amount of development	Environment Agency (1147557)	Noted	This is an important constraint that is noted in the S6 ii policy and will be taken into account in Masterplanning. The level of development / land available allow for the depot and pipelines constraints to be accommodated.	No change
No information provided on strategy or delivery, just a wishlist	Aurora Properties Limited (1151817)	Disagree	The development requirements are clear and the Masterplan process will provide more specific proposals in due course.	No change
Should be required to deliver walking and cycling facility improvements to promote car free access, which should be adequately maintained	St Albans Cycle Campaign (346623) Hertfordshire County Council (837689) 1048449	Agree	Cross reference with Policy L18 and Appendix 4 which set out the Key infrastructure requirements for broad locations including East Hemel Hempstead central. This approach is integral to the policy.	No change
Development needs to be required to deliver transport network (including walking, cycling and equestrian links) and public transport services upgrades/improvements	The British Horse Society (1187597) Ramblers Association (52420)	Agree	Refer to Appendix 4 which sets out the Key infrastructure requirements for broad locations including East Hemel Hempstead central. This approach is integral to the policy.	No change
Need for a traffic-free multi-use right of way for walkers, cyclists, horse-riders and carriage drivers linking EHH (North) and EHH (South)	The British Horse Society (1187597)	Noted	Cross reference with Policy L18 and Appendix 4 which set out the Key infrastructure requirements for broad locations including East Hemel Hempstead. These matters can be properly detailed through the masterplanning process / planning application / EIA processes, with statutory consultation.	No change

Further work needs to be carried out on infrastructure, including highways	Hertfordshire County Council (837689) 1055738	Noted	These points are generally recognised. These matters can be properly detailed through the master planning process / planning application / EIA processes, with statutory consultation.	No change
Internal road/local roads would become a 'rat-run'	Redbourn Parish Council (759908) Leverstock Green Village Association (1185907) 498103	Disagree	The internal road is planned as a main distributor road, so it cannot reasonably be described as a rat run.	No change
An additional Jct 8a would lead to additional traffic movements on local roads, impacting on Redbourn and the surrounding area.	Redbourn Parish Council (759908) Leverstock Green Village Association (1185907)	Disagree	Cross reference Policies L 17 / 18. Infrastructure evidence (ref IDP / IDS) confirms that road access can be provided and the M1 junction improvement proposals are appropriate solutions.	No change
Are Jct 8 improvements actually required?	1184750	Disagree	Cross reference Policies L 17 / 18. Infrastructure evidence (ref IDP / IDS) confirms that road access can be provided and the M1 junction improvement proposals are appropriate solutions.	No change
Difficulty in integrating a gypsy and traveller site with the wider proposed development. Vulnerable to noise and disturbance from the adjacent commercial development.	Owners of Breakspears (973659)	Disagree	Sites have been allocated in the most appropriate locations, based on evidence, as set out in L7.	No change

<p>Additional gypsy and traveller pitches in EHH Broad Location would result in an over-concentration in the area, exacerbating existing problems. Traveller sites should be more evenly distributed across the District</p>	<p>DBC (1186054) 1181723 498103</p>	<p>Disagree</p>	<p>Sites have been allocated in the most appropriate locations, based on evidence, as set out in L7. There is considerable flexibility within these large Broad Locations to locate sites sensitively.</p>	<p>No change</p>
<p>Requirement 1 should refer to development being materially in accordance with the masterplan.</p>	<p>Crown Estate (51946)</p>	<p>Noted</p>	<p>Already set out in overall S6.</p>	<p></p>
<p>Point 2 should include that development should take into consideration the aims and status of the EZ, which accepts that some occupiers will not meet the EZ criteria. Modify policy to clarify that compliance with the criteria is not an absolute requirement, to provide flexibility.</p>	<p>Crown Estate (51946)</p>	<p>Noted</p>	<p>Approach taken appropriately acknowledges importance and role of EZ.</p>	<p>No change</p>
<p>Enviro-Tech should be defined in a glossary for clarity</p>	<p>Crown Estate (51946)</p>	<p>Noted</p>	<p>Defined as part of Hertfordshire Enviro-Tech enterprise zone by Herts LEP.</p>	<p>No change</p>

Range of uses in point 3 should include 'ancillary and supporting' uses	Crown Estate (51946)	Disagree	This matter can be properly detailed through the master planning process/ planning application process	No change
Split between primarily B1 and mixed industrial uses is too prescriptive/inflexible. Flexibility is needed over the plan period	Crown Estate (51946)	Disagree	Policy S6 ii) sets out a clear approach.	No change
Support provision of a variety jobs, but figure of 10,000 jobs should be deleted as is only speculative at this stage with no evidential basis apparent	Crown Estate (51946)	Noted	Support noted. Full and detailed justification is provided by evidence documents. It is not necessary to justify the Plan within the Plan document itself. To do so would result unnecessarily in a longer and more complex document.	No change
Due to extensive ground remodelling required policy should be amended to retain important trees and landscape features 'where possible and appropriate'	Crown Estate (51946)	Disagree	Policy S6 ii) sets out a clear approach. This matter can be properly detailed through the masterplanning process / planning application process	No change
Point 9 should clarify that the link road is needed as part of the wider transport package to support development in SADC and DBC Local Plans, and not just for EHH (central).	Crown Estate (51946)	Noted	Cross reference with Policy L18 and Appendix 4 which set out the Key infrastructure requirements for broad locations including East Hemel Hempstead. These matters can be properly detailed through the masterplanning process / planning application / EIA processes, with statutory consultation.	No change

Point 9 should include reference to upgrading the A414/Green Lane junction, or add additional point	Crown Estate (51946)	Noted	Cross reference with Policy L18 and Appendix 4 which set out the Key infrastructure requirements for broad locations including East Hemel Hempstead. These matters can be properly detailed through the masterplanning process / planning application / EIA processes, with statutory consultation.	No change
Point 10 should be amended to note MMTI provision will be subject to its function and viability being demonstrated	Crown Estate (51946)	Noted	Cross reference with Policy L18 and Appendix 4 which set out the Key infrastructure requirements for broad locations including East Hemel Hempstead. MMTI is required, while acknowledging function will evolve over time. These matters can be properly detailed through the masterplanning process / planning application / EIA processes, with statutory consultation.	No change
Support use of exceptional environmental opportunities within the employment area however it is unsound to specify particular solution such as CHP and large scale solar power as the best option may change over time	Crown Estate (51946)	Noted	Refer to policy L25 which sets out the energy and environmental performance requirements for new developments. This addresses energy efficiency that BL must comply with. Appropriate alternatives that deliver similar objectives may be possible, if fully justified.	No change
Mitigation for noise/air pollution not critical for a major employment location	Crown Estate (51946)	Disagree	Cross reference to Policy L18 which requires major developments to provide proposals for limiting and mitigating air quality impacts.	No change
Support principles of major development at	DBC (1186054)	Disagree	The sites are split in the Plan to allow for explanation of development requirements and to indicate potential stages /	No change

<p>East and North Hemel Hempstead however these areas are being planned through a comprehensive masterplan and should therefore be one location. Amended text for an overarching policy suggested.</p>			<p>phases of development and housing trajectory implications, which differ between BLs. Masterplanning and planning applications for all will clearly be considered in the context of each other.</p>	
<p>Should include a household waste recycling centre</p>	<p>DBC (1186054) Hertfordshire County Council (837689)</p>	<p>Disagree</p>	<p>Cross reference with Policy L18 and Appendix 4 which set out the Key infrastructure requirements for broad locations including East Hemel Hempstead.</p> <p>These matters can be properly detailed through the master planning process / planning application / EIA processes, with statutory consultation.</p>	<p>No change</p>
<p>No fundamental ecological constraints and support retentions of important trees and landscape features</p>	<p>Hertfordshire County Council (837689)</p>	<p>Noted</p>	<p>Support noted</p>	<p>No change</p>
<p>Concerns relating to impact on traffic volume on minor routes to north/east Hemel Hempstead possibly on cycle routes, on B487 Redbourn Road, on M1 Jct 8 and on roads within Maylands. MMTI not sufficient to mitigate impacts.</p>	<p>Hertfordshire County Council (837689)</p>	<p>Noted</p>	<p>These points are generally recognised. These matters can be properly detailed through the master planning process / planning application / EIA processes, with statutory consultation.</p>	<p>No change</p>

Although a business area, provision of a certain amount of other uses e.g. small retail may be appropriate in order to reduce the need to travel	Hertfordshire County Council (837689)	Noted	These are supported already in the overall policy approach. These matters can be properly detailed through the master planning process / planning application / EIA processes, with statutory consultation.	No change
Consultation/liaison with HCC and relevant bus/coach operators needed on MMTI	Hertfordshire County Council (837689)	Noted	That process is supported and ongoing. These matters can be properly detailed through the master planning process / planning application / EIA processes, with statutory consultation.	No change
Heritage environment /assets have not been considered at EHH and lack of criteria to protect assets	Gorhambury Estates Company Limited (375996) Historic England (929489) Leverstock Green Village Association (1185907) Redbourn Parish Council (759908) 334023	Disagree	Cross reference Policy L30 This supports conservation of heritage assets appropriate to their significance and seeks that development which may affect such assets is accompanied by a Heritage Statement.	No change
Heritage Impact Assessment required and policy wording amended to reflect its findings	Historic England (929489)	Disagree	Cross reference Policy L30 This is part of the masterplanning process	No change

Impact on setting of Gorhambury Estate should be mitigated by way of a landscape buffer, building height limits, light shields	Gorhambury Estates Company Limited (375996)	Noted	This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
What masterplanning collaboration has there been?	St Stephen Parish Council (51804)	Noted	There has been ongoing joint working with Dacorum Borough Council, local communities and other stakeholders.	No change
Have infrastructure requirements been viability tested to comply with national policy	Hertsmere Borough Council (51934)	Noted	Updated evidence regarding economic viability of development has been made available on the council website.	No change
Collaboration with neighbouring Councils needed	1181750 1182733	Agree	There has been ongoing joint working with neighbouring local authorities including the South West Herts Group. DtC considered to be met.	No change
Major infrastructure must be provided up front	Colney Heath Parish Council (51891) London Colney Parish Council (52477)	Noted	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / Masterplanning work / planning application process	No change
Be more specific with renewable energy/energy efficiency requirement	1181723	Disagree	Cross reference to policy L25 which sets out the energy and environmental performance requirements of new developments. This addresses renewable energy.	No change

Policy S6 iii) East Hemel Hempstead (South) Broad Location

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Not explicitly clear what sports facilities to be provided	Sport England (824971)	Noted	Cross reference Policy L22 and L26 – 28. The policy refers to strategic and local open space and recreation space and community facilities. Any specific reference to the type of specific sports facilities would be overly prescriptive and inflexible at this stage. This matter can be properly detailed through the Masterplanning process / planning application / EIA processes, with statutory consultation.	No change
No evidence base to inform need for sports provision	Sport England (824971)	Disagree	Cross reference Policy L22 and L26 – 28. Baseline and further work since Regulation 19 has been undertaken to inform specific development proposals. Playing Pitch Strategy update 2019 provides baseline data.	No change
Need for additional facilities at this location where facilities already at capacity	Sport England (824971)	Agree	Cross reference Policy L22 and L26 – 28. The policy concurs stating that development will be required to deliver strategic and local open space and recreation space and community facilities This matter can be properly detailed through the Masterplanning process / planning application / EIA processes, with statutory consultation	No change

Should include sports facility provision in proposal points	Sport England (824971)	Disagree	<p>Cross reference Policy L22 and L26 – 28.</p> <p>The policy states that development will be required to deliver strategic and local open space and recreation space and community facilities</p> <p>This matter can be properly detailed through the Masterplanning process / planning application / EIA processes, with statutory consultation</p>	No change
Unclear if public open space or recreation space refers to indoor or outdoor sports provision	Sport England (824971)	Disagree	<p>Cross reference Policy L22 and L26 – 28.</p> <p>The policy refers to strategic and local public open space. Open space is defined under the NPPF as all space of public value, land and water which offer important opportunities for sport and recreation. It is clear that this is therefore outdoor in nature. The policy also refers to recreation space and community facilities which would capture indoor sports facilities.</p> <p>This matter can be properly detailed through the Masterplanning process.</p>	No change
Consideration of extending/enhancing sports facilities in proposed secondary school	Sport England (824971)	Agree	<p>Cross reference Policy L22 and L26 – 28.</p> <p>The proposed Hemel BL's S6 i-iv (apart from S6ii as a major new Enviro-Tech business / employment land focused location) all require delivery of strategic and local public open space. The precise location and nature of the open spaces and community sport provision will be informed by ongoing joint work with</p>	No change

			Dacorum Borough Council. As per Policy L22 the Council would support new facilities in appropriate and sustainable locations and joint use of facilities near to new housing areas to meet sustainability objectives. This is part of the Masterplanning process.	
Development, including landscaping, should be of high standard design	1184750	Agree	Cross reference Policy L29 This is part of the masterplanning process	No change
Concerns with road access, particularly from/to the M1.	1153741 498103 1184750	Disagree	Cross reference Policies L 17 / 18. Infrastructure evidence (ref IDP / IDS) confirms that road access can be provided and the M1 junction improvement proposals are appropriate solutions.	No change
Further landscape and EIA work should be carried out	1184750	Noted	Cross reference Policy L29 This is part of the masterplanning and planning application process; including statutory consultation	No change
Important trees must be preserved	Hertfordshire County Council (837689) 1184750	Noted	Cross reference Policy L29 Retention of important trees is a requirement of the policy.	No change
Support setting minimum housing targets	Grand Union Investments Ltd (977391)	Noted	Support noted	No change
Lower housing figure should be applied to allow	498103	Disagree	Housing requirement/targets are based on the standard methodology set out by the government – see S4.	No change

for more green spaces and community facilities			<p>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.</p> <p>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p>	
DBC and SADC are not collaborating, particularly with regard to number of housing allocated to SADC and DBC	1144419 1185704	Disagree	<p>Cross reference Policy S2 / S4</p> <p>There has been ongoing joint working with neighbouring local authorities including the South West Herts Group. DtC considered to be met.</p>	No change
Collaboration with neighbouring Councils needed	1181750 1182733	Noted	<p>There has been ongoing joint working with neighbouring local authorities including the South West Herts Group. DtC considered to be met.</p>	No change
What masterplanning collaboration has there been?	St Stephen Parish Council (51804)	Noted	<p>There has been ongoing joint working with Dacorum Borough Council, local communities and other stakeholders.</p>	No change
Dacorum should take control of planning for EHH	1185704	Disagree	<p>Only SADC (as LPA) can plan for land within SADC's area, unless it agrees otherwise. SADC is committed to working jointly with DBC on planning for land at Hemel.</p>	No change
Is there a need for the amount of flexi-care provision required?	St Stephen Parish Council (51804)	Noted	<p>Evidence available in full, including in HCC documents and representations. Policy L2 sets out an appropriate approach.</p>	No change
Policy should include a land size requirement for flexi-care home	Hertfordshire County Council (837689)	Disagree	<p>Requirement as set out in Policy L2.</p> <p>Size requirements can be properly detailed through the Masterplanning / planning</p>	No change

			application / EIA process, with appropriate consultation.	
Have infrastructure requirements been viability tested to comply with national policy	Hertsmere Borough Council (51934)	Noted	Updated evidence regarding economic viability of development has been made available on the council website.	No change
Major infrastructure must be provided up front	Colney Heath Parish Council (51891) London Colney Parish Council (52477)	Noted	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / Masterplanning work / planning application process	No change
Strongly support the policy	Crown Estate (51946)	Noted	Support noted	No change
GB boundary to southern corner of site should be moved to 1) allow flexibility in terms of future development 2) questionable what strategic GB function the triangle of land would continue to play 3) not a strong GB boundary – should be moved out to Hemel Hempstead Road/M1, and to also include Centurion Golf Club which would be justified by economic	Centurion Golf Club (1160058)	Disagree	Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.	No Change

benefits from expansion of its facilities				
Amend point 1 to refer to development being materially in accordance with the masterplan	Crown Estate (51946)	Disagree	Already set out in overall S6.	No change
Concerns the boundary defined on the Policies Map is not large enough for 2,400 homes plus associated infrastructure at 40dph. Additional land at southern tip should be included.	Crown Estate (51946)	Disagree	Some sub-areas will achieve higher density. Overall the land can accommodate the dwelling numbers in the Plan (reference Annex 1)	No change
Density will need to be much higher than 40dph to provide the 2,400 dwellings which would not be appropriate	Leverstock Green Village Association (1185907)	Disagree	Some areas will achieve higher density. Overall the land can accommodate the dwelling numbers in the Plan (reference Annex 1)	No change
40dph too high	1184750	Disagree	This is an appropriate minimum density to make best use of land and to avoid further pressure on loss of greenfield land/ Green Belt. The NPPF supports optimisation of residential density.	No change
No justification for 3% self-build figure, amended policy wording suggested	Crown Estate (51946)	Disagree	Justification based on evidence including the Self Build Register. SADC are required to have regard to this as part of Self Build and Custom Housebuilding Act 2015.	No change

Concerns development may not end up providing the required 40% affordable housing	1144419	Disagree	This is a specific policy requirement in the Plan. Evidence available suggests the level of provision is viable.	No change
Unlikely the development will be built out in plan period due to infrastructure require and scale of development	1185704	Disagree	The Plan necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy. There are sufficient deliverable sites for years 1-5. New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process	No change
Lack of community facilities in plans for EHH	498103	Disagree	Cross reference Policy L22 and L26 – 28. Substantial community facility provision is planned. This matter can be properly detailed through the Masterplanning process / planning application / EIA processes, with statutory consultation.	No change
No information provided on strategy or delivery, just a wishlist	Aurora Properties Limited (1151817)	Disagree	The development requirements are clear and the Masterplan process will provide more specific proposals in due course.	No change
Strongly support allocation and safeguarding of land for schools	Department for Education (1186955)	Noted	Support noted	No change

School building areas should be removed from Green Belt	Department for Education (1186955) Hertfordshire County Council (837689)	Noted	Primary school site is in the land to be taken out of GB. Cross reference L21 and Policies Map.	No change
Education uses will extend beyond area recommended in the GBR for development	Leverstock Green Village Association (1185907)	Noted	Residential development site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.	No change
School site locations should be identified	Hertfordshire County Council (837689)	Noted	Primary school site is in the land to be taken out of GB. Cross reference L21 and Policies Map. This matter can be properly detailed through the master planning process/ planning application/ EIA processes, with statutory consultation.	No change
Clarity needed on whether specific deliverables such as school buildings will be accommodated in the Broad Location or Green Belt	St Albans & District Footpaths Society (723340) The British Horse Society (1187597)	Noted	Primary school site is in the land to be taken out of GB. Cross reference L21 and Policies Map. This matter can be properly detailed through the master planning process/ planning application/ EIA processes, with statutory consultation.	No change
Support transport network improvements	St Albans & District Footpaths	Noted	Support noted	No change

	<p>Society (723340)</p> <p>The British Horse Society (1187597)</p> <p>Ramblers Association (52420)</p>			
Lack of green spaces in plans for EHH	498103	Disagree	<p>Cross reference Policy L22 and L26 – 28.</p> <p>Substantial provision is planned.</p> <p>This matter can be properly detailed through the master planning process / planning application / EIA processes, with statutory consultation.</p>	No change
Support sufficient assets to provide sustainable management of community facilities, open spaces and parklands	<p>St Albans & District Footpaths Society (723340)</p> <p>The British Horse Society (1187597)</p> <p>Ramblers Association (52420)</p> <p>Hertfordshire County Council (837689)</p>	Noted	Support noted	No change

Both strategic and local public space must be provided	Ramblers Association (52420) St Albans & District Footpaths Society (723340) The British Horse Society (1187597) Hertfordshire County Council (837689) 1184750	Agree	This is part of the masterplanning process	No change
Countryside access links must be provided	Ramblers Association (52420) St Albans & District Footpaths Society (723340) The British Horse Society (1187597) St Albans Cycle Campaign (346623)	Agree	This is part of the masterplanning process	No change

	1157340			
Sports/health/educational facilities must not encroach into country park land	1184750	Disagree	Cross reference Policy L26 - 28 Open space provision is very sizable. The detailed master planning of the open space can allow for accommodation of all these uses and for appropriate country park / habitat creation.	No change
Must provide/support the country park/green buffer to the south east	Ramblers Association (52420) St Albans & District Footpaths Society (723340) Hertfordshire County Council (837689) 1184750 1185037 The British Horse Society (1187597)	Agree	This is a development requirement.	No change
Boundary of site should comply with Green Belt Review	Leverstock Green Village Association (1185907)	Disagree	Housing requirement/targets are based on the standard methodology set out by the government – see S4. Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.	No change

			Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.	
The development should be required to deliver walking and cycling facility improvements and public transport links to promote car free access, which should be adequately maintained	Hertfordshire County Council (837689) St Albans Cycle Campaign (346623) 1048449	Agree	Cross reference Policy L18 This approach is integral to the policy.	No change
Development must respond to the 'village character' of Leverstock Green	Leverstock Green Village Association (1185907)	Noted	This matter can be properly detailed through the master planning process / planning application / EIA processes, with statutory consultation. Also cross reference Policy L1 and L23.	No Change
Less dwellings should be proposed so that the scale of the development complements Leverstock Green	Leverstock Green Village Association (1185907)	Disagree	This is an appropriate minimum density / number of dwellings to make best use of land and to avoid further pressure on loss of greenfield land/ Green Belt. The NPPF supports optimisation of residential density. Cross reference Policy S1, S2, L1 and L23.	No change
Heritage environment /assets have not been considered at EHH and lack of criteria to protect assets. Impact on nearby listed buildings including	Historic England (929489) Redbourn Parish Council (759908) Leverstock Green Village	Disagree	Cross reference Policy L30 This supports conservation of heritage assets appropriate to their significance and seeks that development which may affect such assets is accompanied by a Heritage Statement.	No change

Westwick Row and buildings at Gorhambury	Association (1185907) Gorhambury Estates Company Limited (375996) 334023 1184969			
Heritage Impact Assessment required and policy wording should reflect its findings	Historic England (929489)	Disagree	Cross reference Policy L30 This is part of the masterplanning process.	No change
Impact on setting of Gorhambury Estate should be mitigated by way of a landscape buffer, building height limits, light shields	Gorhambury Estates Company Limited (375996)	Noted	Importance of historic Gorhambury Estate acknowledged. This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
Additional gypsy and traveller pitches in EHH Broad Location would result in an over-concentration in the area, exacerbating existing problems. Gypsy and Traveller sites should be more evenly distributed across the District	DBC (1186054) 1181723 498103	Disagree	Sites have been allocated in the most appropriate locations, based on evidence, as set out in L7. There is considerable flexibility within these large Broad Locations to locate sites sensitively.	No change
Should be more 1-2 bed dwellings	1034653	Disagree	Cross reference L1 and Appendix 6	No change

Lack of off-street parking provision in plans for EHH	498103	Disagree	Cross reference Policy L20 There are clear standards in Plan policy.	No change
Further work needs to be carried out on infrastructure, including highways, parking, water, sewerage	Hertfordshire County Council (837689) 498103 867312	Noted	These points are generally recognised. These matters can be properly detailed through the master planning process / planning application / EIA processes, with statutory consultation.	No change
There should be a joint Area Action Plan for EHH with DBC	498103 1185704	Disagree	This was an option considered. It has been replaced with a collaborative joint Masterplanning process which can address the issues more quickly in the context of the clear development requirements in the Plan and the requirements of the NPPF.	No change
Policy should consider social and pastoral needs of future occupants and include requirements for a community facility e.g. a community hall	St Albans Deanery Synod (1185929)	Noted	Refer to Policy L22 which encourages opportunities for new provision of places of worship as part of development of the Local Centres in Broad Locations.	No change
Policy should include requirement for provision of a new hospital	West Hertfordshire Hospitals NHS Trust (1183618)	Disagree	No substantive evidence provided to support such an approach. Cross reference L22.	No change
Civic Society Design Advisory Group should be consulted as part of any pre-planning consultation	St Albans Civic Society (1156974)	Disagree	This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change

Broad Locations should use Design Codes	Harpenden Town Council (51870)	Disagree	This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change
Support principles of major development at East and North Hemel Hempstead however these areas are being planned through a comprehensive masterplan and should therefore be one location. Amended text for an overarching policy suggested.	DBC (1186054)	Disagree	The sites are split in the Plan to allow for explanation of development requirements and to indicate potential stages / phases of development and housing trajectory implications, which differ between BLs. Masterplanning and planning applications for all will clearly be considered in the context of each other.	No change
School provision should take emerging Hemel Garden Communities masterplan and emerging education guidance for Garden Communities by MHCLG guidance into account	DBC (1186054)	Noted	Cross reference L17 Work on the education infrastructure evidence base has been ongoing and has informed the policy requirement.	No change
Institutional residential (C2) units should have a separate housing target and be excluded from dwelling trajectory figures	DBC (1186054)	Disagree	NPPF / PPG / Housing Delivery Test acknowledge that C2 institutional residential units contribute to housing provision.	No change
Be more specific with renewable energy/energy efficiency requirement	1181723	Disagree	Cross reference with Policy L25 which sets out the energy and environmental performance requirements of new developments. This addresses renewable energy.	No change

Policy S6 iv) North Hemel Hempstead Broad Location

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Not explicitly clear what sports facilities to be provided	Sport England (824971)	Disagree	<p>Cross reference Policy L22 and L26 – 28.</p> <p>The policy refers to strategic and local open space and recreation space and community facilities. Any specific reference to the type of specific sports facilities would be overly prescriptive and inflexible at this stage. This matter can be properly detailed through the Masterplanning process / planning application / EIA processes, with statutory consultation.</p>	No change
No evidence base to inform need for sports provision	Sport England (824971)	Noted	<p>Cross reference Policy L22 and L26 – 28.</p> <p>Baseline and further work since Regulation 19 has been undertaken to inform specific development proposals. Playing Pitch Strategy update 2019 provides baseline data.</p>	Publish updated evidence
Need for additional facilities at this location where facilities already at capacity	Sport England (824971)	Agree	<p>Cross reference Policy L22 and L26 – 28.</p> <p>The policy concurs stating that development will be required to deliver strategic and local open space and recreation space and community facilities</p> <p>This matter can be properly detailed through the Masterplanning process / planning application / EIA processes, with statutory consultation</p>	No change

Should include sports facility provision in proposal points	Sport England (824971)	Disagree	<p>Cross reference Policy L22 and L26 – 28.</p> <p>The policy states that development will be required to deliver strategic and local open space and recreation space and community facilities</p> <p>This matter can be properly detailed through the Masterplanning process / planning application / EIA processes, with statutory consultation</p>	No change
Unclear if public open space or recreation space refers to indoor or outdoor sports provision	Sport England (824971)	Disagree	<p>Cross reference Policy L22 and L26 – 28.</p> <p>The policy refers to strategic and local public open space. Open space is defined under the NPPF as all space of public value, land and water which offer important opportunities for sport and recreation. It is clear that this is therefore outdoor in nature. The policy also refers to recreation space and community facilities which would capture indoor sports facilities.</p> <p>This matter can be properly detailed through the Masterplanning process.</p>	No change
Consideration of extending/enhancing sports facilities in proposed secondary school	Sport England (824971)	Agree	<p>Cross reference Policy L22 and L26 – 28.</p> <p>The proposed Hemel BL's S6 i-iv (apart from S6ii as a major new Enviro-Tech business / employment land focused location) all require delivery of strategic and local public open space. The precise location and nature of the open spaces and community sport provision will be informed by ongoing joint work with</p>	No change

			Dacorum Borough Council. As per Policy L22 the Council would support new facilities in appropriate and sustainable locations and joint use of facilities near to new housing areas to meet sustainability objectives. This is part of the Masterplanning process.	
Development, including landscaping, should be of a high standard of design	1184750	Agree	Cross reference Policy L29 This is part of the masterplanning process	No change
Welcome requirement for new managed woodland and encourage provision of street trees	The Woodland Trust (1185811)	Noted	Support noted	No change
Broad Locations should use Design Codes	Harpenden Town Council (51870)	Disagree	This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change
Support setting minimum housing targets	Grand Union Investments Ltd (977391)	Noted	Support noted	No change
DBC and SADC are not collaborating, particularly with regard to number of housing allocated to SADC and DBC	1144419 1185704	Disagree	Cross reference Policy S2 / S4 SADC and DBC are clearly working together through ongoing Duty To Cooperate, including the SWH JSP process.	No change
What masterplanning collaboration has there been?	St Stephen Parish Council (51804)	Noted	There has been ongoing joint working with Dacorum Borough Council, local communities and other stakeholders.	No change

Collaboration with neighbouring Councils needed	1181750 1182733	Noted	There has been ongoing joint working with neighbouring local authorities including Dacorum and the South West Herts Group. DtC considered to be met.	No change
Concerns development may not end up providing the required 40% affordable housing	1144419	Disagree	This is a specific policy requirement in the Plan. Evidence available suggests the level of provision is viable.	No change
Unlikely the development will be built out in plan period due to infrastructure require and scale of development	1185704	Disagree	The Plan necessitates a significant change in approach from previous scales of development. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy. There are sufficient deliverable sites for years 1-5. New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process	No change
Further work needs to be carried out on infrastructure, including highways, parking, water, sewerage	Hertfordshire County Council (837689) 498103 867312	Noted	These points are generally recognised. These matters can be properly detailed through the master planning process / planning application / EIA processes, with statutory consultation.	No change
Support transport network improvements	St Albans & District Footpaths Society (723340)	Noted	Support noted	No change

	The British Horse Society (1187597) Ramblers Association (52420)			
Concerns with road access, particularly from/to the M1	1153741 498103 1184750	Disagree	Cross reference with Policies L 17 / 18. Infrastructure evidence (ref IDP / IDS) confirms that road access can be provided and the M1 junction improvement proposals are appropriate solutions. This matter can be properly detailed through the Masterplanning/ planning application process, with appropriate consultation.	No change
Infrastructure requirements and their deliverability not been fully considered by SADC or DBC	Redbourn Parish Council (759908)	Disagree	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process	No change
Have infrastructure requirements been viability tested to comply with national policy	Hertsmere Borough Council (51934)	Noted	Updated evidence regarding economic viability of development has been made available on the council website.	No change
Major infrastructure must be provided up front	Colney Heath Parish Council (51891) London Colney Parish Council (52477)	Noted	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / Masterplanning work / planning application process	No change

Health and safety aspects of building close to M1, pylons, oil pipeline, Buncefield Oil Depot and under Luton Airport flightpath need to be considered	498103 1144419 1185704	Noted	These points are generally recognised. This matter can be properly detailed through the Masterplanning process / planning application / EIA processes, with statutory consultation.	No change
Lower housing figure should be applied to allow for more green spaces and community facilities	498103	Disagree	Housing targets are based on evidence on local housing need and standard methodology set out by the government.	No change
There should be a joint Area Action Plan with DBC	498103 1185704	Disagree	This was an option considered. It has been replaced with a collaborative joint Masterplanning process which can address the issues more quickly in the context of the clear development requirements in the Plan and the requirements of the NPPF.	No change
Dacorum should take control of planning for EHH	1185704	Disagree	Only SADC (as LPA) can plan for land within SADC's area, unless it agrees otherwise. SADC is committed to working jointly with DBC on planning for land at Hemel.	No change
No information provided on strategy or delivery, just a wishlist	Aurora Properties Limited (1151817)	Disagree	The development requirements are clear and the Masterplan process will provide more specific proposals in due course.	No change
Strongly support allocation and safeguarding of land for schools	Department for Education (1186955)	Noted	Support noted	No change
School site locations should be identified	Hertfordshire County Council (837689)	Noted	Primary school site is in the land to be taken out of GB. Cross reference L21 and Policies Map.	No change

			This matter can be properly detailed through the master planning process / planning application / EIA processes, with statutory consultation.	
School building areas should be removed from green belt	Department for Education (1186955) Hertfordshire County Council (837689)	Noted	Primary school sites in the land to be taken out of GB. Cross reference L21 and Policies Map.	No change
Policy should include indication of school site size required	Department for Education (1186955)	Noted	Add reference in IDP to HCC size requirements as set out in response to L21	IDP will be updated on an ongoing basis.
Proposed secondary school will risk Redbourn children's access to Roundwood Park	1185037	Noted	School place catchment and allocations policies are not a planning matter.	No change
Is there a need for the amount of flexi-care provision required?	St Stephen Parish Council (51804)	Noted	Evidence available in full, including in HCC documents and representations. Policy L2 sets out an appropriate approach.	No change
Policy wording should include land size requirement for flexi-care home	Hertfordshire County Council (837689)	Disagree	Requirement as set out in Policy L2. Size requirements can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change
Scale of growth unclear as reference to 1,000 and 1,500 dwellings	Redbourn Parish Council (759908)	Noted	BL will have a minimum capacity for 1,500 dwellings, with delivery of 1,000 beyond 2036.	No change

Cumulative growth at East and North Hemel Hempstead sites would be challenging to deliver	Redbourn Parish Council (759908)	Disagree	The Plan involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy.	No change
Support sufficient assets to provide sustainable management of community facilities, open spaces and parklands	St Albans & District Footpaths Society (723340) The British Horse Society (1187597) Ramblers Association (52420) Hertfordshire County Council (837689)	Noted	Support noted	No change
Both strategic and local public space must be provided	Ramblers Association (52420) St Albans & District Footpaths Society (723340) The British Horse Society (1187597)	Agree	This is part of the masterplanning process	No change

	Hertfordshire County Council (837689) 1184750			
Countryside access links must be provided	Ramblers Association (52420) St Albans & District Footpaths Society (723340) The British Horse Society (1187597) St Albans Cycle Campaign (346623) 1157340	Agree	This is part of the masterplanning process	No change
Clarity needed on whether specific deliverables such as school buildings will be accommodated in the Broad Location or Green Belt	St Albans & District Footpaths Society (723340) The British Horse Society (1187597)	Noted	School sites are in the land to be taken out of GB. Requirement is in policy text. Cross reference L21. This matter can be properly detailed through the master planning process / planning application / EIA processes, with statutory consultation.	No change

<p>Should be required to deliver walking and cycling facility improvements and public transport links to promote car free access, which should be adequately maintained.</p>	<p>St Albans Cycle Campaign (346623) Hertfordshire County Council (837689) 1048449</p>	<p>Agree</p>	<p>Cross reference Policy L18 This approach is integral to the policy.</p>	<p>No change</p>
<p>Must provide/support the country park</p>	<p>Ramblers Association (52420) St Albans & District Footpaths Society (723340) Hertfordshire County Council (837689) The British Horse Society (1187597) 1184750 1185037</p>	<p>Agree</p>	<p>This is set out in the policy and will be taken forward as part of the Masterplanning process</p>	<p>No change</p>
<p>Important trees must be preserved</p>	<p>Hertfordshire County Council (837689) 1184750</p>	<p>Noted</p>	<p>Cross reference Policy L29 Retention of important trees is a requirement of the policy.</p>	<p>No change</p>

<p>Heritage environment /assets have not been considered and lack of criteria to protect assets, including nearby Grade II Listed buildings and Aubrey Camp scheduled monument</p>	<p>Historic England (929489) Redbourn Parish Council (759908) Leverstock Green Village Association (1185907) 334023</p>	<p>Disagree</p>	<p>Cross reference Policy L30</p> <p>This supports conservation of heritage assets appropriate to their significance and seeks that development which may affect such assets is accompanied by a Heritage Statement.</p> <p>Such heritage assets form only a small proportion of the overall Broad Location, are acknowledged and will be treated appropriately as part of the Masterplanning / planning application processes.</p>	<p>No change</p>
<p>Heritage Impact Assessment required and policy wording amended to reflect its findings</p>	<p>Historic England (929489)</p>	<p>Disagree</p>	<p>Cross reference Policy L30</p> <p>This is part of the masterplanning process</p>	<p>No change</p>
<p>Support principles of major development at East and North Hemel Hempstead however these areas are being planned through a comprehensive masterplan and should therefore be one location.</p>	<p>Dacorum Borough Council (1186054)</p>	<p>Disagree</p>	<p>The sites are split in the Plan to allow for explanation of development requirements and to indicate potential stages / phases of development and housing trajectory implications, which differ between BLs. Masterplanning and planning applications for all will clearly be considered in the context of each other.</p>	<p>No change</p>
<p>School provision should take emerging Hemel Garden Communities masterplan and emerging education guidance for Garden Communities by MHCLG guidance into account</p>	<p>Dacorum Borough Council (1186054)</p>	<p>Noted</p>	<p>Cross reference L17</p> <p>Work on the education infrastructure evidence base has been ongoing and has informed the policy requirement.</p>	<p>No change</p>

Institutional residential (C2) units should have a separate housing target and be excluded from dwelling trajectory figures	Dacorum Borough Council (1186054)	Disagree	NPPF / PPG / Housing Delivery Test acknowledge that C2 institutional residential units contribute to housing provision.	No change
Should include requirement relating to mitigating adverse impacts from motorway noise and air pollution	Hertfordshire County Council (837689)	Disagree	Cross reference to Policy L18 which requires major developments to provide proposals for limiting and mitigating air quality impacts.	No change
40dph too high	1184750	Disagree	This is an appropriate minimum density to make best use of land and to avoid further pressure on loss of greenfield land/ Green Belt. The NPPF supports optimisation of residential density.	No change
Policy should consider social and pastoral needs of future occupants and include requirements for a community facility e.g. a community hall	St Albans Deanery Synod (1185929)	Noted	Refer to Policy L22 which encourages opportunities for new provision of places of worship as part of development of the Local Centres in Broad Locations.	No change
Concerns over proximity to Buncefield - policies should include reference to the health and safety Development Proximity Zone Consultation Zones at Buncefield Oil Storage Depot.	Redbourn Parish Council (759908) 759883 498103 1144419 1185704	Disagree	The importance of this issue is acknowledged. The Plan development proposals already take account of the health and safety issues associated with the Depot. The Health and Safety Executive will be consulted as part of any planning application in proximity to the Buncefield DPZ. This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change

Be more specific with renewable energy/energy efficiency requirement	1181723	Disagree	Cross reference with Policy L25 which sets out the energy and environmental performance requirements of new developments. This addresses renewable energy.	No change
Civic Society Design Advisory Group should be consulted as part of any pre-planning consultation	St Albans Civic Society (1156974)	Disagree	This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change
Strongly support the policy	Crown Estate (51946)	Noted	Support noted	No change
Point 1 should refer to development being materially in accordance with the masterplan	Crown Estate (51946)	Disagree	Already set out in overall S6.	No change
No justification for 3% self-build figure, amended policy wording suggested	Crown Estate (51946)	Disagree	Justification based on evidence including the Self Build Register. SADC are required to have regard to this as part of Self Build and Custom Housebuilding Act 2015.	No change
Support inclusion of land east of Holtsmere End Road	Mr and Mrs Bill and Valerie Barr (1157883)	Noted	Support noted	No change

Policy S6 v) East St Albans Broad Location

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
School building areas should be removed from green belt	Department for Education (1186955)	Noted	Primary school site in the land to be taken out of GB. Secondary school to be retained in the GB. Cross reference L21 and Policies Map.	No change

	Hertfordshire County Council (837689)			
Primary school should be increased to 3FE	Hertfordshire County Council (837689)	Agree	Minor modification – clarification “A site for and appropriate contributions towards a 3 FE”	Minor modification – “A site for and appropriate contributions towards a 3 FE”
Clarity needed on whether specific deliverables such as school buildings will be accommodated in the Broad Location or Green Belt	St Albans & District Footpaths Society (723340) The British Horse Society (1187597)	Noted	Both schools within the Broad Location. Primary school site in the land to be taken out of GB. Secondary school to be retained in the GB. Cross reference L21 and Policies Map. This matter can be properly detailed through the master planning process / planning application / EIA processes, with statutory consultation.	No change
Strongly support allocation and safeguarding of land for schools	Department for Education (1186955)	Noted	Support noted	No change
Policy should include indication of school site size required	Department for Education (1186955)	Noted	Add reference in IDP to HCC size requirements as set out in response to L21	IDP will be updated on an ongoing basis.
Broad Location Land should be retained for future school expansion	1153245 1186129	Disagree	Housing need is a greater priority for use of this site. The main site owner has promoted the site as available and deliverable for housing.	No change
Not a sustainable location for a secondary school, and instead existing schools should be expanded	1185775	Disagree	Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy. Both expanded and new schools are part of the strategy.	No change

<p>Both strategic and local public space must be provided</p>	<p>Ramblers Association (52420)</p> <p>St Albans & District Footpaths Society (723340)</p> <p>The British Horse Society (1187597)</p> <p>1184750</p>	<p>Agree</p>	<p>This is part of the masterplanning process.</p>	<p>No change</p>
<p>Countryside access links must be provided</p>	<p>Ramblers Association (52420)</p> <p>St Albans & District Footpaths Society (723340)</p> <p>The British Horse Society (1187597)</p> <p>St Albans Cycle Campaign (346623)</p> <p>1157340</p>	<p>Agree</p>	<p>This is part of the masterplanning process.</p>	<p>No change</p>

Support transport network improvements	<p>St Albans & District Footpaths Society (723340)</p> <p>The British Horse Society (1187597)</p> <p>Ramblers Association (52420)</p> <p>1185460</p>	Noted	Support noted	No change
Support sufficient assets to provide sustainable management of community facilities, open spaces and parklands	<p>St Albans & District Footpaths Society (723340)</p> <p>The British Horse Society (1187597)</p> <p>Ramblers Association (52420)</p>	Noted	Support noted	No change
Should be required to deliver walking and cycling facility improvements to promote car free access, which should be adequately maintained	St Albans Cycle Campaign (346623)	Agree	<p>Cross reference Policy L18</p> <p>This approach is integral to the policy.</p>	No change

	Hertfordshire County Council (837689) 867587 1048449 1185460			
Further work needs to be carried out on infrastructure, including highways, parking, water, sewerage	Hertfordshire County Council (837689) Ellenbrook Area Residents Association Committee (1185802) 498103 867312 867587 1184378 1185460 1185775	Noted	These points are generally recognised. These matters can be properly detailed through the master planning process / planning application / EIA processes, with statutory consultation.	No change
Policy should consider social and pastoral needs of future occupants and include requirements for a	St Albans Deanery Synod (1185929)	Noted	Refer to Policy L22 which encourages opportunities for new provision of places of worship as part of development of the Local Centres in Broad Locations.	No change

community facility e.g. a community hall				
Is there a need for the amount of flexi-care provision required?	St Stephen Parish Council (51804)	Disagree	Evidence available in full, including in HCC documents and representations. Policy L2 sets out an appropriate approach.	No change
Policy should include land size requirement for flexi-care home	Hertfordshire County Council (837689)	Disagree	Requirement as set out in Policy L2. Size requirements can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change
Have infrastructure requirements been viability tested to comply with national policy	Hertsmere Borough Council (51934)	Noted	Updated evidence regarding economic viability of development has been made available on the council website.	No change
Major infrastructure must be provided up front	Colney Heath Parish Council (51891) London Colney Parish Council (52477)	Noted	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / Masterplanning work / planning application process	No change
'Other community provisions, including health provisions' is insufficient. Request amendment to 'including new GP, clinic and other healthcare facilities'	1185035	Disagree	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process.	No change

Broad Locations should use Design Codes	Harpenden Town Council (51870)	Disagree	This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change
40dph too high	1184750	Disagree	This is an appropriate minimum density to make best use of land and to avoid further pressure on loss of greenfield land/ Green Belt. The NPPF supports optimisation of residential density.	No change
Minimum capacity of 1,250 dwellings to be should be changed to 902 dwellings, as 348 already being built.	Oaklands College (1185294)	Disagree	Policy states 1,250 dwellings includes area with extant permission of 348 dwellings.	No change
Wording of S6 v) 16 and 17 to be amended to include 'subject to discussions regarding local needs and optimal location	Oaklands College (1185294)	Disagree	The development requirements are clear and the masterplan process will confirm specific proposals	No change
Wording of S6 v) 10 to be amended to include location of which to be agreed through discussions between District Council, County Council and Oaklands College	Oaklands College (1185294)	Disagree	This will in practice be the case, but there is no need to set it out explicitly in the policy.	No change
Excellence in design, energy efficient and water management is required in all Broad Locations	St Albans Civic Society (1156974)	Agree	Cross reference to Policies L23/25 which set out requirements for achieving high quality design and sustainable energy. There are particular opportunities at East St Albans because of the role and nature of Oaklands.	No change

<p>Heritage environment /assets have not been considered and lack of criteria to protect assets</p>	<p>Historic England (929489) 1153245 1186129</p>	<p>Disagree</p>	<p>Cross reference Policy L30</p> <p>This supports conservation of heritage assets appropriate to their significance and seeks that development which may affect such assets is accompanied by a Heritage Statement.</p> <p>Such heritage assets form only a small proportion of the overall Broad Location, are acknowledged and will be treated appropriately as part of the Masterplanning / planning application processes.</p>	<p>No change</p>
<p>Should include requirement to design to mitigate adverse air quality impacts, as in S6 i), ii) and iii).</p>	<p>Hertfordshire County Council (837689) Ellenbrook Area Residents Association Committee (1185802) 1153245</p>	<p>Disagree</p>	<p>Cross reference to Policy L18 which requires major developments to provide proposals for limiting and mitigating air quality impacts.</p>	<p>No change</p>
<p>Proposed development will encroach upon the Green Belt</p>	<p>1153245 1186129</p>	<p>Noted</p>	<p>Housing requirement/targets are based on the standard methodology set out by the government – see S4.</p> <p>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.</p> <p>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p>	<p>No change</p>

The Broad Location does not take into account Watling Chase Community Guide	1153245	Disagree	Watling Chase has been identified under L29. Development will be considered against the Watling Chase Supplementary Planning Guidance.	No change
Request Beaumont Schools playing field is removed from Broad Location or; amendment made to for playing fields to be retained or replaced with equivalent or better.	Sports England (824971)	Disagree	Playing fields is part of Broad Location as it is part of the area that will be excluded from the Green Belt to create a new, defensible long term boundary.	No change
No plan for wildlife protection / preservation of green space areas for the whole Broad Location area	1186129	Disagree	Requirement as set out in Policy L29. This is included in evidence documents. Localised detailed matters can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
Part of the site under HCC ownership is physically detached from the majority of the broad location site, and should not be included in the master plan.	Hertfordshire County Council (1185913)	Disagree	Whole area needs to be considered holistically rather than on a piecemeal basis. This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change
Has not taken into account submitted Local Plan for Welwyn Hatfield	Ellenbrook Area Residents Association Committee (1185802) 1153245 1186129	Disagree	There has been ongoing joint working with neighbouring local authorities including the South West Herts Group. DtC considered to be met.	No change

No information provided on strategy or delivery, just a wishlist	Aurora Properties Limited (1151817) 867587	Disagree	The development requirements are clear and the Masterplan process will provide more specific proposals in due course.	No change
What masterplanning collaboration has there been?	St Stephen Parish Council (51804)	Noted	Masterplanning is at the very earliest stages. Collaboration with residents and stakeholders will take place as progress is made.	No change
Collaboration with neighbouring Councils needed	Ellenbrook Area Residents Association Committee (1185802) 1181750 1182733 867587 1153245	Agree	There has been ongoing joint working with neighbouring local authorities including the South West Herts Group.	No change
No Sequential test based on the Latest SFRA.	Environmental Agency (1147557)	Noted	Cross reference to Policy L29 and NPPF/NPPG. Updated Flood Risk Assessment has been prepared and added to the website.	No change

Policy S6 vi) North St Albans Broad Location

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Countryside access links must be provided	Ramblers Association (52420) St Albans & District Footpaths Society (723340) The British Horse Society (1187597) St Albans Cycle Campaign (346623) 1157340	Agree	This is part of the masterplanning process	No change
Support transport network improvements	St Albans & District Footpaths Society (723340) The British Horse Society (1187597) Ramblers Association (52420)	Noted	Support noted	No change

Insufficient infrastructure to cope with additional traffic	840795 867587	Disagree	Traffic modelling shows no 'showstoppers' regarding traffic. New infrastructure will be provided in association with new development. Further details can be found in IDP updates / Masterplanning work / planning application process	No change
Improvements to public transport, footpaths and cycling routes need to be specifically identified	867587 1048449 1153802	Disagree	Cross reference to Policy L18 This matter can be properly detailed through the masterplanning/ planning application/ EIA process, with appropriate consultation.	No change
Clarity needed on whether specific deliverables such as school buildings will be accommodated in the Broad Location or Green Belt	St Albans & District Footpaths Society (723340) The British Horse Society (1187597)	Noted	Primary school site in the land to be taken out of GB. Cross reference L21 and Policies Map. This matter can be properly detailed through the master planning process / planning application / EIA processes, with statutory consultation.	No change
School building areas should be removed from green belt	Department for Education (1186955) Hertfordshire County Council (837689)	Noted	Primary school site in the land to be taken out of GB. Cross reference L21 and Policies Map.	No change
The development should be required to deliver walking and cycling facility improvements and	St Albans Cycle Campaign (346623) Hertfordshire County Council (837689)	Agree	Cross reference Policy L18 This approach is integral to the policy.	No change

public transport links to promote car free access which should be adequately maintained	1153802 1048449			
Further work needs to be carried out on infrastructure, including highways, parking, water, sewerage	Hertfordshire County Council (837689) 498103 867312 1185775	Noted	These points are generally recognised. These matters can be properly detailed through the master planning process / planning application / EIA processes, with statutory consultation.	No change
Policy should consider social and pastoral needs of future occupants and include requirements for a community facility e.g. a community hall	St Albans Deanery Synod (1185929)	Noted	Refer to Policy L22 which encourages opportunities for new provision of places of worship as part of development of the Local Centres in Broad Locations.	No change
Have infrastructure requirements been viability tested to comply with national policy	Hertsmere Borough Council (51934)	Noted	Updated evidence regarding economic viability of development has been made available on the council website.	No change
Major infrastructure must be provided up front	Colney Heath Parish Council (51891)	Noted	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process	IDP will be updated on an ongoing basis.

	London Colney Parish Council (52477)			
Should include plans for new St Albans North station	1153802	Disagree	No evidence of need identified and would be contrary to Network Rail strategy for stations.	No change
Explicitly drop Ariston Site for retail, and confirm with HCC that the two new primary schools will be located in the North St Albans Broad Location, and not the Ariston Site.	Friends of Bernards Heath (118795)	Disagree	Ariston is not identified for retail. Policy S6 vi) sets out requirement for one new primary school.	No change.
Another primary school is not required in North St Albans, when instead an additional secondary school is required.	1184862 1184966 840795	Disagree	North St Albans Broad Location will generate additional need, as well as other growth. Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.	No change
Will the new primary school be located within the Green Belt?	840795	Noted.	Primary school site in the land to be taken out of GB. Cross reference L21 and Policies Map.	No change

Strongly support allocation and safeguarding of land for schools.	Department for Education (1186955)	Noted	Support noted	No change
Policy should include indication of school site size required	Department for Education (1186955)	Noted	Add reference in IDP to HCC size requirements as set out in response to L21	IDP will be updated on an ongoing basis.
School site locations should be identified	Hertfordshire County Council (837689)	Disagree	Primary school site in the land to be taken out of GB. Cross reference L21 and Policies Map.	No change
North St Albans BL can be developed to meet open space standards	Hallam Land Management Limited (1185998)	Noted	Requirement set out in policy text. This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
Suggest inclusion of 'Urban Wilderness' project, as an approach for new open space creation in this Broad Location	Hallam Land Management Limited (1185998)	Noted	This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
Both strategic and local public space must be provided	Ramblers Association (52420), 1184750 St Albans & District Footpaths Society (723340)	Agree	This is part of the masterplanning process.	No change

	The British Horse Society (1187597)			
Welcome requirement for new managed woodland and encourage provision of street trees	The Woodland Trust (1185811)	Noted	Support noted	No change
Woodland 'Long Springs' bordering the site should be protected by uncultivated strip for public access	1185956	Noted	Importance of Long Springs acknowledged. This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
Clarity needed on whether specific deliverables such as school buildings will be accommodated in the Broad Location or Green Belt	St Albans & District Footpaths Society (723340) The British Horse Society (1187597)	Noted	Primary school site in the land to be taken out of GB. Cross reference L21 and Policies Map.	No change
Unclear from policies map if St Albans Schools Woollam Playing Fields playing fields form part of the broad location.	Sport England (824971) 1185956	Disagree	The policies map is based on ordnance survey. The base is periodically updated, but the latest available has been used. In order to create a long-term defensible Green Belt boundary, a very small part of the existing Woollams playing fields are included in the Broad Location. There will be	No change

Should be removed from Broad Location.			considerable new provision in and associated with the Broad Location.	
No evidence base to inform need for sports provision	Sport England (824971)	Disagree	Cross reference Policy L22 and L26 – 28. Baseline and further work since Regulation 19 has been undertaken to inform specific development proposals. Playing Pitch Strategy update 2019 provides baseline data.	No change
Should include sports facility provision in proposal points	Sport England (824971)	Disagree	Cross reference Policy L22 and L26 – 28. The policy states that development will be required to deliver strategic and local open space and recreation space and community facilities This matter can be properly detailed through the Masterplanning process / planning application / EIA processes, with statutory consultation	No change
Unclear if public open space or recreation space refers to indoor or outdoor sports provision	Sport England (824971)	Disagree	Cross reference Policy L22 and L26 – 28. The policy refers to strategic and local public open space. Open space is defined under the NPPF as all space of public value, land and water which offer important opportunities for sport and recreation. It is clear that this is therefore outdoor in nature. The policy also refers to recreation space and community facilities which would capture indoor sports facilities. This matter can be properly detailed through the Masterplanning process.	No change
Need for additional facilities at this location where	Sport England (824971)	Agree	Cross reference Policy L22 and L26 – 28.	No change

facilities already at capacity			<p>The policy concurs stating that development will be required to deliver strategic and local open space and recreation space and community facilities</p> <p>This matter can be properly detailed through the Masterplanning process / planning application / EIA processes, with statutory consultation</p>	
Consideration of extending/enhancing sports facilities in proposed school	Sport England (824971)	Agree	<p>Cross reference Policy L22 and L26 – 28.</p> <p>As per Policy L22 the Council would support new facilities in appropriate and sustainable locations and joint use of facilities near to new housing areas to meet sustainability objectives.</p> <p>This is part of the Masterplanning process.</p>	No change
Reference should be made to linking key ecological corridors including Heartwood, Batchwood and Beech Bottom Dyke	1153802	Noted	<p>Policy 29 sets out requirements for development. This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.</p>	No change
In support of policy in respect of housing mix, size, type and density, infrastructure. Clearly meets requirements for Green Belt release.	763827	Noted	Support noted	No change

1-2 bedroom homes is not a sensible mix for this site and should be slanted towards larger family homes	1183126	Disagree	Cross reference to Policy L1 and Appendix 6 Evidence points to most need being for small – medium sized family homes, which will be the priority. 1 bedrooms will only be a small proportion of the total.	No change
Development will be built out too quickly and will not create a sustainable community	1183126	Disagree	Housing trajectory at appendix 2 shows indicative delivery rates. This will allow creation of a sustainable community.	No change
40dph too high	1184750	Disagree	This is an appropriate minimum density to make best use of land and to avoid further pressure on loss of greenfield land/ Green Belt. The NPPF supports optimisation of residential density.	No change
Is there a need for the amount of flexi-care provision required?	St Stephen Parish Council (51804)	Disagree	Evidence available in full, including in HCC documents and representations. Policy L2 sets out an appropriate approach.	No change
Policy should include land size requirement for flexi-care home	Hertfordshire County Council (837689)	Disagree	Requirement as set out in Policy L2. Size requirements can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change
Broad Locations should use Design Codes	Harpenden Town Council (51870)	Disagree	This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change

With additional traffic there will be a reduction in Air Quality	840795	Noted	Cross reference to Policy L18 which requires major developments to provide proposals for limiting and mitigating air quality impacts.	No change
Should include requirement to design to mitigate adverse air quality impacts, as in S6 i), ii) and iii).	Hertfordshire County Council (837689)	Disagree	Cross reference to Policy L18 which requires major developments to provide proposals for limiting and mitigating air quality impacts.	No change
Heritage environment /assets have not been considered and lack of criteria to protect assets	Historic England (929489)	Disagree	Cross reference Policy L30 This supports conservation of heritage assets appropriate to their significance and seeks that development which may affect such assets is accompanied by a Heritage Statement. Such heritage assets form only a small proportion of the overall Broad Location, are acknowledged and will be treated appropriately as part of the Masterplanning / planning application processes.	No change
Location of planned 2FE school should be located adjacent to Townsend School rather than within the strategic location, to create better support between primary and secondary,	Townsend School (1186028)	Disagree	Concentrating development in larger sites that can create new communities and deliver infrastructure – including schools - is a key part of the development strategy. Cross reference L21.	No change

and reduce traffic on New Greens Estate.				
Energy efficiency should include a separate policy, and should be the highest standard as per Policy L25	1153802	Disagree	Refer to policy L25 which sets out the energy and environmental performance requirements for new developments.	No change
Excellence in design, energy efficient and water management is required in all Broad Locations	St Albans Civic Society (1156974)	Noted	Requirements for BL set out in Policy L25.	No change
Maybe opportunity for mineral extraction at this broad location. A mineral resource assessment should be carried out.	Hertfordshire County Council (837689)	Disagree	An Environmental Impact Assessment (EIA) would be required for developments that are prescribed by the EIA Regulations.	No change
No information provided on strategy or delivery, just a wishlist	Aurora Properties Limited (1151817)	Disagree	The development requirements are clear and the Masterplan process will provide more specific proposals in due course.	No change

What masterplanning collaboration has there been?	St Stephen Parish Council (51804)	Noted	Masterplanning is at the very earliest stages. Collaboration with residents and stakeholders will take place as progress is made.	No change
Collaboration with neighbouring Councils needed	1181750 1182733	Noted	There has been ongoing joint working with neighbouring local authorities including the South West Herts Group.	No change

L1- Housing Size, Type, Mix and Density

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
There are already many privately owned new housing developments in St Albans which the council agreed to, which are only partially occupied	1182314	Disagree	The LPA does not have control over how private housing is bought/sold/occupied.	No change
Support the draft plan	Oaklands College (1185294) 1184221	Noted	Support noted	No change
The council is not doing enough to provide affordable housing and needs to reset its targets	1184399	Disagree	Cross reference to policy L3/4 which provide guidance on approach taken to provide affordable housing.	No change

to restore historical supply side failure				
Excellence in design does not go hand in hand with high density housing	1034653	Disagree	This is an appropriate minimum density to make best use of land and to avoid further pressure on loss of greenfield land/ Green Belt. Policy L23 sets out the main design principles for new developments. This includes promoting sustainable and high quality designs.	No change
Building massed concentrations of affordable units at the proposed mix of sizes, and on the scale proposed, will unbalance the structures necessary for thriving innovative- and balanced- communities	867312	Disagree	The NPPF prioritises achieving optimal housing densities and appropriate mix of sizes / types. This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
The largest requirement (57%) is for 3 bed houses, however credible analysts recognise that larger family and 'executive' homes are essential to attracting investment and	867312	Noted	Evidential basis for specific mix is summarised in Appendix 6 and more detail supporting the Local Plan is available in full.	No change

entrepreneurs into an area.				
Concerns over developer and resident disputes over the varying standards of space and housing density between Dacorum (30-35dph) and SADC (40dph). SADC needs to recognize this explicitly and devise clear justifications and mitigations of likely consequences	867312	Noted	DtC arrangements will ensure development is coordinated across boundaries under joint working and liaison arrangements. This is an appropriate minimum density to make best use of land and to avoid further pressure on loss of greenfield land/ Green Belt. The NPPF supports optimisation of residential density.	No change
Concerns that the minimum average housing density of 40dph is too high. “ The average and best new developments are about 25-30 houses per hectare	1184750 1185704	Disagree	This is an appropriate minimum density to make best use of land and to avoid further pressure on loss of greenfield land/ Green Belt. The NPPF supports optimisation of residential density.	No change
Requests a total block on all future new builds	1184784	Disagree	Housing targets are based on evidence on local housing need and standard methodology set out by the government.	No change
Highlight the importance of	Martin Grant Homes and Kearns Land (975683)	Disagree	Full and detailed justification is provided by evidence documents. It is not necessary to justify the Plan within the	No change

<p>providing a housing development that is based upon proportionate and up-to- date evidence. The policy should also indicate where this evidence can be found.</p>			<p>Plan document itself. To do so would result unnecessarily in a longer and more complex document.</p> <p>There has been and will be ongoing joint working with neighbouring local authorities including the South West Herts Group. 2016 evidence is still highly relevant. Forthcoming draft SW Herts study will update 2016 evidence, but will not fundamentally alter the underlying evidence supporting the mix set out.</p>	
<p>Object to the proposed requirement for affordable housing size, type and mix to reflect that being provided for the market element of all development. Whatever the market, it is very unlikely that it will be so closely aligned to the social rented sector.</p>	<p>Martin Grant Homes and Kearns Land (975683)</p>	<p>Disagree</p>	<p>Evidential basis for specific mix is summarised in Appendix 6 and more detail supporting the Local Plan is available in full.</p>	<p>No change</p>
<p>Flats should not be more than 2 storeys high in category 2 areas. That should form part of the policy</p>	<p>Hill Residential (1158064) 1144419</p>	<p>Disagree</p>	<p>Cross reference to policy L23 where height must be appropriate in the street scene and not negatively impact the existing urban characteristics.</p>	<p>No change</p>

<p>Setting the housing density to 40 dwellings per hectare is likely to result in a highly urbanised environment. This contradicts the statement that "All new housing will be developed at a density that is consistent with achieving high quality, sustainable design that does not compromise the distinctive character of the area in which it is situated"</p>	<p>1185704</p>	<p>Disagree</p>	<p>This is an appropriate minimum density to make best use of land and to avoid further pressure on loss of greenfield land/ Green Belt. The NPPF supports optimisation of residential density.</p> <p>Policy L23 sets out the main design principles for new developments. This includes promoting sustainable and high quality designs.</p>	<p>No change</p>
<p>The developments should not be considered urban extensions (as they are not) and density should be defined as a maximum of 30 dph in these areas. More Green Belt should be released if necessary to cover the shortfall.</p>	<p>1185704</p>	<p>Disagree</p>	<p>Site selection is firmly based on comprehensive GB work and the most appropriate locations have already been selected.</p> <p>40dph is an appropriate minimum density to make best use of land and to avoid further pressure on loss of greenfield land/ Green Belt. The NPPF supports optimisation of residential density.</p>	<p>No change</p>

Generally support L1 draft	Hill Residential (1158064)	Noted	Support noted	No change
Disagree with the policy statement that higher density development will be encouraged in accessible urban locations with good access to services as it is inadequate in the context of new NPPF policies. The council should maximise opportunities for regeneration and reuse of previously developed land before removing land from the Green belt for brownfield sites and underutilised land.	CPRE Hertfordshire (872572)	Disagree	Development need, overall Plan context and site specific analysis in GB work provide exceptional circumstances for GB release. Evidence on development strategy / site selection is available in full. Cross reference with policy S2.	No change
The policy should include a requirement for new sites and regeneration, redevelopment and change of use schemes to meet	CPRE Hertfordshire (872572)	Disagree	Cross reference with Policy L23 and S2. Policy L1 states new housing will be developed at a density that is consistent with achieving high quality, sustainable design that does not compromise the distinctive character of the area. Cross reference with S1 in respect of Settlement Hierarchy for new development, and L18 in respect of Transport Strategy.	No change

<p>specified density standards, with suitable area for higher density development accessible by public transport shown on the policies map</p>				
<p>The Policy should therefore include minimum density requirements in the Policy that reflect their location and character. In any Broad Locations that are retained in the Plan there should be a minimum housing density of 60 units per hectare in accordance with policy advice for newly planned large land areas, and 100 per hectare for apartments/flats in accessible urban locations near public transport interchanges.</p>	<p>CPRE Hertfordshire (872572)</p>	<p>Disagree</p>	<p>40dph is an appropriate minimum density to make best use of land and to avoid further pressure on loss of greenfield land/ Green Belt. The NPPF supports optimisation of residential density.</p> <p>Policy L1 states new housing will be developed at a density that is consistent with achieving high quality, sustainable design that does not compromise the distinctive character of the area. Policy S6 states which density is required for each BL.</p>	<p>No change</p>

It is unclear which parts of the policy relate to Broad Locations and which relate to other development	Jarvis Homes (973180)	Disagree	L1 states which criterion refers to all housing developments and broad locations. Cross reference to Policy S6 which sets out the criterion for each broad locations, along with Appendix 6.	No change
The policy encourages higher density development but does not state what density would be appropriate and where, this is required by paragraph 123 of the NPPF 2018 and should be included within the policy.	Jarvis Homes (973180)	Disagree	Policy L1 states new housing will be developed at a density that is consistent with achieving high quality, sustainable design that does not compromise the distinctive character of the area. Policy S6 states which density is required for each BL.	No change.
The strategic local plan needs to address the strong unsubsidised market in larger properties	Aboyne Residents Association (1181214)		Evidential basis is summarised in Appendix 6 and more detail supporting the Local Plan is available in full	No change
Would like to see the plan encourage creative implementations of higher rise flat based accommodation in	1185971	Disagree	Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. 40dph is an appropriate minimum density to make best use of land and to avoid further pressure on loss of greenfield land/	No change

order to minimise the consumption of green belt land.			Green Belt. The NPPF supports optimisation of residential density.	
Disagree with the prioritisation of integrating the look and feel of buildings with any adjacent existing buildings over the consumption of the Green Belt	1185971	Disagree	Good design is a requirement set out by the NPPF Paragraph 127 and L23	No change
Support the housing mix proposed	347648	Noted	Support noted	No change
Local factors must be taken into account in tailoring an appropriate housing mix for each individual site (refers to Broad Locations)	Legal and General (1051022) CEG (1158030) Hallam Land Management Limited (1185998)	Noted	Evidential basis is summarised in Appendix 6 and more detail supporting the Local Plan is available in full	No change
Agrees that the mix should be based on robust evidence and should be informed by the District-wide assessment of housing need	Legal and General (1051022)	Noted	Support noted	No change

Clarification is sought on whether the precise housing mix required should vary between the strategic housing allocations to reflect local patterns of demand	Legal and General (1051022) CEG (1158030)	Noted	Evidential basis is summarised in Appendix 6 and more detail supporting the Local Plan is available in full.	No change
Support the strategy taken to extrapolate from the evidence taken from the Housing vision study which focused on the particular circumstances of the St Albans District	Trustees of James Henry Frank Sewell Deceased (1185630)	Noted	Support noted	No change
Support L1	Trustees of James Henry Frank Sewell Deceased (1185630) Wheathampstead Parish Council (51941)	Noted	Support noted	No change
Policy wording is not clear and disturbing " <i>higher density development, including buildings</i> "	St Stephen Parish Council (51804)	Disagree	The NPPF prioritises achieving optimal housing densities and appropriate mix of sizes / types. This will apply to any urban development / expansion. This is a reasonable approach and other policies such as L23 and the specific context will determine what an appropriate height in individual circumstances is.	No change

<i>of greater height than existing, will be encouraged.'</i>				
Encouraging buildings of greater height than existing will significantly impact the local character of areas such as Chiswell Green and Park Street Garden Village, falling outside the acceptable standard	St Stephen Parish Council (51804)	Disagree	Refer to policy S1 which indicates that higher density and height will be encouraged, particularly in most accessible parts of urban settlements. No reason in principle that higher is not 'acceptable', depending on context.	No change
Support the proposal to build small/medium family homes to allow both trading up and down freeing up properties for more suitable occupation	Colney Heath Parish Council (51891)	Noted	Support noted	No change
Renewable energy targets for developments should be increased and enforced ,with more specific aims	Colney Heath Parish Council (51891)	Agree	Cross reference to Policy L25 which sets out the energy standards for new developments. Larger Broad locations will be expected to deliver renewable/ low- carbon energy supply.	No change

for creating carbon neutral areas				
The plan should encourage energy efficient buildings and the incorporation of energy efficient solutions such as solar and wind power at an early planning stage and working with the BRE as appropriate	Colney Heath Parish Council (51891)	Noted	Cross reference to Policy L25 which sets out the energy standards for new developments. This matter can be properly detailed through the masterplanning/ planning application/ EIA process, with appropriate consultation.	No change
Policy L1 is too vague and contains no strategy (with the exception of a requirement for housing in the broad locations to achieve a minimum net average density of 40dph)	Aurora Properties Limited (1151817)	Disagree	L1 directly addresses requirements.	No change

<p>Concerned with the statement “developed at a density that is consistent with achieving high quality sustainable design” and its future impact on local character for areas</p>	<p>St Albans Civic Society (1156974)</p>	<p>Noted</p>	<p>The NPPF prioritises achieving optimal housing densities and appropriate mix of sizes / types.</p> <p>Cross reference with Policy L23 and S2. Policy L1 states new housing will be developed at a density that is consistent with achieving high quality, sustainable design that does not compromise the distinctive character of the area.</p>	<p>No change</p>
<p>Suggest further consideration for downsizing, mix of dwelling, first time purchasers, or those of lower means</p>	<p>Wheathampstead Parish Council (51941)</p>	<p>Disagree</p>	<p>L1 already sets out support for opportunities for downsizers. Cross reference to policy L3/4 which provide guidance on our approach taken to provide affordable housing.</p> <p>Appendix 6 also provides more information on housing mix with regards to affordable and subsidised home ownership.</p>	<p>No change</p>
<p>The key to a thriving local housing market is to build small / medium family homes. Building this type of property will enable people who currently live in flats to trade up to the next stage of family accommodation, freeing up smaller properties for</p>	<p>London Colney Parish Council (52477)</p>	<p>Noted</p>	<p>Small / medium sized family homes is a key focus of the policy.</p>	<p>No change</p>

several of the other groups on the list.				
The policy could provide clearer guidance about the approach to housing mix and type to demonstrate flexibility. For example, will the housing mix policy be applied uniformly or will this be flexible reflecting the location of a proposal?	Watford Borough Council (1122500)	Disagree	Evidential basis is summarised in Appendix 6 and more detail supporting the Local Plan is available in full. L1 sets out taking into account evidence of local need, existing pattern of development in the area and site-specific factors.	No change
The policy is unclear as it does not provide specific guidance on the mix of housing to be provided in developments	Anderson Group (1146719)	Noted/ Disagree	Evidential basis is summarised in Appendix 6 and more detail supporting the Local Plan is available in full. L1 sets out taking into account evidence of local need, existing pattern of development in the area and site-specific factors. The fine details of this matter can be properly detailed through the Masterplanning/ planning application/ EIA process, with appropriate consultation.	No change

<p>Just under 30% of all housing identified within the plan is to be an urban extension of Hemel Hempstead, limiting the choice for St Albans residents to find housing in the district.</p>	<p>Anderson Group (1146719)</p>	<p>Disagree</p>	<p>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.</p> <p>Cross reference with S6 i), ii) and iii)</p>	<p>No change</p>
<p>Concerns that the policy could be used to refuse developments on an ad hoc basis without reference to evidence of housing need</p>	<p>Gladman Developments Ltd (1187201)</p>	<p>Disagree</p>	<p>Evidential basis is summarised in Appendix 6 and more detail supporting the Local Plan is available in full.</p> <p>Cross reference to Policies S6, L3 and L23 which provide guidance on the requirements for new developments.</p>	<p>No change</p>
<p>The policy provides a significant degree of uncertainty in terms of how it is applied in the decision making</p>	<p>Gladman Developments Ltd (1187201) Home Builders Federation Ltd (1156936)</p>	<p>Disagree</p>	<p>Cross reference to Policies S6, L3 and L23 which provide guidance on the requirements for new developments.</p>	<p>No change</p>
<p>The policy should be amended to refer to the latest SHMA to ensure consistent and responsive decision making</p>	<p>Gladman Developments Ltd (1187201)</p>	<p>Noted</p>	<p>Evidential basis is summarised in Appendix 6 and more detail supporting the Local Plan is available in full. L1 is clear in setting requirements.</p>	<p>No change</p>

with a fair degree of predictability				
Support L1's aim of achieving a mix of housing types in new developments which reflects evidence of local need	Crown Estate (51946) Adrian Irving and Alban Developments Ltd (1156368)	Noted	Support noted	No change
Contesting the evidential basis for the policy objective of having the same mix of dwelling sizes for all tenures	Crown Estate (51946)	Disagree	Evidential basis is summarised in Appendix 6 and more detail supporting the Local Plan is available in full.	No change
Figures in Appendix 6 are based on the SADC 2013 SHMA which is both out of date and assumed that St Albans is a self-contained Housing Market Area. This is due to be superseded by a new joint South West Herts SHMA in late 2018	Crown Estate (51946)	Disagree	There has been and will be ongoing joint working with neighbouring local authorities including the South West Herts Group. 2016 evidence is still highly relevant. Forthcoming draft SW Herts study will update 2016 evidence, but will not fundamentally alter the underlying evidence supporting the mix set out.	No change

<p>The policy should not include the 5th paragraph which refers to a single housing mix for all tenures. Additionally, Appendix 6 should reflect the tenure specific mix contained in the Savills Report (attached by TCE)</p>	<p>Crown Estate (51946)</p>	<p>Disagree</p>	<p>There has been and will be ongoing joint working with neighbouring local authorities including the South West Herts Group. 2016 evidence is still highly relevant. Forthcoming draft SW Herts study will update 2016 evidence, but will not fundamentally alter the underlying evidence supporting the mix set out.</p>	<p>No change</p>
<p>Welcome the flexibility element of the policy</p>	<p>Adrian Irving and Alban Developments Ltd (1156368) Gladman Developments Ltd (1187201) Home Builders Federation Ltd (1156936) Crest Strategic Projects and Bloor Homes (1158079)</p>	<p>Noted</p>	<p>Support noted</p>	<p>No change</p>
<p>Policy L1 is too vague</p>	<p>Aurora Properties Limited (1151817) 1144419</p>	<p>Disagree</p>	<p>Policy L1 sets out a clear approach. Detailed matters can be properly detailed through the Masterplanning/ planning application/ EIA process, with appropriate consultation.</p>	<p>No change</p>
<p>The policy and Appendix 6 should refer to 2016 SHMA forms the</p>	<p>Adrian Irving and Alban Developments Ltd (1156368)</p>	<p>Disagree</p>	<p>Appendix 6 refers to the existing SHMA evidence, both SADC and SWH.</p>	<p>No change</p>

most recent evidence on housing mix	Crest Strategic Projects and Bloor Homes (1158079)			
The policy must provide an indication on the general property size mix they are seeking to achieve (based on number of bedrooms) and how this will be assessed. This general mix should inform, not dictate, the type of development that is delivered	Home Builders Federation Ltd (1156936) Dacorum Borough Council (1186054) Hallam Land Management Limited (1185998)	Noted	This is set out in Appendix 6.	No change
Supports paragraph 6 which encourages the provision of higher density development in accessible urban locations with good access to services as it can encourage the use of sustainable modes of transport	Hertfordshire County Council (837689)	Noted	Support noted	No change
In addition, the formatting and	CEG (1158030)	Disagree	Full and detailed justification is provided by evidence documents. It is not necessary to justify the Plan within the	No change

wording should be amended to distinguish between the formal policy and the reasoned justification for the policy.			Plan document itself. To do so would result unnecessarily in a longer and more complex document.	
Support the objective of policy L1 as it proposes all new housing developments to contribute to a mix of different housing types	Crest Strategic Projects and Bloor Homes (1158079)	Noted	Support noted	No change
Welcome the aspect of encouraging the provision of first time buyers (1-2 bed) flats, first family homes (2-3 bed houses) and opportunities for downsizers	Crest Strategic Projects and Bloor Homes (1158079)	Noted	Support noted	No change
The evidence of housing mix could be different at the end of the plan period compared to that which exists from 2015 and	Hallam Land Management Limited (1185998)	Note	Explicitly acknowledged in Appendix 6.	No change

underpins the policy. The policy must allow for consideration of changes in circumstances				
Concerns that no account will have been taken of changes to the stock profile on account of houses built between 2011 and 2020	Hallam Land Management Limited (1185998)	Disagree	Full and detailed justification is provided by evidence documents. It is not necessary to justify the Plan within the Plan document itself. To do so would result unnecessarily in a longer and more complex document.	No change
Each planning permission granted on Broad Location sites will need to incorporate measures that allows a flexible approach to determining what is the appropriate housing mix at different points in that build programme	Hallam Land Management Limited (1185998)	Noted	L1 and Appendix 6 are clear as to what is required. Detailed matters can be properly detailed through the Masterplanning / planning application/ EIA process, with appropriate consultation.	No change
The density of any individual proposal must reflect the principles of achieving high	Hallam Land Management Limited (1185998)	Agree	This is an appropriate approach to minimum density to make best use of land and to avoid further pressure on loss of greenfield land/ Green Belt. Policy L23 sets out the main	No change

quality development, sustainable design and respect an area's character			design principles for new developments. This includes promoting sustainable and high quality designs.	
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L2 – Provision of Older Persons Housing and Special Needs Housing

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
There is a lack of evidence to justify the requirements set for bedspaces within the older persons and special needs housing sector	Martin Grant Homes and Kearns Land Limited (975683) Hallam Land Management Limited (1185998)	Disagree	Evidence available in full, including in HCC documents and representations.	No change
Uncertain where the remainder of the bedspace accommodation for older people is expected to be located	Martin Grant Homes and Kearns Land Limited (975683)	Noted	Policy S6, L2 and L8 addresses this matter.	No change
There is no definition of 'flexi-care' besides it being within class C3	Retirement Housing Group (1185738)	Noted	This is included in evidence documents, including in HCC documents and representations.	No change

<p>Flexi-care should not be classified as C3. Certain forms of specialist housing for older people such as Extra Care/ Assisted Living may by virtue of care provided fall within Class C2</p>	<p>Retirement Housing Group (1185738) McCarthy & Stone Retirement Lifestyles Ltd (1186072)</p>	<p>Disagree</p>	<p>Policy L2, L3, L4 and S6 sets out an appropriate approach, including provision of C2.</p>	<p>No change</p>
<p>There is a confusion within the definition of flexi-care as policy S4 denotes that flexi-care homes and similar use class C2 can fall under one category</p>	<p>Retirement Housing Group (1185738)</p>	<p>Agree</p>	<p>Flexi Care homes fall under use class C3, therefore, this will be amended in policy S4 (typo)</p>	<p>Minor modification Swap 'C2' and 'C3' in paragraph 2 of policy S4</p>
<p>Target for the delivery of specialist accommodation for older people should be recalculated using the Housing for Later Life multiplier</p>	<p>Retirement Housing Group (1185738)</p>	<p>Disagree</p>	<p>Evidence available in full, including in HCC documents and representations. Policy L2 sets out an appropriate approach.</p>	<p>No change</p>

<p>Council has not considered the economic viability of development to inform the targets set out within the Local Plan</p>	<p>McCarthy & Stone Retirement Lifestyles Ltd (1186072)</p>	<p>Disagree</p>	<p>Evidence available in full, including in HCC documents and representations. Policy L2 sets out an appropriate approach. Updated evidence regarding economic viability of development has been made available on the council website.</p>	<p>No change</p>
<p>The policy is based on outdated evidence (Three Dragon's viability research). Contravenes criteria in NPPF.</p>	<p>McCarthy & Stone Retirement Lifestyles Ltd (1186072)</p>	<p>Disagree</p>	<p>Updated evidence regarding economic viability of development has been made available on the council website.</p>	<p>No change</p>
<p>Needs to be a better distinction between C2 and C3 Extra Care accommodation to allow each scheme to be considered on its own circumstances. Alternatively, the policy commentary or guidance must provide sufficient flexibility to all for consideration of the specific circumstances for each scheme.</p>	<p>McCarthy & Stone Retirement Lifestyles Ltd (1186072)</p>	<p>Disagree</p>	<p>Policy L2 and L3 sets out a clear approach. Each scheme will be considered on its own merits.</p>	<p>No change</p>

Should be a presumption in favour of sustainable housing, in particular specialist housing which is being proposed on suitable sites	McCarthy & Stone Retirement Lifestyles Ltd (1186072)	Agree	Refer to policy L23 and L25 which sets out energy, environmental performance, design and layout standards for new developments. This will also be applicable for specialist housing on sites.	No change
The plan currently relies on its strategic developments to deliver a proportion of care or flexi-care accommodation	Stackbourne Limited (1153646)	Noted	Policy S6, L2 and L3 sets out a clear approach.	No change
A risk of older persons and special needs housing being made an after-thought as the economic benefits attached to them are much lower. 'Smallford Works' site put forward to meet this need.	Stackbourne Limited (1153646)	Disagree	Policy S6, L2, L3 and L8 set out a clear approach for older persons and special needs housing. The requirements are expected to be met by developers.	No change
Supports policy	Trustees of James Henry Frank Sewell Deceased (1185630)	Noted	Support noted	No change

	<p>Harpenden Town Council (51870)</p> <p>St Albans Civic Society (1156974)</p> <p>Gladman Developments Ltd (1187201)</p> <p>Crest Strategic Projects and Bloor Homes (1158079)</p>			
C2, C3 and special needs housing numbers are too generic	Aurora Properties Limited (1151817)	Disagree	Policy L2 sets out a clear approach. Evidence available in full, including in HCC documents and representations.	No change
A lack of strategy for how L2 housing provision will be achieved with regards to allocations	<p>Aurora Properties Limited (1151817)</p> <p>Castleoak Care Communities (1187716)</p>	Disagree	Policy S6, L2 and L8 set out a clear approach for older persons and special needs housing. The requirements are expected to be met by developers.	No change
No evidence to support or explain the approach to the provision of care accommodation	Signature Senior Lifestyle (1186910)	Disagree	Policy L2 sets out a clear approach. Evidence available in full, including in HCC documents and representations.	No change
Provided detailed information relating to bedspace numbers	Hertfordshire Country Council (837689)	Noted	SADC acknowledges the information provided	No change

Local Plan should include a criteria which enables exemptions to be made to the provision of affordable home ownership where specialist accommodation is secured.	Crest Strategic Projects and Bloor Homes (1158079)	Disagree	Policy L2 and L3 sets out an appropriate approach.	No change
C2 component of the policy should be additional to the Plan's housing requirement	Hallam Land Management Limited (1185998)	Disagree	The plan sets out an appropriate approach. This has been reinforced by the government's approach in the updated NPPF and PPG.	No change
Plan should clarify that the affordable housing provision required for older persons accommodation is part of the 40% requirement and not in addition	Hallam Land Management Limited (1185998)	Disagree	L2 and L3 sets out a clear approach.	No change
Supports the inclusion of a minimum requirement for C2 care accommodation	Castleoak Care Communities (1187716)	Noted	Support noted	No change

Concerned with the approach taken in ensuring that sufficient specialist housing and accommodation for older persons can be delivered	Castleoak Care Communities (1187716)	Disagree	Policy S6, L2, L3 and L8 set out a clear approach for older persons and special needs housing. The requirements are expected to be met by developers.	No change
The minimum bedspace requirements for both C2 and C3 is inadequate as it doesn't reflect the 2016 SHMA requirements	Castleoak Care Communities (1187716)	Disagree	Policy S6, L2 and L8 set out a clear approach for older persons and special needs housing. Evidence available in full, including in HCC documents and representations.	No change
Emphasis on mental / physical capacity important to aims of being a dementia friendly community	Wheathampstead Parish Council (51941)	Noted	Policy S6, L2 and L8 set out a clear approach for older persons and special needs housing. Refer to policy L23 and L25 which sets out design and layout standards for new developments. This will also be applicable for specialist housing on sites.	No change

L3 – Provision of and Financial Contributions towards Affordable Housing

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Changes (including any Changes to Plan)
There is already existing privately owned housing which is partially occupied and can be used to meet	1182314	Disagree	The LPA does not have control over how private housing is bought/sold/occupied.	No change

affordable housing targets for local people				
The policy fails to provide significant short-term improvements in affordable housing	1184399	Disagree	Policy L3 sets out an appropriate approach. There are sufficient deliverable sites for years 1-5. This is confirmed in relevant developer representations.	No change
Social housing numbers are too low	St Albans Labour Party (1183933) 1184399	Disagree	Evidential basis for specific mix is summarised in Appendix 6 and more detail supporting the Local Plan is available in full. It is not necessary to justify the Plan within the Plan document itself. To do so would result unnecessarily in a longer and more complex document.	No change
The Council must make a use of the lifting of the borrowing cap to ensure enough social housing would be built	1184399	Noted	Not within planning remit	No change
Development not consistent with national policy as only 36% of houses will be 1-2 bedroom in an area which has a high proportion of 3-4 bedroom houses	1034653	Disagree	Evidential basis for specific mix is summarised in Appendix 6 and more detail supporting the Local Plan is available in full.	No change

Term 'affordable housing' a misused term for 'subsidised housing'	867068	Disagree	The terminology used reflects NPPF wording and is consistent with national policy.	No change
Plan should concentrate on smaller affordable dwellings to buy	867068	Disagree	Housing Mix is set out in Policy L1 and Appendix 6. Evidential basis for specific mix is summarised in Appendix 6 and more detail supporting the Local Plan is available in full.	No change
Percentage of Affordable Housing type 3) (Subsidised Home ownership types) should be raised from 40% to preferably more than 50%	867068	Disagree	Cross reference Appendix 6 which sets out justification for the requirement.	No change
Concerns over loss of affordable housing from the 40% target due to properties being set above the market rent	867587	Disagree	Policy L3 sets out an appropriate approach. Affordable housing can be secured through Planning Obligations at application stage.	No change
Mix of affordable housing types does not reflect the evidence base and must be adjusted to do so	St Albans Labour Party (1183933)	Disagree	Evidential basis for specific mix is summarised in Appendix 6 and more detail supporting the Local Plan is available in full.	No change

Minimum target should be raised to 75% affordable homes on sites of 10 dwellings or more to reflect the demands	St Albans Labour Party (1183933)	Disagree	This mix not appropriate due to viability, deliverability and community balance / cohesion	No change
80% social and affordable housing is far too high	1184750	Disagree	The plans does not seek 80% affordable rent in BLs. Policy S6 and L3 sets out a clear approach.	No change
Policy should be reworded to make clear affordable housing should be secured via an affordable housing scheme to be agreed with the Council, as part of a reserved matters or full application	Martin Grant Homes and Kearns Land (975683)	Disagree	Policy L3 sets out a clear approach. This matter can be properly detailed through the Masterplanning / planning application process.	No change
Lack of evidence to justify 40% affordable housing requirement	Martin Grant Homes and Kearns Land (975683)	Disagree	Evidential basis for specific mix is summarised in Appendix 6 and more detail supporting the Local Plan is available in full. It is not necessary to justify the Plan within the Plan document itself. To do so would result unnecessarily in a longer and more complex document.	No change
The 40% minimum requirement should be secured from major schemes	Martin Grant Homes and Kearns Land -975683	Noted	Required by Policy L3.	No change

The term 'socially desirable geographic spread' is too ambiguous for applicants and decision makers	Martin Grant Homes and Kearns Land (975683) Jarvis Homes (973180)	Disagree	Refers to schemes of 100 dwellings or more. Will be agreed with the identified provider as part of Masterplanning / planning application / obligation stages.	No change
Concerns over shared ownership schemes and the risk of increasing maintenance charges and rent for owners. Highlight the need for the council to address this and find ways to manage/prevent this.	1144419	Disagree	Not within planning remit	No change
Support 40% requirement for affordable housing	Hill Residential (1158064) Trustees of James Henry Frank Sewell Deceased (1185630) Colney Heath Parish Council (51891) St Albans Civic Society (1156974) Settle (1187516)	Noted	Support noted	No change

	Crest Strategic Projects and Bloor Homes (1158079) 347648			
There is a need for an up to date whole plan viability assessment	Hill Residential (1158064) M Scott Properties (1185993) Home Builders Federation Ltd (1156936)	Noted	Updated evidence regarding economic viability of development has been made available on the council website.	No change
Policy is not clear about when affordable housing will be sought and what the relevant thresholds are	Jarvis Homes (973180)	Disagree	Policy L3 sets out a clear approach.	No change
The approach to vacant buildings credit is not in line with NPPF	Jarvis Homes (973180)	Disagree	Policy L3 sets out a clear approach. Para 63 of the NPPF is defined in footnote.	No change
More information should be provided on how the affordable housing sum may vary or should be calculated	Jarvis Homes (973180)	Disagree	Policy L3 sets out a clear approach	No change

Suggested mix of affordable housing type is not conducive to addressing the fundamental affordability problems within the district.	CEG (1158030) 1185775	Disagree	Evidential basis for specific mix is summarised in Appendix 6 and more detail supporting the Local Plan is available in full.	No change
A significantly higher proportion of properties should be social rented than 30%	1185775	Disagree	Policy L3 sets out appropriate affordable housing requirements. Evidential basis for specific mix is summarised in Appendix 6 and more detail supporting the Local Plan is available in full.	No change
The policies relating to Older Persons Housing should also include promotion of housing suitable for downsizing, which may well be able to be provided at market value	1185775	Noted	Policy L1 which supports opportunities for downsizing.	No change
Uncertain how the affordable housing will be distributed across individual sites in Broad Locations	Colney Heath Parish Council (51891) London Colney Parish Council (52477) 347648	Noted	All Broad Locations must meet a minimum of 40% affordable housing. The distribution will be agreed through the process of Masterplanning with local communities, landowners and other stakeholders.	No change
The minimum 40% affordable housing	Colney Heath Parish Council (51891)	Noted	All Broad Locations must meet a minimum of 40% affordable housing. The distribution will be agreed through	No change

contribution should be evenly distributed throughout individual sites and Broad Locations	347648		the process of Masterplanning with local communities, landowners and other stakeholders.	
Developers must deliver the affordable housing proportion and not be able to avoid this responsibility	Colney Heath Parish Council (51891) 347648	Agree	All requirements set out in the Broad Location policies, including a minimum 40% affordable housing, have been agreed as deliverable by the landowners/developers.	No change
Must be a range of unit types and sizes similar to private tenure for social and affordable rented housing	London Colney Parish Council (52477) Colney Heath Parish Council (51891) 347648	Noted	Policy L3 sets out a clear approach	No change
Generally support policy	Legal and General (1051022)	Noted	Support noted	No change
Inconsistency between Local Plan and NPPF. There is no requirement for financial contributions for schemes of 9 or fewer homes. This should be removed or corrected.	Legal and General (1051022) Trustees of James Henry Frank Sewell Deceased- (1185630) RF Sinclair and Sons (1058251) Aurora Properties Limited (1151817)	Disagree	Policy L3 sets out appropriate approach based on local evidence	No change

	Gladman Developments Ltd (1187201) Home Builders Federation Ltd (1156936) 52064			
Complex policy wording used relating to default mechanism	Legal and General (1051022)	Disagree	Policy L3 sets out a clear approach	No change
Council's full evidence base relating to viability should be published prior to the submission of the emerging plan	Legal and General (1051022)	Noted	Updated evidence regarding economic viability of development has been made available on the council website.	No change
Support affordable housing split of 60% to 40%	Trustees of James Henry Frank Sewell Deceased (1185630)	Noted	Support noted	No change
Would like to know percentage cost for schemes with 9 or fewer homes	St Stephen Parish Council (51804)	Noted	Policy L3 provides details on the overall affordable housing percentage requirements. 'Cost' will depend on individual site circumstances.	No change
Affordable homes should be 20% below market rents	Aurora Properties Limited (1151817)	Noted	Required by Policy L3 for affordable rent	No change
Discounted market sales should be	Aurora Properties Limited (1151817)	Disagree	Policy L3 sets out appropriate affordable housing requirements responding to government definitions in NPPF	No change

20% below local market value				
Insufficient specific provision for Starter Homes which have the greatest demand in SADC	Aurora Properties Limited (1151817) Gladman Developments Ltd (1187201)	Disagree	Starter homes supported by Policy L3	No change
Policy wording is not clear on the approach to be taken on sites for between 10-50 dwellings	M Scott Properties (1185993)	Disagree	Refer to policy L3 'Affordable Housing Provisions' and 'financial contributions' section.	No change
Absence of a detailed viability study for each Broad Location	M Scott Properties (1185993)	Noted	Updated evidence regarding economic viability of development has been made available on the council website. Further evidence may be made available in due course. Viability/deliverability have been agreed for all Broad Locations by the landowners/developers	No change
No evidence to justify or explain 40% requirement for care accommodation. Should not refer to C2.	Signature Senior Lifestyle (1186910) Castleoak Care Communities (1187716) McCarthy & Stone Retirement Lifestyles Ltd (1186072)	Disagree	The NPPF para 62 states that where a need for affordable housing is identified planning policies should specify the level and type required. Evidence available in full, including in HCC documents and representations.	No change
Affordable housing contributions should be increased	London Colney Parish Council (52477)	Disagree	Evidential basis for specific mix is summarised in Appendix 6 and more detail supporting the Local Plan is available in full.	No change

			This mix not appropriate due to viability, deliverability and community balance / cohesion.	
A 75% affordable and 25% market split has no reasonable prospect of being delivered	London Colney Parish Council (52477)	Agree	75% 25% split not proposed in Policy	No change
The policy should be worded as an aspiration to meet local needs in full	London Colney Parish Council (52477)	Disagree	Evidential basis for specific mix is summarised in Appendix 6 and more detail supporting the Local Plan is available in full.	No change
No justification for requiring schemes at fewer than 10 (net) to make a financial contribution to off-site provision	Mr Dean Ivory (52552) Shonleigh Nominees (978420) Trustees GA Simons Family Trust (1187408) Kenneth Ivory (978427) Mr Richard Blair (977889) Mr Antonio Barba (1187384) D'Arblay Investments (1187404) Watford Borough Council (1122500)	Disagree	Policy L3 sets out appropriate approach based on local evidence	No change

<p>No justification that the landowner should receive nothing for land for affordable housing</p>	<p>Mr Dean Ivory (52552) Shonleigh Nominees (978420) Kenneth Ivory (978427) Mr Richard Blair (977889) Mr Antonio Barba (1187384) D'Arblay Investments (1187404)</p>	<p>Disagree</p>	<p>Affordable housing will be sought by way of Planning Obligation. Landowners can receive receipts for affordable housing by means of those obligations.</p>	<p>No change</p>
<p>The requirement that a building has not been in economical beneficial use for at least 3 years, and has been marketed for the same, period is not justified</p>	<p>Kenneth Ivory (978427) Mr Richard Blair (977889) Mr Antonio Barba (1187384) D'Arblay Investments (1187404) Mr Dean Ivory (52552) Shonleigh Nominees (978420)</p>	<p>Disagree</p>	<p>Policy L3 sets out a clear approach and is justified in the context of the District and the LP approach overall.</p>	<p>No change</p>
<p>Review process would need to consider not only return values but costs as well</p>	<p>Mr Dean Ivory (52552) Shonleigh Nominees (978420) Mr Richard Blair (977889)</p>	<p>Noted</p>	<p>Review process will take both values and costs into account.</p>	<p>No change</p>

	Mr Antonio Barba (1187384) D'Arblay Investments (1187404)			
The provision of affordable housing is considered to be inadequate, as recent experience in the District has been that developers fail to deliver the agreed percentage of affordable housing often citing viability as a reason	Sandridge Parish Council (869186)	Disagree	Policy L3 provides an overall set of requirements. Policy S6 sets out a minimum requirement for affordable housing and other policy requirements in Broad Locations. Viability/deliverability have been agreed for all Broad Locations by the landowners/developers	No change
Concerns that future development would be on Green Belt sites in preference to Brownfield and that developers would not provide the targeted percentage of affordable housing	Sandridge Parish Council (869186)	Disagree	Cross refer development strategy in S1 and S2. Policy L3 provides an overall set of requirements. Policy S6 sets out a minimum requirement for affordable housing and other policy requirements in Broad Locations. Viability/deliverability have been agreed for all Broad Locations by the landowners/developers	No change
No evidence base to demonstrate whether the policy	Anderson Group (1146719)	Noted	Updated evidence regarding economic viability of development has been made available on the council website. Further evidence may be made available in due course.	No change

position has been tested for viability				
Viability matters must be tested through the plan preparation and not negotiated on a site by site level (other than exceptional circumstances)	Anderson Group (1146719)	Noted	Updated evidence regarding economic viability of development has been made available on the council website. Further evidence may be made available in due course.	No change
Support updated definition of Affordable Housing which recognises Starter Homes and Discounted Market Sales homes as types of affordable housing	Gladman Developments Ltd (1187201)	Noted	Support Noted	No change
Concerns over the potential limitations imposed on site promoters as affordable housing is restricted to a given type (social rent)	Mr Marcello Cannatella (1187377) Mr Dean Ivory (52552) Shonleigh Nominees (978420) Kenneth Ivory (978427)	Disagree	Policy L3 and Appendix 6 sets out a clear approach.	No change
Concerns over the homogenous housing mix	Crown Estate (51946)	Disagree	Evidential basis for specific mix is summarised in Appendix 6 and more detail supporting the Local Plan is available in full.	No change

proposed for all tenures				
Need for two separate mixes for affordable and market housing	Crown Estate (51946)	Disagree	Evidential basis for specific mix is summarised in Appendix 6 and more detail supporting the Local Plan is available in full.	No change
Remove the default mechanism for non-provision	Home Builders Federation Ltd (1156936)	Disagree	L3 sets out a clear approach given likely varying conditions and context over the Plan period.	No change
The percentage requirement of 40% is excessive	Mr Dean Ivory (52552) Kenneth Ivory (978427) Shonleigh Nominees (978420) Aurora Properties Limited (1151817) D'Arblay Investments (1187404) Mr Richard Blair (977889) Mr Antonio Barba (1187384) Trustees GA Simons Family Trust (1187408)	Disagree	Evidential basis for specific mix is summarised in Appendix 6 and more detail supporting the Local Plan is available in full.	No change
Support the range of affordable housing options	Settle (1187516)	Noted	Support noted	No change

Note the acknowledged need for specialist accommodation within the broader onward supply of affordable homes	Settle (1187516)	Note	Support noted	No change
Encourage a clearer definition to the terms included in describing 'Social Rent' levels	Settle (1187516)	Disagree	The terminology used reflects NPPF wording and is consistent with national policy.	No change
Affordable housing mix should be based on robust evidence and up-to-date evidence	CEG (1158030)	Noted	Evidential basis for specific mix is summarised in Appendix 6 and more detail supporting the Local Plan is available in full.	Publish updated evidence
Identifying land for affordable housing in planning permissions and obligations is not an appropriate practice	Crest Strategic Projects and Bloor Homes (1158079)	Disagree	Policy L3 sets out an appropriate approach	No change
Policy should reflect normal market practices and avoid an onerous situation that may impede delivery.	Crest Strategic Projects and Bloor Homes (1158079)	Disagree	Policy L3 sets out an appropriate approach that will not impede delivery	No change

Allow alternatives to provision, in kind, on site.	Crest Strategic Projects and Bloor Homes (1158079)	Disagree	Policy L3 sets out a clear approach	No change
Specific policy wording suggested in relation to default provision in case of non-provision.	Crest Strategic Projects and Bloor Homes (1158079)	Disagree	Policy L3 sets out a clear approach. Will be agreed with the identified provider as part of Masterplanning / planning application / obligation stage.	No change
Policy fails to provide a degree of flexibility with regards to the methods of securing affordable housing provision in respective planning obligations	Hallam Land Management Limited (11859998)	Disagree	Policy L3 sets out a clear approach	No change
Policy percentage for affordable housing is too high	Mr Dean Ivory (52552) Kenneth Ivory (978427) Shonleigh Nominees (978420) D'Arblay Investments (1187404) 1184750	Disagree	Evidential basis for specific mix is summarised in Appendix 6 and more detail supporting the Local Plan is available in full.	No change

L4- Affordable housing development in the Green Belt (rural exceptions sites)

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
If a site is already designated in a made Neighbourhood Plan, it would already not be subject to the policies in this Plan.	RF Sinclair and Sons (1058251) 52064	Disagree	Proposals, even on allocated sites in a Neighbourhood Plan, will still need to comply with policies in the Local Plan.	No change
The policy seeks only to allow for social rented housing on exception sites rather than <i>“one or more types of affordable housing”</i> as set out in paragraph 71 of the NPPF. Therefore L4 is not considered to be consistent with national policy.	973180	Disagree	NPPF paragraph 71 refers to “one or more” types of affordable housing. Therefore one type – social rented housing, is in accordance with the NPPF.	No change
This policy is likely to reduce the number of affordable houses	Hunston Planning Limited (1185622)	Disagree	This is an additional route for housing development, subject to the details set out in the policy. Other routes in the LP or through national policy in the NPPF are also available.	No change

delivered in the Green Belt rather than increase it	Trustees of James Henry Frank Sewell Deceased (1185630) Shonleigh Nominees (978420)			
Does not seek to meet the area's objectively assessed needs as it excludes the provision of some forms of affordable housing	Hunston Planning Limited (1185622)	Disagree	Overall, housing requirement/targets are based on the standard methodology set out by the government – see S4. Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy. This is an additional route for development to meet some localised needs, subject to the details of the policy.	No change
Criterion (iii) may unintentionally make 'limited affordable housing' inappropriate in the District, rather than appropriate development allowed by the NPPF	Hunston Planning Limited (1185622)	Disagree	NPPF allows for the principle of limited affordable housing, subject to Local Plan policies – which this is detailing.	No change
The policy seeks to set a maximum number of affordable homes per site at just two-thirds of the amount the Council	Hunston Planning Limited (1185622)	Noted	The planning application was determined under the currently adopted Local Plan (1994), and full justification can be found in the officer's report. Policy L4 defines 'limited' as required by paragraph 145 of the NPPF 2018.	No change

recently approved for itself in the Green Belt				
The NPPF states that <i>“limited affordable housing for local community needs under policies set out in the development plan”</i> is considered appropriate development in the Green Belt and as such does not have to demonstrate <i>“very special circumstances”</i> . This should not be used to justify development where it would not otherwise meet the test of <i>“very special circumstances”</i>	Colney Heath Parish Council (51891) Hunston Planning Limited (1185622) Trustees of James Henry Frank Sewell Deceased (1185630) 347648	Noted	Policy L4 does not state a requirement to demonstrate ‘very special circumstances’. Policy L4 defines ‘limited’ as required by paragraph 145 of the NPPF 2019. This requirement is also reflective with paragraphs 77-79 of the NPPF 2019, supporting development that meets local need whilst avoiding homes in isolated areas.	No change
The text should be rewritten to reflect a more positive approach to appropriate development in the Green Belt which will boost the	Trustees of James Henry Frank Sewell Deceased (1185630) M Scott Properties (1185993)	Disagree	The current wording reflects the approach actually taken to the strategic approach of the LP. The new NPPF wording 2019 is generally similar and not contradictory to the approach taken.	No change

supply of housing rather than make it more difficult to achieve				
Highlight the need for Neighbourhood Plan consideration	St Stephen Parish council (51804)	Noted	Policy L4 states any site designated solely for affordable housing in made Neighbourhood Plan will be supported.	No change
Criterion (iv) is unnecessary. If the area is " <i>dominated by buildings</i> " it is unlikely to be performing any Green Belt purpose and the Council should consider the release of that area from the Green Belt	Aurora Properties Limited (1151817)	Disagree.	This requirement is reflective with paragraphs 77-79 of the NPPF 2019, supporting development that meets local need whilst avoiding homes in isolated areas. Not all settlements are excluded from the Greenbelt, as set out in Policy S2.	No change
This policy could allow 'carte blanche' building across the Green Belt if the housing is designated as affordable	St Albans Civic Society (1156974)	Disagree	The NPPF sets out that limited affordable housing for local community needs can be appropriate in the Green Belt. These requirements are also reflective with paragraphs 77-79 of the NPPF 2019, supporting development that meets local need whilst avoiding homes in isolated areas.	No change
The policy suggests that a developer could put their entire affordable housing quota for a scheme on the Green Belt, leaving any urban	St Albans Civic Society (1156974)	Disagree	Para 145 of the NPPF sets out that limited affordable housing for local community needs can be appropriate in the Green Belt.	No change

<p>brown field site to be developed exclusively for private housing. The policy must guard against such possibility</p>				
<p>As currently permitted, the policy only allows for development that is no larger than 10 dwellings on a maximum site area of 0.5 Ha. The definition of a rural exception site in the NPPF (2012) advises that rural exception sites are 'small sites' but it does not define the number of dwellings. Given the acute need for affordable housing in the District they consider that this threshold should be increased</p>	<p>M Scott Properties (1185993)</p>	<p>Disagree</p>	<p>Para 145 of the NPPF sets out that limited affordable housing for local community needs can be appropriate in the Green Belt, in accordance with Local Plan policies. L4 defines what is considered limited.</p>	<p>No change</p>
<p>Encourage the revision of the wording for policy requirement (ii) to be more reflective</p>	<p>M Scott Properties (1185993)</p>	<p>Disagree</p>	<p>NPPF paragraph 71 refers to "one or more" types of affordable housing. Therefore one type – social rented housing, is in accordance with the NPPF.</p>	<p>No change</p>

of the new definition of affordable housing set out in the NPPF (2018)				
The requirement that affordable housing is in some way restricted to Social Rent will effectively mean that viable sites will not come forward given Government funding	Shonleigh Nominees (978420)	Disagree	NPPF paragraph 71 refers to “one or more” types of affordable housing. Therefore one type – social rented housing, is in accordance with the NPPF.	No change
The policy fails to recognise the close relationship some Green Belt settlements have with the major settlements of the District. Therefore, distinguishing between the priority need for housing for local community and that of major settlements will be hard to evidence. This approach overlooks a significant contribution medium scale sites	Anderson Group (1146719)	Disagree	Para 145 of the NPPF sets out that limited affordable housing for local community needs can be appropriate in the Green Belt, in accordance with Local Plan policies. L4 defines what is considered limited. Housing not identified as local community needs is not considered to fall within this exception in the NPPF.	No change

<p>on the edge of non-Green Belt areas could provide to meeting both market and affordable needs in the District.</p>				
<p>Account should be taken of LTP4's Policy 5: Development Management, part G, which states: <i>“Resist development that would either severely affect the rural or residential character of a road or other right of way, or which would severely affect safety on rural roads, local roads and rights of way especially for vulnerable road users. This should include other routes which are important for sustainable transport or leisure”</i></p>	<p>Hertfordshire County Council (837689)</p>	<p>Noted</p>	<p>This requirement is reflective with paragraphs 77-79 of the NPPF 2019, supporting development that meets local need whilst avoiding homes in isolated areas. Greenbelt settlements are defined under S2.</p> <p>Development will be required to comply with Policy L18 and L19.</p>	<p>No change</p>

Supports the principles of policy L4	CPRE Hertfordshire (872572)	Noted	Support noted	No change
Suggests an amendment of the site size criterion to encourage the optimal use of sites, particularly for smaller dwellings, through either reducing the qualifying site size to 0.75 hectares, or increasing the number of dwellings to 15	CPRE Hertfordshire (872572)	Disagree	Policy states size of sites must be below this, at 0.5 hectares, and defines 'limited' as required by paragraph 145 of the NPPF 2019.	No change
The policy should require the impact on the Green Belt to be 'minimal', rather than 'limited'. There should be a requirement that this is also demonstrated in a Planning Statement accompanying the planning application	CPRE Hertfordshire (872572)	Disagree	Policy defines 'limited' as required by paragraph 145 of the NPPF 2019. The policy also identifies what type of housing constitutes 'Local Community Need', and evidence of this, and legal agreement, will be sought at planning application stage.	No change
Recommend the addition of a criterion to read	Historic England (929489)	Disagree	Cross reference with Policy LP30.	No change

<i>'the development will conserve and where appropriate enhance the historic environment'</i>				
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L5- Small Scale Development in Green Belt Settlements

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Current policy wording fails to give the local community, in the form of the Neighbourhood plan, the specific opportunity to review and modify the Green Belt Settlement boundary	St Stephen Parish Council (51804) 867587	Partly Agree	Cross refer to S2 - The NPPF and draft Local Plan support Neighbourhood planning. The Local Plan deals with the overall need for new housing and is not reliant on NPs. NPs must make their local own justification for additional housing provision (and for other uses); this is their intended role. Given the specific wording used in the final NPPF 2018 (after the Council decision on 11 July 2018 based on the draft NPPF) a minor modification should be made to make clear that if detailed local evidence justifies development at a neighbourhood scale, on land currently designated as Green Belt, it is supported in principle.	No Change (to L5 – minor modification to S2)
Policy L5 differs from national policy as it effectively precludes certain types of development that the NPPF specifically provides for	Jarvis Homes (973180) Belgrave Land (Northern) No 2 Limited (1185928) DB Rees (Builders) Ltd (1160056) Hunston Planning Limited (1185622)	Disagree	The proposed policy does not preclude development which is already acceptable under para 145 of the NPPF.	No change

	Trustees of James Henry Frank Sewell Deceased (1185630)			
There is a lack of clarity with the policy. The reader must assume that all four criteria set out must be satisfied	Jarvis Homes (973180) DB Rees (Builders) Ltd (1160056)	Disagree	Policy sets out all four criteria are relevant.	No change
Given all criteria in L5 must be met, it would indicate that only previously developed sites are included. This conflicts with paragraph 145 of NPPF which permits infill development on greenfield and brownfield land	Jarvis Homes (973180) DB Rees (Builders) Ltd (1160056)	Disagree	The proposed policy does not preclude development which is already acceptable under para 145 of the NPPF.	No change
The description of previously developed land that includes " <i>part of a previously developed property area</i> " is unclear.	Jarvis Homes (973180) DB Rees (Builders) Ltd (1160056)	Disagree	Definition of Previously Developed Land set out in Glossary of NPPF.	No change
The restriction of development to 10	Jarvis Homes (973180)	Disagree	NPPF refers to Infilling, whilst LP provides clarity as to what constitutes Infilling in this context in this District.	No change

<p>dwellings does not accord with the NPPF which places no size restriction on sites, providing it does not have a greater impact on openness</p>	<p>DB Rees (Builders) Ltd (1160056) Hunston Planning Limited (1185622)</p>			
<p>The definition of infill development being restricted to a gap is considered inappropriate. There are many potential infill sites that are not gaps in frontages but are nevertheless infill development in terms of being within a settlement and part of the built form.</p>	<p>Jarvis Homes (973180) DB Rees (Builders) Ltd (1160056)</p>	<p>Disagree</p>	<p>NPPF refers to Infilling, whilst LP provides clarity as to what constitutes Infilling in this context in this District.</p>	<p>No change</p>
<p>Policy L5 should be deleted as the content of paragraph 145 NPPF adds plenty of meaningfulness to the policy coverage.</p>	<p>DB Rees (Builders) Ltd (1160056) Jarvis Homes (973180) 52064</p>	<p>Disagree</p>	<p>Policy L5 refers to small scale development in Green Belt Settlements. The proposed policy does not preclude development which is already acceptable under para 145 of the NPPF.</p>	<p>No change</p>

<p>No justification has been provided for excluding part of Sleafshyde village from the boundary of the Green Belt Settlement</p>	<p>Jarvis Homes (973180) 52064</p>	<p>Disagree</p>	<p>The excluded area is considered separate to the main area, and is not considered part of the Green Belt Settlement.</p>	<p>No change</p>
<p>There is no definition of “infilling” or “limited filling” in the NPPF. This can result in difficulty for sites to come forward as the decision-maker is left to form a view on an application</p>	<p>Belgrave Land (Northern) No 2 Limited (1185928)</p>	<p>Disagree</p>	<p>NPPF refers to Infilling, whilst LP provides clarity as to what constitutes Infilling in this context in this District.</p>	<p>No change</p>
<p>The definition of an infill site is overly prescriptive and has no basis for introduction into the policy as a key test. The wording is therefore a barrier to sustainable development</p>	<p>Belgrave Land (Northern) No 2 Limited (1185928) Minister Court Frogmore (1185980)</p>	<p>Disagree</p>	<p>NPPF refers to Infilling, whilst LP provides clarity as to what constitutes Infilling in this context in this District.</p>	<p>No change</p>

Request for the criterion 3 of Policy L5 to be deleted to ensure consistency with national policy in the Framework and to ensure the policy can effectively deliver sustainable development	Belgrave Land (Northern) No 2 Limited (1185928)	Disagree	Policy L5 refers to small scale development in Green Belt Settlements. The proposed policy does not preclude development which is already acceptable under para 145 of the NPPF.	No change
Support L5	CPRE Hertfordshire (872572) St Albans Civic Society (1156974) 1185945	Noted	Support noted	No change
Disagree with the Smallford village hatched area, denoting allowable small scale development, and request for it to be corrected	1185945	Noted	Boundaries of Green Belt Settlements based on evidence. Cross reference to Policies Map.	No change
A separate limb to policy L5 should be included to reflect the development exceptions set out in the Framework.	Minister Court Frogmore (1185980)	Disagree	The proposed policy does not preclude development which is already acceptable under para 145 of the NPPF.	No change

<p>The boundaries of many of the “Green Belt Settlements” are arbitrarily drawn, with cases where substantial areas of the settlement are shown excluded from the definition</p>	<p>52064</p>	<p>Disagree</p>	<p>Boundaries of Green Belt Settlements based on evidence. Cross reference to Policies Map.</p>	<p>No change</p>
<p>The draft plan’s criteria within this proposed policy lack clarity and will not provide the predictability that developers need. The third bullet point of this draft policy is too subjective and open to varied interpretation</p>	<p>52064</p>	<p>Disagree</p>	<p>Approach is consistent with national policy.</p>	<p>No change</p>
<p>Policy wording needs to refer to a maximum site size, and not a maximum of 10 dwellings. This can lead to a large, very low density, development which would be inconsistent with</p>	<p>CPRE Hertfordshire (872572)</p>	<p>Disagree</p>	<p>Proposed developments will also be required to comply with the other criterion set out in L5 and other LP and NPPF policies on making best use of land, appropriate density etc.</p>	<p>No change</p>

the objectives of the Plan and National Planning Policy				
Suggest that a maximum site size of 0.75 hectares should be specified by the Policy	CPRE Hertfordshire (872572)	Disagree	Proposed developments will also be required to comply with the other criterion set out in L5.	No change
No justification has been provided for excluding part of Radlett Road (Frogmore) village (including the report site) from the boundary of the Green Belt Settlement	DB Rees (Builders) Ltd (1160056)	Disagree	The excluded area is considered separate to the main area, and is not considered part of the Green Belt Settlement.	No change
The definition of Green Belt settlement envelope is not necessarily determinative of whether a proposal could be considered limited infilling in terms of the NPPF. Case law has established that a judgement will	DB Rees (Builders) Ltd (1160056) Jarvis Homes (973180)	Noted	Approach is consistent with national policy. Policy L5 refers to small scale development in Green Belt Settlements. The proposed policy does not preclude development which is already acceptable under para 145 of the NPPF.	No Change

<p>need to be made “on ground”, based on relevant factors, rather than simply relying on a Local Plan designation</p>				
<p>The policy should allow limited infilling in villages on non- previously developed land and allow the redevelopment of previously develop land even if its outside a village</p>	<p>Hunston Planning Limited (1185622)</p>	<p>Disagree</p>	<p>Approach is consistent with national policy. Policy L5 refers to small scale development in Green Belt Settlements. The proposed policy does not preclude development which is already acceptable under para 145 of the NPPF.</p>	<p>No Change</p>
<p>The policy has conflated two separate forms of appropriate development to the detriment of both (“Limited infilling in villages” and “limited infilling and the partial or complete redevelopment of previously developed land”). This will increase the difficulty in delivering them</p>	<p>Hunston Planning Limited (1185622) Trustees of James Henry Frank Sewell Deceased (1185630)</p>	<p>Disagree</p>	<p>Approach is consistent with national policy. Policy L5 refers to small scale development in Green Belt Settlements. The proposed policy does not preclude development which is already acceptable under para 145 of the NPPF.</p>	<p>No Change</p>

<p>The wording of the policy needs to be clearer</p>	<p>Colney Heath Parish Council (51891) London Colney Parish Council (52477) 347648</p>	<p>Disagree</p>	<p>The current wording reflects the approach actually taken to the structure of the LP. The new NPPF wording 2019 is generally similar and not contradictory to the approach taken.</p>	<p>No change</p>
<p>Limited development of previously undeveloped land should be considered on a case by case basis judging the specific proposal for any individual site and ensuring the openness to the settlement is not lost over time and ultimately being taken out of the Green Belt 'washover' entirely</p>	<p>Colney Heath Parish Council (51891) 347648</p>	<p>Noted</p>	<p>Approach is consistent with national policy.</p>	<p>No change</p>
<p>The policy should be split in two sections to reflect the exceptions as set out in the NPPF</p>	<p>Trustees of James Henry Frank Sewell Deceased (1185630)</p>	<p>Disagree</p>	<p>Approach is consistent with national policy. Policy L5 refers to small scale development in Green Belt Settlements. The proposed policy does not preclude development which is already acceptable under para 145 of the NPPF.</p>	<p>No change</p>

The policy seems to allow infilling only in those parts of a villages where there is no room for infilling	Trustees of James Henry Frank Sewell Deceased (1185630) 347648	Disagree	Approach is consistent with national policy. The proposed policy does not preclude development which is already acceptable under para 145 of the NPPF.	No change
Recommend for the text regarding the policies and extent of the village envelopes to be reviewed to promote appropriate development in the Green Belt rather than frustrate it	Trustees of James Henry Frank Sewell Deceased (1185630)	Disagree	<p>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p> <p>Approach is consistent with national policy. The proposed policy does not preclude development which is already acceptable under para 145 of the NPPF.</p>	No change
L5 paragraph 1 should be deleted. The NPPF paragraph 145 (e) does not require limited infilling in the Green Belt to be previously developed land	Aurora Properties Limited (1151817)	Disagree	Approach is consistent with national policy. Policy L5 refers to small scale development in Green Belt Settlements. The proposed policy does not preclude development which is already acceptable under para 145 of the NPPF.	No change
L5 relaxes planning rules for the re designated 'Green Belt Settlements' of Folly Fields, Lea Valley and Gustard	Wheathampstead Parish Council (51941)	Support	Support Noted	No change

Wood. By more readily permitting small scale development within the localities the need for additional housing and facilities may be addressed without eroding the Green Belt				
Notes that the plan seeks to spread future development around existing towns via the identified broad locations /circumstances and not in others	London Colney Parish Council (52477)	Noted	Approach is consistent with national policy.	No change
Suggest a clarification on what constitutes a gap in such situations (i.e. if a lone building is considered sufficient to define a gap suitable for infill or if a gap requires stronger definition of its boundaries and	Watford Borough Council (1122500)	Disagree	The policy refers to small scale development in Green Belt settlements, as defined in S2 and the proposals map. A gap is defined under point 3 of the policy. The proposed policy does not preclude development which is already acceptable under para 145 of the NPPF.	No change

relationship to the existing settlement)				
The assessment of extensions is based on its relationship to the existing building and any potentially adverse impact on the surrounding area. If these are the critical factors it is unclear why the size thresholds would be required rather than assessing a scheme on its design merits	Watford Borough Council (1122500)	Disagree	Proposed developments will also be required to comply with the other criterion set out in L5. This includes point 3 (infill) and point 4 (character).	No change
Sandridge green belt settlement boundary constraints potential growth	Owner of Pound Farm & East of Sandridge (1187227)	Disagree	The excluded area is not considered to be within the Green Belt Settlement envelope. The proposed policy does not preclude development which is already acceptable under para 145 of the NPPF.	No change
Policy L5 allocation should be extended to allow small scale development such as 'Notcutts Garden Centre'	Notcutts (1160112)	Disagree	The excluded area is not considered to be within the Green Belt Settlement envelope. The proposed policy does not preclude development which is already acceptable under para 145 of the NPPF.	No change

<p>SADC should consider modifying L5 to include an additional criterion, which would allow for the open character of the settlement which contributes to the openness of the Green Belt to be protected. This is particularly important where the settlement lies in a fragile gap between towns</p>	<p>Welwyn Hatfield Borough Council (52397)</p>	<p>Disagree</p>	<p>Proposed developments will also be required to comply with the other criterion set out in L5. This includes point 3 (infill) and point 4 (character).</p>	<p>No change</p>
<p>In addition to the requirement set out in this policy, account should be taken of LTP4's Policy 5: Development Management, part g, which states: "Resist development that would either severely affect the rural or residential character of a road or other right of way, or which</p>	<p>Hertfordshire County Council (837689)</p>	<p>Disagree</p>	<p>L5 refers to Green Belt requirement is reflective with paragraphs 77-79 of the NPPF 2019, avoiding homes in isolated areas. Greenbelt settlements are defined under S2.</p> <p>Development will be required to comply with Policy L18 and L19.</p>	<p>No change</p>

<p>would severely affect safety on rural roads, local roads and rights of way especially for vulnerable road users. This should include other routes which are important for sustainable transport or leisure.”</p>				
<p>Recommend the addition of a criterion to read ‘the development will conserve and where appropriate enhance the historic environment’</p>	<p>Historic England (929489)</p>	<p>Disagree</p>	<p>Cross reference to Policy L30 which addresses this.</p>	<p>No change</p>

Policy L6 - Extension or Replacement of Dwellings in the Green Belt

Representation Point	Representor Raising Point (see below for list of abbreviations)	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Policy is unnecessary as many of the works referred to would be permitted development	RF Sinclair and Sons (1058251) 52064	Disagree	Policy applies to development that is not permitted development and planning permission is required. Permitted development rights are a separate process.	No change
Policy should refer to replacement of 'buildings' not 'dwellings'	RF Sinclair and Sons (1058251) 52064	Disagree	Policy L6 applies to specifically to dwellings. The principle of replacement buildings in the Green Belt are addressed in the NPPF.	No change
Policy too detailed/restrictive/complex	Jarvis Homes (973180) Aurora Properties Ltd (1151817) 1185956	Disagree	The Policy establishes important principles for Green Belt development	No change
Part i) conflicts with NPPF which only requires extensions to not be disproportionate to size of original dwellings	Jarvis Homes (973180)	Disagree	Policy provides further detail as to what would be disproportionate additions. There is no conflict with the NPPF	No change

'Replacement Dwellings' section conflicts with NPPF which doesn't require assessment on location or character/size	Jarvis Homes (973180)	Disagree	Policy provides further detail to assess replacement dwellings which are not inappropriate in the Green Belt in principle. There is no conflict with the NPPF	No change
Support policy - acceptable	St Albans Civic Society (1156974) 1185630	Noted	Support noted	No change

Policy L7 Gypsies, Travellers and Travelling Show People

Representation Point	Representor Raising Point (see below for list of abbreviations)	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Sites should be more evenly distributed across the District	St Stephen Parish Council (51804) Colney Heath Parish Council (51891) DBC (1186054) 1144419 1185704 1185821 1186046 1181723 347648	Disagree	Sites have been allocated in the most appropriate locations, based on evidence, as set out in L7.	No change

	498103			
Additional pitches in EHH Broad Location would result in an over-concentration in the area, exacerbating existing problems.	DBC (1186054)	Disagree	Sites have been allocated in the most appropriate locations, based on evidence, as set out in L7. There is considerable flexibility within these large Broad Locations to locate sites sensitively.	No change
EHH (Central) Broad Location is a proposed employment site and not therefore an appropriate location for a travellers site	DBC (1186054)	Disagree	Cross reference to Policy S6. Sites have been allocated in the most appropriate locations, based on evidence, as set out in L7. There is considerable flexibility within these large Broad Locations to locate sites sensitively.	No change
SADC should not allocate sites in an extension of a town in another district	Berkhamsted Residents Action Group (186012)	Disagree	Sites have been allocated in the most appropriate locations, based on evidence, as set out in L7. There is considerable flexibility within these large Broad Locations to locate sites sensitively. SADC is the responsible LPA and is committed to working jointly with DBC on planning in these areas.	No change
Policy needs amending to include a target following updated GTANA	DBC (1186054) WHBC (52397)	Disagree	Updated draft GTANA work 2019 has been published. No need to amend Policy or approach.	No change

Question robustness of evidence base and level of need	Herts GATE (1151880)	Disagree	Updated draft GTANA work 2019 has been published. No need to amend Policy or approach.	No change
Sites do not reflect traveller need and will have a long lead-in time	Herts GATE (1151880)	Disagree	Updated draft GTANA work 2019 has been published. No need to amend Policy or approach.	No change
Management arrangement for proposed new sites is unclear	Herts GATE (1151880)	Disagree	Will be agreed as part of Masterplanning / planning application/obligation stage.	No change
Land adjacent existing Barley Mow site should be considered	Herts GATE (1151880)	Disagree	Sites have been allocated in the most appropriate locations, based on evidence, as set out in L7. Policy L7 already sets out that the potential and suitability of extending existing sites will be considered.	No change
Policy supported as sound/acceptable	St Albans Civic Society (1156974) 1185630	Noted	Support noted	No change
Should be collaborative masterplanning work with HBC to consider site provision that have the potential to affect Hertsmere	HBC 51934	Noted	SADC and HBC are working together through the SWH JSP process. For all issues where there might be a cross-boundary implication for Hertsmere/SADC then appropriate involvement in Masterplanning will take place in due course.	No change

Evidence base should take account of need from Hertsmere's transit site	WHBC (52397)	Disagree	Updated draft GTANA work 2019 has been published. No need to amend Policy or approach.	No change
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Policy L8 - Primarily Residential Areas

Representation Point	Representor Raising Point (see below for list of abbreviations)	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Converted units need to be of a reasonable size	1144419	Noted	Cross reference to policy L24 which sets out the development amenity standards. These are applicable to all forms and scales of development and must be followed in principle.	No change
Policy should discourage rather than refuse conversion of flats to dwellings	1185956	Disagree	Policy L8 sets out a very clear approach. Housing targets are based on evidence on local housing need and standard methodology set out by the government. Development which results in a loss of housing units will be detrimental to these aims.	No change
Multiple occupation properties must be provided with sufficient parking	1144419	Noted	Appendix 1 table sets out parking requirements for houses in multiple occupation. As set out in policy L20, parking provision for changes of use or extensions shall reflect the number of spaces required for the new use of the extension.	No change
Policy will not effectively protect residential amenity	Thames Water (931213)	Noted	Cross reference with Policy L24, which sets out a clear approach to Development Amenity Standards.	No change

Support policy – approach acceptable.	St Albans Civic Society (1156974) Gladman Developments Ltd.(1187201)	Noted	Support noted	No change
Residential area boundaries should be amended to include ‘Kingston Smith’ site and Aboyne Lodge School (given that no zoning category for schools near the City Centre will be made)	867312	Disagree	Evidence based boundaries chosen based primarily on usage on the ground and local character. Cross refer L12	No change

L9 - Primarily Business Use Areas

Representation Point	Representor Raising Point (see below for list of abbreviations)	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Policy ineffective as has been overtaken by the change of use freedoms under GPDO	1058251	Disagree	It is one of the strategic objectives of the plan to provide appropriate commercial development. The policy aims to support business uses in principle from the loss of premises in Class B arising from permitted development rights of the GPDO through Article 4 directions.	No change
More flexibility for mixed uses, including housing	HCC (837689) Watford BC (1122500)	Disagree	It is acknowledged that Para 81 (d) NPPF states that policies should be flexible enough to accommodate needs not expected in the plan, allow for new flexible working practises such as live-work accommodation and to enable	No change

required in designated areas.	52552 978427 872572		response to changes in economic circumstances. However this is a very selective policy for a small number of key employment areas.	
Define business use areas on policies map	872572	Agree	The Policies Map already refers to L9 business use areas.	No change
Include high speed broadband and next level telecommunications in all new business / commercial developments	St Stephen Parish Council(51804)	Agree	Cross reference to Policy 17. Plan policy encourages high speed broadband and next generation telecommunications provision in new development.	No change
Concerns relating to decentralised retail uses (in business use areas) that could undermine central area shopping	St Albans Civic Society (1156974)	Disagree	The LP aims to enhance and protect the vitality and viability of centres through a presumption against retail outside centres. L9 concurs stating that additional retail uses will not be permitted (in primarily business use areas) unless strictly related to a primarily Class B activity.	No change
Allocate development site at Roehyde for 25ha mixed industrial and research facilities (as employment land or special employment location in Green	Goodman (1153774)	Disagree	Cross reference to Policy S2, L10 and 11. An additional Green Belt employment location is not required. This site is not suitable for such development and is in part an existing waste site. BRE and Rothamsted Research are established areas of employment within the Green Belt and areas designated as part of the multi-site Hertfordshire Enviro-Tech Enterprise Zone supported by the Government. They have important functions supporting business start-ups and attracting UK	No change

Belt) – to support University of Hertfordshire			and international investment. Whilst it is acknowledged the importance of teaching and research undertaken by the University of Hertfordshire, it is not incorporated within the Herts Enterprise Zone.	
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L10 Strategic Office Locations

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Plan policy should allow flexibility for alternative uses within Strategic Office Locations	Eskmuir Properties Ltd. (1156728) Waford BC (1122500)	Disagree	The policy does not rule out mixed use; it only prioritises office use and development and protects existing office use.	No change
Shortage of supply of office space/ additional space required	Pegasus (1186098)	Disagree	Policy S6 ii) East Hemel requires delivery of a circa 17ha business park for primarily Class B1 office uses. Also part of the multi-site Hertfordshire Enviro-Tech Enterprise Zone. The allocation of Article 4 directions within the strategic office locations will protect much of the remaining stock.	No change
Employment need evidence (2016) is out of date	Pegasus (1186098)	Disagree	2016 evidence is still highly relevant. St Albans SW Hertfordshire Economic Study update published February 2019. Takes into account recent economic forecasts, the changes to the commercial property stock including that lost through PD, revisit growth scenarios and assesses demand and supply.	No change
Special employment locations and new provision at East Hemel Hempstead	Pegasus (1186098)	Disagree	There is scope for further development in strategic office locations. BRE and Rothamsted Research are established areas of employment and will support sectors with strong growth potential. A new business park of circa 17ha for primarily office development at East Hemel Hempstead will	No change

Broad Location are remote from St Albans City Centre.			meet all quantitative need and is well located for central services and facilities.	
Special employment locations only cater for limited/ specialist sectors of the economy	Pegasus (1186098)	Agree	<p>BRE and Rothamsted Research are established areas of employment within the Green Belt and areas designated as part of the multi-site Hertfordshire Enviro-Tech Enterprise Zone supported by the Government. They have important functions supporting business start-ups and attracting UK and international investment. Green technology is a business sector with strong growth potential to create jobs over the plan period.</p> <p>A new business park of circa 17ha for primarily office development at East Hemel Hempstead will meet all quantitative need and is well located for central services and facilities.</p>	No change
Site at Copsewood, St Albans should be allocated for commercial use (offices)	Pegasus (1186098)	Disagree	There is no need for additional land (cross reference policies S 2/5/6). The proposed site is a Green Belt location. There are no exceptional circumstances for allocation of further employment land.	No change
Allocate development site at Roehyde for 25ha mixed industrial and research facilities (as employment land or special employment location in Green	1153774	Disagree	<p>Cross reference Policy S2, L9 and 11.</p> <p>BRE and Rothamsted Research are established areas of employment within the Green Belt and areas designated as part of the multi-site Hertfordshire Enviro-Tech Enterprise Zone supported by the Government. They have important functions supporting business start-ups and attracting UK and international investment.</p> <p>Whilst it is acknowledged the importance of teaching and research undertaken by the University of Hertfordshire, it is</p>	No change

Belt) – to support University of Hertfordshire			not incorporated within the Herts Enterprise Zone and there is need for related employment land provision. The proposed site is a Green Belt location. There are no exceptional circumstances for allocation of further employment land.	
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L11 - Special Employment Locations in the Green Belt

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Redevelopment, intensification and extension of built development at these sites is unacceptable. Additional development is only acceptable within existing built 'footprint', possibly including redevelopment of underused or redundant temporary/ ancillary buildings such as glasshouses	Ramblers Association (52420) CPRE (872572) Harpenden Society (51870) St Albans & District Footpaths Society (723340)	Disagree	BRE and Rothamsted Research are established areas of development / employment within the Green Belt and are designated as part of the multi-site Hertfordshire Enviro-Tech Enterprise Zone. They have important functions supporting business start-ups and attracting UK and international investment. Future growth will be carefully planned and controlled in relation to Green Belt openness; through masterplanning and agreements, as set out in the Policy.	No change

<p>Policy should differentiate between development supported in principle and that which demonstrates very special circumstances</p>	<p>British Horse Society (1187597)</p>	<p>Disagree</p>	<p>BRE and Rothamsted Research are established areas of employment within the Green Belt and areas designated as part of the multi-site Hertfordshire Enviro-Tech Enterprise Zone. They have important functions supporting business start-ups and attracting UK and international investment. Policy indicates that for these sites, Green Belt very special circumstances are important and may apply in relation to the proposed masterplan / agreements.</p>	<p>No change</p>
<p>Policy should include provisions for off-shoot businesses. Residential schemes within the Green Belt that relate to these businesses should include some provision for staffing</p>	<p>975683</p>	<p>Disagree</p>	<p>Policy L11 sets out a very clear approach, including reference to business carrying out complementary knowledge-based research and development activities.</p> <p>General housing development is not supported. Some accommodation may be required as ancillary to and supporting research activity and essential staffing</p>	<p>No change</p>
<p>Need for active travel/travel plans and multi-user routes for leisure</p>	<p>Ramblers Association (52420) St Albans & District Footpaths Society (723340) Hertfordshire County Council (837689)</p>	<p>Disagree</p>	<p>Cross reference Policy 18 which generally promotes sustainable modes and transport infrastructure. Policy L11 concurs with the representation in that criteria (3) seeks improved pedestrian and cycle links to Bricket Wood Station (which lies North of the Common, BRE and adjacent housing). Rothamsted is well located for central area transport access. Depending on the nature of any redevelopment/expansion in the future, travel plans may be required – cross reference L18.</p>	<p>No change</p>

<p>Release of land at Townsend Lane for (affordable) housing would support Rothamsted Research as employer</p>	<p>Hill Residential (1158064) Lawes Agricultural Trust (1187615)</p>	<p>Disagree</p>	<p>Cross reference to representations re Policy S2.</p> <p>Land at Townsend Lane does not fall within one of the Broad Locations for development within the LP 2018.</p> <p>There are two planned Broad Locations for development within Harpenden to the NE and NW of the town lying approx. 1.5-2 miles from Rothamsted Institute in proximity and accessible via a range of active transport.</p> <p>Policy L3 facilitates a minimum of 40% affordable homes as a proportion of the overall dwelling numbers on site to include 'social rent', 'affordable rent' and 'subsidised home ownership types'.</p> <p>Ambitions/needs of Rothamsted Research alone cannot determine Plan development strategy.</p>	<p>No change</p>
<p>BRE & Rothamsted cater for specific sectors of economy</p>	<p>1186098</p>	<p>Agree</p>	<p>BRE and Rothamsted Research are established areas of employment within the Green Belt and areas designated as part of the multi-site Hertfordshire Enviro-Tech Enterprise Zone supported by the Government. They have important functions supporting business start-ups and attracting UK and international investment. Green technology is a business sector with strong growth potential to create jobs over the plan period.</p>	<p>No change</p>
<p>The BRE section should include criteria to afford protection to the Mohne Dam monument and in Rothamsted to conserve the Harpenden Conservation</p>	<p>Historic England (929489)</p>	<p>Disagree</p>	<p>Cross reference Policy L30 which supports conservation of heritage assets as appropriate to their significance. This issue will also be addressed in proposed Masterplanning and agreements</p>	<p>No change</p>

Area and Rothamsted Manor				
Policy could be used to support inappropriate housing development at these locations	St Stephens PC (51804)	Disagree	General housing development is not supported. Some accommodation may be required as ancillary to and supporting research activity and essential staffing.	No change
Allocate development site at Roehyde for 25ha mixed industrial and research facilities (as employment land or special employment location in Green Belt) - to support University of Hertfordshire	1153774	Disagree	<p>Cross reference Policy L9.</p> <p>BRE and Rothamsted Research are established areas of employment within the Green Belt and areas designated as part of the multi-site Hertfordshire Enviro-Tech Enterprise Zone supported by the Government. They have important functions supporting business start-ups and attracting UK and international investment.</p> <p>Whilst it is acknowledged the importance of teaching and research undertaken by the University of Hertfordshire, it is not incorporated within the Herts Enterprise Zone and there is need for related employment land provision.</p>	No change

L12 - Centre for Retail, Services and Leisure

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Lack of evidence/ policy on changing retail market; suggestion to	Aboyne Residents Association (1181214) 867312	Disagree	Evidence can be found online in the South West Hertfordshire retail and leisure study and its draft update 2019.	No change

include a strategy for dealing with parking and traffic as barriers to retail growth in City Centre				
Increase development of service and leisure in 'Key Shopping Areas'	1185717	Noted	The policy supports the creation of new services that contribute positively to the vitality and viability of the area.	No change
Remove protection on retail in defined frontages	St Albans Civic Society (1156974) 52064	Disagree	NPPF supports positive policies such as this to support town centres and these limited numbers of retail frontages. Supported also by retail evidence studies.	No change
Remove restriction on Hot Food Takeaways. Policy revision suggested.	Kentucky Fried Chicken (Great Britain) Limited (1050716) McDonalds Restaurants (1187475)	Disagree	The policy sets out an appropriate and balanced approach which provides for consumer choice and also aims to promote healthier lifestyles and protect residential amenity.	No change
Introduce public art to attract footfall	St Albans Civic Society (1156974)	Agree	Refer to policy L23 which supports the provision of public art in public realm.	No change
Support Local Centre Designation for Wheathampstead	Wheathampstead Parish Council (51941)	Noted	Support noted	No change
Out of centre retail development	London Colney Parish Council (52477)	Noted	The LP aims to enhance and protect the vitality and viability of centres through a presumption against retail outside centres.	No change

should not be at the expense of St Albans centre, and must ensure the unique character of the medieval city is preserved	Colney Heath Parish Council (51891)		Please refer to policy L30 for guidance on the approaches taken to preserve the historic environment.	
Clarification needed on how retail variation and changes of use will be considered in primary and secondary retail areas	Watford Borough Council (1122500)	Noted	Policy L12 sets out an overarching approach for retail centres. Consideration for changes of use will be considered on an individual basis and depending on the individual nature of the application.	No change
Support additional retail, services and leisure provisions in Broad Location Sites	Crest Strategic Projects and Bloor Homes (1158079)	Noted	Existing LP approach supported	No change
Marshalswick Lane food store, not just petrol forecourt canopy, should be included in District Centre boundary	Sainsbury's Supermarkets Ltd (376338)	Agree	Proposal for minor adjustment noted	Minor modification – Policies Map minor amendment to district centre boundary

Town centre and key shopping area boundaries should be amended to not include Aboyne Lodge School, residential gardens, Kingston Smith site and Coupers Garage	867312	Disagree	Evidence based boundaries chosen based primarily on usage on the ground and local character. Cross refer L8	No change
Policy does not comply with tests set out in the NPPF	Legal & General Investment Management (1185943)	Disagree	The LP aims to enhance and protect the vitality and viability of centres through a presumption against retail outside centres. NPPF supports positive policies such as this to support town centres. Supported also by retail evidence studies.	No change

L13 - Attractive and Vibrant Cultural and Civic Areas

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
The Plan does not refer to tourism development	Hunston Planning Ltd. (1185622) 1181750	Disagree	Policy L13 refers to entertainment and visitor facilities.	No change
Policy does not protect against loss of existing facilities	Theatres Trust (1179001)	Disagree	Policy L13 supports the retention of existing cultural and entertainment facilities. Policy L22 supports the retention of leisure and other community buildings	No change

Additional hotel provision should be identified in or close to Harpenden	Hunston Planning Ltd. (1185622)	Disagree	Delivery of additional and improved hotel provision is supported by Policy L13.	No change
There are no site-specific policies which support the improvement of cultural and entertainment facilities	Abbey Theatre (1186123)	Disagree	Policy L13 gives site specific proposals, amongst others are St Albans City Centre, Cathedral Quarter, Harpenden leisure redevelopments etc.	No change
Environmental enhancements should include reference to schemes to encourage sustainable forms of transport.	St Albans Cycle Campaign (346623) Growth & Infrastructure Unit Hertfordshire County Council (837689)	Disagree	Sustainable transport is addressed in Policy L18	No change
Enhancements should be sought specifically for the proposed Park Street Garden Village	St Stephen Parish Council (51804)	Disagree	Requirements for Park Street Garden Village addressed in Policy S6 xi)	No change
Proposals to enhance these facilities need to be accessible / inclusive	Harpenden Town Council (51870)	Noted	L13 requires enhancement and management of area to encourage activities that are a focus on community activity and pride. Detailed design of improvements/enhancements/additional facilities will be addressed at the planning application stage.	No change

Proposals to enhance these facilities need to be provided with sufficient parking	Harpenden Town Council (51870)	Agree	Parking requirements addressed at L20 and Appendix 1.	No change
Support hotel provision, but hotel proposals in Harpenden should only be developed near Town and Local Centres	Harpenden Town Council (51870)	Noted	Policy L14 requires a sequential approach to non-residential uses in residential areas.	No change
Support reference to culture and history but should reference conserving/enhancing historic environment	Historic England (929489)	Noted	Addressed in Policy L30	No change

L14 Location of Non Residential Uses Serving Residential Areas

Representation Point	Representor Raising Point (see below for list of abbreviations)	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
No strategy / lack of detail in providing for the social and pastoral needs for the Broad	St Albans Deanery Synod (1185929)	Disagree	Cross reference Policy S6, L12 and L22 which require community facilities and opportunities for new provision of places of worship as part of development of new Local Centres in Broad Locations, including in joint use community buildings.	No change

Location developments				
Support additional retail units where viable outside urban locations	347648	Noted	Support noted	No change
Support provision of small scale community development	St Stephen Parish Council (51804)	Noted	Support noted	No change
Facilities that serve communities in Broad Locations should be 'green'/landscaped	St Albans Civic Society (1156974)	Noted	Cross reference Policies 6, 23 and 29 which include requirements for green infrastructure, public open space and retention of important landscape features.	No change
Community services should say 'support and contribute towards' sustainable communities rather than deliver them.	Watford Borough Council (1122500)	Agree	A minor clarification setting out that these services 'support and contribute towards' sustainable communities rather than deliver them is suggested.	Suggested minor modification 'support and contribute towards' instead of 'deliver'
Policy on sequential approach should not refer to need	Sainsbury's Supermarkets Ltd. (376338)	Disagree	The approach taken is consistent with national policy. Need should be considered as part of the assessment.	No change

Policy should include health impact and sustainable transport references	Hertfordshire County Council (837689)	Disagree	Cross reference Policy L18 which references sustainable transport and air quality. Policies are based on the draft NPPF which includes sustainable transport and health.	No change
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L15 Leisure Uses

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Approach to provision is too negative.	Sport England (824971)	Disagree	The NPPF para. 92 states that planning policies should plan positively for community facilities such as recreational facilities. Policy L15 states that high intensity uses and medium intensity type A uses will <i>only</i> be permitted within towns and villages. This positively directs these uses to these areas.	No change
Medium intensity uses are acceptable in Green belt – Policy should not be conditional.	Sport England (824971)	Disagree	The NPPF para. 92 states that planning policies should plan positively for community facilities such as open space. Policy L15 states that medium intensity uses type B will <i>normally</i> be permitted in the Green Belt. This positively supports these uses in these areas, but with appropriate caveats.	No change
Support policy with amendment to recognise horse riding/carriage driving.	Ramblers Association (52420) The British Horse Society (1187597) 1157340	Agree	Proposal for minor adjustment noted	Minor modification - to include mention of horse riding/carriage driving

Policy for High Intensity Uses is incorrect as not all non-residential activities can be provided through a sequential approach or without use of Green Belt / open land.	St Albans School (1187032) 52064	Disagree	The NPPF requires an approach to these issues. Policy L15 states that high intensity uses and medium intensity type A uses will <i>only</i> be permitted within towns and villages. This positively directs these uses to these areas.	No change
Park Street Garden Village development should comply with policy on Medium Intensity uses Type A and B and also be considered for High intensity uses	St Stephen Parish Council (51804)	Agree	Cross reference Policies L12 and L13 which references provision of retail and service developments.	No change
Leisure uses in Broad Locations should be 'green' / landscaped	St Albans Civic Society (1156974)	Noted	Cross reference Policies L12, L13 and L14 which require environmental enhancements to take place for preserving and enhancing the local setting.	No change
Support policy subject to reference to travel planning requirement.	Hertfordshire County Council (837689)	Noted	Cross reference to Policy L18 which addresses transport strategy. Support noted	No change

L16 Mixed Use Opportunity Areas

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Mixed use, including high density residential, needed for Colney Fields Retail Centre and Griffiths Way	1055738	Agree	Policy L16 specifically encourages mixed use, including residential in these areas. Cross reference with L1 which relates to density.	No change
Griffiths Way retail development – should not adversely affect town centre viability/ vitality	Albans Civic Society (1156974)	Agree	Policy L16 specifically states retail and services should not adversely affect town centre vitality and viability. Cross reference with L12 which relates to the vitality and viability of town centre locations.	No change
Development at Griffiths Way has the ability to impact surrounding Listed Buildings.	Historic England (929489)	Noted	Noted - Cross reference to policy L30	No change

Colney Fields/Ridgeview should be a preferred location for retail/service use, and mixed use should not constrain this purpose. Retail planning consent on Ridgeview Lodge should be recognised.	Legal & General Investment Management (1185943) Sainsbury's Supermarkets Ltd. (376338)	Disagree	Retail/service uses are positively supported in the policy.	No change
Promote Policy L16 (ref Colney Fields Retail Centre) through joint working	Hertsmere Borough Council (51934)	Noted	There has been and will be ongoing joint working with neighbouring local authorities including Hertsmere and the South West Herts Group.	No change
Colney Fields Retail Centre – no further expansion of retail space should be permitted / should not adversely affect town centre	St Albans Civic Society (1156974) 1055738	Noted	Policy L16 states retail and services should not adversely affect town centre vitality and viability. Cross reference with L12 which relates to the vitality and viability of town centre locations.	No change
Ridgeview, London Colney / Colney Fields Retail Centre –	1055738	Disagree	Mixed use, including residential, encouraged in L16.	No change

continue residential usage				
Support the development at CCOS.	St Albans Civic Society (1156974)	Noted	Support noted	No change
CCOS development has the ability to impact on Conservation Area.	Historic England (929489)	Noted	Cross reference to Policy L30 which sets requirements for new developments in conservation areas, which must respond to the character, appearance and local distinctiveness of the area.	No change

L17 Infrastructure

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Reference to utilities infrastructure and broadband are supported	Harpenden Town Council (51870) St Stephen Parish Council (51804)	Noted	Support noted	No change
High speed broadband is essential for new development	St Stephen Parish Council (51804)	Noted	Support noted	No change
Providers will not commit resources to confirm high speed connections until outline planning permission is obtained. Should	Legal and General (1051022) CEG (1158030)	Disagree	This matter can be properly detailed through the masterplanning work.	No change

be considered rather than addressed.				
<p>There is inadequate infrastructure to support new development in the district and in particular at Broad Locations & locality. There is an existing infrastructure deficit / existing infrastructure is already under strain or overstretched such as roads, traffic, parking, cycle network, schools, NHS etc</p> <p>Specific locations include:</p> <ul style="list-style-type: none"> • District • Broad Locations and locality • Hemel Hempstead 	<p>St Albans Civic Society (1156974)</p> <p>Verulam Residents Association (1185823)</p> <p>Bricket Wood Residents Association (1186066)</p> <p>STACC (346623)</p> <p>789007</p> <p>759883</p> <p>863632</p> <p>867587</p> <p>871923</p> <p>1187590</p> <p>1185714</p> <p>1048449</p> <p>1056580</p> <p>1152471</p> <p>1158536</p> <p>1182733</p>	Disagree	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process.	No change

<ul style="list-style-type: none"> Other locations 	1182793 1183112 1184271 1184378 1184569 1184784 1185483 1185583 1185821 1185935 1186129			
There is limited evidence to support identification of broad locations. Robustness of strategy is under question.	Redbourn Parish Council (759908)	Disagree	Evidence on development strategy / site selection is available in full. Evidence is available and landowner/developer teams have confirmed deliverability of Broad Location related infrastructure.	No change
IDP / infrastructure planning is inadequate / contrary to NPPF / not up to date. It is based on lower housing allocation / does not relate	Redbourn Parish Council (759908) Hertfordshire County Council (837689) Harpenden Green Belt Association (866541)	Disagree	Work on the infrastructure evidence base has been ongoing and IDP updates will be made as required to reflect the latest position.	IDP will be updated on an ongoing basis.

to the scale of development being proposed. More evidence required / Update required.	Aboyne Residents Association (1181214) Leverstock Green Village Association (1185907) 334023 759883 1185704			
Need for update to demonstrate deliverability / viability of the LP. Unclear whether BL & planning policy are viable. NPPF para 67 & NPPG requirement.	Gladman (1187201)	Partly agree	Evidence is available and landowner/developer teams have confirmed deliverability of Broad Location related infrastructure. Updated viability report has been prepared and will be added to the website.	Updated viability report to be added to evidence on website.
Add ref to LTP4 & GTPs in IDP.	Hertfordshire County Council (837689)	Agree	IDP update to include ref to LTP4 & GTPs	IDP will be updated on an ongoing basis.
Some transport mitigation may be carried out as S278 works, add ref in IDP.	Hertfordshire County Council (837689)	Agree	IDP update to include ref to s278 works	IDP will be updated on an ongoing basis.
Robust evidence of capacity within the existing utilities network is required.	Harpenden Town Council (51870)	Noted	IDP includes reference to utilities network. Further details can be found in IDP updates / master planning work / planning application process	No change
An independent report on the impact of building	759883	Disagree	HSE safety guidance is available and HSE have been consulted by landowners. This matter can be properly	No change

within the shadow of the Buncefield oil depot is required.			detailed through the masterplanning work/ planning application process	
GB Review should be updated to demonstrate it is appropriate to consider development at NHH	Redbourn Parish Council (759908)	Disagree	Evidence on development strategy / site selection is available in full.	No change
New garden village in Hertsmere is under consideration by Hertsmere. Potential infrastructure needs for Hertsmere garden village	Hertsmere Borough Council (1182733)	Noted	It is one of a number of different options under consideration by Hertsmere. SADC has raised concerns about potential impacts. Ongoing consideration under Duty To Cooperate and joint working arrangements.	No change
A more radical and ambitious overarching transport strategy should be developed to prevent 'the residual cumulative impacts on the road network becoming severe'	1185460	Disagree	LP policy together with HCC's LTP4 provides an appropriate overarching strategy for transport.	No change

IDS does not plan for growth outside BLs.	Harpenden Green Belt Association (866541)	Disagree	IDS includes a column for 'other non-BL development'	No change
IDS is missing from list of supporting documents.	St Albans Cycle Campaign (346623)	Disagree	The IDS is included at appendix 4 of the LP.	No change
IDS does not have a detailed list of all infrastructure schemes.	Hertfordshire County Council (837689) Legal and General (1051022) CEG (1158030)	Agree	The IDS is designed to provide a one page summary overview. Master planning and IDP updates should provide more details.	No change
Masterplanning will inform the IDS	Hallam Land Management (1185998)	Noted	IDS explanatory notes deals with this.	No change
The most significant infrastructure issues for BLs relate to transport and schools	Aboyne Residents Association (1181214)	Noted	Work on the infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.	No change
For BL at NW Harpenden, onsite health facility is shown on IDS if NHS do not have existing GP capacity nearby; but it is not listed at S6viii. Requirement should be tested	Legal and General (1051022) CEG (1158030)	Noted	This matter can be properly detailed through the masterplanning work / planning application	No change

against capacity as part of master planning.				
For BL at Chiswell Green, IDS should be reviewed to remove ref to healthcare floorspace. It is too small and not necessary in view of existing healthcare capacity in the area.	Adrian Irving (Trustee) and Alban Developments Limited (1156368)	Disagree	This matter can be properly detailed through the masterplanning work/ planning application	No change
At EHHS option for one new hospital of c7ha to serve population of West Herts. On completion of the new facility in 2024/26, closure of St Albans Hospital and HH hospital would release land for other uses, although site disposals may occur before this date.	West Hertfordshire Hospitals NHS Trust (1183618)	Disagree	<p>In Press Release Oct 2018 WHHT indicated that “The proposal to develop planned care on the St Albans and Hemel Hempstead hospital sites as set out in the original SOC currently remains our preferred way forward.”</p> <p>St Albans hospital site is considered in principle to be the best location to serve the SADC population. It is also centrally located within the West Herts area.</p> <p>No substantive evidence has been submitted to justify a deliverable alternative in a sequentially preferable location to serve SADC population.</p>	No change

The latest position regarding WHHT hospital has not been taken into account and evidence needs to be updated.	Leverstock Green Village Association (1185907)	Disagree	There has been and continues to be ongoing engagement with WHHT.	No change
Hospital provision should be addressed	Wheathampstead Parish Council (51941)	Noted	Work on the infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.	IDP will be updated on an ongoing basis.
HVCCG provided detailed comments about capacity of GPs to absorb some of the proposed development and where there is a shortfall of space. New development expected to make a proportionate contribution towards additional facilities.	Herts Valleys Clinical Commissioning Group (1177790, 1183617)	Noted	Work on the infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.	IDP will be updated on an ongoing basis.
There are possible plans for a community hub in St Albans and ongoing work to look at redeveloping Harpenden	Herts Valleys Clinical Commissioning Group (1177790, 1183617)	Noted	Work on the infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.	IDP will be updated on an ongoing basis.

Memorial Hospital into a fit for purpose community site. HVCCG formula is set out to calculate the cost per dwelling of mitigating the impact that additional growth brings.				
Should include reference to environmental infrastructure to help to meet NPPF paragraph 149	Environment Agency (1147557)	Disagree	Already covered by 'green' infrastructure	No change
IDP should include an updated Flood Risk Assessment	Environment Agency (1147557)	Noted	The updated SFRA report has been added to the website.	No change
IDP should refer to Thames Basin Management Plan 2015 under strategic green infrastructure - river corridors.	Environment Agency (1147557)	Noted	Work on the infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.	IDP will be updated on an ongoing basis.
Policy should include additional references to waste water and	Thames Water (931213)	Disagree	Policies L23 and L29 address drainage and flood risk. Suggested text would be appropriate as planning conditions or informatives, rather than policy.	No change

planning conditions.				
Infrastructure must be supported by S106 & CIL	St Stephen Parish Council (51804)	Noted	Approach is consistent with national policy.	No change
Policy should reference planning obligations and be consistent with NPPF	Crown Estate (51946) Hill Residential (1158064) Crest Strategic Projects, Bloor Homes, and Mr Scott (1158079) Hallam Land Management (1185998)	Disagree	Approach is consistent with national policy.	No change
It is not lawful to remedy existing infrastructure deficits / Clarification required for contributions sought which go beyond mitigating the impact of development.	Hill Residential (1158064) Hallam Land Management (1185998)	Disagree	Approach is consistent with national policy. This matter can be properly detailed through the masterplanning work and planning applications.	No change
Need to introduce a proportional approach to infrastructure improvements over and above	Crown Estate (51946)	Disagree	Approach is consistent with national policy. This matter can be properly detailed through the masterplanning work.	No change

those required to make development acceptable				
Support policy / support delivery of infrastructure	Hertfordshire County Council (837689) Environment Agency (1147557) Crest Strategic Projects and Bloor Homes (1158079) Hunston Planning Limited (1185630) Hallam Land Management (1185998) Department for Education (1186955)	Noted	Support noted	No change
Vehicle charging points are essential for new development	St Stephen Parish Council (51804)	Partly Agree	Policies L18 and L20 require consideration of technology and infrastructure for sustainable travel.	No change
For Wheathampstead village transport connections are important. Good bus services required.	Wheathampstead Parish Council (51941)	Noted	Policy L18 requires consideration of bus related measures.	No change
The delivery of social infrastructure, e.g. community	St Albans School (1187032) 52064	Disagree	Appropriate infrastructure should be provided where required in association with new development.	No change

leisure & education, should not be burdened by infrastructure contributions.				
Concern that policy relates to infrastructure and not community facilities.	Aurora Properties Limited (1151817)	Disagree	Policy L17 relates to a wide range of infrastructure and related facilities. This includes community facilities.	No change
St Albans District is within new London Plan strategic infrastructure priority ' Midland and west coast mainline..' policy SD3 & fig 2.15	Greater London Authority (1157729)	Noted	Policy L17 recognises need for strategic infrastructure.	No change
Lack of clarity in the Dacorum IDP in relation to increased quantum of growth, joint area action plan & cross boundary working.	Leverstock Green Village Association (1185907)	Noted	Work on SADC infrastructure evidence base has been ongoing and IDP updates will reflect the latest position. Dacorum are at an earlier stage in Plan making. Appropriate liaison is ongoing.	IDP will be updated on an ongoing basis.
Underground ducting must be accessible without disturbance to road surfaces	St Stephen PC (51804)	Noted	Policy L17 deals with this.	No change

New infrastructure must be provided before or at the same time as development e.g. new schools, healthcare facilities	347648	Disagree	New infrastructure must be provided within an appropriate timescale. Work on SADC infrastructure evidence base has been ongoing and IDP updates and Masterplanning will reflect the latest position.	IDP will be updated on an ongoing basis.
Concern that the increase in traffic from development will provide the opportunity for government to introduce J8A at Redbourn	1184750	Disagree	Work on SADC infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.	IDP will be updated on an ongoing basis.

L18 Transport Strategy

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Support policy or general thrust of policy	Legal and General (1051022) Crest Strategic Projects and Bloor Homes (1158079)	Noted	Support noted	No change
The Overall Approach outlined in Policy L18 supports the aims of LTP4. However, HCC as Highways Authority would like to see	Hertfordshire County Council (837689)	Noted	This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change

strong links to the application of the transport user hierarchy in the development of transport mitigations.				
Plan should reduce car dependency and car use. Benefits will be improved public health through active travel increase and air pollution decrease and reduced congestion	1185967	Noted	Policy L18 seeks to support this approach.	No change
Modal shift should be encouraged by making sustainable travel more accessible not by making driving less accessible	Harpenden Town Council (51870)	Noted	Policy L18 seeks a balanced approach to supporting sustainable travel, while acknowledging the reality of high levels of car ownership. Aspects of this matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change
Expectation is unrealistic for modal change to buses and bicycles	867312	Disagree	Approach is consistent with national policy.	No change
There is a lack of evidence to support claim that selection of BLs are based on opportunities for sustainable travel.	Harpenden Green Belt Association (866541) 1185775 1185704	Disagree	Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. Opportunities for sustainable travel formed part of that site selection work and is available online.	No change

NPPF para 138 requires first consideration to sites well served by public transport.	Aurora Properties Limited (1151817)	Noted	Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. Opportunities for sustainable travel formed part of that site selection work and is available online.	No change
Better transport through district is required for road / cycle / footway	Wheathampstead Parish Council (51941)	Agreed	Supported by approach taken in L18. Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.	IDP will be updated on an ongoing basis.
Bullet 4 - Add ref to "Residential development will provide a reasonable level of parking for residents, in order to protect amenity for existing residents."	Legal and General (1051022)	Disagree	Policy L20 and appendix 1 deals with parking.	No change
Bullet 4 add 'at non-residential development'	Legal and General (1051022) CEG (1158030)	Disagree	Policy L20 and appendix 1 deals with parking.	No change
Bullet 6 - employers should be encouraged to produce travel plans which encourage sustainable modes of transport	Hertfordshire County Council (837689)	Noted	Policy L18 already deals appropriately with travel plans.	No change
Bullet 8 - add "secure" to "cycle parking in new developments..."	STACC (346623)	Noted	Minor modification for clarification	Minor modification to add "secure"

Bullet 12 - should refer to all roads and not just major roads.	Hertfordshire County Council (837689)	Disagree	There are clear standards in Plan policy which relates to all roads.	No change
Add new bullet - access by cycle "provision of appropriate amenities and community facilities easily accessible on foot to major new development sites"	STACC (346623)	Noted	Minor modification for clarification	Minor modification - access by cycle "provision of appropriate amenities and community facilities easily accessible on foot to major new development sites"
A more radical and ambitious overarching transport strategy should be developed to prevent the residual cumulative impacts on the road network	1185460	Disagree	Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position. A transport evidence workplan has been agreed with HCC.	No change
Main Transport Schemes (MTS) Sentence 1 - add ref to 'the funding of the main transport schemes will be agreed through the planning application process and accord with CIL regs.'	Crown Estate (51946)	Disagree	This matter can be properly detailed through the Masterplanning / planning application/ EIA process, with appropriate consultation.	No change
Support policy / support overall approach	British Horse Society (1187597)	Noted	Support Noted	No change

	Hill Residential (1158064)			
Para 1 - delete ref to 'utility and leisure' before 'trips'	Hertfordshire County Council (837689)	Noted	Minor modification for clarification	Minor modification - delete ref to 'utility and leisure' before 'trips'
Para 1, replace 'alongside primary roads' with 'alongside roads likely to have high traffic volumes'.	British Horse Society (1187597) Footpaths Secretary Ramblers Association (52420) 1157340	Disagree	There are clear standards in Plan policy. Approach is consistent with national policy.	No change
Para 2 - Replace existing wording with new. "(2) a new route between the intersection of the B487 (Hemel Hempstead Road / Redbourn Road) and the Nickey Line, running south along the East Hemel Hempstead site spine road to the A4147 in the south. This will be funded by Broad Locations S6(i), (ii) and (iii). There may also be potential to extend this route further afield to St Albans	Crown Estate (51946)	Disagree	There are clear proposals in Plan policy. Approach is consistent with national policy.	No change

and Redbourn, subject to detailed assessment”.				
Extension of green ring required to provide cycle route for London Colney children to secondary school	London Colney Parish Council (52477)	Noted	Policy L29 deals with this.	No change
Extension to green ring in villages welcomed	Wheathampstead Parish Council (51941)	Noted	Support noted – also Policy L29 deals with this.	No change
RoWIP is welcomed and links to health & wellbeing.	Wheathampstead Parish Council (51941)	Noted	Support Noted	No change
Improvement to inter-urban cycling routes should be identified in the IDP	Hertfordshire County Council (837689)	Noted	Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.	IDP will be updated on an ongoing basis.
Add ref to secure cycle parking.	1048449	Noted	Policy L18 deals with this. See also minor modification above.	No change
Priority should be given to urban cycling routes, rather than inter-urban routes.	1048449	Noted	Both are supported in L18. Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.	No change
A commitment to maintaining cycle paths is required.	STACC (346623) 1048449	Noted	Approach is consistent with national policy and regulations.	No change
Lack of coherent cycle network in the District should be acknowledged.	1048449	Disagree	Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.	No change

Better defined cycle routes required	St Stephens Parish Council (51804)	Disagree	Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.	No change
Cycle routes should contribute to free flow of traffic rather than have a negative impact	Harpenden Town Council (51870)	Noted	Both cycling and free flow of traffic are supported in L18. Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.	IDP will be updated on an ongoing basis.
Add ref to horse carriage drivers.	Footpaths Coordinator St Albans & District Footpaths Society (723340)	Disagree	Not necessary here. Approach is consistent with national policy.	No change
Preferable for horse riders to be treated separate to cycling & walking.	Hertfordshire County Council (837689)	Disagree	There are clear proposals in Plan policy. Approach is consistent with national policy.	No change
Preparation and implementation of Local Cycling and Walking Infrastructure Plans (LCWIPs) should be included.	1048449	Disagree	Overall support for cycling and walking in L18. LCWIPs not within Plan remit.	No change
Additional bus routes in all BLs will be essential and must be included in travel plans.	Hertfordshire County Council (837689)	Noted	Overall support for bus provision in L18 and S6. This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
Improved roads will result in more reliable bus services & help mode shift	Colney Heath Parish Council (51891) London Colney Parish Council (52477)	Noted	Overall support for bus provision in L18	No change

More buses required / Improved bus service welcomed. For eg to connect villages & urban centres.	St Albans Labour Group (1183933) Wheathampstead Parish Council (51941) St Stephens Parish Council (51804) 1056580	Noted	Overall support for bus provision in L18	No change
Consider bus hubs which allows villagers to cycle or drive to a local site for access to bus services	Colney Heath Parish Council (51891)	Noted	Overall support for bus provision in L18.	No change
Reliance on buses is not credible for e.g funding cutbacks in recent years.	Aboyne Residents Association (1181214) 1152471	Noted	Overall support for bus provision in L18. National approach to bus funding not within planning remit.	No change
Welcome improvement to Abbey Line. More detail needed.	Abbey Flyer Users Group (1156861) St Albans Labour Group (1183933) St Stephens Parish Council (51804) 1185775 867068	Noted	Support Noted	No change

Agreement is required from other parties to make improvements.	867068	Noted	Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.	No change
Abfly have commissioned a detailed feasibility study from independent expert railway consultants. Part one of the study indicates that the capital costs of a passing loop will be considerably less than previous estimates and that there is a sound business case for investment in upgrading the Abbey Line.	Abbey Flyer Users Group (1156861)	Noted	Requirement for improved Abbey Line service in S6.	No change
London Northwestern have plans to upgrade the Abbey Line which are different to policy.	1181750	Noted	Requirement for improved Abbey Line service in S6. Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.	No change
All mention of rail links to be explored- abbey line or midland mainline should be excluded.	1055738	Disagree	Requirement for improved Abbey Line service in S6. Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.	No change

By reinstating the link to the Abbey line freight trains would have additional access to the west coast main line and midland main line.	1186081	Noted	Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.	No change
This is not a committed rail industry scheme and delivery would be subject to a feasibility study and funding, together with all necessary consents. In addition we cannot support any increase in frequency along the Abbey line unless the level crossing at Cotton Mill Lane is closed.	Network Rail (1184616)	Noted	Noted requirements for feasibility. Long lead-in time acknowledged in timeline for delivery. No evidence supplied to support closing of Cotton Mill Lane crossing. Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.	No change
Decked car park at Harpenden Station – Delete reference / Priority should be given to improving accessibility by sustainable modes.	Hertfordshire County Council (837689) STACC(346623)	Disagree	Policy L18 seeks a balanced approach to supporting sustainable travel, while acknowledging the reality of high levels of car ownership.	No change
Improved accessibility to Harpenden station by public transport is welcomed	St Albans Labour Group (1183933)	Noted	Support noted	No change

Better cycle access and storage is required for Harpenden Railway Station.	1185775	Noted	Supported by approach in L18.	No change
Query if Thameslink trains will be unable to cope with extra commuters from new development plus impact of railfreight scheme.	St Albans Labour Group (1183933) 1185714	Noted	Additional planned rail capacity has been noted. Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.	No change
A new London Colney station would be an aspirational and realistic improvement and meet sustainability needs	1183210	Noted	Sustainable rail transport improvements sought under S6 xi.	No change
Detailed traffic mitigation measures for Broad Locations should be included in the Transport Assessment accompanying any planning application.	Hertfordshire County Council (837689)	Noted	Required by L18	No change
Due to the lack of Modelling work it is unclear at the current time what highway improvements will	Hertfordshire County Council (837689)	Noted	A transport evidence workplan has been agreed with HCC.	No change

be required for the Local Plan.				
Extra highway capacity is not supported unless required to enable new development.	Hertfordshire County Council (837689)	Noted	Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position. A transport evidence workplan has been agreed with HCC.	No change
Improvement to road infrastructure is required in advance of new development	Colney Heath Parish Council (51891)	Noted	Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.	No change
Junction improvement required. Junction re-design should explore improvement for safety of cyclists and pedestrians and increased bus priority.	Hertfordshire County Council (837689) STACC (346623) St Albans Labour Group (1183933) 1183210	Noted	Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position. A transport evidence workplan has been agreed with HCC.	No change
Junction Improvement will increase traffic	Redbourn Parish Council (759908)	Noted	This matter can be properly detailed through the Masterplanning/ planning application / EIA process, with appropriate consultation.	No change
Para 4 - add ref to new residential and non-residential developments	Hertfordshire County Council (837689)	Disagree	Policy L20 deals with this	No change
Provision of recharge points in St Albans needs further investigation to deliver extra provision.	St Albans Civic Society (1156974)	Disagree	Policy L18 & L20 deals with this	No change

A ring road for the city with infrastructure improvements at bottlenecks is wanted. It would traffic calm the entire city at a budget cost.	1181750	Disagree	Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position. A transport evidence workplan has been agreed with HCC.	No change
A414 upgrade needs to be completed as a matter of urgency. The proposed 'hamburger' style roundabout at London Colney North needs to be an up and over as does Park Street roundabout.	1186081	Disagree	Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position. A transport evidence workplan has been agreed with HCC.	No change
A414 proposals will impact on the other routes crossing the A414 in St Albans area in London Colney and Colney Heath	1186046	Noted	Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position. A transport evidence workplan has been agreed with HCC.	No change
Welcome policy	STACC (346623)	Noted	Support Noted	No change
Add text "Residential development will provide a reasonable level of parking for residents, in order to	CEG (1158030)	Disagree	Policy L20 & appendix 1 provides clear standards.	No change

protect amenity for existing residents.”				
It is considered that support for car-share/shared mobility options could be mentioned.	Hertfordshire County Council (837689)	Disagree	Policy L20 & appendix 1 deals with this.	No change
More park and ride is required	Colney Heath Parish Council (51891)	Disagree	Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.	No change
Parking impact assessment for town centre and transport hubs required	867312	Disagree	Policy L20 & appendix 1 provides clear standards.	No change
Increased parking is needed for eg at Harpenden, St Albans, local roads.	Aboyne Residents Association (1181214) Harpenden Town Council (51870) Verulam Residents Association (1185823)	Disagree	Policy L20 & appendix 1 provides clear standards.	No change
Policies on car parking provision and management can have a direct impact on the uptake of sustainable modes and need to be considered in a comprehensive manner, looking at	Hertfordshire County Council (837689)	Noted	Policy L18 seeks a balanced approach to supporting sustainable travel, while acknowledging the reality of high levels of car ownership.	No change

both on and off street facilities, pricing and availability.				
HCC would prefer that Travel Plans are sought through the Section 106 process which enables the county council to seek a monitoring fee.	Hertfordshire County Council (837689)	Noted	This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change
it is unduly excessive to expect travel plans and air quality statements from all development of 10 + dwellings	RF Sinclair & Sons (1058251) 52064	Disagree	Policy L18 sets out a clear approach, supported by the NPPF	No change
To comply with NPPF para 111 amend policy to say "All developments that will generate significant amounts of movement should be required to provide a Travel Plan".	Crest Strategic Projects and Bloor Homes (1158079)	Disagree	Policy L18 sets out a clear approach which is consistent with national policy.	No change
Travel plan requirements should be in line with the latest HCC guidance.	Hertfordshire County Council (837689)	Noted	This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change
School travel plans should apply to all	1181750	Disagree	Policy L18 sets out a clear approach	No change

schools, new and existing; public and private.				
<p>There is no adequate, up to date evidence about traffic movement and traffic congestion. Current evidence relates to a lower level of growth than in the LP. IDP is out of date / COMET does not cover all relevant roads.</p> <p>More evidence required for specific locations such as:</p> <ul style="list-style-type: none"> • Broad Locations & locality • St Albans central area • A414 corridor • Roads close to Luton eg M1, A1081, B653, A5183/B4540 • Other eg district wide 	<p>Redbourn Parish Council (759908)</p> <p>Aboyne Residents Association (1181214)</p> <p>Leverstock Green Village Association(1185907)</p> <p>North Herts District Council (1185674)</p> <p>Luton Borough Council (861967)</p> <p>Welwyn Hatfield Borough Council (52397)</p> <p>867312</p> <p>Central Bedfordshire Council (861963)</p> <p>North Herts District Council (1185674)</p> <p>Bricket Wood Residents Association (1186066)</p>	Noted	<p>Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.</p> <p>A transport evidence workplan has been agreed with HCC.</p> <p>Some matters can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.</p>	Update to IDP

	<p>Harpenden Green Belt Association (866541)</p> <p>334023</p> <p>1185714</p> <p>1144419</p>			
<p>Assurance required prior to submission that transport modelling will not flag up significant issues.</p>	<p>London Colney Parish Council (52477)</p>	<p>Noted</p>	<p>No 'showstoppers' identified. Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.</p> <p>A transport evidence workplan has been agreed with HCC.</p>	<p>No change</p>
<p>Some nearby councils would like a better understanding of potential cross-boundary issues. Eg Central Beds, N Herts, Luton</p>	<p>Luton Borough Council (861967)</p> <p>Central Bedfordshire Council (861963)</p> <p>North Herts District Council (1185674)</p>	<p>Noted</p>	<p>Addressed on an ongoing basis through DC arrangements.</p>	<p>No change</p>

<p>Transport evidence for some BLs shows that there are no highway constraints preventing development.</p>	<p>Crest Strategic Projects and Bloor Homes (1158079) Legal and General (1051022) Adrian Irving and Alban Development Ltd (1156368)</p>	<p>Noted</p>	<p>Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position. A transport evidence workplan has been agreed with HCC. Some matters can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.</p>	<p>No change</p>
<p>There is inadequate transport infrastructure to support new development in the district and in particular at Broad Locations & locality. There is an existing infrastructure deficit / existing infrastructure is already under strain or overstretched; such as roads; parking; bus; rail; cycle network. Specific locations include:</p>	<p>Redbourn Parish Council (759908) Ellenbrook Area Residents Association Committee (1185802) Colney Heath Parish Council (51891) Wheathampstead Parish Council (51941) St Albans Labour Group (1183933) 1184750 1185460 1185704 1183210</p>	<p>Disagree</p>	<p>Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position. A transport evidence workplan has been agreed with HCC. Some matters can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.</p>	<p>No change</p>

<ul style="list-style-type: none"> Broad Locations and locality 	1185744			
	1184864			
<ul style="list-style-type: none"> Colney Heath 	1187008			
<ul style="list-style-type: none"> Southern part of St Albans, in particular around King Harry roundabout and King Harry Lane 	1184839			
	1158536			
	863091			
	1184271			
<ul style="list-style-type: none"> Proposed new school at London Road 	1182480			
	1185244			
<ul style="list-style-type: none"> Other eg district wide 	1185478			
	1185481			
	1185482			
	1185479			
	1185633			
	1185640			
	871923			
	1182697			
	1185469			
	1184378			
	347648			
	867587			

	1184567 1183112 1055683 840795 1184569 1153741 1187590 1185714 1182793 1182518 1185971 760045 1185821 1185728			
Housing at PSGV will frustrate delivery of an important part of the national SFRI network, contrary to government policy objectives.	DB Cargo (1184888) Freight on Rail (1187503) Network Rail (1184616)	Noted	Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy. The main site owner has promoted the site as available and deliverable for housing. Considerations have taken into account the existing planning permission for an alternative use and other relevant factors.	No change

<p>Radlett is v important to help improve access to rail services in London and the wider Southeast. Radlett location is exceptionally good for rail freight. It is able to serve a large proportion of customers in the region. If Radlett is not delivered it will be a major setback to the industry.</p>	<p>Freight on Rail (1187503) GB Railfreight (1187613)</p>	<p>Noted</p>	<p>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.</p> <p>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p> <p>The main site owner has promoted the site as available and deliverable for housing. Considerations have taken into account the existing planning permission for an alternative use and other relevant factors.</p>	<p>No change</p>
<p>Opportunities to develop SRFI in southern England are very few.</p>	<p>DB Cargo (1184888) GB Railfreight (1187613)</p>	<p>Noted</p>	<p>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.</p> <p>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p> <p>The main site owner has promoted the site as available and deliverable for housing. Considerations have taken into account the existing planning permission for an alternative use and other relevant factors.</p>	<p>No change</p>
<p>SRFI is important to secure modal shift for freight to be transported by rail rather than road. Modal shift cannot</p>	<p>DB Cargo (1184888) Freight on Rail (1187503) GB Railfreight (1187613)</p>	<p>Noted</p>	<p>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.</p> <p>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p>	<p>No change</p>

be achieved without SRFIs. The likely saving in road miles is immense. A daily service would avoid 18 million truck miles.			The main site owner has promoted the site as available and deliverable for housing. Considerations have taken into account the existing planning permission for an alternative use and other relevant factors.	
SRFI is supported.	DB Cargo (1184888) Freight on Rail (1187503) GB Railfreight (1187613) Network Rail (1184616)	Noted	Support Noted. Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy. The main site owner has promoted the site as available and deliverable for housing. Considerations have taken into account the existing planning permission for an alternative use and other relevant factors.	No change
1. Support policy /policy sound	Harpenden Town Council (51870) Hunston (1185630) St Stephens Parish Council (51804) STACC (346623) Central Beds (861963)	Noted	Support Noted	No change
Policy is not clearly written. Formatting and wording should	CEG (1158030) LRM Planning Limited obo Hallam Land	Disagree	Policy L18 sets out a clear approach	No change

be amended to distinguish between the formal policy and the reasoned justification.	Management (1185998)			
Policy is difficult to understand in relation to BLs.	Hallam Land Management Limited(1185998)	Disagree	Policy L18 sets out a clear approach	No change
For Nickey Line, action is required to improve safety at crossing. Eg regular maintenance of verge; speed limits on approaching roads; crossing upgrade; reposition of crossing at roundabout.	Friends of Nickey Line (1184312)	Noted	<p>The Nickey Line footpath / cycleway is an important landscape, commuting and recreational route feature. As it will need to be crossed there will inevitably be some localised adverse impacts. There will also be considerable opportunities for enhancement. Masterplanning will consider damage mitigation, integration and maximising opportunities within and beyond the development.</p> <p>Some matters can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.</p> <p>Some elements are not within planning remit.</p>	IDP will be updated on an ongoing basis.
Greater housing density should be provided near railway stations and bus routes.	1158258	Disagree	<p>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.</p> <p>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p>	No change
Napsbury park has access to great network of major roads & is 10 mins drive from mainline stations.	Countrywide Planning (1186783)	Noted	<p>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.</p> <p>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p>	No change

Planner should read RAC report BBC News - Young couples 'trapped in car dependency'	1187504	Noted	Issue acknowledged. Policy L18 seeks a balanced approach to supporting sustainable travel, while acknowledging the reality of high levels of car ownership.	No change
We would like to see more car clubs.	STACC (346623)	Noted	Policy L18 sets out a clear approach	No change
Lower Luton Road is unsafe for journey route to school	Wheathampstead Parish Council (51941)	Noted	Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position. A transport evidence workplan has been agreed with HCC. Some matters can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
Transport connections are important to villages eg Wheathampstead	Wheathampstead Parish Council (51941)	Noted	Policy L18 sets out a clear approach	No change
Roads and Infrastructure should be delivered before or at the same time as new developments.	1185945	Noted	Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position. A transport evidence workplan has been agreed with HCC. Some matters can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
Enforcement should be used if HGV's stray from primary roads.	1185945	Noted	Not within planning remit	No change

At EHH, rise in air pollution will impact people who would potentially be living and working next to a motorway.	1144419	Noted	Issue and approach identified in S6	No change
Before deciding on quantity and timescales for development - all transport issues should be addressed.	1185704	Noted	<p>LP required to be based on proportionate evidence. Not all detailed issues will reasonably be fully worked through at this stage. Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.</p> <p>A transport evidence workplan has been agreed with HCC.</p> <p>Some matters can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.</p>	No change
Opportunities have been missed to promote sustainable travel. Suggested additions to policy are listed in full response.	1153802	Disagree	Policy L18 sets out a clear approach	No change
There are no traffic considerations and No parking improvements	863632	Disagree	Policy L18, L19, L20, Appendix 1 and IDP set out a clear approach	No change

L19 - Highways / Access Considerations for New Development

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Plan is not based on up to date & relevant evidence about transport movement and traffic congestion.	Redbourn Parish Council (759908) Harpenden Society (1156761) Aboyne Residents Association (1181214) Leverstock Green Village Association (1185907)	Disagree	Work on the infrastructure evidence base has been ongoing and IDP updates will reflect the latest position. A transport evidence workplan has been agreed with HCC.	IDP will be updated on an ongoing basis.
Scale of growth and distribution of development must be properly assessed and considered in transport terms.	Leverstock Green Village Association (1185907)	Noted	Work on the infrastructure evidence base has been ongoing and IDP updates will reflect the latest position. A transport evidence workplan has been agreed with HCC.	IDP will be updated on an ongoing basis.
Provision for setting down/picking up in a safe and acceptable manner can be a challenge. Eg St Albans School. Aspects of policy needs to be reworked.	St Albans School (1187032)	Disagree	Policies L19 sets out a clear approach	No change

More clarity required including implementation and enforcement. Eg school coaches in George St & Fishpool Street	St Albans Civic Society (1156974)	Disagree	Policies L19 sets out a clear approach	No change
For education facilities and day nursery/creches, setting down/picking up should be minimum of 300m from entrance. Illegal parking in the vicinity of these uses must be enforced.	STACC (346623)	Disagree	Policies L19 sets out a clear approach	No change
Support policy	Footpaths Secretary Ramblers Association (52420)	Noted	Support noted	No change
Criteria (i) add ref to 'carriage drivers'	British Horse Society (1187597)	Disagree	Policies L19 sets out a clear approach, including "horse-riders and other non-motorised users"	No change
For para 3, add ref to horse rider and carriage drivers. / Add more refs to horse rider and carriage drivers.	Footpaths Secretary Ramblers Association (52420) British Horse Society (1187597) 1157340	Disagree	Policies L19 sets out a clear approach	No change

For non-motorised users, improve crossings where existing routes cross busy roads.	British Horse Society (1187597)	Disagree	Policies L19 sets out a clear approach	No change
Local RoW & local foot/cycle paths require connection to local amenities such as shops and schools.	STACC (346623)	Agree	Minor modification would be a useful clarification	Minor modification – “including to local amenities such as shops and schools” to L19 para 4
In (ii) it should not require assessment of 'all alternatives and their cost'. It should relate to reasonable alternatives where appropriate.	CEG (1158030) Legal and General (1051022)	Partly Agree	Minor modification to add word “reasonable” would be a useful clarification	Minor modification – add “reasonable”
Direct routes from EHH to St Albans via Bluehouse Hill /Verulam Road / Folly Lane to city station. This route is virtually gridlocked with long tailbacks in the morning	Aboyne Residents Association (1181214)	Noted	Work on the infrastructure evidence base has been ongoing and IDP updates will reflect the latest position. A transport evidence workplan has been agreed with HCC. Additional work may be detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	IDP will be updated on an ongoing basis.

Hemel Hempstead crossing - problem with speed and traffic volumes. Suggested measures for speed limits and crossing upgrade.	Friends of the Nickey Line (1184312)	Noted	As above	IDP will be updated on an ongoing basis.
A5183 Redbourn Bypass / B487 Redbourn Lane Roundabout Crossings - detailed measures suggested for speed limit, crossing upgrade & verge management.	Friends of the Nickey Line (1184312)	Noted	As above	IDP will be updated on an ongoing basis.
A1081, Ambrose Lane & Lower Luton Road are a concern as they will be affected by new development in a severely adverse way.	Harpenden Society (1156761) Wheathampstead Parish Council (51941)	Noted	As above	IDP will be updated on an ongoing basis.
East and North Hemel Hempstead Broad Locations - traffic impact on	Leverstock Green Village Association (1185907) Redbourn Parish Council (759908)	Noted	As above	IDP will be updated on an ongoing basis.

B487 Redbourn Road				
Must plan for traffic impediments to retail in the city centre	Aboyne Residents Association (1181214) 867312	Noted	As above	IDP will be updated on an ongoing basis.
N St Albans & E St Albans broad locations - Tinkering with junctions will not enable the network cope with the current traffic levels let alone the increased traffic generated by 2,500 new homes	867587	Noted	As above	IDP will be updated on an ongoing basis.
N St Albans BL - Increased road widths are required. Roads are gridlocked.	840795	Noted	As above	IDP will be updated on an ongoing basis.
BL Chiswell Green - inadequate narrow local roads were not designed for this level of vehicle increase and they are unsuitable to	1158536 1184271	Noted	As above	IDP will be updated on an ongoing basis.

accommodate any proposed development.				
East and North Hemel Hempstead Broad Locations - New developments will have a disproportionate and unsustainable impact on access from/to the M1 from/through/to Redbourn and Harpenden.	1153741	Noted	As above	IDP will be updated on an ongoing basis.
Concern regarding introduction of new J8A at Redbourn.	1184750	Noted	As above	IDP will be updated on an ongoing basis.
BL East Hemel /Nickey Line - developers have indicated a number of improvements to the Nickey Line including crossings & all weather surfacing.	Friends of the Nickey Line (1184312)	Noted	As above	IDP will be updated on an ongoing basis.

<p>BL - Park Street Garden Village requires a significantly improved road network and traffic management schemes. Consideration should be given to a Park & Ride Scheme.</p>	<p>1185744</p>	<p>Noted</p>	<p>As above</p>	<p>IDP will be updated on an ongoing basis.</p>
<p>BL S6v E St Albans - Primary Network Route (PNR) (The A1057) is failing to cope as it is, the additional vehicles coming from these developments will choke this route to a standstill. The increased traffic will also increase the noise pollution and air pollution.</p>	<p>Ellenbrook Area Residents Association Committee (1185802)</p>	<p>Noted</p>	<p>As above</p>	<p>IDP will be updated on an ongoing basis.</p>
<p>BL EHH - Not enough work seems to have been done on defining the</p>	<p>1185704</p>	<p>Noted</p>	<p>As above</p>	<p>IDP will be updated on an ongoing basis.</p>

required changes to the road network to cope with the extra cars (+ buses and lorries presumably. Before deciding on quantity and timescales for development - all transport issues should be addressed				
Redbourn Lane Car Park - detailed measures suggested for maintenance, improvement to entrance and larger size.	Friends of the Nickey Line (1184312)	Noted	Not within planning remit.	No change
Policy support/ various policy aspects welcomed	Barton Wilmore obo Bloor Homes (1158079) British Horse Society (1187597)	Noted	Support noted	No change
Reliance on buses is not credible.	Aboyne Residents Association (1181214)	Disagree	Policy L18 deals with this. Buses are not 'relied on' but are an important part of the sustainable transport approach	No change
Parking implications for city centre must be dealt with	Aboyne Residents Association (1181214) 867312	Noted	Policy L18, L20 & Appendix 1 deals with this.	No change

For key considerations in assessing new development, NPPF paras 108-111 are relevant.	Hunston (1185630)	Noted	Approach is consistent with national policy.	No change
LTP4 / GTP outline potential schemes for EHH relate to lower growth assumptions. They will have some disbenefits.	Leverstock Green Village Association (1185907)	Noted	Work on the infrastructure evidence base has been ongoing and IDP updates will reflect the latest position on LTP4 & GTPs.	IDP will be updated on an ongoing basis.
The formatting and wording should distinguish between policy and 'reasoned justification'.	CEG (1158030)	Disagree	Policy L19 sets out a clear approach	No change
Criterion (iii) gives weight to advisory documents. It should be recognised that material considerations may justify an alternative approach.	Hallam Land Management Limited (1185998)	Noted	Policy L19 sets out an appropriate approach	No change
Policy says new roadside services will be refused in GB. This is too negative and	RF Sinclair & Sons (1058251) 52064	Disagree	Policy L19 sets out a clear approach.	No change

needs to be reworked.				
In BLs, residential roads should have 20mph limit.	STACC (346623) 1048449	Noted	This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change
For Wheathampstead village, transport connections are paramount. Better transport required throughout district with connectivity by road/cycle/footpath between settlements.	Wheathampstead Parish Council (51941)	Noted	Policy 18 deals with this.	No change
Add ref to railway level crossing. Detailed wording suggested.	Network Rail (1184616)	Disagree	No evidence supplied to justify the approach suggested.	No change
Amend para 2 to reflect the NPPF 2018 to ' <u>A Travel and Traffic Assessment and an Air Quality Assessment</u> will be required for major developments.'	Hertfordshire County Council (837689)	Noted	Minor modification will provide helpful clarification.	Minor modification to reflect minor updated wording in NPPF - ' <u>A Travel and Traffic Assessment and an Air Quality Assessment</u> will be required for major developments'.

L20 – New Development Parking Guidance and Standards

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Protection of existing parking spaces is contrary to switch to sustainable travel. Existing parking spaces could provide local amenity space or cycle parking instead.	St Albans Cycle Campaign (346623)	Disagree	A realistic approach supporting sustainable travel whilst acknowledging the ongoing role of the car has been taken.	No change
NPPF & NPPG support reduced levels of parking	Hertfordshire County Council (837689)	Noted	Policy L20 & appendix 1 sets out a clear approach	No change
Low car / no car parking provision is supported in highly accessible areas and where additional car trips would lead to adverse impact on highway network e.g. congested areas / junctions at capacity nearby. Car share supported.	Hertfordshire County Council (837689)	Noted	Policy L20 & appendix 1 sets out a clear approach	No change

Provision needs to be made for the disabled persons parking spaces	Hertfordshire County Council (837689)	Noted	Policy L20 & appendix 1 sets out a clear approach	No change
Clarify the parking standards for visitors and unallocated parking in policy and appendix 1	Legal and General (1051022)	Disagree	Policy L20 & appendix 1 sets out a clear approach	No change
Appendix 1 standards will lead to an over-provision of parking spaces outside of city centres but in highly accessible locations e.g. How Wood	Hilton House Properties Limited (1057476)	Disagree	A realistic approach supporting sustainable travel whilst acknowledging the ongoing role of the car has been taken. Policy L20 & appendix 1 sets out an appropriate approach	No change
Broad Location at Chiswell Green will worsen parking issues	1187590	Disagree	A realistic approach supporting sustainable travel whilst acknowledging the ongoing role of the car has been taken. Policy L20 & appendix 1 sets out a clear approach	No change
Policy opposes the loss of garage courts, even though the Council's is delivering affordable housing through	52064	Disagree	This matter is appropriately addressed by the overall LP policy framework	No change

making better use of such sites.				
The whole issue of the older residents and their need always to use a car to shop has been ignored	760045	Disagree	A realistic approach supporting sustainable travel whilst acknowledging the ongoing role of the car has been taken. Policy L20 & appendix 1 sets out a clear approach	No change
Government requires 1.5 spaces per unit.	760045	Disagree	Misstatement of Government policy. Policy L20 & appendix 1 sets out an appropriate approach	No change
The plan is derelict in its approach to parking. This is the number one problem of the district / Sufficient parking is required.	863632 1144419	Disagree	A realistic approach supporting sustainable travel whilst acknowledging the ongoing role of the car has been taken. Policy L20 & appendix 1 sets out a clear approach	No change
Need to demonstrate that parking in town centres and transport hubs, e.g. train stations, can cope with the needs of a higher population.	867312	Noted	Work on the infrastructure evidence base has been ongoing and IDP updates will reflect the latest position	IDP will be updated on an ongoing basis.
Proposed residential parking standards are onerous.	Adrian Irving and Alban Developments Ltd (1156368)	Disagree	A realistic approach supporting sustainable travel whilst acknowledging the ongoing role of the car has been taken. Policy L20 & appendix 1 sets out a clear approach	No change

Cambridge City Council Local Plan appendix D & Cycle Parking Guide are considered to be best practice. SADC proposed standards at appendix 1 falls short of this requirement. Bring it fully into line with Cambridge guidance. Numerous changes suggested to LP appendix 1.	St Albans Cycle Campaign (346623) 1048449	Disagree	Policy L20 & appendix 1 sets out a clear approach. Cambridge Cycle Parking Guide is already directly referenced in L20. However Cambridge has an exceptionally large student and young person population that means some aspects relating to cycling are not directly comparable.	No change
Clarify the cycle parking standards	Legal and General (1051022)	Disagree	Policy L20 & appendix 1 sets out a clear approach	No change
Reference to other authority for cycle standards does not respond to local circumstances	Hilton House Properties Limited, (1057476)	Disagree	Cambridge is an acknowledged leader with regard to supporting cycling. Policy L20 & appendix 1 sets out an appropriate approach	No change
Plan is very weak on cycle parking	1185967	Disagree	Policy L20 & appendix 1 sets out a clear approach	No change
Specific policy wording suggested	Crown Estate (51946) Hertfordshire County Council (837689)	Disagree	Policy L20 & appendix 1 sets out a clear approach	No change

Size of parking bays should take account of the fact that cars have got larger.	St Albans Civic Society (1156974)	Disagree	Policy L20 & appendix 1 sets out a clear approach	No change
East Hemel Hempstead (Central) should be in parking zone 3.	Crown Estate (51946)	Disagree	Policy L20 & appendix 1 sets out an appropriate approach	No change
2002 parking policy should be revised to reflect new best practice	St Albans Cycle Campaign (346623)	Disagree	Policy L20 & appendix 1 sets out a clear approach	No change
Elements of the policy are unclear	Legal and General (1051022)	Disagree	Policy L20 & appendix 1 sets out a clear approach	No change
Requirement for vehicle charging points is not very aspirational and should be increased.	Hilton House Properties Limited (1057476) 1185525	Disagree	Policy L18, L20 & appendix 1 sets out a clear approach	No change
Car share parking is not going to work.	1144419	Disagree	Policy L20 & appendix 1 sets out a clear approach	No change

L21 – Education

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Policy should allow the possibility of delivery of school by developers	Crest Strategic Projects and Bloor Homes (1158079)	Noted	Policy L21 /IDP sets out an appropriate approach.	No change
Where school capacity is higher than BL population requires, transfer site at nil cost should be for a proportion of the school only	Crown Estate (51946)	Noted	Policy L21 /S6 / IDP sets out an appropriate approach	No change
'Transferred to education authority at nil cost' may prevent flexibility to deliver bespoke educational facilities	Hunston Planning Limited (1185622)	Disagree	Policy L21 /IDP sets out an appropriate approach	No change
Sites to be transferred to Local Education Authority will benefit HCC in respect of land values. May	1185775	Disagree	Policy L21 /IDP sets out an appropriate approach	No change

conflict with government policy re free schools				
New schools must be provided in a timely manner, before or at the same time as development.	Colney Heath Parish Council (51891) London Colney Parish Council (52477)	Noted	Policy L21 /IDP sets out an appropriate approach. Timing of school provision will be decided during Masterplanning/planning application processes.	No change
A full business case to show that the "appropriate contribution" from the developers will be both sufficient in its own right and supported by other funding.	1153742	Noted	Policy L21 /IDP sets out an appropriate approach. Exact nature of school provision will be decided during Masterplanning/planning application processes.	No change
Support policy / support delivery of new schools	London Colney Parish Council (52477) St Stephen Parish Council (51804)	Agree	Support noted	No change
Add ref to each new school	CEG(1158030)	Noted	Add reference in IDP	IDP will be updated on an ongoing basis.
Site requirement should accord with BB103 or BB104	Department for Education (1186955)	Noted	Add reference in IDP	IDP will be updated on an ongoing basis.
Do not refer to state funded education	Crown Estate (51946)	Disagree	Policy L21 / IDP sets out a clear approach	No change

<p>Broad Locations: At BL - North St Albans new school playing fields will serve a community joint use function but not designated Local Green Space. Covenants would restrict use of land.</p>	<p>Hallam Land Management Limited (1185998)</p>	<p>Disagree</p>	<p>Policy L21 sets out a clear approach – when not in the Green Belt, new school playing fields will be designated as Local Green Space.</p>	<p>No change</p>
<p>Policy seeks to prevent future sell off of school playing fields by confirming community value</p>	<p>Hunston Planning Limited(1185622)</p>	<p>Noted</p>	<p>Support for Policy L21 which addresses this already is noted.</p>	<p>No change</p>
<p>School development in GB is contrary to NPPF</p>	<p>Harpenden Green Belt Association (866541) Historic England (929489) Leverstock Green Village Association (1185907) St Albans Civic Society (1156974) 1185714</p>	<p>Disagree</p>	<p>Policy L21 /S3 / S6 sets out an appropriate approach</p>	<p>No change</p>
<p>Remove school site &/or school built zone from GB. Show school</p>	<p>Department for Education (1186955)</p>	<p>Disagree</p>	<p>Policy L21 /S3 / S6 sets out an appropriate approach</p>	<p>No change</p>

boundary on map.	Hertfordshire County Council (837689) Crown Estate (51946)			
No difference between building a new primary school at BL and building one on the Townsend site.	Chair of Governors Townsend School (1186028)	Disagree	Concentrating development in larger sites that can create new communities and deliver infrastructure – including schools - is a key part of the development strategy. Cross reference S6 vi.	No change
Blocks of GB adjacent to BLs at NW Harpenden, E St Albans, EHHN & London Colney is erroneous. They should be included within broad locations and designated as local green space.	1055738	Disagree	Policy L21 /S3 / S6 sets out an appropriate approach	No change
Add ref to the historic environment	Historic England (929489)	Disagree	Policy L30 deals with this	No change
Object to new school in GB due to lack of exceptional circumstances / very special circumstances	CPRE (872572) Ramblers Association (52420)	Disagree	Policy L21 /S3 / S6 set out a clear approach	No change

Land off London Road (LOLR) unsuitable and unjustified. Landowners do not support therefore it is not deliverable.	Beechwood Homes (1123837) Gorhambury Estates Company Ltd (375996) Verulam Golf Club (1185810) 1185565 1186015 1185761	Disagree	School site allocations based on evidence and work with HCC. Work on the education infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.	No change
Support housing at land off London Road site.	Verulam Golf Club (1185810) 1186015	Disagree	Policy S4 deals with housing requirement	No change
Add ref to protect the historic environment	Historic England (929489)	Disagree	Policy L30 deals with this	No change
Support policy	St Albans Labour Group (1183933)	Noted	Support noted	No change
London Road is congested & the junction of London Road/Verulam Industrial Estate, particularly with the railway bridge being so close and would become very dangerous. Infrastructure to support cycling	1185728	Noted / Disagree	Policy L18/L19 deals with this. Site selection in part because of proximity to areas where primary school pupils live/will live and will be able to access by walking.	No change

and walking is difficult, the lives of school children at risk if this proposal goes ahead. There are few primary age children within walking distance of the land which means any pupil will travel by car.				
HCC request an additional school allocation is required at Ariston site for state funded primary education.	Hertfordshire County Council (837689)	Noted / Disagree	School site allocations based on evidence and work with HCC. Work on the education infrastructure evidence base has been ongoing and IDP updates will reflect the latest position. HCC still working on evidence base regarding intended location for school and approach to provision.	No change
Do not support school at Ariston Site	FOBH (1181795)	Noted	School site allocations based on evidence and work with HCC. Work on the education infrastructure evidence base has been ongoing and IDP updates will reflect the latest position. HCC still working on evidence base regarding intended location for school and approach to provision.	No change
Add ref to appropriate local infrastructure to encourage cycling and walking to school.	Footpaths Coordinator St Albans & District Footpaths Society (723340) British Horse Society (1187597)	Disagree	Policy L18 deals with this	No change

	London Colney Parish Council (52477) STACC (346623) Ramblers Association (52420)			
Add ref to travel plan	British Horse Society (1187597) Ramblers Association (52420)	Disagree	Policy L18 deals with this.	No change
Lack of evidence base for education / IDP update required	Department for Education (1186955) Redbourn Parish Council (759908) 1185583	Noted	Work on the education infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.	No change
Policy L21 is not justified or consistent with national policy.	Harpenden Green Belt Association (866541)	Disagree	Approach is consistent with national policy.	No change
Include ref to special education need.	St Albans Labour Group (1183933)	Disagree	Included in overall approach to school provision	No change
Existing schools are already oversubscribed / strain on existing schools by new development, especially at Broad Locations.	1185469 1185714 1184569 1184784 1153741	Noted	Concentrating development in larger sites that can create new communities and deliver infrastructure – including schools - is a key part of the development strategy.	No change

More primary school places are required at Chiswell Green / Park Street	St Stephen Parish Council (51804)	Noted	Work on the education infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.	IDP will be updated on an ongoing basis.
Secondary school required at PSGV	St Stephen Parish Council (51804)	Noted	Policy S6 xi provides for this.	No change
Concern about lack of new secondary places for St Albans	St Albans Labour Group (1183933)	Disagree	Concentrating development in larger sites that can create new communities and deliver infrastructure – including schools - is a key part of the development strategy.	No change
Secondary places for Kimpton are required	North Herts District Council (1185674)	Disagree	Concentrating development in larger sites that can create new communities and deliver infrastructure – including schools - is a key part of the development strategy.	No change
BL North St Albans - object to primary school. Margaret Wix, an excellent primary school, is substantially under used. / Additional secondary places are required.	1184862 840795 1184966	Disagree	Concentrating development in larger sites that can create new communities and deliver infrastructure – including schools - is a key part of the development strategy.	No change
The whole of the East Hemel area proposals should be totally reconsidered.	334023	Disagree	Concentrating development in larger sites that can create new communities and deliver infrastructure – including schools - is a key part of the development strategy.	No change

For Verulam area, the proposed plan does nothing to remedy the inadequacy of infrastructure in this area - particularly schools	Verulam Residents Association (1185823)	Disagree	Concentrating development in larger sites that can create new communities and deliver infrastructure – including schools - is a key part of the development strategy.	No change
BL at NE Harpenden - HCC have no plans for improvement except those related to new school.	1183112	Disagree	HCC support approach here and in S6 vii. Concentrating development in larger sites that can create new communities and deliver infrastructure – including schools - is a key part of the development strategy.	No change
Lack of ref to Extended Learning facilities	St Albans Labour Group (1183933)	Disagree	Included in overall approach to school provision.	No change
More clarity required due to policy overlap in categories: new school; broad locations; GB education sites.	Legal and General (1051022) CEG (1158030)	Disagree	Policy L21 sets out a clear approach, in conjunction with other policies.	No change
Policy does not make provision for schools in the independent sector.	St Albans School (1187032)	Disagree	There is no evidence of additional need in the independent sector that needs to be separately addressed in the LP. This matter can be appropriately addressed by the overall LP policy framework	No change
Policy is vague	Aurora Properties Limited (1151817)	Disagree	Policy L21 sets out a clear approach	No change

Proposals at EHH for a new secondary school will affect access to Roundwood School for Redbourn children.	1185037	Noted	Not within planning remit.	No change
Unclear whether NE Harp and NW Harp will deliver a single 2FE school or two 2FE schools.	1153741	Noted	Policy S6 deals with this. They are two separate schools.	No change

L22 - Community Leisure and Sports Facilities

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Policy requirement for community, leisure, sports facilities and local centre at Broad Locations is supported	Harpenden Town Council (51870) Crest Strategic Projects and Bloor Homes (1158079)	Noted	Support noted	No change
Policy supports the early allocation of BLs from which the majority of funding for such	Hunston Planning Limited (1185630)	Noted	Policy L22 sets out a clear approach.	No change

facilities will come.				
'Suitably re-provided elsewhere' is very subjective. Loss of existing community infrastructure may be needed to fund improvement elsewhere but with an overall net loss. (e.g. Museum of St Albans, Harpenden Public Halls). Delete policy.	St Albans School (1187032) 52064	Disagree	Examples given show suitable re-provision along lines set out in policy L22.	No change
Joint use facilities at educational development are not always feasible and should be deleted.	St Albans School (1187032)	Disagree	Policy L22 sets out an appropriate approach	No change
The policy should be reworded to say that replacement provision of equivalent or better provision in terms of quantity	Sport England (824971)	Disagree	Policy L22 sets out a clear approach	No change

and quality in a suitable location will need to be provided.				
There is a need for new purpose built mosque.	1185960	Noted	Policy L22 acknowledges that there is a deficit of worship space and sets out an appropriate approach to provision.	No change
Not enough thought has gone into providing for the social and pastoral needs of the people who will live in the proposed developments. The provision of a Community Hall or Multi-Faith Centre should also be included in any development.	St Albans Deanery Synod (1185929)	Noted	Policy L22 acknowledges that there is a deficit of worship space and sets out an appropriate approach to provision	No change
Marketing should be undertaken to demonstrate demand for existing use if any.	Watford Borough Council (1122500)	Noted	Policy L22 deals with this.	No change
Support policy to protect public houses	St Albans Civic Society (1156974)	Noted	Support noted	No change

	St Albans Labour Party (1183933)			
Text on public houses lacks sufficient guidance and justification	Theatres Trust (1179001)	Disagree	Has been considered in depth at PPC. Policy L22 sets out a clear approach.	No change
The land proposed for cemetery extension is not available from landowner and should be deleted from the map. Landowner wishes to work with the council to identify alternative land next to the existing cemetery, which can be provided alongside new residential development.	Gallagher Estates (1143916)	Disagree	The need for additional cemetery provision and the identification of an extension to London Road cemetery as the most appropriate location is clear.	No change
Criteria for very special circumstances is insufficient.	CPRE (872572) 1019306	Disagree	Policy L22 sets out a clear approach.	No change
In relation to St Albans City	CPRE (872572)	Disagree	Has been considered in depth at PPC. Policy L22 sets out a clear approach	No change

<p>Football Club - need reference to suitable alternative locations beyond the district boundary in criteria 1. Criteria 2 should recognise that new development would have a severe impact. Criteria 3 scale of development should be minimised. Public scrutiny of viability assessment is required. Primary public access to stadium to be by sustainable transport modes guaranteed through legal agreement.</p>				
<p>The enabling development must conform to NPPF it must not be a Trojan horse</p>	<p>St Albans Civic Society (1156974)</p>	<p>Noted</p>	<p>Has been considered in depth at PPC. Policy L22 sets out a clear approach</p>	<p>No change</p>

for large housing estates				
Existing football club site must be returned to the park for public enjoyment.	St Albans Civic Society (1156974)	Noted	The LP sets out an appropriate policy framework for future decision making. This matter can be properly detailed through the masterplanning/ planning application/ EIA process, with appropriate consultation.	No change
Support policy in principle	St Albans Labour Party (1183933)	Noted	Support noted	No change
The Council has not demonstrated that it is the public interest to support a private commercial facility in the Green Belt.	Ramblers Association (52420)	Disagree	Has been considered in depth at PPC. Policy L22 sets out an appropriate approach	No change
Enabling development must be restricted to that which is essential to ensure the deliverability and viability of the stadium.	Ramblers Association (52420)	Noted	Has been considered in depth at PPC. Policy L22 sets out an appropriate approach	No change
Add ref to significant community benefits (beyond benefits to St Albans City FC)	CPRE (872572) Sport England (824971)	Noted	Policy L22 sets out an appropriate approach.	No change

can be demonstrated / including how the development would help meet identified community, sports and leisure facility needs.				
Travel to multiple hospital locations is unacceptable eg Watford & Stevenage. Travel is difficult, especially by public transport and should be addressed.	Colney Heath Parish Council (51891) Wheathampstead Parish Council (51941)	Noted	Not directly within LP remit	No change
Health and well-being policy needs to be expanded	St Albans Labour Party (1183933) Wheathampstead Parish Council (51941)	Noted	Health and well-being is appropriately addressed by LP policy framework overall – including transport, green spaces, provision of special needs accommodation, community facilities etc.	No change
Hospital provision should be addressed / adequate provision needed.	Colney Heath Parish Council (51891) London Colney Parish Council (52477) Wheathampstead Parish Council (51941)	Noted	There has been and continues to be ongoing liaison with the West Herts Hospital Trust. Work on the infrastructure evidence base has been ongoing and IDP update will reflect the latest position.	IDP will be updated on an ongoing basis.
GP and other healthcare facilities are	London Colney Parish Council (52477)	Noted	Work on the infrastructure evidence base has been ongoing and IDP update will reflect the latest position.	IDP will be updated on an ongoing basis.

important. Adequate provision required.				
A&E is required	St Albans Labour Party (1183933)	Disagree	There has been and continues to be ongoing liaison with the West Herts Hospital Trust. Work on the infrastructure evidence base has been ongoing and IDP update will reflect the latest position.	IDP will be updated on an ongoing basis.
Where health facilities are no longer required there should be a presumption for housing use on NHS land. Policies aimed to prevent loss of NHS facilities can harm delivery of services for the community. Disposal of unneeded NHS facilities can be delayed or prevented.	NHS Property (911547)	Disagree	Policy L22 sets out a clear approach. Where NHS facilities are genuinely no longer required then uses such as residential can be supported.	No change
CCG detailed comments about capacity of GPs to absorb some of the proposed development and	Herts Valleys Clinical Commissioning Group (1177790, 1183617)	Noted	Work on the infrastructure evidence base has been ongoing and IDP update will reflect the latest position.	No change

where there is a shortfall of space.				
New development is expected to make a proportionate contribution towards additional facilities. Herts Valleys Clinical Commissioning Group formula is set out to calculate the cost per dwelling of mitigating the impact of additional growth.	Herts Valleys Clinical Commissioning Group (1177790, 1183617)	Noted	Work on the infrastructure evidence base has been ongoing and IDP update will reflect the latest position.	IDP will be updated on an ongoing basis.
CCG's strategy of 'Your Care, Your Future' focuses on moving care out of large acute sites into more community focused delivery points. There are possible plans for a community hub in St Albans and ongoing work to look at redeveloping	Herts Valleys Clinical Commissioning Group (1177790, 1183617)	Noted	Work on the infrastructure evidence base has been ongoing and IDP update will reflect the latest position.	IDP will be updated on an ongoing basis.

Harpenden Memorial Hospital into a fit for purpose community site.				
The local acute provider is working through options for reconfiguring their current sites. St Albans City Hospital is part of that.	Herts Valleys Clinical Commissioning Group (1177790, 1183617)	Noted	There has been and continues to be ongoing liaison with the West Herts Hospital Trust. Work on the infrastructure evidence base has been ongoing and IDP update will reflect the latest position.	IDP will be updated on an ongoing basis.
Current infrastructure is insufficient at Batford. Infrastructure must be improved including restoration of local centre and resources.	789007	Noted	A local centre is identified at Batford – see also L12. This matter can be properly detailed through the masterplanning / planning application/ EIA process, with appropriate consultation.	No change
For North East Harpenden Broad Location, football pitches is assumed, but it is traditionally male. Sports provision should be gender neutral.	789007	Noted	This matter can be properly detailed through the masterplanning/ planning application/ EIA process, with appropriate consultation.	No change

<p>Retention of existing community leisure and sports is consistent with NPPF & Sport England. Part of the Broad Location site at North St Albans is currently used for playing fields for Old Albanians Sports Club. In preparing master plan consideration will need to be given as to how these are accommodated.</p>	<p>Hallam Land Management Limited (1185998)</p>	<p>Noted</p>	<p>This matter can be properly detailed through the masterplanning/ planning application/ EIA process, with appropriate consultation.</p>	<p>No change</p>
<p>Policy should give consideration to extending or enhancing existing sports facilities that adjoin the Broad Location such as the Verulam School, Beaumont School and Oaklands College sites</p>	<p>Sport England (824971)</p>	<p>Noted</p>	<p>Policies S6 & L22 set out a clear approach - This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.</p>	<p>No change</p>

New community facilities should be transferred to the town council	Harpenden Town Council (51870)	Noted	Ownership of community facilities can be properly detailed through the masterplanning/ planning application/ EIA process, with appropriate consultation.	No change
Additional manned police station(s) required.	St Albans Labour Party (1183933)	Disagree	The police have not identified such requirements. Work on the infrastructure evidence base has been ongoing and IDP update will reflect the latest position.	IDP will be updated on an ongoing basis.
Improved changing rooms for sports facilities is required.	St Albans Labour Party (1183933)	Noted	Not directly within Local Plan remit – cross reference S3 and support for sport and recreation facilities.	No change
A local road circuit with a Cyclo Cross element on top is top priority for the cycling club.	Verulam Cycling Club (1187616)	Noted	This matter is appropriately addressed by LP policy framework	No change
HCC early childhood services identify that 4 children's centre areas may not have sufficient places.	Hertfordshire County Council (837689)	Noted	Work on the infrastructure evidence base has been ongoing and IDP update will reflect the latest position.	IDP will be updated on an ongoing basis.
HCC library services: Redbourn & Wheathampstead to be co-located with fire stations, construction to commence 2018.	Hertfordshire County Council (837689)	Noted	Work on the infrastructure evidence base has been ongoing and IDP update will reflect the latest position.	IDP will be updated on an ongoing basis.

<p>No additional libraries are planned for St Albans, so additional demand will need to be met by increasing capacity at existing locations nearest to proposed development. Appropriate contributions are required. Drive for efficiencies means that floorspace of existing libraries may change.</p>				
<p>HCC Community Protection: No change required to Hertfordshire Fire and Rescue Services facilities. An integrated risk management plan is being produced which considers relocation of stations. Hertfordshire Fire and Rescue</p>	<p>Hertfordshire County Council (837689)</p>	<p>Noted</p>	<p>Work on the infrastructure evidence base has been ongoing and IDP update will reflect the latest position.</p>	<p>IDP will be updated on an ongoing basis.</p>

Services wished to be consulted on water supply. Sprinkler systems in all new buildings and development is recommended.				
Up-to-date sports facility strategy (indoor and outdoor sports) required	Sport England (824971)	Noted	New evidence base for Playing Pitch Strategy has been published.	No change
Should address the principle of alternative sports and recreation provision (where the benefits clearly outweigh the loss) being acceptable on open space, sports and recreation land/buildings.	Sport England (824971)	Noted	Policy L22 sets out an appropriate approach.	No change
Existing settlements also need much better access to community facilities. There should be plans to upgrade	1181750	Noted	Policy L22 sets out an appropriate approach.	No change

existing housing areas with poor community facilities e.g. Verulam, Batchwood.				
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L23 Urban Design and Layout of New Development

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
<p>Plan should do more to promote health and wellbeing in new developments including designing attractive and safe access and facilities for sustainable modes</p> <p>Reference 'Hertfordshire's Health and Wellbeing Planning Guidance, May 2017 https://www.hertfordshire.gov.uk/hertfordshires-</p>	<p>Sport England (824971)</p> <p>Hertfordshire County Council (837689)</p>	Disagree	<p>The principles included in the Guidance are already embedded in various Plan policies. Cross reference Policies S2 /L18 / L24 / L26-29.</p> <p>A reference to the guidance can be added.</p>	Minor modification - (reference to HCC Guidance)

health-and-wellbeing-planning-guidance				
No evidence underpinning the need for M4 (2) dwellings (accessible and adaptable)	Martin Grant Homes and Kearns Land (975683) Thakeham Homes (1187005) Home Builders Federation (1156936)	Disagree	SHMA evidence (and forthcoming SW Herts update) indicates changing demographics and increasing numbers of older persons aged 85 and over. New homes should be designed in a flexible way to ensure that housing is accessible and adaptable, maximising ability to remain in homes and/or provide for people with a disability. This presents a clear case for all housing to meet an accessible standard. This policy would positively impact on equality of opportunity.	No change
Mandatory amount of green roofing should be stipulated. Clarification of meaning of term requested.	St Albans Civic Society (1156974) 1153802	Disagree	To stipulate a threshold for the minimum amount of green space provision (green roofing) is overly prescriptive. Definition of green roofing can be included in online glossary.	Addition to associated online glossary
Lighting references in Policy are inadequate / lack detail. They should refer to all developments not just major developments.	Hertfordshire County Council (837689) 1153802 52064	Disagree	Policy acknowledges the adverse impact on the environment from light pollution and seeks to mitigate. The guidance notes referred to are relevant to all cases and provide sufficient detail. This is only possible where the LPA has planning control. Planning control is not possible on small scale installations.	No change

<p>Section J 'Lighting' should be removed as modern lighting systems can be added to facilities without harm to residential amenity / ecology</p>	<p>St Albans School (1187031)</p>	<p>Disagree</p>	<p>Policy is required to adverse impact on the environment from light pollution and seeks to mitigate. The guidance notes referred to are relevant to all cases and provide sufficient detail.</p>	<p>No change</p>
<p>Landscape impact assessment and EIA is required at feasibility stage to ensure no loss of ecology. Additional criteria are required within design principles and details.</p>	<p>Hertfordshire County Council (837689) 1184750</p>	<p>Agree</p>	<p>Cross reference to Policy L24 / 29 Policy L23 concurs, stating that development should take account of its landscape context. Policy L29 seeks landscape impact assessments for all major development and those which may have significant effect on the local landscape. Development covered by EIA are set out in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Council will determine likely impact through a 'screening' procedure and whether an EIA is required.</p>	<p>No change</p>
<p>All buildings should be maintained by a management company to prevent individuals modifying the fronts of houses</p>	<p>1184750</p>	<p>Noted</p>	<p>Not within planning remit</p>	<p>No change</p>

<p>Policy will result in housing densities that are too high. This does not allow for good design.</p>	<p>1184750 840795</p>	<p>Disagree</p>	<p>Cross reference to Policies S6 and L1. High(er) density does not result in poor quality design. The NPPF para 123 (a) states that plans should contain policies to optimise the use of land in their area to include the use of minimum density standards that should seek a significant uplift in the average density of residential development. Work on density assumptions are based on HCA research recommending residential densities of 30-50dph in suburban locations (the BLs for development).</p>	<p>No change</p>
<p>Policy too detailed / prescriptive - Plan should rely on NPPF.</p>	<p>RF Sinclair and Sons (1058251) Crest Strategic Projects and Bloor Homes (1158079) Hallam Land Management Limited (1185998) St Albans School (1187031) 52064</p>	<p>Disagree</p>	<p>This is essential design policy. The NPPF (Section 12) supports local design policy and guidance.</p>	<p>No change</p>
<p>Requirement for surface water drainage information for non-major development not in line with national policy</p>	<p>Jarvis Homes (973180)</p>	<p>Disagree</p>	<p>NPPF (Section 14) supports appropriate approaches to flooding risk.</p>	<p>No change</p>

Specific policy wording suggested relating to SUDS – remove word ‘urban’	Hertfordshire County Council (837689)	Agree	Minor modification to reflect more recent usage of SUDS to refer to ‘Sustainable Drainage Systems’ rather than older usage as ‘Sustainable Urban Drainage Systems’ acknowledged minor clarification	Minor modification – remove word ‘urban’
Supporting text should be included encouraging early consultation with Thames Water / recommendations to prevent sewer blockages	Thames Water (931213)	Disagree	Matter can be dealt with as planning application stage	No change
Point (D) requires the scale and massing to be subservient- unclear what is meant by subservient and unjustified as to why new buildings should be so. The location of the development and size of the site do not require this generic approach, scale and massing should	Hill Residential (1158064) Jarvis Homes (973180)	Disagree	The NPPF para 9 states that the required development must ‘take local circumstances into account, to reflect the character, needs and opportunities of each area’. Para 122 criteria d states ‘desirability of maintaining an areas prevailing character and setting’. The policy does not unduly constrain potential development locations.	No change

be appropriate to existing context.				
New development should be compatible with the pattern and character of the existing development in all cases not just in verdant and mature suburban areas	Hill Residential (1158064) Jarvis Homes (973180)	Disagree	The NPPF para 9 states that the required development must 'take local circumstances into account, to reflect the character, needs and opportunities of each area'. The Plan approach takes specific account of the nature of the mature and verdant suburbs with their particular characteristics such as large plots. Not all the district has that particular character. Due regard to relationships with existing development in all cases is acknowledged already.	No change
Design Advice Leaflets No 1 & 2 are outdated	Jarvis Homes (973180) Trustees of James Henry Frank Sewell Deceased (1185630)	Disagree	Design Advice Leaflet 1 is still highly relevant to smaller scale development within existing urban areas. The policy also refers to Herts Building Futures (design guidance) and does not unduly constrain design for potential developments.	No change
Plan design policies do not acknowledge the role that urban design and development layouts play in reducing the impacts of climate change	Environment Agency (1147557)	Disagree	Cross reference policies L25/26. Criteria xi deals directly with this issue. Herts building futures provides more guidance.	No change
Potential for adjusted / relaxed specific design standards within	Legal & General (1051022) CEG (1158030)	Noted	Cross reference to L24 Sufficient clarity provided in policy.	No change

BL requires clarification.	Historic England (929489)			
Design review policy should include reference to 'Building More Building Beautiful'.	St Albans Civic Society, (1156974) Hallam Land (1185998) 1185950 1184967	Disagree	Whilst the content of the policy exchange document is acknowledged as general background evidence and context - with reference in particular to affordable housing delivery - it is 'London centric' and does not wholly reflect the context of SADC and has no official status. https://policyexchange.org.uk/wp-content/uploads/2018/06/Building-More-Building-Beautiful.pdf	No change
Independent design review opinion should be sought from residents and Civic Society	St Albans Civic Society, (1156974) 1184967 1185950	Agree	This is the intent of the policy	No change
Pre-application expert design review should not be a requirement for the Broad Locations. Not clear what the difference is between a pre-application expert design review and a subsequent and additional independent design review	Hallam Land (1185998)	Disagree	The importance of design quality is acknowledged in the NPPF and this is an appropriate way to secure it.	No change

Clarification required on definition of good urban design and welcoming contemporary design.	St Albans Civic Society (1156974) Hallam Land Management Limited (1185998) 1185950	Noted	The NPPF focuses on high quality buildings and good design standards and reference character and sense of place rather than a particular design typology.	No change
Street design should allow for social interaction for health, safety, social cohesion, the environment and citizenship.	1184967	Agree	The policy seeks to achieve a high standard of detailed design and layout through design and layout principles. The NPPF states the need to support communities' health, social and cultural wellbeing and para 91 (a) states the aim to promote social interaction to achieve healthy and inclusive places.	No change
Clarification required on the distinction between 'should' and 'must' in Policy	St Albans Civic Society (1156974)	Disagree	Must is a deliberately used stronger word. Should is more flexible and possibly less restrictive. The policy uses both words. The NPPF uses the wording 'should' more frequently and 'must' when referring to policies reflecting international obligations and statutory requirements (for example).	No change
Building height control area should be shown on policies map	Historic England (929489)	Disagree	Cross reference Para 1.10. Elements of the policies map will be in the form of online information.	No change
Policy should refer to need to conserve and enhance, particularly in relation to re-instatement of	Historic England (929489)	Disagree	Cross reference Policy 30 The policy states that these aspects must be sensitively considered in relation to the host building and streetscene. Reference to conserve and enhance where location within conservation area best placed within policy L30.	No change

historic shopfront designs.				
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L24 Development Amenity Standards

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Support good urban design (residential & industrial) through this policy	1184750	Noted	Support noted	No change
Landscape impact assessment and EIA is required at feasibility stage to ensure no loss of ecology. Additional criteria are required within design principles and details	Hertfordshire County Council (837689) 1184750	Agree	Cross reference to Policy L23 / L29 Policy L23 concurs, stating that development should take account of its landscape context. Policy L29 seeks landscape impact assessments for all major development and those which may have significant effect on the local landscape. Development covered by EIA are set out in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Council will determine likely impact through a 'screening' procedure and whether an EIA is required.	No change
Policy will result in housing densities that are too high. This does not allow for good design.	1184750 840795	Disagree	Cross reference to Policies S6 policies and L1 / L24 High(er) density does not result in poor quality design. The NPPF para 123 (a) states that plans should contain policies to optimise the use of land in their area to include the use of minimum density standards that should seek a significant uplift in the average density of residential development. The minimum density set out in the BL policies is 40dph. Work on density assumptions are based on HCA research	No change

			recommending residential densities of 30-50dph in suburban locations (the BLs for development).	
Strict controls of amenity space compromise viability and delivery of urban optimisation	Jarvis Homes (973180) Home Builders Federation Ltd (1156936) 1058251 52064	Disagree	The Policy establishes important design principles. Policy allows for a reduction in the standards of amenity provision to reflect the less constrained design opportunity provided by the BL's and any coherent design approach.	Update of design guidance planned following Plan adoption.
Unclear 'internal space' minimum requirement.	Jarvis Homes (973180) St Albans Civic Society (1156974) Home Builders Federation Ltd (1156936) Crest Strategic Projects and Bloor Homes (1158079) CEG (1158030) Hertfordshire County Council (837689) 1185704 1185630	Disagree	Plan policies deliberately do not specify internal (national technical standards) space standards to allow flexibility to design for varied and changing lifestyles. The policy properly requires suitable provision of external space (where internal space is limited).	No change

<p>Clarification of definition of 'room' would be helpful to clarify what amenity space is required for studios.</p>	<p>Jarvis Homes (973180) St Albans Civic Society (1156974) Home Builders Federation Ltd (1156936) Crest Strategic Projects and Bloor Homes (1158079) CEG (1158030) Hertfordshire County Council (837689) 1185704 1185630 1185630</p>	<p>Disagree</p>	<p>A studio is by definition a single room. 'Room' as related to studios are multi-purpose.</p>	<p>No change</p>
<p>Landscape planting should be recognised in its contribution to amenity.</p>	<p>Jarvis Homes (973180) St Albans Civic Society (1156974) Home Builders Federation Ltd (1156936) Crest Strategic Projects and Bloor Homes (1158079) CEG (1158030)</p>	<p>Agree</p>	<p>Cross reference to Policy L29</p>	<p>No change</p>

	Herts County Council (837689) 1185704 1185630			
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L25 Energy and environmental performance of new development

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Reducing need to build in the Green Belt would be more environmentally friendly through less carbon emissions	1182314 1153802	Noted	The NPPF puts a high priority on meeting housing need. This requires some use of green field/ Green belt land. Policy states that the larger broad locations will be expected to deliver renewable/low carbon energy supply.	No change
Policy should give greater consideration to the needs of the end user (building occupier) to assist them in living sustainably.	1153802	Noted	It is acknowledged that the environment in which we live, work and socialise plays a significant role in the health of individuals and communities. The policy by its title of 'energy and environmental performance of new development' seeks to reduce carbon dioxide and other emissions that has impacts on air quality and public health and gives those opportunities. The policy does ref to energy conservation in use.	No change
Policy should reference the issue of construction waste, the 'circular economy'	1153802	Noted	L25 supports minimising construction waste generation and reuse/recycling materials and the principles of the waste hierarchy. Hertfordshire County Council is the waste planning authority for Hertfordshire. Waste is managed through the Hertfordshire Waste Development Framework 2011-2026. A	No change

and design for disassembly.			key objective is to find alternatives to allow the movement away from landfill by embracing alternative technologies. Proposals for waste management should be in accordance with this framework.	
Policy does not recognise the energy hierarchy (Lean, Clean, Green).	1153802	Noted	The energy hierarchy would inform the design, construction and operation of new buildings. The priority is to reduce energy demand, supply energy efficiently and incorporate new renewable technologies. This is the purpose of the policy and does not require a specific hierarchy namecheck.	No change
Renewable energy policy / proposals should relate to all developments, not just those over 50 units, classed as major developments or those broad locations stated.	London Colney Parish Council (52477) 1153802	Disagree	Under current NPPF this focuses on effective and proportionate implementation of policy and it is more difficult and less proportionate to apply this aspect of policy to smaller scale development.	No change
Requirement for environmental performance and sustainability statement at pre-application stage is onerous	Martin Grant Homes and Kearns Land (975683)	Disagree	Embedding sustainable principles from the earliest stage possible can ensure appropriate measures are built into design. Pre-application stage provides greater opportunities for maximising the benefits.	No change
Parking should be surfaced with permeable materials	Ver Valley Society (826041)	Noted	Policy concurs stating that sustainable construction should be an integral part of all planning applications. Policy L20 states 'parking surfaces should be permeable'.	No change

Plan should make reference to remediation of contaminated land	Environment Agency (1147557)	Disagree	<p>This is a matter dealt with generally in the NPPF.</p> <p>The Council may impose planning obligations/conditions to ensure remediation of specific sites.</p> <p>High risk development proposals such as petrol stations and cemeteries should be avoided within vulnerable groundwater areas</p>	No change
Plan should include targets and standards for carbon emissions and energy efficiency. Referring to performance targets in conditions and agreements is insufficient. Need for clear policy guidance how development will demonstrate compliance.	<p>Hill Residential (1158064)</p> <p>Environment Agency (1147557)</p> <p>Thames Water (931213)</p> <p>St Stephen Parish Council (51804)</p> <p>St Albans Labour Party Group (1183933)</p> <p>1153802</p>	Noted	Para 149 of the NPPF states that local councils should take proactive approach to mitigating and adapting to climate change taking into account the long term implications for water supply. BREEAM BRE HQM considered best method for setting performance standards.	No change
Set targets for non-domestic water consumption and requirement to implement water recycling for non-potable uses.	<p>Environment Agency (1147557)</p> <p>London Colney Parish Council (52477)</p> <p>1153802</p>	Noted	<p>Policy applies optional water consumption technical standard.</p> <p>Para 149 of the NPPF states that local councils should take proactive approach to mitigating and adapting to climate change taking into account the long term implications for water supply.</p> <p>Land use activities can indirectly/directly impact upon surface and groundwater quality. May be of benefit to state</p>	No change

Protect groundwater.			certain uses must submit and assessment of the potential impact of the use on groundwater such as petrol stations, cemeteries, waste treatment facilities and non-landfill waste management activities, storage of slurry etc Policy L23 states that SUDS principles will be applied as a drainage management tool to manage surface water runoff.	
Recommend modification to refer to Part L of Building Regulations	Adrian Irving and Alban Developments Ltd (1156368)	Disagree	This is addressed by relevant building control legislation	No change

L26 Local Green Space

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Ariston site should be designated as Local Green Space	Friends of Bernards Heath (1181795)	Disagree	The Policies map designates the recreation ground at Bernards Heath adjacent to Sandridge Road as local green space, in accordance with the Green Space technical evidence. Ariston Playing Fields are not a public open space.	No change
Green Belt, greenspaces, parks and woodland are being sacrificed to development	840795	Noted	Policies S1 and S2 provide a clear development strategy. Development need, overall Plan context and site specific analysis in GB work provide exceptional circumstances for GB release.	No change

Local green spaces that are publically accessible should be provided by village green designation and new public rights of way	Ramblers Association (52420) St Albans & District Footpaths Society (723340) The British Horse Society (1187597)	Noted	Policy L29 prioritises enhanced public access improvements to the Green Infrastructure Network. Opportunities are detailed in the Green Infrastructure Plans that support access to recreation and open space such as the St Albans Radial Greenway. The County Council are responsible for a 'Rights of way improvement plan' which is incorporated into policy L18 regarding the transport strategy.	No change
The designation criterion 'demonstrably special' is unclear.	St Albans School (1187032) 52064	Disagree	The NPPF para 99 states that local green spaces should be designated when a plan is prepared. The designation of the local green spaces correlates with the criteria in NPPF para 100 as they are within settlement limits in proximity to local communities and have particular local significance in terms of recreation or natural value.	No change
The designation restricts urban area development sites	St Albans School (1187032) 52064	Disagree	The Plan provides for development need. Local green spaces have important functions for health and wellbeing of communities and protection of the environment.	No change
Harpenden Neighbourhood Plan designates 12 local green spaces	Harpenden Town Council 51870)	Noted	The council are committed to supporting neighbourhood plans; the HNP designations now form part of the Development Plan.	No change
The policy should ensure there are no unrealistic requirements on developers	Hertfordshire County Council (837689)	Noted	Policy gives clarity on when ancillary development to support local green space would be acceptable.	No change

L27 Green Space Not Designated as Local Green Space

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Policy scope and application is unclear and doesn't provide necessary clarity and certainty- better to rely on NPPF	Martin Grant Homes and Kearns Land (975683)	Disagree	Policy is deliberately criteria based to support well balanced planning judgements on when ancillary built development would be supported and when loss of green space may be acceptable. NPPF is focused on sport and recreation facility issues, and does not deal with all relevant open space considerations (e.g. wildlife and urban landscape / visual value)	No change
Policy should ensure wildlife conservation	1153802	Noted	Policy stipulates criteria that wildlife conservation is to be provided for in the design and landscaping of proposed development, maintain watercourses and would not damage or destroy the environment.	No change
Policy should ensure no unrealistic requirements are placed on developers	St Albans School (1187032) 52064	Noted	Policy gives clarity on when loss of areas of green space would be acceptable. Inevitably the intention is to place appropriate requirements on development proposals.	No change
Policy should include reference to 8m buffer along watercourses	Environment Agency (1147557)	Disagree	This issue is covered generally in Policy L29. There is no need to include all detailed guidance/ EA policy as this is available in supporting documents.	No change

Not explicit how land which no longer serves recreational/sporting purposes will be assessed	Sport England (824971)	Agree	The wording can be amended from 'clearly demonstrated that the building or facility is no longer required' to incorporate the precise wording of para 97 criteria (a) of the NPPF to ensure that an assessment is undertaken to demonstrate surplus.	Minor modification Amend to reflect specific NPPF wording criteria that 'an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements'.
Does not specify that replacement land and facilities needs to be equivalent or better	Sport England (824971)	Agree	The wording can be amended from 'unless suitably re-provided elsewhere' to incorporate the precise wording of para 97 criteria (b) of the NPPF to ensure that facilities are the same or better and in the most appropriate locations.	Minor modification Amend to reflect specific NPPF wording that 'suitable replacement land and facilities of equivalent or better provision in terms of quantity and quality can be provide elsewhere'
Would prefer specific mentions of rivers Red, Ver and Lea, rather than vague term 'Watercourse'	Ver Valley Society (826041)	Noted	These are detailed matters about implementation of policy. They will be covered through detailed sector / local guidance.	No change

L28 Green Space Standards and New Green Space Provision

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Policy allows no flexibility if there is overprovision	Jarvis Homes (973180)	Disagree	Cross reference Policies L26/L27 which set out when it may be acceptable to lose green space. The purpose of the policy is to establish a baseline standard of provision required in new development.	No change
Policy should clarify what is meant by 'teenage areas' within tables	Hertfordshire County Council (837689)	Disagree	'Teenage areas' is a term derived from PPS 17 typology of green spaces. SADC Green Spaces Technical Report 2016 defines this as areas for wheeled sports and pieces of equipment within existing parks. Multi-games courts and youth shelters are taken into consideration. The NPPF does not define a typology for this form of open space however in terms of equality and inclusion it is important that the local plan caters for all the community.	No change
Policy should clarify whether Porters Hill Park is included within North East Harpenden Broad Location	Batford Community Action Group (1185696)	Disagree	Cross reference Policies Map. Porters Hill Park lies immediately adjacent to the south of the Broad Location at NE Harpenden and is clearly not within the boundary. No need to refer to in the Policy.	No change
All development should contain open spaces and sports centres/facilities. These areas	Batford Community Action Group (1185696) 789007 1184750	Noted	Cross reference L24 and S6. The policy sets out green space standards for new residential areas. The policy states that designs must respond positively to environmental context and integrate with existing environmental character reflecting landscape character. Policies S6 within BL require delivery of recreation space and public open space and in	No change

should not encroach upon proposed country park and should not affect tree retention /landscaping. Topography should be respected.			the case of S6 i), S6 iii) and S6 iv) (East Hemel North, East Hemel South and North Hemel) managed woodland and new Country Park. The BLs will be planned in detail through masterplanning processes and the factors referred to will be important considerations.	
Provision of green space and its management must be secured by planning obligations.	Sport England (824971) St Albans Civic Society (1156974) Watford Borough Council (1122500)	Noted	Cross reference Policy L17. Policy covers this. Direct provision of and financial contributions to infrastructure will be secured through S106 and CIL.	No change
Quantity standards for amenity green space is not based on robust evidence	Sport England (824971)	Disagree	Quantity standards refer to the area of open space in sq m required for every person, within a set area. Greenspace Strategy 2016 (SADC) set local quantity standards Green Spaces Technical Report 2011 The open space required from new development is based on the anticipated increase in population resulting from the new development.	No change
Quantity standards for amenity green space does not satisfy CIL Regulation 122 tests	Sport England (824971)	Disagree	Greenspace Strategy 2016 (SADC) set local quantity standards Green Spaces Technical Report 2011	No change

<p>Policy only covers grass pitches. Does not reflect priority for artificial grass pitch (AGP) provision.</p>	<p>Sport England (824971)</p>	<p>Agree</p>	<p>Baseline and further work since Regulation 19 has been undertaken to inform specific development proposals. Playing Pitch Strategy update 2019 provides baseline data on grass and AGPs across the District taking into account the significant investment of SADC in AGP provision and trends within sports.</p> <p>Policy L28 states that the specific form/mix of provision will be negotiated in relation to the consideration of policy and green space deficiencies.</p>	<p>No change</p>
<p>Does not reflect Rugby Football Union priority for improvements to existing capacity rather than new pitches. Junior rugby pitch provision missing from Park St, East and North Hemel. Does not distinguish between individual sports</p>	<p>Sport England (824971) St Stephen Parish Council (51804)</p>	<p>Agree</p>	<p>Baseline and further work since Regulation 19 has been undertaken to inform specific development proposals. Playing Pitch Strategy update 2019 provides baseline data on grass and AGPs across the District taking into account the significant investment of SADC in AGP provision and trends within sports.</p> <p>Policy L28 states that the specific form/mix of provision will be negotiated in relation to the consideration of policy and green space deficiencies. Policy L28 also supports the enhancement of existing facilities.</p>	<p>No change</p>
<p>Does not refer to Sport England latest guidance to calculate pitch needs of new development</p>	<p>Sport England (824971)</p>	<p>Agree</p>	<p>Baseline and further work since Regulation 19 has been undertaken to inform specific development proposals. Playing Pitch Strategy update 2019 utilises the latest guidance from Sport England. Specific reference not needed in Policy.</p>	<p>No change</p>

<p>Accessibility standard is inappropriate</p>	<p>Sport England (824971)</p>	<p>Disagree</p>	<p>The LP aims to promote sustainable transport through accessibility and NPPF para 104 states planning policies should provide for high quality walking and cycling networks. Natural England 'Accessible natural greenspace guidance' recommends greenspace no more than 300m from home. SADC Technical report green spaces refers to the FIT standards for play (HA per 1000 persons) and ANGS (size OS 2ha = 300m)</p> <p>Greenspace Strategy 2016 (SADC) set local accessibility standards. Green Spaces Technical Report 2011</p> <p>Natural England Nature nearby 'Accessible natural greenspace guidance' 2011</p> <p>300m is the typical distance threshold to small and local parks and areas of greenspace with a multi-functional role.</p>	<p>No change</p>
<p>Policy threshold of 100 dwellings for making green space provision is too low</p>	<p>Sport England (824971)</p>	<p>Disagree</p>	<p>Appropriate open space is important in developments of this size. This is particularly the case in respect of play.</p>	<p>No change</p>
<p>Policy should refer to detailed design of sports facilities (floodlighting etc)</p>	<p>Sport England (824971)</p>	<p>Agree</p>	<p>Design of sports facilities captured within the general design principles L23. Design principle (j) captures floodlighting guidance from ILP and design for non-residential developments in excess of 1,000sqm will be subject to pre-application expert design review with appropriate community support.</p> <p>Policy L28 refers to play facilities designed and provided in accordance with national best practise guidance set out in Fields in Trust, supplementary planning documents and other local guidance. Reference could also be made to Sport England guidance.</p>	<p>Minor modification</p> <p>Refer to Sport England design guidance as footnote P.61 LP.</p>

No up to date evidence base on outdoor sports facilities	Sport England (824971)	Disagree	Baseline and further work since Regulation 19 has been undertaken to inform specific development proposals. Playing Pitch Strategy update 2019 provides baseline data on grass and AGPs across the District taking into account the significant investment of SADC in AGP provision and trends within sports.	No change
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L29 Green and Blue Infrastructure, Countryside, Landscape and Trees

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Landscape impact assessment and EIA is required at development feasibility stage to ensure no loss of ecology	1184750	Noted	Policy L29 seeks landscape impact assessments for all major development and those which may have significant effect on the local landscape. The policy biodiversity requirements also necessitate detailed assessment. Development covered by EIA are set out in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Council will determine likely impact through a 'screening' procedure and whether an EIA is required.	No change
Habitat networks and ecosystem services are green infrastructure	Hallam Land Management Limited (1185998)	Noted	This is integral to policy.	No change
Rights of Way Improvement Plan implementation is required. Horse carriage driving	Hertfordshire County Council (837689) 1157340	Noted	This is covered under the countryside access heading. Specific mention of this detail is not necessary.	No change

provision should be made				
<p>More detail is needed on biodiversity:</p> <ul style="list-style-type: none"> - Landscape level biodiversity enhancement - refer to DEFRA Biodiversity Impact Assessment Calculator - Ecological surveys based on British Standards BS 42020:2013 Biodiversity - Seek advice from Hertfordshire Ecology & Herts & 	<p>Herts and Middlesex Wildlife Trust (866619)</p> <p>Hertfordshire County Council (837689)</p> <p>Redbourn Parish Council (759908)</p> <p>1153802</p>	Noted	These are detailed matters about implementation of policy and are not required in the policy itself.	No change

Middlesex Wildlife Trust				
<p>More detail is needed on woodland protection:</p> <ul style="list-style-type: none"> - Use Natural England's Ancient Woodland inventory assessment guide to assist appropriate development - Use Woodland Trust standard to determine how much woodland is required - Protect ancient woodland as per the NPPF - Reference Community orchards. Should reference tree specifications, arboriculture 	<p>Forestry Commission (1182710)</p> <p>HCC (837689)</p> <p>The Woodland Trust (1185811)</p> <p>Forestry Commission (1182710)</p> <p>St Albans Civic Society (1156974)</p> <p>1185704</p>	Noted	These are detailed matters about implementation of policy and are not required in the policy itself.	No change

<p>surveys, soil handling and preparation</p> <p>- Integrate trees within wider landscape</p>				
<p>Suggest inclusion of detailed footpath improvement proposals (listed)</p>	<p>Ramblers Association (52420)</p> <p>St Albans & District Footpaths Society (723340)</p> <p>British Horse Society (1187597)</p>	<p>Noted</p>	<p>These are detailed matters about implementation of policy. They will be covered through detailed sector / local guidance.</p>	<p>No change</p>
<p>Figure 2 Green Infrastructure does not indicate proposed country parks, wildlife sites, SSSI, rivers, specific, public access and</p>	<p>Ramblers Association (52420)</p> <p>St Albans & District Footpaths Society (723340)</p> <p>Crown Estate (51946)</p>	<p>Noted</p>	<p>Figure 2 sets out the key green infrastructure network although this is noted as for illustrative purposes only. This network is supplemented by the Green Infrastructure Plan 2011 of proposed green infrastructure network and projects and Watling Chase Supplementary Planning Guidance (Hertsmere Council). Policy states that enhanced public access improvements are a high priority. Watling Chase Community Forest designation is outlined on Figure 2.</p>	<p>Minor modification</p> <p>amend footnote 24 to corrected link</p>

Watling Chase Community Forest	Hertfordshire County Council (837689) British Horse Society (1187597) 1153245		Proposed country parks within the BL for development will be subject to Masterplanning and their exact locations are not presently known within the wider designation.	
Policy fails to connect Green Ring and Heartwood Forest with green corridor within Welwyn Hatfield	Welwyn Hatfield Borough Council (52397) 867587	Partly Agree	Ellenbrook County Park in WHBC area is shown in Figure 2. The focus of the policy / Figure 2 is developing and new proposals.	Minor modification Add bullet p64 - Connect Green Ring and Heartwood Forest with green corridor within Welwyn Hatfield
Policy should specifically mention main Green Corridor Routes / River Valleys	Ver Valley Society (826041) Tarmac (1153267)	Noted	These are detailed matters about implementation of policy and are not required in the policy itself.	No change

<p>Plan strategy should better recognise role of agricultural land to food production and ecology.</p> <p>The reference to the refusal of an application if it results in the loss of the most versatile agricultural land is inconsistent with the NPPF.</p> <p>Policy states development resulting in such land loss 'will normally be refused is unsound since the Council's Site Assessment Matrix confirms that some high quality agricultural land is contained within the proposed Broad Locations</p>	<p>RF Sinclair and Sons (1058251)</p> <p>St Albans School (1187032)</p> <p>Hertfordshire County Council (837689)</p> <p>Crown Estate (51946)</p> <p>52064</p> <p>1153802</p> <p>1158064</p> <p>1055738</p> <p>1184569</p> <p>1185704</p>	<p>Noted</p>	<p>This is primarily a matter for evidence and the SA. This acknowledges losses to development. SADC BLs are acknowledged to contain some higher quality areas of agricultural land, which has been taken into account in the overall development approach, alongside other factors such as the Green Belt.</p>	<p>No change</p>
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<p>Clarify where grade 1,2 & 3A agriculture land is within the BL's.</p>				
<p>Housing areas should be designed to encourage wildlife e.g. The Wildlife Trusts' building homes for people and wildlife</p>	<p>1184967</p>	<p>Noted</p>	<p>Reference document referred to: https://www.wildlifetrusts.org/sites/default/files/2018-05/homes_for_people_and_wildlife_lr_-_spreads.pdf This is useful sector guidance on detailed implementation of policy.</p>	<p>No change</p>

<p>Sympathetic landscaping of development areas is required to preserve the character of Redbourn and East Hemel Hempstead</p>	<p>1153741</p>	<p>Agree</p>	<p>Cross reference Policy S6. This is a matter for masterplanning.</p>	<p>No change</p>
<p>Loss of green spaces and corridors between St Albans and Hatfield; including woodland and open space at Wynches Farm and Symondshyde Wood as quiet area and failure to develop Ellenbrook Fields Country Park</p>	<p>Aurora Properties Limited (1151817) Ellenbrook Area Residents Association Committee (1185802) 1186129 1153245</p>	<p>Noted</p>	<p>Cross reference policies L26 – 29, which protect the most important open spaces and woodlands. Ongoing liaison with Welwyn & Hatfield Council under DtC. Some specific matters are largely matters for WHBC Local Plan / policy.</p>	<p>No change</p>
<p>Opportunities in association with development should be taken to create new green corridors and link green spaces through</p>	<p>Watford Borough Council (1122500) 1153802</p>	<p>Noted</p>	<p>This is a matter for detailed masterplanning taking account of this Policy.</p>	<p>No change</p>

new development.				
The policy should mention the role of green infrastructure in enhancing and conserving the historic environment and improving setting (such as at Napsbury Park)	Historic England (929489)	Noted	Cross reference Policy L30. This is covered under this policy. Napsbury Park is a designated Conservation Area and Historic Park & Garden.	No change
Policy does not deal in sufficient detail with minimising flooding and surface water runoff risks.	Hertfordshire County Council (837689) Thames Water (931213) Environment Agency (1147557) 1153802	Disagree	This is a matter sufficiently dealt with in the overall policy and NPPF. More detail is available through references to relevant sector guidance. Detailed area specific evidence for the Local Plan is also available.	No change

L30 Historic Environment

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Policy serves no purpose because it reiterates NPPF	RF Sinclair and Sons (1058251) St Albans School (1187032) 52064	Disagree	The NPPF states that strategic policies for the conservation and enhancement of the natural, built and historic environment should set out an overall strategy for the pattern, scale and quality of development. Para 185 states that plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets	No change
Plan should encourage densification of appropriate sites in conservation areas (they should be prioritised above greenfield)	1153802	Noted	It does - where proposed development meets the policy criteria within conservation areas.	No change
Review conservation area boundaries in light of future redevelopment of land on the western side of Bricket Road	Eskmuir Properties Ltd (1156728)	Disagree	Conservation Areas are designated under the Planning (Listed Buildings and Conservation Areas) Act 1990 para 69. The Council will ensure that the conservation area justifies its special interest. The existence of a CA does not prevent appropriate development.	No change

Heritage Assets / Archaeology in Broad Locations have not been considered	334023 1184969 1187597	Disagree	The NPPF para 189 states that 'where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk based assessment and where necessary a field evaluation'. This will be an important issue for the masterplanning process (S6).	No change
Long views important in Conservation Areas for preserving heritage assets and tourism	St Albans Civic Society (1156974)	Agree	The policy concurs, stating within development affecting heritage assets 'new development must respect the wider context of the asset, with particular regard to important views of the districts built heritage and landscapes'.	No change
Policy should refer to 'non-designated rather than 'undesigned' / clarify archaeological site of <i>national importance</i> '	Crown Estate (51946) Historic England (929489) Crest Strategic Projects and Bloor Homes (1158079) CEG (1158030)	Agree	The NPPF para 197 p.56 refers to non-designated heritage assets.	Minor modification - Amend terminology to accord with NPPF.
Policy paragraph 6 'the significance of the heritage asset' should be amended. 'Worthy of conservation' implies	Historic England (929489)	Agree	The NPPF para 194 refers to the 'significance of the heritage asset'.	Minor modification - Amend terminology to accord with NPPF

designated assets are not worthy				
Policy should mention setting of Conservation Areas & Listed Buildings.	Crown Estate (51946) Historic England (929489) Crest Strategic Projects and Bloor Homes (1158079) CEG (1158030)	Agree	Amend to accord with the Act.	Minor modification - to accord with the Act
Policy is incorrect as there is no enhancement of scheduled ancient monument test in NPPF.	CEG (1158030)	Disagree	Para 184 of the NPPF refers to the desirability of sustaining and enhancing the significance of heritage assets.	No change.
Policy does not reflect NPPF, as it does not refer to the tests of 'substantial' and 'less than substantial harm'	Legal and General (1051022)	Agree	NPPF paras 195 & 196 refer to where a proposed development will lead to substantial harm, consent should be refused unless demonstrated that the substantial harm is necessary to achieve public benefits that outweigh that harm.	No change

<p>Include locally specific/distinctive elements and possible criteria for the designation of locally listed buildings.</p>	<p>Historic England (929489)</p>	<p>Disagree</p>	<p>The NPPF includes local listing within the definition of a heritage asset and conservation areas are designated heritage assets. Applications can be made to SADC for inclusion of a building that falls within designated conservation area on the local list that at present does not warrant inclusion on the statutory list. Local listed buildings are considered to make positive contribution to the character and appearance of the conservation area.</p> <p>LLB information and designation criteria are matters of detail recorded in CACS and GIS information.</p>	<p>Website information will be updated as necessary on ongoing basis.</p>
<p>Policy should omit criterion (a) regarding flexible approach to viable uses</p>	<p>Historic England (929489)</p>	<p>Disagree</p>	<p>The NPPF para 185 states that strategy for conservation should take into account the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation. It is not helpful to the future of listed buildings to preclude other viable uses which may secure upkeep and survival.</p>	<p>No change</p>
<p>Policy should refer to 'public benefits' rather than 'planning benefits'</p>	<p>Historic England (929489)</p>	<p>Agree</p>	<p>The NPPF refers to harm should be weighed against the public benefits of the proposal including securing its optimal viable use.</p>	<p>Minor modification - to 'public benefits'</p>
<p>No policy for Heritage at Risk or for management of a register.</p>	<p>Historic England (929489)</p>	<p>Disagree</p>	<p>The NPPF para. 185 states that plans should set out positive strategy for the historic environment including heritage assets most at risk. This is already set out in L30. Historic England maintain a list of buildings at risk (3 SADC – Devils Dyke & the Slad; Aubrey's Camp and Sopwell Priory and Sopwell House). The SA Scoping report lists the Buildings at Risk within SADC.</p>	<p>No change</p>

<p>Include historic environment within monitoring indicators</p>	<p>Historic England (929489)</p>	<p>Disagree</p>	<p>Cross reference Monitoring Framework.</p> <p>It is acknowledged that monitoring and review are essential in establishing how the objectives of the plan are being achieved and whether any changes are required. However the Monitoring Framework is for core indicators only.</p> <p>In practice the Council will note any significant issues / changes in respect of the historic environment in its AMR.</p> <p>Buildings at risk records are maintained.</p>	<p>No change</p>
<p>Include heritage technical terms within glossary</p>	<p>Historic England (929489)</p>	<p>Noted</p>	<p>Within the library of documents for the LP 2018 there is a glossary which includes technical terms on the historic environment: https://www.stalbans.gov.uk/Images/Glossary_tcm15-64812.pdf</p> <p>The intention is that this would be maintained as an online resource with a link to the final plan document.</p>	<p>No change</p>
<p>Include pre-application archaeological assessments within development briefs. Include reference to refusal of development that would adversely affect currently undiscovered assets.</p>	<p>Hertfordshire County Council (837689) CEG (1158030)</p>	<p>Agree</p>	<p>The NPPF para 189 states that 'where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk based assessment and where necessary a field evaluation'.</p> <p>This will be an important issue for the masterplanning process (S6).</p>	<p>No change</p>

Suggest known heritage assets are recorded on the Hertfordshire County Council's Historic Environment Record	Hertfordshire County Council (837689)	Noted	The Hertfordshire Historic Environment Record is an online database and public resource. It would be of benefit that all heritage assets are recorded. This is already an agreed approach / process. It is not necessary to include this in the Plan policy. The Plan (Para 1.10) explains that information will be regularly updated on the on-line GIS based part of the policies map.	No change
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Appendix 1 – New Development Parking Guidance and Standards

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Parking provision shouldn't be set based on the assumption that potential buyers will predominantly be commuters	1144419	Noted	They haven't been. These parking provisions are set based on the evidence of a mix of buyers, many of whom will not be commuters.	No change
Sufficient parking must be provided to accommodate conversions to multiple occupation.	1144419	Disagree	Appendix 1 table sets out parking requirements for houses in multiple occupation. As set out in policy L20, parking provision for changes of use or extensions shall reflect the number of spaces required for the new use of the extension.	No change

<p>Provision of more cycle parking spaces in residential areas is necessary to encourage cycling. They should also be provided in convenient locations with secure fixings. Cycle parking standards to reference the BRE Home Quality Mark scheme.</p>	<p>1153802</p>	<p>Noted</p>	<p>Appendix 1 sets out cycle parking requirements for C3 Residential areas.</p> <p>Policy L20 and footnote 21 directs to guidance on the provision of good quality cycle parking.- The sources provided also cover safety and security for cycle parking spaces.</p> <p>Extract from LP Policy L20:</p> <p>“For guidance on the provision of good quality cycle parking refer to Chapters 2,3,4 and 5 of Transport Initiatives LLP and Cambridge City Council ‘cycle Parking Guide for New Residential Development 2010’^21 and any subsequent guidance/ amendments. This document is considered best practice and appropriate for application in St Albans District.”</p>	<p>No change</p>
<p>More cycle parking required at rail stations based on current and future population changes and commute patterns. This should also take place in conjunction with designing cycle routes into town from developments.</p>	<p>1153802</p>	<p>Agree</p>	<p>Appendix 1 sets out cycle parking requirements for Public Transport facilities.</p> <p>Refer to policies L18 and S6 which address the need for providing intra-urban cycle links and ones connecting new developments to city centres. Additionally, policy L23 sets out the design and layout requirements for new developments by highlighting the need for prioritising sustainable transport measures/ non-car movement.</p> <p>Sustainable transport measures are encouraged by Policy 18, 19 and 20.</p>	<p>No change</p>

<p>Appendix 1 table doesn't prioritise cycling or follow the requirement for good quality cycle provision in residential areas. The Local Plan needs to adopt a much simpler Cambridge spaces standards.</p>	<p>St Albans Cycle Campaign (346623) 1185967</p>	<p>Disagree</p>	<p>Appendix 1 sets out cycle parking requirements for C3 Residential areas.</p> <p>Policy L20 and footnote 21 directs to guidance on the provision of good quality cycle parking using the Cambridge's 'Cycle and Parking Guide for New Residential Development 2010'.</p> <p>Extract from LP Policy L20:</p> <p>"For guidance on the provision of good quality cycle parking refer to Chapters 2,3,4 and 5 of Transport Initiatives LLP and Cambridge City Council 'cycle Parking Guide for New Residential Development 2010'^21 and any subsequent guidance/ amendments. This document is considered best practice and appropriate for application in St Albans District."</p>	<p>No change</p>
<p>The proposed parking provision will lead to an over-provision of parking spaces within residential developments which are located in highly accessible locations that are well-served by public transport services (this encourages vehicle use)</p>	<p>Hilton House Properties (1057476)</p>	<p>Disagree</p>	<p>Appendix 1 sets out cycle parking requirements for C3 Residential areas.</p> <p>The Plan promotes sustainable travel behaviour including through the introduction of parking zones where a degree of parking restraint is imposed. This approach reduces on site provision in the locations most accessible to services and facilities and to public transport.</p> <p>Refer to policy L20 for more information on car parking standards for new developments which are also based on the zonal approach.</p> <p>Appendix 1 zoning can allow for schemes below standards to be acceptable in sustainable locations.</p>	<p>No change</p>

Appendix 2 – Housing Trajectory

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Insufficient evidence to support the strategy for meeting the Council's housing requirement.	Martin Grant Homes and Kearns Land (975683) CP Holdings (1158145) 973643 1153650	Disagree	Evidence on development strategy / site selection is available in full.	No change
The trajectory includes a number of dwellings that cannot be considered to be deliverable in the context of the definition in the glossary of the NPPF without further, clear justification.	Martin Grant Homes and Kearns Land (975683) RF Sinclair and Sons (1058251)	Disagree	Evidence on development strategy/ site selection is available in full.	No change
No justification for the windfall allowance of 95 dwellings in 2020/21 and 105 dwellings per annum thereafter.	Martin Grant Homes and Kearns Land (975683) Hunston Planning Limited (1185622) Minister Court Frogmore (1185980)	Disagree	Paragraph 68 of the NPPF states the <i>“local planning authorities should support the development of windfall sites through their policies and decisions- giving great weight to the benefits of using suitable sites within existing settlements for homes.”</i> There is no conflict with NPPF.	No change

	<p>London Colney Limited (977496)</p> <p>Home Builders Federation Ltd (1156936)</p> <p>973643</p>			
<p>Don't believe the evidence supports the assumption that an additional 80 homes will be delivered from 2025/26</p>	<p>Hunston Planning Limited (1185622)</p>	<p>Disagree</p>	<p>Evidence on development strategy / site selection is available in full</p>	<p>No change</p>
<p>No justification given for the delivery rates from the broad location sites.</p>	<p>Martin Grant Homes and Kearns Land (975683)</p>	<p>Disagree</p>	<p>Full and detailed justification is provided by evidence documents.</p>	<p>No change</p>
<p>The trajectory is not anticipated to deliver the annual total of 913 homes until after 2025.</p>	<p>RF Sinclair and Sons (1058251)</p> <p>Minister Court Frogmore (1185980)</p> <p>Thakeham Homes (1187005)</p> <p>Wrenbridge Land Ltd (1187023)</p> <p>London Colney Limited (977496)</p>	<p>Disagree</p>	<p>The Plan necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy.</p>	<p>No change</p>

	Home Builders Federation Ltd (1156936)			
No evidence has been provided to justify the split of annual housing requirement into three time periods	Minster Court Frogmore (1185980)	Disagree	The Plan necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy. There are sufficient deliverable sites for years 1-5. This is confirmed in relevant developer representations.	No change
Concerned about the provision of 2,300 homes from the 'Park Street Garden Village' given the fact this is a major Green Belt release and the potential challenge with rail freight.	RF Sinclair and Sons (1058251)	Noted	The Plan necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy.	No change
Sceptical about the realistic housing delivery on large housing allocations.	RF Sinclair and Sons (1058251) Comer Group (872799) Wrenbridge Land Ltd (1187023)	Noted	The Plan necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy.	No change
Concerns about the robustness of	Hunston Planning Limited (1185622)	Disagree	The Plan necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new	No change

the housing trajectory.			sites that are best able to deliver to the overall plan development strategy.	
There is a lack of small and medium-sized sites.	Hunston Planning Limited (1185622)	Disagree	Concentrating development in larger sites that can create new communities and effectively deliver infrastructure is a key part of the development strategy. Small sites of half a hectare or less have been and will continue to be an important source of housing land supply through windfall.	No change
No detailed evidence has been put forward to justify the stepped trajectory, nor to set out what alternative approaches the Council has explored.	Wrenbridge Land Ltd (1187023) London Colney Limited (977496) Home Builders Federation Ltd (1156936) Owners of Land South of Burydell Lane (1186128) 973643 1153650 1186131	Disagree	The Plan necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy. There are sufficient deliverable sites for years 1-5. This is confirmed in relevant developer representations.	No change
There is a risk of a protracted legal dispute occurring for the garden village site which can derail the housing trajectory assumptions about dwelling	973643	Noted	The main site owner has promoted the site as available and deliverable for housing. Considerations have taken into account the existing planning permission for an alternative use and other relevant factors.	No change

completions on the site.				
Support the standard methodology of 913 dwellings per annum	973643 1153650	Noted	Support noted	No change
Recommend speeding up delivery through granting planning permissions on some of the proposed allocations ahead of the Local Plan adoption.	1153650	Disagree	The Plan necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy. There are sufficient deliverable sites for years 1-5. This is confirmed in relevant developer representations.	No change
The housing trajectory fails to meet the five year housing supply and appears to be unsubstantiated.	Aurora Properties Limited (1151817)	Disagree	The Plan necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy. There are sufficient deliverable sites for years 1-5. This is confirmed in relevant developer representations.	No change
Recommend the allocation of more sites to ensure a five year housing land supply is provided with the starting year as 2018.	Thakeham Homes (1187005) Comer Group (872799) Home Builders Federation Ltd (1156936)	Disagree	The Plan necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy. There are sufficient deliverable sites for years 1-5. This is confirmed in relevant developer representations. 2020 is the earliest realistically possible	No change

	CP Holdings (1158145)		date of adoption of the Plan and is therefore appropriate in the context of the new draft and final NPPF.	
The plan relies on the plan period of 2020-2036 which is inconsistent with the PPG.	Department of Health & Social Care and Bloor Homes (1156886) 977496	Disagree	2020 is the earliest realistically possible date of adoption of the Plan and is therefore appropriate in the context of the new draft and final NPPF.	No change
Lack of evidence to justify the reason why the plan period begins from 2020 and not 2018	Wrenbridge Land Ltd (1187023) Gladman Developments Ltd (1187201)	Disagree	2020 is the earliest realistically possible date of adoption of the Plan and is therefore appropriate in the context of the new draft and final NPPF.	No change
Object to the plan period of 2020-2036.	Gladman Developments Ltd (1187201) London Colney Limited (977496)	Noted	2020 is the earliest realistically possible date of adoption of the Plan and is therefore appropriate in the context of the new draft and final NPPF.	No change
There is a lack of flexibility provided with the housing trajectory.	Gladman Developments Ltd (1187201) Owner Pound Farm & East of Sandridge (1187227)	Disagree	The Plan necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy. There are sufficient deliverable sites for years 1-5. This is confirmed in relevant developer representations.	No change
Request for the Council to amend the housing plan period to align with supporting evidence base.	Gladman Developments Ltd (1187201)	Disagree	2020 is the earliest realistically possible date of adoption of the Plan and is therefore appropriate in the context of the new draft and final NPPF. Evidence is available in full.	No change

<p>The adoption of a more balanced strategy with a greater role for non-strategic sites would increase the amount of development which might realistically occur within the shorter term, therefore reducing the need for a stepped housing requirement.</p>	<p>Gladman Developments Ltd (1187201)</p>	<p>Disagree</p>	<p>The Plan necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy. There are sufficient deliverable sites for years 1-5. This is confirmed in relevant developer representations.</p>	<p>No change</p>
<p>The plan relies heavily on large strategic growth locations to meet the District's housing needs.</p>	<p>Owner Pound Farm & East of Sandridge (1187227)</p>	<p>Noted</p>	<p>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p>	<p>No change</p>
<p>The base date used for assessing housing needs is not consistent with the approach set out in the PPG.</p>	<p>Home Builders Federation Ltd (1156936)</p>	<p>Disagree</p>	<p>2020 is the earliest realistically possible date of adoption of the Plan and is therefore appropriate in the context of the new draft and final NPPF</p>	<p>No change</p>

<p>Do not consider it appropriate for the unanticipated delay factor to be redistributed across the remaining plan period. Suggest that it would be better to rebase the plan period from 2018 and include any unimplemented planning permissions as part of their expected supply trajectory.</p>	<p>Home Builders Federation Ltd (1156936)</p>	<p>Disagree</p>	<p>2020 is the earliest realistically possible date of adoption of the Plan and is therefore appropriate in the context of the new draft and final NPPF.</p>	<p>No change</p>
<p>Urban optimisation allowance should be included in windfall allowance to avoid potential double counting in the supply estimates.</p>	<p>Home Builders Federation Ltd (1156936) CP Holdings (1158145)</p>	<p>Disagree</p>	<p>Supply from urban optimisation is categorised separately from windfall as it results from the new strategy set out in the new LP/NPPF. There is no double counting.</p>	<p>No change</p>
<p>Urban optimisation has no status or policy driver to implement it and</p>	<p>Anderson Group (1146719)</p>	<p>Disagree</p>	<p>The LP/NPPF prioritises achieving optimal housing densities and appropriate mix of sizes / types.</p>	<p>No change</p>

should be removed	Home Builders Federation Ltd (1156936)			
Support the housing trajectory as robust and deliverable.	Crown Estate (51946)	Noted	Support noted	No change
SHLAA should be reviewed to ensure there are enough sites to be delivered within 5 years of adoption	CP Holdings (1158145)	Disagree	Please refer to Appendix 2. There are sufficient deliverable sites for years 1-5.	No change
364 dwellings for pre-application and submitted applications is unreliable as there is no guarantee the application will be submitted, or be refused	CP Holdings (1158145)	Disagree	Small sites of half a hectare or less have been and will continue to be an important source of housing land supply through windfall. Please refer to Appendix 2. There are sufficient deliverable sites for years 1-5.	No change
Housing delivery should be focused on site allocations primarily	CP Holdings (1158145)	Disagree	Concentrating development in larger sites that can effectively deliver infrastructure is a key part of the development strategy. Small sites of half a hectare or less have been and will continue to be an important source of housing land supply through windfall. Please refer to Appendix 2.	No change

Appendix 3 – Monitoring Framework

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Plan monitoring arrangements undeveloped: do not judge relative progress towards long-term aims	Aboyne Residents Association (1181214) 867312	Disagree	The Monitoring Framework is deliberately designed to focus on the essential areas where the NPPF requires the Council to track progress, particularly in provision of development land. Other matters are contextual and it may be possible to include some elements in wider monitoring.	No change
Include monitoring and indicators for the historic environment	Historic England (929489)	Disagree	This is not an essential part of the Plan Monitoring Framework. Other matters are contextual and it may be possible to include some elements, including historic buildings at risk and conservation area appraisal and enhancement progress in wider monitoring.	No change
The monitoring target for “Metropolitan Green Belt” justifies the need to remove associated school build zones from the Green Belt	Hertfordshire Country Council (837689)	Disagree	This is a strategy and policy issue (dealt with elsewhere). It is not a matter relevant to the Monitoring Framework.	No change

Appendix 4 – Infrastructure Delivery Schedule

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Support ongoing updates to the IDP	Trustees of James Henry Frank Sewell Deceased (1185630)	Noted	Support noted	No change
Support the IDS for providing the latest information on the IDP	Department for Education (1186955)	Noted	Support noted	No change
Suggest the provision of an addendum to the IDS which provides a summary for projections of capacity and need for school places and schools based on the forecast housing growth at allocated sites. This should also include any need for additional special educational needs places.	Department for Education (1186955)	Noted	Work on the infrastructure evidence base has been ongoing and IDP updates will reflect the latest position	IDP will be updated on an ongoing basis.

<p>IDP is not updated alongside IDS. This questions the robustness of the strategy.</p>	<p>Redbourn Parish Council (759908) Leverstock Green Village Association (1185907) Hertfordshire County Council (837689)</p>	<p>Noted</p>	<p>Work on the infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.</p>	<p>IDP will be updated on an ongoing basis.</p>
<p>Proposes an amendment to IDS to reflect the full range of infrastructure benefits arising from the NW Harpenden allocation.</p>	<p>Legal and General (1051022)</p>	<p>Noted</p>	<p>IDS is a live document which will be updated at appropriate intervals as and when further information becomes available. Work on the infrastructure evidence base for Broad Locations such as NW Harpenden has been ongoing and IDP updates will reflect the latest position.</p>	<p>IDP will be updated on an ongoing basis.</p>
<p>Inconsistency between policy S6 viii) and IDS table: Appendix 4 indicates that North West Harpenden site will provide 139sqm on-site health facility which has not been stated as a requirement in policy S6 viii) policy.</p>	<p>Legal and General (1051022)</p>	<p>Disagree</p>	<p>No inconsistency – health need and provision to be addressed through Masterplanning and planning applications, similarly to other Broad Locations.</p>	<p>No change</p>

Request the removal of the reference to the delivery of 87sqm of healthcare floor-space at 'West of Chiswell Green' site. Given the existing healthcare capacity of the area and the size of the facility offered, this provision is not required.	Adrian Irving and Alban Developments Ltd (1156368)	Disagree	Health need and provision to be addressed through Masterplanning and planning applications, similarly to other Broad Locations.	No change
Supports the requirement to make appropriate provisions to infrastructure.	Welwyn Hatfield Borough Council (52397)	Noted	Support noted	No change
The IDS doesn't identify the necessary highway/transport infrastructure that will be required.	Hertfordshire County Council (837689)	Disagree	That level of detail is not required for the IDS at this stage. The matter of highway/ transport infrastructure required can be properly addressed through the IDP and Masterplanning processes.	No change
IDS needs to be updated in relation to school provision and school costs	Hertfordshire County Council (837689)	Noted	Ongoing iterative discussions with HCC	IDP will be updated on an ongoing basis.

Appendix 5 - List of smaller residential sites with permission

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Suggest a better presentation of the list of small sites by totalling them up	RF Sinclair and Sons (1058251)	Disagree	This is done in Appendix 2 Housing trajectory	No change
Data used on small sites is not comprehensive due to the repeat entries and no presentation of the relationship to housing land supply.	RF Sinclair and Sons (1058251)	Disagree	Appendix 2 Housing trajectory deals with this – NB: Appendix 5 includes a couple of duplicate permissions on same sites.	No change
It is unclear whether the housing supply for small sites is additional housing or whether it is net of any housing demolitions.	Aurora Properties Limited (1151817)	Disagree	Appendix 2 Housing trajectory deals with this	No change
Small sites will not address any percentage of the housing requirement in	Hunston Planning Limited (1185622)	Disagree	The list was largely designed to be illustrative. Future supply will include additional small sites.	No change

the Local Plan because they will be built before the start of the Plan Period.				
Lack of evidence to show why the 10% target for small and medium sized sites, by the NPPF, cannot be achieved.	Hunston Planning Limited (1185622)	Agree	The housing trajectory (and other evidence) shows 10% level is achievable.	No change

Appendix 6 – Housing Mix

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Question justification for mix	867068	Disagree	Evidential basis is summarised in Appendix 6 itself and more detail supporting the Local Plan is available in full.	No change
No evidence is provided to demonstrate what percentage of the local population cannot afford to buy (or rent) at the Market Value	867068	Disagree	Evidential basis is summarised in Appendix 6 itself and more detail supporting the Local Plan is available in full.	No change
No justification has been provided for the	867068	Disagree	Evidential basis is summarised in Appendix 6 itself and more detail supporting the Local Plan is available in full.	No change

proportion of affordable housing (types)				
Mix results in over concentrations of affordable housing and will not create balanced communities	867312 1184750	Disagree	Affordable housing will be of different types; creating a balanced housing offer meeting most pressing needs.	No change
Concerns that different housing density requirements will be applied across the boundary of Dacorum and SADC.	867312	Disagree	The NPPF prioritises achieving optimal housing densities and appropriate mix of sizes / types. This will apply to any urban development / expansion.	No change
Concerns that building mass concentrations of affordable units at the proposed mix of sizes, and on the scale proposed, will unbalance the structures necessary for thriving innovative- and	867312	Disagree	The NPPF prioritises achieving optimal housing densities and appropriate mix of sizes / types. This will apply to any urban development / expansion.	No change

balanced-communities.				
The minimum target for affordable housing must be set to 75% affordable homes on sites of 10 dwellings or more, to match the level indicated in housing evidence	St Albans Labour Party (1183933)	Disagree	This mix not appropriate due to viability, deliverability and community balance/ cohesion	No change
Suggest a greater social mix with 40% social and affordable housing, 30-40% 2-4 bedroom housing and 20% 4-6 bedroom housing	1184750	Disagree	Evidential basis for specific mix is summarised in Appendix 6 itself and more detail supporting the Local Plan is available in full. This mix not appropriate as doesn't correlate to evidence and due to viability, deliverability and community balance / cohesion.	No change
Reducing the supply of large homes affects future flexibility for family use / community balance	Aboyne Residents Association (1181214)	Disagree	The mix includes a substantial element of family size housing.	No change

Support approach to meeting affordable housing need, including mix	Trustees of James Henry Frank Sewell Deceased (1185630)	Noted	Support noted	No change
Mix needs to be updated to match SWHG research (once it is completed)	Dacorum Borough Council (1186054)	Disagree	The mix does not differ greatly from that suggested by existing SWHG research and also reasonably reflects particular local needs as evidenced in more detail in SADC research evidence.	No change

Annex 1 – Broad Location (BL) Area and Base Capacity Calculations (in Hectares – Ha)

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Park Street Garden Village Broad Location and its associated data should be removed and replaced with the Butterfly World site in Chiswell Green	Butterfly World Project Ltd (1183965)	Disagree	Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.	No change
Request school buildings as well as the playing fields be removed from the green belt	Department for Education (1186955)	Disagree	Some school sites are on land excluded from the Green Belt and some are not, as set out here. Policy approach set out at S3 and L21	No change

Query the justification of the school site allocations	Department for Education (1186955)	Disagree	School site allocations based on evidence and work with HCC. Policy approach set out at S3 and L21	No change
Delete 'in GB' from title of column six.	Hertfordshire County Council (837689)	Disagree	School site allocations based on evidence and work with HCC. Policy approach set out at S3 and L21	No change

Sustainability Appraisal

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
The SA/SEA does not consider other/all specific sites that have been put forward and fails to provide an assessment for them, explaining why they have been rejected	<p>Taylor Wimpey Strategic Land (1187472)</p> <p>Martin Grant Homes and Kearns Land (975683)</p> <p>ERLP 1 Sarl (1123561)</p> <p>M Scott Properties (1185993)</p> <p>Mr Pete Hutchison (1153268)</p> <p>Department of Health & Social Care and Bloor Homes (1156886)</p> <p>Owner Pound Farm & East of Sandridge (1187227)</p>	Noted	See Sustainability Appraisal full report.	No change

	Helioslough Ltd (1182085)			
The SA has not considered the impact of increasing the East Hemel South proposed dwellings development by 140%	Leverstock Green Village Association (1185907) 334023	Noted	See Sustainability Appraisal full report.	No change
The SA should contain a fuller assessment and development scoping exercise must be carried out on the East Hemel Hempstead (North) development to ensure that the area maintains an appropriate landscaping and character, sympathetic to the nearby settlement	1153741	Noted	See Sustainability Appraisal full report.	No change

The SA doesn't currently provide any explicit commentary on the process the Council undertook to apply the sequential test based on the latest SFRA, taking future climate change into account	Environment Agency (1147557)	Noted	See Sustainability Appraisal full report.	No change
Support the SA	1185695 1186062	Noted	See Sustainability Appraisal full report.	No change
There is no compatibility between the Vision and Objectives listed within the Plan and the SA objectives	Stackbourne Limited (1153646)	Noted	See Sustainability Appraisal full report.	No change
The Plan and SA have not been positively prepared as they disregard the planning permission that	Helioslough Ltd (1182085) Department of Health & Social Care and Bloor Homes (1156886)	Noted	See Sustainability Appraisal full report.	No change

exists for the SRFI				
Disagree with outcomes of SA assessment of Park Street Garden Village against the sustainability objectives	Helioslough Ltd (1182085)	Noted	See Sustainability Appraisal full report.	No change
SA incorrect that prior gravel extraction will have destroyed all remains as some of the site has not been quarried.	Helioslough Ltd (1182085)	Noted	See Sustainability Appraisal full report.	No change
SA incorrect to refer to site as previously developed land - land developed for minerals extraction excluded by paragraph 70 of NPPF	Helioslough Ltd (1182085)	Noted	See Sustainability Appraisal full report.	No change
SA and the Plan are not considered to be consistent with	Helioslough Ltd (1182085)	Noted	See Sustainability Appraisal full report.	No change

national policy as they don't aim to deliver sustainable development				
The SA is misleading in its assessment of PSGV. It includes ambiguous statements, does not consider site constraints which could hinder development proposals, and ignores the loss of benefits resulting from not providing the SRFI.	Helioslough Ltd (1182085)	Noted	See Sustainability Appraisal full report.	No change
No acknowledgement of the planning permission for the SRFI on the site of the proposed Park Street Garden Village	M Scott Properties (1185993)	Noted	See Sustainability Appraisal full report.	No change
The SA demonstrates full compliance with the Plan's	Trustees of James Henry Frank Sewell Deceased (1185630)	Noted	See Sustainability Appraisal full report.	No change

requirement to consider social, economic and environmental factors				
SA methodology excludes small to medium sites in sustainable locations with facilities beneficial for any development	M Scott Properties (1185993)	Noted	See Sustainability Appraisal full report.	No change
SA is inconsistent with the proposed 2020 commencement date for the Local Plan	M Scott Properties (1185993)	Noted	See Sustainability Appraisal full report.	No change
The SA should provide an objective- led approach whereby the potential impacts of a development plan, its allocations and all reasonable alternatives are appraised to the same level of detail in order to	M Scott Properties (1185993) Department of Health & Social Care and Bloor Homes (1156886)	Noted	See Sustainability Appraisal full report.	No change

identify their contribution to sustainable development				
Support the SA statement that not all villages are suitable for accommodating growth	M Scott Properties (1185993)	Noted	See Sustainability Appraisal full report.	No change
The SA fails to address the negative consequences of housing provision on large strategic sites and the impacts this has on supply	Redbourn Parish Council (759908)	Noted	See Sustainability Appraisal full report.	No change
No consultation was undertaken for North East Redbourn site at the Issues and Options stage. Unclear how the site (as well as other 'omission sites') was explored as an alternative in the	Redbourn Parish Council (759908)	Noted	See Sustainability Appraisal full report.	No change

Sustainability Appraisal (SA)				
The Plan and the accompanying SA rely on much of the previous work undertaken to support the Strategic Local Plan (SLP) and draft Detailed Local Plan (DLP), the evidence base for which is out of date	Department of Health & Social Care and Bloor Homes (1156886)	Noted	See Sustainability Appraisal full report.	No change
The council hasn't consulted on the SA	Owner Pound Farm & East of Sandridge (1187227)	Noted	See Sustainability Appraisal full report.	No change
Agree with the supporting statement in the SA with regards to flood risks but recommend the creation of an aim of new development that contributes to reducing existing flood risk (where applicable)	Hertfordshire County Council (837689)	Noted	See Sustainability Appraisal full report.	No change

Sustainability implications of the spatial strategy have not been properly assessed	Land at The Dak (1186131) Owners of Land South of Burydell Lane (1186128)	Noted	See Sustainability Appraisal full report.	No change
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General Comments

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
The prolonged feedback process and website difficulties would deter people from submitting responses	1153741 963110 1185950	Noted	Public consultation processes are primarily statutory. Website used successfully by many hundreds of respondents. Alternative routes of submission – hard copy etc. – supported by SADC.	No change
Concerns with the existence of a knowledge and expertise gap between policy and representations, arising from a lack of knowledge of the planning procedures. This suggests that some responses will have more weight in shaping	963110 1185950	Noted	All consultation responses that raise material planning considerations are taken into account during the plan making process.	No change

the local plan than others				
Agree with the figures used for the preparation of the Local Plan	1185775	Noted	Support noted	No change
Would like to see a stronger commitment to the residential development of brownfield land, particularly rear gardens of existing residential properties, as a method of increasing the number of new dwellings in the district	1121386	Noted	Policy S1 sets out a clear approach and positively supports residential development in existing urban areas, subject to other policies.	No change
Support all aspects of the Local Plan	1185695 1186018 1185939 1186062	Noted	Support noted	No change
CALA homes proposed development in Bedmond Lane Meadow must be	1185695 1185939 1186062	Noted	Applications on this site will be assessed against relevant planning policies and material considerations.	No change

refused as it is designated an Asset of Community Value				
Concern with the consistency of the local plan due to the existence of policies which fail to establish a link with the Government policy and guidance	London Wates (Bricket Wood) Limited (1186996) 52064	Disagree	Policies reflect overall government / NPPF approach	No change
'Chapter 5- Design, Conservation and Enhancement of the natural, built and historic environment', drawn up with the help of the communities, was not promoted	1185950	Disagree	There has been ongoing joint working with residents, landowners, local communities and other stakeholders.	No change
Recognise the importance of a new Local Plan	St Albans Civic Society (156974)	Noted	Noted	No change
The LPA must adopt a more holistic spatial approach to	Intrasales Ltd (1157383)	Disagree	Housing requirement/targets are based on the standard methodology set out by the government – see S4.	No change

<p>delivering housing that plans positively and enables sustainable locations in the district to play a greater role in meeting the area's housing requirements</p>			<p>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.</p> <p>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p>	
<p>Difficulty in understanding the justification for the local plan policies due to the constant need to cross-reference with the SA</p>	<p>Martin Grant Homes and Kearns Land (975683)</p>	<p>Disagree</p>	<p>Full and detailed justification is provided by evidence documents. It is not necessary to justify the Plan within the Plan document itself. To do so would result unnecessarily in a longer and more complex document.</p>	<p>No change</p>

List of Site Promotions: Residential (Strategic and Small Scale), Employment and Mixed Use

Residential (Strategic and Small-scale)

Burston Garden Centre

CWC Group (no specific site promotion)

Dunstable Road Redbourn

Eaton Lodge, Punch Bowl Lane

Former Butterfly World

Former HSBC Training Centre at Smug Oak Lane

Glinwell site, Hatfield Road, St Albans

Hanstead Park

Harper Green Garden Village

Harper Lodge Industrial Estate and Ivory Racing Stables

Land adjacent to Breakspears

Land at Batchwood Drive

Land at Boissy Close

Land at Common Lane, Harpenden

Land at Gaddesden Lane

Land at Greenway to the South of London Road

Land at Hill Dyke Road, Wheathampstead

Land at Lye Lane- Intrasales Ltd

Land at Noke Side, Chiswell Green
Land at Park Street Lane, How Wood
Land West of Watling Street, Park Street
Land at Piggottshill Lane
Land at Roundhouse Farm
Land at the Dak, Colney Heath Lane
Land at Tollgate Road
Land at Windridge Farm
Land between Bedmond Lane and Mayne Avenue
Land between Tollgate Road & Coursers Road
Land East of Common Lane, Batford
Land east of Redbourn
Land north east of Redbourn
Land north of Ragged Hall Lane, Chiswell Green
Land North Of Redbourn
Land North of Sandridge
Land off Shenley Lane, London Colney
Land Rear of the Cherry Tree, Wheathampstead
Land South of Alban Way
Land South of Burydell Lane
Land south west of Fishpool Street

Land to the East of Napsbury Lane [Napsbury Fields]

Land to the east of Sandridge

Land west of Redbourn

Land West of Westminster Fields Harpenden

Land West of London Colney

Moor Mill North

Moor Mill South

Sauncey View Lodge, Common Lane, Harpenden

North of Napsbury

North of Wheathampstead Road

Notcutts Garden Centre, Hatfield Road, St Albans

Orchard Drive, How Wood, St Albans

Orchard Garage Woodcock Hill

Park Street Baptist Church, Tippendell Lane

Pound Farm

Radio Nurseries

Radlett Road, Frogmore, St Albans

Land at Radlett

Redbourn Golf Club & Aldwickbury Park Golf Club

Roundhouse Farm

Tollgate Farm

Townsend Lane

Tyttenhanger- Tarmac

Vacant Weight Training Club, Leyland Avenue

Verulam Golf Club, London Road

Land at Wheathampstead

Employment

Land adjoining Copsewood, North Orbital Road, St Albans

Land at Roehyde

Land North West of Colney Fields

Mixed Use

Burston Site

Land east of Watling Street

Smallford Works

List of abbreviations used

BL – Broad Location

CCOS – City Centre Opportunity Site

CHP – Combined Heat and Power

DBC - Dacorum Borough Council

EHH – East Hemel Hempstead

EIA – Environmental Impact Assessment

EZ – Enterprise Zone

GBR – Green Belt Review

GDPO - General Permitted Development Order

GTANA – Gypsy and Traveller Accommodation Needs Assessment

HBC – Hertsmere Borough Council

HCC – Hertfordshire County Council

HSE – Health and Safety Executive

IDP – Infrastructure Deliver Plan

IDS – Infrastructure Delivery Schedule

JSP – Joint Strategic Plan

LEP – Local Enterprise Partnership

LGS – Local Green Space

LP - Local Plan

LPA - Local Planning Authority

SADC – St Albans City and District Council

MMTI – Multi Modal Transport Interchange

MoU – Memorandum of Understanding

NPPF – National Planning Policy Framework

PSGV – Park Street Garden Village

SA – Sustainability Appraisal

SEA – Strategic Environmental Assessment

SEP – Strategic Economic Plan

SFRA – Strategic Flood Risk Assessment

SRFI – Strategic Rail Freight Interchange

SWHG– South West Herts Group

SHMA – Strategic Housing Market Area

WHBC – Welwyn Hatfield Borough Council

Policy S6 vii) North East Harpenden Broad Location

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Harpenden has existing infrastructure issues that will be exacerbated by the proposed development	Batford Community Action Group (1185696) 789007 1183112 1183210 1184567 1056907 1185775 1185714	Noted	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process.	IDP will be updated on an ongoing basis.
The proposed Broad Location is a significant distance from the town centre, and is unsustainable	1185775	Disagree	Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy. Many facilities are in close proximity such as schools and town centre relatively accessible	No change
Support transport network improvements	St Albans & District Footpaths Society (723340)	Noted	Support noted	No change

	The British Horse Society (1187597) Wheathampstead Parish Council (51941)			
Countryside access links must be provided	Ramblers Association (52420) St Albans & District Footpaths Society (723340) The British Horse Society (1187597) St Albans Cycle Campaign (346623)	Agree	This is part of the masterplanning process.	No change
Should be required to deliver walking and cycling facility improvements to promote car free access, which should be adequately maintained	St Albans Cycle Campaign (346623) Hertfordshire County Council (837689) Batford Community Action Group (1185696) 1048449	Agree	Cross reference Policy L18 This approach is integral to the policy.	No change
Further work needs to be carried out on infrastructure, including highways, parking, water, sewerage	Hertfordshire County Council (837689) Batford Community Action Group (1185696) 1185775	Noted	These points are generally recognised. These matters can be properly detailed through the master planning process / planning application / EIA processes, with statutory consultation.	No change

	<p>Wheathampton Parish Council (51941)</p> <p>Harpenden Greenbelt Association (866541)</p> <p>Harpenden Society (1156761)</p> <p>115365</p> <p>1056907</p> <p>118571</p> <p>498103</p> <p>867312</p> <p>1183112</p> <p>1183210</p> <p>1184567</p>			
<p>Policy should consider social and pastoral needs of future occupants and include requirements for a community facility e.g. a community hall</p>	<p>St Albans Deanery Synod (1185929)</p>	<p>Noted</p>	<p>Refer to Policy L22 which encourages opportunities for new provision of places of worship as part of development of the Local Centres in Broad Locations.</p>	<p>No change</p>

Have infrastructure requirements been viability tested to comply with national policy	Hertsmere Borough Council (51934) Harpenden Society (1156761)	Noted	Updated evidence regarding economic viability of development has been made available on the council website.	No change
Major infrastructure must be provided up front	Colney Heath Parish Council (51891) London Colney Parish Council (52477)	Noted	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process	IDP will be updated on an ongoing basis.
Broad locations lack a neighbourhood centre and are unsustainable.	Batford Community Action Group (1185696) Harpenden Green Association (866541) 115365	Disagree	Cross reference with L22, which identifies Local Centres in Broad Locations. This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
Improvements of PROW	Footpaths coordinator (723340) Wheathampton Parish Council (51941)	Noted	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process	IDP will be updated on an ongoing basis.
The policy should clearly demonstrate how impact on infrastructure will be mitigated	Harpenden Town Council (51870)	Noted	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process	IDP will be updated on an ongoing basis.

<p>The policy should state that development will be required to provide new neighbourhood centre</p>	<p>Harpenden Town Council (51870)</p>	<p>Noted</p>	<p>Cross reference with L22, which identifies Local Centres in Broad Locations.</p> <p>This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.</p>	<p>No change</p>
<p>Both strategic and local public space must be provided</p>	<p>Ramblers Association (52420)</p> <p>St Albans & District Footpaths Society (723340)</p> <p>The British Horse Society (1187597)</p> <p>Batford Community Action Group (1185696)</p> <p>1184750</p>	<p>Agree</p>	<p>This is part of the masterplanning process</p>	<p>No change</p>
<p>Development would result in loss of Greenacres Equestrian Centre These facilities should be re-provided nearby.</p>	<p>The British Horse Society (1187597)</p> <p>114567</p>	<p>Disagree</p>	<p>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.</p> <p>The main site owners have promoted the site as available and deliverable for housing.</p>	<p>No change</p>
<p>Policy should include the requirement for outdoor sports provisions, and clarify whether open</p>	<p>Sports England (824971)</p>	<p>Disagree</p>	<p>Cross reference Policy L22 and L26 – 28.</p> <p>The policy refers to strategic and local public open space. Open space is defined under the NPPF as all space of public value, land and water which offer important opportunities for sport and recreation. It is clear that this is therefore outdoor in</p>	<p>No change</p>

space or recreation space includes outdoor sports provisions			nature. The policy also refers to recreation space and community facilities which would capture indoor sports facilities. This matter can be properly detailed through the Masterplanning process.	
Request policy gives consideration to extending or enhancing sports facilities in the proposed secondary school adjoin the site.	Sports England (824971)	Agree	Cross reference Policy L22 and L26 – 28. As per Policy L22 the Council would support new facilities in appropriate and sustainable locations and joint use of facilities near to new housing areas to meet sustainability objectives. This is part of the Masterplanning process.	No change
Proposed development would have impact on the natural environment	Batford Community Action Group (1185696)	Disagree	Development covered by EIA are set out in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Council will determine likely impact through a 'screening' procedure and whether an EIA is required. Cross reference with L29.	No change
Clarity needed on whether specific deliverables such as school buildings will be accommodated in the Broad Location or Green Belt	St Albans & District Footpaths Society (723340) The British Horse Society (1187597)	Noted	Primary school site in the land to be taken out of GB. Cross reference L21 and Policies Map.	No change
Plan should include a Greater focus on the archaeological potential and history	789007	Disagree	Appropriate policy is applicable to the whole District. The proposed development at S6vii NE Harpenden will be subject to masterplanning and will accord with policy L30 regarding historic environment and archaeology.	No change

within Batford (Harpenden)				
Heritage environment /assets have not been considered and lack of criteria to protect assets	Historic England (929489)	Disagree	<p>Cross reference Policy L30</p> <p>This supports conservation of heritage assets appropriate to their significance and seeks that development which may affect such assets is accompanied by a Heritage Statement.</p> <p>Such heritage assets form only a small proportion of the overall Broad Location, are acknowledged and will be treated appropriately as part of the Masterplanning / planning application processes.</p>	No change
Strongly support allocation and safeguarding of land for schools	Department for Education (1186955)	Noted	Support noted	No change
School site locations should be identified	Hertfordshire County Council (837689)	Disagree	Primary school site in the land to be taken out of GB. Cross reference L21 and Policies Map.	No change
School building areas should be removed from green belt	<p>Department for Education (1186955)</p> <p>Hertfordshire County Council (837689)</p>	Noted	<p>Primary school site in the land to be taken out of GB. Cross reference L21 and Policies Map.</p> <p>This matter can be properly detailed through the master planning process / planning application / EIA processes, with statutory</p>	No change
S6 vii) and viii) unclear on whether it is one school between one site or one school for each.	1153741	Disagree	S6 vii and S6 viii required the provision of 2FE primary school in each Broad Location.	No change

Does not provide sufficient justification that the schools will be financially sustainable, or impact upon the sustainability of existing school.	1153741	Disagree	<p>Updated evidence regarding economic viability of development has been made available on the council website.</p> <p>This is a specific policy requirement in the Plan. All requirements set out in the Broad Location policies, have been agreed as deliverable by the landowners/developers.</p>	No change
Point 10 amended to "A site for and appropriate contributions towards a 2FE primary school (inc early years) or delivery of the school by the site developers"	Crest Strategic Projects and Bloor Homes (1158079)	Disagree	Policy wording is appropriate. This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
40dph too high	Batford Community Action Group (1185696) Harpenden Greenbelt Association (866541) 1184750	Disagree	This is an appropriate minimum density to make best use of land and to avoid further pressure on loss of greenfield land/ Green Belt. The NPPF supports optimisation of residential density.	No change
Broad Locations should use Design Codes	Harpenden Town Council (51870) Batford Community Action Group (1185696)	Disagree	This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change

Further clarity in details needed in due course, which may be part of the masterplan discussion.	1153650	Noted	This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
Excellence in design, energy efficient and water management is required in all Broad Locations	St Albans Civic Society (1156974)	Noted	Requirements for BL set out in Policy L25.	No change
Point 5 amended to "minimum overall net density per hectare provided the development is in keeping with the character and appearance of the surrounding area"	Crest Strategic Projects and Bloor Homes (1158079)	Disagree	This is an appropriate minimum density to make best use of land and to avoid further pressure on loss of greenfield land/ Green Belt. The NPPF supports optimisation of residential density.	No change
Point 12 amended to "3% of homes provided to be self/custom build housing"	Crest Strategic Projects and Bloor Homes (1158079)	Disagree	This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
Should be more housing provided for elderly and disabled people	Harpenden Society (1156761)	Disagree	Housing for the elderly, including downsizers is a key part of the LP. There are clear standards in Policy L1 and L2.	No change

Point 14 amended to "High quality design, energy efficiency and waste management"	Crest Strategic Projects and Bloor Homes (1158079)	Disagree	There are clear standards in Plan Policy. This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
Point 15 amended to "Appropriate renewable energy production and supply mechanisms, where feasible and viable"	Crest Strategic Projects and Bloor Homes (1158079)	Disagree	There are clear standards in Plan Policy. This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
Housing figures should be maximum, not minimum	Batford Community Action Group (1185696) Harpenden Town Council (51870)	Disagree	Housing requirement/targets are based on the standard methodology set out by the government – see S4. Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.	No change
Is there a need for the amount of flexi-care provision required?	St Stephen Parish Council (51804)	Noted	Evidence available in full, including in HCC documents and representations. Policy L2 sets out an appropriate approach.	No change
Policy should include land size requirement for flexi-care home	Hertfordshire County Council (837689)	Disagree	Requirement as set out in Policy L2. Size requirements can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change

40% affordable housing is welcome, but should be amended to 'meet local need'	Batford Community Action Group (1185696)	Noted	There are clear standards in Policy L1 and L2.	No change
Support inclusion of Sauncey Wood Lodge, however proposed housing figure should more accurately reflect that of expected housing delivery.	1153650	Disagree	Support noted. Housing trajectory at appendix 2 shows indicative delivery rates.	No change
It is unclear whether Porters Hill Play Park forms part of the broad location. Its loss if opposed.	Harpenden Greenbelt Association (866541)	Noted	Porters Hill Play Park is not located within the Broad Location.	No change
Land east of Common Lane should be included in the Broad Location	1186108	Disagree	Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.	No change
As part owners of the site support the Proposal	978393 1187423	Noted	Support noted	No change

Policy should consider the requirement for 'community led' development, particularly in the masterplan process.	Batford Community Action Group (1185696)	Noted	This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
What masterplanning collaboration has there been?	St Stephen Parish Council (51804)	Noted	Masterplanning is at the very earliest stages. Collaboration with residents and stakeholders will take place as progress is made.	No change
Collaboration with neighbouring Councils needed	1181750 1182733	Noted	There has been ongoing joint working with neighbouring local authorities including the South West Herts Group.	No change
Lack of cooperation with neighbouring authorities	Batford Community Action Group (1185696) Harpenden Green Association (866541) 1185714	Disagree	There has been ongoing joint working with neighbouring local authorities including the South West Herts Group. DtC considered to be met.	No change
Key documentation will not be provided until after regulation 19, meaning public would be unable to comment.	Batford Community Action Group (1185696) Harpenden Green Association (866541) 1185714	Disagree	Evidence is available in full and where required has been and will be further updated.	No change
Support DtC discussions on North East Harpenden	Central Bedfordshire Council (861963)	Noted	Support noted	No change

Support sufficient assets to provide sustainable management of community facilities, open spaces and parklands	St Albans & District Footpaths Society (723340) The British Horse Society (1187597)	Noted	Support noted	No change
No information provided on strategy or delivery, just a wishlist	Aurora Properties Limited (1151817)	Disagree	The development requirements are clear and the Masterplan process will provide more specific proposals in due course.	No change
No Sequential test based on the Latest SFRA. Request amendment to state no develop in areas at risk of flooding (Zones 2 and 3) taking future impact of climate change into account.	Environmental Agency (1147557)	Noted	Cross reference to Policy L29 and NPPF/NPPG. Updated Flood Risk Assessment has been prepared and added to the website.	No change
Development will exacerbate Flood Risk	Batford Community Action Group (1185696)	Noted	Cross reference to Policy L29 and NPPF/NPPG. Updated Flood Risk Assessment has been prepared and added to the website.	No change
Should include requirement to design to mitigate adverse air quality impacts, as in S6 i), ii) and iii).	Hertfordshire County Council (837689)	Disagree	Cross reverence to Policy L18 which requires major developments to provide proposals for limiting and mitigating air quality impacts.	No change

Policy S6 viii) North West Harpenden Broad Location

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Harpenden has existing infrastructure issues that will be exacerbated by the proposed development	Batford Community Action Group (1185696) Harpenden Greenbelt Association (866541) 789007 1055683 1185775 1185714	Disagree	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process	IDP will be updated on an ongoing basis.
Support walking/cycling facility improvements to promote car-free access	The British Horse Society (1187597) Friends of the Nickey Line (1184312) 1048449	Noted	Support noted	No change
Should require improved road safety for non-motorised users	The British Horse Society (1187597)	Noted	Requirements set out in L19.	No change.
Countryside access links must be provided	Ramblers Association (52420)	Agree	This is part of the masterplanning process	No change

	<p>St Albans & District Footpaths Society (723340)</p> <p>The British Horse Society (1187597)</p> <p>St Albans Cycle Campaign (346623)</p>			
Support transport network improvements	<p>St Albans & District Footpaths Society (723340)</p> <p>Ramblers Association (52420)</p> <p>Friends of the Nickey Line (1184312)</p>	Noted	Support noted	No change
Should be required to deliver walking and cycling facility improvements to promote car free access, which should be adequately maintained	<p>St Albans Cycle Campaign (346623)</p> <p>Hertfordshire County Council (837689)</p> <p>Friends of the Nickey Line (1184312)</p> <p>1153741</p> <p>1048449</p>	Agree	<p>Cross reference Policy L18</p> <p>This approach is integral to the policy.</p>	No change
Further work needs to be carried out on infrastructure, including highways,	Hertfordshire County Council (837689)	Noted	These points are generally recognised. These matters can be properly detailed through the master planning process /	No change

parking, water, sewerage	Batford Community Action Group (1185696) 1185775 1185714 498103 867312		planning application / EIA processes, with statutory consultation.	
Policy should consider social and pastoral needs of future occupants and include requirements for a community facility e.g. a community hall	St Albans Deanery Synod (1185929)	Noted	Refer to Policy L22 which encourages opportunities for new provision of places of worship as part of development of the Local Centres in Broad Locations.	No change
Support sufficient assets to provide sustainable management of community facilities, open spaces and parklands	St Albans & District Footpaths Society (723340) Ramblers Association (52420)	Noted	Support noted	No change
Have infrastructure requirements been viability tested to comply with national policy	Hertsmere Borough Council (51934) Harpenden Society (1156761)	Noted	Updated evidence regarding economic viability of development has been made available on the council website.	No change

Planning Contributions should go towards the resurfacing of the Nickey Line.	Friends of the Nickey Line (1184312)	Noted	The Nickey Line footpath / cycleway is an important landscape, commuting and recreational route feature. There are considerable opportunities for enhancement. Masterplanning will consider opportunities and if appropriate S106 contributions provided.	No change
Improvements of PROW	Footpaths coordinator (723340)	Noted	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process	IDP will be updated on an ongoing basis.
The policy should clearly demonstrate how impact on infrastructure will be mitigated	Harpenden Town Council (51870)	Noted	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process	IDP will be updated on an ongoing basis.
The policy should state that the development will be required to provide new neighbourhood centre	Harpenden Town Council (51870)	Noted	Cross reference with L22, which identifies Local Centres in Broad Locations. This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
Major infrastructure must be provided up front	Colney Heath Parish Council (51891) London Colney Parish Council (52477)	Noted	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process	IDP will be updated on an ongoing basis.
Broad locations lack a neighbourhood centre and are unsustainable.	Batford Community Action Group (1185696)	Disagree	Cross reference with L22, which identifies Local Centres in Broad Locations. This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change

School building areas should be removed from green belt	Department for Education (1186955) Hertfordshire County Council (837689)	Disagree	Primary school site in the land to be retained in GB. Cross reference L21 and Policies Map.	No change
Clarity needed on whether specific deliverables such as school buildings will be accommodated in the Broad Location or Green Belt	St Albans & District Footpaths Society (723340) The British Horse Society (1187597)	Disagree	Primary school site in the land to be retained in GB. Cross reference L21 and Policies Map.	No change
S6 vii) and viii) unclear on whether it is one school between one site or one school for each.	1153741	Noted	S6 vii and S6 viii required the provision of 2FE primary school in each Broad Location.	No change
Strongly support allocation and safeguarding of land for schools	Department for Education (1186955)	Noted	Support noted	No change
Policy should include indication of school site size required	Department for Education (1186955)	Noted	Add reference in IDP to HCC size requirements as set out in response to L21	IDP will be updated on an ongoing basis.
Does not provide sufficient justification that the schools will be financially sustainable, or impact upon the	1153741	Disagree	Updated evidence regarding economic viability of development has been made available on the council website.	No change

sustainability of existing school.			This is a specific policy requirement in the Plan. All requirements set out in the Broad Location policies, have been agreed as deliverable by the landowners/developers.	
Support provision of recreational space and public open space	The British Horse Society (1187597)	Noted	Support noted	No change
Policy should include the requirement for outdoor sports provisions, and clarify whether open space or recreation space includes outdoor sports provisions	Sports England (824971)	Disagree	Cross reference Policy L22 and L26 – 28. The policy refers to public open space. Open space is defined under the NPPF as all space of public value, land and water which offer important opportunities for sport and recreation. It is clear that this is therefore outdoor in nature. The policy also refers to recreation space and community facilities which would capture indoor sports facilities. This matter can be properly detailed through the Masterplanning process.	No change
Should state Ancient Woodland bordering the site should be retained and protected	Harpenden Greenbelt Association (866541)	Disagree	Importance of Ancient Woodland acknowledged. Cross reference Policy L30, which supports the protection of ancient woodlands. This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
The location of the proposed school would be detrimental to the Green Belt	Harpenden Greenbelt Association (866541)	Noted	Site selection is firmly based on comprehensive GB work and the most appropriate locations have already been selected.	No change
The required housing number is	1055683	Disagree	Housing requirement/targets are based on the standard methodology set out by the government – see S4.	No change

overestimated, and does not justify the release of Greenbelt			<p>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.</p> <p>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p> <p>Calculation basis set out at Annex 1.</p>	
The Policy should include “provisions of green links connecting North West Harpenden to the surrounding countryside, which will enhance the recreation and leisure use of the Green Belt beyond Harpenden to the north of the site”	CEG (1158030)	Disagree	Requirement set out in Policies L28 and L29. This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No Change
Both strategic and local public space must be provided	<p>Ramblers Association (52420)</p> <p>St Albans & District Footpaths Society (723340)</p> <p>1184750</p>	Agree	This is part of the masterplanning process	No change
40dph too high	<p>1184750</p> <p>Harpenden Greenbelt Association (866541)</p>	Disagree	This is an appropriate minimum density to avoid further pressure on loss of greenfield land/ Green Belt. The NPPF supports optimisation of residential density.	No change

	Batford Community Action Group (1185696)			
Housing figures should be maximum, not minimum	Harpenden Town Council (51870) Harpenden Greenbelt Association (866541)	Disagree	Housing requirement/targets are based on the standard methodology set out by the government – see S4. Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.	No change
Site is of insufficient size to provide 580 dwellings.	Harpenden Greenbelt Association (866541)	Disagree	Some parts of the Broad Location will be at higher and lower density. Overall the land can accommodate the dwelling numbers in the Plan. Calculation basis set out at Annex 1.	No change
Should be more housing provided for elderly and disabled people	Harpenden Society (1156761)	Disagree	Housing for the elderly, including downsizers is a key part of the LP. There are clear standards in Policy L1 and L2.	No change
“Broad Locations’ should be changed to ‘Specific deliverable sites’ and deliverable within 5 years	CEG (1158030) Legal and General (1051022)	Disagree	Local Plan wording reflects NPPF wording.	No change
Supports the allocation of the site	CEG (1158030) Legal and General (1051022)	Noted	Support noted	No change
Is there a need for the amount of flexi-	St Stephen Parish Council (51804)	Noted	Evidence available in full, including in HCC documents and representations. Policy L2 sets out an appropriate approach.	No change

care provision required?				
Policy should include land size requirement for flexi-care home	Hertfordshire County Council (837689)	Disagree	Requirement as set out in Policy L2. Size requirements can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change
Support DtC discussions on North West Harpenden	Central Bedfordshire Council (861963)	Noted	Support noted	No change
What masterplanning collaboration has there been?	St Stephen Parish Council (51804)	Noted	Masterplanning is at the very earliest stages. Collaboration with residents and stakeholders will take place as progress is made.	No change
Collaboration with neighbouring Councils needed	1181750 1182733	Noted	There has been ongoing joint working with neighbouring local authorities including the South West Herts Group.	No change
Key documentation will not be provided until after regulation 19, meaning public would be unable to comment.	Batford Community Action Group (1185696) Harpenden Green Association (866541) 1185714	Disagree	Evidence is available in full and where required has been and will be further updated.	No change
Lack of cooperation with neighbouring authorities	Batford Community Action Group (1185696) Harpenden Green Association (866541)	Disagree	There has been ongoing joint working with neighbouring local authorities including the South West Herts Group. DtC considered to be met.	No change

	1185714			
Broad Locations should use Design Codes	Harpenden Town Council (51870) Batford Community Action Group (1185696)	Disagree	This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change
Density would be out of character with the surrounding area.	Harpenden Greenbelt Association (866541)	Disagree	This is an appropriate minimum density to make best use of land and to avoid further pressure on loss of greenfield land/ Green Belt. The NPPF supports optimisation of residential density. Cross reference to policy L1 which does not compromise the distinctive character of areas where new developments will be based.	No change
The policy should read 'the masterplanning process should be conducted in parallel with the preparation of the Local Plan, to enable timely site delivery'	Legal and General (1051022) CEG (1158030)	Disagree	Masterplanning is at an early stage but will continue to support LP process. No need to change LP text.	No change
Excellence in design, energy efficient and water management is required in all Broad Locations	St Albans Civic Society (1156974)	Noted	Requirements for BL set out in Policy L25.	No change

Should include requirement to design to mitigate adverse air quality impacts, as in S6 i), ii) and iii).	Hertfordshire County Council (837689)	Disagree	Cross reference to Policy L18 which requires major developments to provide proposals for limiting and mitigating air quality impacts.	No change
Development will exacerbate Flood Risk	Batford Community Action Group (1185696)	Noted	Cross reference to Policy L29 and NPPF/NPPG. Updated Flood Risk Assessment has been prepared and added to the website.	No change
Impact listed building / its setting should be made clear.	Harpenden Greenbelt Association (866541)	Disagree	Cross reference Policy L30 This supports conservation of heritage assets appropriate to their significance and seeks that development which may affect such assets is accompanied by a Heritage Statement.	No change
Heritage environment /assets have not been considered and lack of criteria to protect assets	Historic England (929489)	Disagree	Cross reference Policy L30 This supports conservation of heritage assets appropriate to their significance and seeks that development which may affect such assets is accompanied by a Heritage Statement.	No change
No information provided on strategy or delivery, just a wishlist	Aurora Properties Limited (1151817)	Disagree	The development requirements are clear and the Masterplan process will provide more specific proposals in due course.	No change

Policy S6 ix) West of London Colney Broad Location

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Green routes required for London Colney children to access secondary schools	London Colney Parish Council (52477)	Noted	<p>Policy L29 sets out the proposed key green infrastructure network. Enhanced public access improvements to this network is a key priority. S6 ix regarding the BL for London Colney requires a transport network of walking and cycling links.</p> <p>This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.</p>	No change
Countryside access links must be provided	<p>Ramblers Association (52420)</p> <p>St Albans & District Footpaths Society (723340)</p> <p>The British Horse Society (1187597)</p> <p>St Albans Cycle Campaign (346623)</p>	Agree	This is part of the masterplanning process.	No change
Support transport network improvements	<p>St Albans & District Footpaths Society (723340)</p> <p>Ramblers Association (52420)</p>	Noted	Support noted	No change

<p>Should be required to deliver walking and cycling facility improvements to promote car free access, which should be adequately maintained</p>	<p>St Albans Cycle Campaign (346623) Hertfordshire County Council (837689) 1048449</p>	<p>Agree</p>	<p>Cross reference Policy L18 This approach is integral to the policy.</p>	<p>No change</p>
<p>Further work needs to be carried out on infrastructure, including highways, parking, water, sewerage</p>	<p>Hertfordshire County Council (837689) London Colney Parish Council (52477) 498103 867312 1185583 1185821</p>	<p>Noted</p>	<p>These points are generally recognised. These matters can be properly detailed through the master planning process / planning application / EIA processes, with statutory consultation.</p>	<p>No change</p>
<p>Policy should consider social and pastoral needs of future occupants and include requirements for a community facility e.g. a community hall</p>	<p>St Albans Deanery Synod (1185929)</p>	<p>Noted</p>	<p>Refer to Policy L22 which encourages opportunities for new provision of places of worship as part of development of the Local Centres in Broad Locations.</p>	<p>No change</p>

Have infrastructure requirements been viability tested to comply with national policy	Hertsmere Borough Council (51934)	Noted	Updated evidence regarding economic viability of development has been made available on the council website.	No change
Major infrastructure must be provided up front	Colney Heath Parish Council (51891) London Colney Parish Council (52477)	Noted	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process.	IDP will be updated on an ongoing basis.
Existing infrastructure issues will be exacerbated by the proposed development	London Colney Parish Council (52477) Bricketwood Residents Association (1186066) 1182733 1185583 1185821	Noted	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process	IDP will be updated on an ongoing basis.
The development will result in strain on facilities and services for existing residents.	Bricketwood Residents Association (1186066)	Noted	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process	IDP will be updated on an ongoing basis.
School building areas should be removed from green belt	Department for Education (1186955) Hertfordshire County Council (837689)	Disagree	Primary and secondary 'all-through' school site in the land to be retained in GB. Cross reference L21 and Policies Map.	No change

Must include a secondary school	London Colney Parish Council (52477)	Agree	Policy S6 ix) sets out this requirement.	No change
Clarity needed on whether specific deliverables such as school buildings will be accommodated in the Broad Location or Green Belt	St Albans & District Footpaths Society (723340) The British Horse Society (1187597)	Noted	Primary and secondary 'all-through' school site in the land to be retained in GB. Cross reference L21 and Policies Map.	No change
Strongly support allocation and safeguarding of land for schools	Department for Education (1186955)	Noted	Support noted	No change
Policy should include indication of school site size required	Department for Education (1186955)	Noted	Add reference in IDP to HCC size requirements as set out in response to L21.	IDP will be updated on an ongoing basis.
London Colney already has three primary schools, with a secondary school close by.	1055738	Noted	London Colney has grown to the stage where it is a small town in terms of its overall scale, population level and number of households. A new secondary school and primary school is a key part of providing appropriate facilities for London Colney.	No change
Support provision of recreational space and public open space	The British Horse Society (1187597) Bricketwood Residents Association (1186066)	Noted	Requirements set out in Policy L27 and L28. This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
Both strategic and local public space must be provided	Ramblers Association (52420)	Agree	Requirements set out in Policy L27 and L28. This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change

	St Albans & District Footpaths Society (723340) 1184750			
Support sufficient assets to provide sustainable management of community facilities, open spaces and parklands	St Albans & District Footpaths Society (723340) Ramblers Association (52420) Bricketwood Residents Association (1186066)	Noted	Support noted	No change
Policy should include the requirement for outdoor sports provisions, and clarify whether open space or recreation space includes outdoor sports provisions	Sports England (824971)	Disagree	Cross reference Policy L22 and L26 – 28. The policy refers to public open space. Open space is defined under the NPPF as all space of public value, land and water which offer important opportunities for sport and recreation. It is clear that this is therefore outdoor in nature. The policy also refers to recreation space and community facilities which would capture indoor sports facilities. This matter can be properly detailed through the Masterplanning process.	No change
Should include a commitment to working closely with Hertsmere BC, particularly in relation to infrastructure	Hertsmere Borough Council (51934) 1182733	Noted	There has been and will be ongoing joint working with neighbouring local authorities including Hertsmere the South West Herts Group. DtC considered to be met.	No change

Hertsmere BC should be partners for masterplanning work	Hertsmere Borough Council (51934)	Noted	SADC and HBC are working together through the SWH JSP process. For all issues where there might be a cross-boundary implication for Hertsmere/SADC then appropriate involvement in Masterplanning will take place in due course.	No change
Support discussions between SADC and Parish Council	London Colney Parish Council (52477)	Noted	Support noted	No change
What masterplanning collaboration has there been?	St Stephen Parish Council (51804)	Noted	Masterplanning is at the very earliest stages. Collaboration with residents and stakeholders will take place as progress is made.	No change
Collaboration with neighbouring Councils needed	London Colney Parish Council (52477) 1181750 1182733 1185583 1185821	Noted	There has been ongoing joint working with neighbouring local authorities including the South West Herts Group.	No change
Should have a maximum capacity of 440 homes, not a minimum	London Colney Parish Council (52477)	Disagree	Housing requirement/targets are based on the standard methodology set out by the government – see S4. Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy. Calculation basis set out at Annex 1.	No change
40dph too high	1184750 1185821	Disagree	This is an appropriate minimum density to avoid further pressure on loss of greenfield land/ Green Belt. The NPPF supports optimisation of residential density.	No change

Under councils own guidance of a minimum of 500 dwellings.	1185775	Disagree	Site selection methodology set out site area or site capacity as criteria for assessment. This BL falls within that site area criteria.	No change
Is there a need for the amount of flexi-care provision required?	St Stephen Parish Council (51804)	Noted	Evidence available in full, including in HCC documents and representations. Policy L2 sets out an appropriate approach.	No change
Policy should include land size requirement for flexi-care home	Hertfordshire County Council (837689)	Disagree	Requirement as set out in Policy L2. Size requirements can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change
The 440 homes should be provided within the Park Street Garden Village.	1055738	Disagree	Housing requirement/targets are based on the standard methodology set out by the government – see S4. Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.	No change
Adverse impact on Napsbury Historic Park and Conservation Area	1055738	Disagree	Cross reference Policy L30 This supports conservation of heritage assets appropriate to their significance and seeks that development which may affect such assets is accompanied by a Heritage Statement.	No change
Heritage environment /assets have not been considered and lack	Historic England (929489)	Disagree	Cross reference Policy L30	No change

of criteria to protect assets			This supports conservation of heritage assets appropriate to their significance and seeks that development which may affect such assets is accompanied by a Heritage Statement.	
Excellence in design, energy efficient and water management is required in all Broad Locations	St Albans Civic Society (1156974)	Agree	Cross reference to Policies L23/25 which set out requirements for achieving high quality design and sustainable energy?	No change
Broad Locations should use Design Codes	Harpenden Town Council (51870)	Disagree	This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change
Should include requirement to design to mitigate adverse air quality impacts, as in S6 i), ii) and iii).	Hertfordshire County Council (837689)	Disagree	Cross reference to Policy L18 which requires major developments to provide proposals for limiting and mitigating air quality impacts.	No change
The development will have a detrimental impact on air quality	Bricketwood Residents Association (1186066)	Disagree	Cross reference to Policy L18 which requires major developments to provide proposals for limiting and mitigating air quality impacts. SADC takes into consideration the need to minimise the impact on air quality	No change
The development will have a detrimental impact on ecology	Bricketwood Residents Association (1186066) Hertfordshire County Council (837689)	Noted	Development covered by EIA are set out in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Council will determine likely impact through a 'screening' procedure and whether an EIA is required. Cross reference with L29.	No change

<p>No Sequential test based on the Latest SFRA. Request amendment to state no develop in areas at risk of flooding (Zones 2 and 3) taking future impact of climate change into account.</p>	<p>Environmental Agency (1147557)</p>	<p>Noted</p>	<p>Cross reference to Policy L29 and NPPF/NPPG. Updated Flood Risk Assessment has been prepared and added to the website.</p>	<p>No change</p>
<p>Maybe opportunity for mineral extraction at this broad location. A mineral resource assessment should be carried out.</p>	<p>Hertfordshire County Council (837689)</p>	<p>Disagree</p>	<p>An Environmental Impact Assessment (EIA) would be required for developments that are prescribed by the EIA Regulations.</p>	<p>No change</p>
<p>Why is London Colney identified as a Town when it is a village?</p>	<p>1185583 118775 1185821</p>	<p>Disagree</p>	<p>London Colney has grown to the stage where it is a small town in terms of its overall scale, population level and number of households.</p>	<p>No change</p>
<p>As landowner supports broad location. Technical and environmental studies conclude that there are no significant impediments to development.</p>	<p>Hertfordshire County Council Property (1185913)</p>	<p>Noted</p>	<p>Support noted</p>	<p>No change</p>

<p>It is recommended that the southern site boundary is extended to accommodate the country park and community playing fields as proposed on the masterplan.</p>	<p>Hertfordshire County Council Property (1185913)</p>	<p>Disagree</p>	<p>Site selection and boundaries are firmly based on comprehensive GB work and the most appropriate locations have already been selected.</p>	<p>No change</p>
<p>No information provided on strategy or delivery, just a wishlist</p>	<p>Aurora Properties Limited (1151817)</p>	<p>Disagree</p>	<p>The development requirements are clear and the Masterplan process will provide more specific proposals in due course.</p>	<p>No change</p>
<p>Planning contributions should be sought, to be spent by local groups / parishes</p>	<p>Bricketwood Residents Association (1186066)</p>	<p>Noted</p>	<p>Planning contributions may be sought by way of S106 agreements during the planning application stage / set out in the regulation 123 List on adoption of CIL.</p> <p>This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.</p>	<p>No change</p>

Policy S6 x) West of Chiswell Green Broad Location

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Should include flexi-care provision	St Stephen Parish Council (51804)	Disagree	Evidence available in full, including in HCC documents and representations. Policy L2 sets out an appropriate approach.	No change
Policy should include land size requirement for flexi-care home	Hertfordshire County Council (837689)	Disagree	Requirement as set out in Policy L2. Size requirements can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change
40dph too high	1184750	Disagree	This is an appropriate minimum density to avoid further pressure on loss of greenfield land/ Green Belt. The NPPF supports optimisation of residential density.	No change
Is there a need for the amount of flexi-care provision required?	St Stephen Parish Council (51804)	Disagree	Evidence available in full, including in HCC documents and representations. Policy L2 sets out an appropriate approach.	No change
Strongly against new homes being built in this Broad Location	1185629 1186774	Disagree	Housing requirement/targets are based on the standard methodology set out by the government – see S4. Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.	No change

365 dwellings is below the strategic threshold for the number of dwellings (500)	973643 977724	Disagree	Site selection methodology set out site area or site capacity as criteria for assessment. This BL falls within that site area criteria.	No change
365 dwellings is not sufficient to fill a 2fe primary school, and the site should be increased / smaller sites allocated to deliver this.	973643 977724	Disagree	Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy. This is a specific policy requirement in the Plan. All requirements set out in the Broad Location policies have been agreed as deliverable by the landowners/developers.	No Change
Clarity needed on whether specific deliverables such as school buildings will be accommodated in the Broad Location or Green Belt	St Albans & District Footpaths Society (723340) The British Horse Society (1187597)	Noted	Primary school site in the land to be taken out of GB. Cross reference L21 and Policies Map.	No change
Strongly support allocation and safeguarding of land for schools	Department for Education (1186955) St Stephen Parish Council (51804)	Noted	Support noted	No change
Policy should include indication of school site size required	Department for Education (1186955)	Noted	Add reference in IDP to HCC size requirements as set out in response to L21	IDP will be updated on an ongoing basis.
School site locations should be identified	Hertfordshire County Council (837689)	Noted	Primary school site in the land to be taken out of GB. Cross reference L21 and Policies Map.	No change

School building areas should be removed from green belt	Department for Education (1186955) Hertfordshire County Council (837689)	Noted	Primary school site in the land to be taken out of GB. Cross reference L21 and Policies Map.	No change
Existing schools in the area are already crowded	1185469 1186780	Disagree	Cross Reference L21. Primary school to be provided. Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.	No change
Existing infrastructure issues will be exacerbated by the proposed development	Bricketwood Residents Association (1186066) St Stephen Parish Council (51804) 863091 871923 1182697 1184271 1184839 1158536 1184864 1185244 1185469 1185633	Disagree	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process	IDP will be updated on an ongoing basis.

	1185640 1156288 1182480 1186780 1183783 1187008 1185640 1187590 1186783 1185482 1185481 1185478 1185479			
Improving Public Transport / Walking / Cycling Links will not be sufficient	1182697	Disagree	Cross reference Policy L18 This approach is integral to the policy.	No change

<p>Countryside access links must be provided</p>	<p>Ramblers Association (52420)</p> <p>St Albans & District Footpaths Society (723340)</p> <p>The British Horse Society (1187597)</p> <p>St Albans Cycle Campaign (346623)</p>	<p>Agree</p>	<p>This is part of the masterplanning process</p>	<p>No change</p>
<p>Support transport network improvements</p>	<p>St Albans & District Footpaths Society (723340)</p> <p>Ramblers Association (52420)</p>	<p>Noted</p>	<p>Support noted</p>	<p>No change</p>
<p>Should be required to deliver walking and cycling facility improvements to promote car free access, which should be adequately maintained</p>	<p>St Albans Cycle Campaign (346623)</p> <p>Hertfordshire County Council (837689)</p> <p>1048449</p>	<p>Agree</p>	<p>Cross reference Policy L18</p> <p>This approach is integral to the policy.</p>	<p>No change</p>
<p>Further work needs to be carried out on infrastructure, including highways,</p>	<p>Hertfordshire County Council (837689)</p> <p>498103</p> <p>867312</p>	<p>Noted</p>	<p>These points are generally recognised. These matters can be properly detailed through the master planning process / planning application / EIA processes, with statutory consultation.</p>	<p>No change</p>

parking, water, sewerage				
Have infrastructure requirements been viability tested to comply with national policy	Hertsmere Borough Council (51934)	Noted	Updated evidence regarding economic viability of development has been made available on the council website.	No change
Major infrastructure must be provided up front	Colney Heath Parish Council (51891) London Colney Parish Council (52477)	Noted	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process	IDP will be updated on an ongoing basis.
Broad Location at Chiswell Green will worsen parking issues	1187590	Disagree	Cross reference with policy L20 and appendix 1, which sets out the Local Authority's parking standards for new development. New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process.	IDP will be updated on an ongoing basis.
Policy should consider social and pastoral needs of future occupants and include requirements for a community facility e.g. a community hall	St Albans Deanery Synod (1185929)	Noted	Refer to Policy L22 which encourages opportunities for new provision of places of worship as part of development of the Local Centres in Broad Locations.	No change

The site is not located in a sustainable location	Bricketwood Residents Association (1186066) 1185775 1186783	Disagree	Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy. The site is a relatively sustainable location and primary school provision, community facility provision and open space provision onsite will assist.	No change
Support sufficient assets to provide sustainable management of community facilities, open spaces and parklands	St Albans & District Footpaths Society (723340) Ramblers Association (52420)	Noted	Support noted	No change
Support provision of recreational space and public open space	The British Horse Society (1187597)	Noted	Support noted	No change
Both strategic and local public space must be provided	Ramblers Association (52420) St Albans & District Footpaths Society (723340) 1184750	Agree	This is part of the masterplanning process	No change
Policy should include the requirement for outdoor sports	Sports England (824971)	Disagree	Cross reference Policy L22 and L26 – 28. The policy refers to public open space. Open space is defined under the NPPF as all space of public value, land and water	No change

provisions, and clarify whether open space or recreation space includes outdoor sports provisions			<p>which offer important opportunities for sport and recreation. It is clear that this is therefore outdoor in nature. The policy also refers to recreation space and community facilities which would capture indoor sports facilities.</p> <p>This matter can be properly detailed through the Masterplanning process.</p>	
Development will have an impact on the destruction of trees and hedgerows	87923	Noted	<p>Cross reference Policy L29, which sets out the requirements for the protection of existing woodland, trees and landscape features.</p> <p>This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.</p>	
The development will have a detrimental impact on ecology	<p>Bricketwood Residents Association (1186066)</p> <p>1158536</p>	Disagree	<p>Development covered by EIA are set out in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Council will determine likely impact through a 'screening' procedure and whether an EIA is required. Cross reference with L29.</p>	No change
Should include requirement to design to mitigate adverse air quality impacts, as in S6 i), ii) and iii).	Hertfordshire County Council (837689)	Disagree	<p>Cross reference to Policy L18 which requires measures to improve air quality.</p>	No change
The development will have a detrimental impact on air quality	<p>Bricketwood Residents Association (1186066)</p> <p>1184271</p> <p>1184839</p>	Disagree	<p>Cross reference to Policy L18 which requires measures to improve air quality.</p>	No change

1158536			
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1156288			
1182480			
1186780			
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863091			
871923			

Broad Locations should use Design Codes	Harpenden Town Council (51870)	Disagree	This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change
Excellence in design, energy efficient and water management is required in all Broad Locations	St Albans Civic Society (1156974)	Noted	Requirements for BL set out in Policy L25.	No change
Increasing village by 30% will have a detrimental impact on character.	1182697 1184271 1184839 1158536 1184864 1185244 1185469 1185482 1185481 1185478 1185479 1185633 1185640	Disagree	No reason for detrimental impact on character. Masterplanning is at the very earliest stages. Collaboration with residents and stakeholders will take place as progress is made. Housing requirement/targets are based on the standard methodology set out by the government – see S4. Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.	No change

	1156288 1182480 1183783 1187008 1185640 1187590 863091 871923			
Supports the broad location. The site is deliverable, free from constraints and exceptional circumstances exist to release from the green belt.	Adrian Irving and Alban Developments Ltd (1147416)	Noted	Support noted	No change
Collaboration with neighbouring Councils needed	1181750 1182733	Noted	There has been ongoing joint working with neighbouring local authorities including the South West Herts Group.	No change
What masterplanning collaboration has there been?	St Stephen Parish Council (51804)	Noted	Masterplanning is at the very earliest stages. Collaboration with residents and stakeholders will take place as progress is made.	No change
Welcomes support with plan for	Bricketwood Residents Association (1186066)	Noted	Support noted	No change

neighbourhood planning				
Planning contributions should be sought, to be spent by local groups / parishes	Bricketwood Residents Association (1186066)	Noted	<p>Planning contributions may be sought by way of S106 agreements during the planning application stage / set out in the regulation 123 List on adoption of CIL.</p> <p>This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.</p>	No change
No information provided on strategy or delivery, just a wishlist	Aurora Properties Limited (1151817)	Disagree	The development requirements are clear and the Masterplan process will provide more specific proposals in due course.	No change
Heritage environment /assets have not been considered and lack of criteria to protect assets	Historic England (929489)	Disagree	<p>Cross reference Policy L30</p> <p>This supports conservation of heritage assets appropriate to their significance and seeks that development which may affect such assets is accompanied by a Heritage Statement.</p>	No change
Contradicts with S1, where Chiswell Green is a lower category to London Colney, but will received a similar level of development.	1186783	Disagree	<p>Cross Reference Policy S1, S2.</p> <p>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.</p> <p>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p>	No change
BL should be increased to include	Butterfly World Ltd (1183965)	Disagree	Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.	No change

Butterfly World, rather than SRFI				
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Policy S6 xi) Park Street Garden Village Broad Location

Representation Point	Representor Raising Point (see below for list of abbreviations)	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Further technical and environmental studies would be required to develop the masterplan	Hertfordshire County Council Property (1185913)	Noted	Masterplanning is at the very earliest stages.	No change
If Park Street Garden Village comes forward for housing SADC should commit to joint working with Hertsmere BC and relevant infrastructure providers	Hertsmere Borough Council (51934) 1182733	Noted	There has been and will be ongoing joint working with neighbouring local authorities including Hertsmere the South West Herts Group. DtC considered to be met.	No change
No evidence to support increased frequency of Abbey Line service form first occupation or passing loop	Department of Health & Social Care and Bloor Homes (1156886) M Scott Properties (1185993) 1185775	Disagree	Requirement for improved Abbey Line service. Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position. Long lead-in time acknowledged in timeline for delivery.	No change

<p>Countryside access links must be provided</p>	<p>Ramblers Association (52420)</p> <p>St Albans & District Footpaths Society (723340)</p> <p>The British Horse Society (1187597)</p> <p>St Albans Cycle Campaign (346623)</p> <p>1157340</p>	<p>Agree</p>	<p>This is part of the masterplanning process</p>	<p>No change</p>
<p>Support transport network improvements</p>	<p>St Albans & District Footpaths Society (723340)</p> <p>Ramblers Association (52420)</p> <p>Minister Court Frogmore Ltd (1185980)</p>	<p>Noted</p>	<p>Support noted</p>	<p>No change</p>
<p>Rail improvement requires have limitations including no mention of off peak timetabling, and proximity of stations to developable area of site.</p>	<p>Helioslough Ltd (1182085)</p> <p>Watford Borough Council (1122500)</p> <p>1181750</p> <p>1185775</p>	<p>Noted</p>	<p>Requirement for improved Abbey Line service. Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.</p> <p>Long lead-in time acknowledged in timeline for delivery.</p>	<p>No change</p>

Substantial road improvements will be required – those agreed for the SRFI are unlikely to be sufficient	Helioslough Ltd (1182085)	Noted	The need for a comprehensive package of transport measures is acknowledged in S6 xi, L18 etc. A transport evidence workplan has been agreed with HCC.	No change
Should be required to deliver walking and cycling facility improvements to promote car free access, which should be adequately maintained	St Albans Cycle Campaign (346623) Hertfordshire County Council (837689) Watford Borough Council (1122500) 1048449 1185744	Agree	Cross reference Policy L18 This approach is integral to the policy.	No change
Further work needs to be carried out on infrastructure, including highways, parking, water, sewerage	Hertfordshire County Council (837689) St Stephen Parish Council (51804) 498103 867312 1185775 1186081	Noted	Work on the infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.	IDP will be updated on an ongoing basis.

Have infrastructure requirements been viability tested to comply with national policy	Hertsmere Borough Council (51934)	Noted	Updated evidence regarding economic viability of development has been made available on the council website.	No change
Policy should consider social and pastoral needs of future occupants and include requirements for a community facility e.g. a community hall	St Albans Deanery Synod (1185929)	Noted	Refer to Policy L22 which encourages opportunities for new provision of places of worship as part of development of the Local Centres in Broad Locations.	No change
Major infrastructure must be provided up front	Colney Heath Parish Council (51891) London Colney Parish Council (52477)	Noted	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process	IDP will be updated on an ongoing basis.

Existing infrastructure issues will be exacerbated by the proposed development	St Stephen Parish Council (51804) Bricket Wood Residents Association (1186066) 1181750 1182733 1185744 1185775 1186081	Noted	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process	IDP will be updated on an ongoing basis.
Any increased Abbey Line service not committed, and can only be supported if Cottonmill Lane crossing closed.	National Rail (1184616)	Noted	Long lead-in time acknowledged in timeline for delivery. No evidence supplied to support closing of Cotton Mill Lane crossing. Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.	No change
The proposed park and rail will have a detrimental impact on public right of way	St Albans & District Footpaths Society (723340)	Disagree	Requirements set out in Policy L18. This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
No justification for the requirement for the Park and Rail facility	St Albans & District Footpaths Society (723340) M Scott Properties (1185993)	Disagree	Evidence available, including in HCC documents and representations. Policy S6 xi sets out an appropriate approach. Further details can be found in IDP updates / master planning work / planning application process	No change

	1185775			
Rail improvement works need to be looked at realistically	St Stephen Parish Council (51804) St Albans Civic Society (1156974) 1185775	Noted	Required realism noted and already incorporated into Policy S6 xi.	No change
Improvements to the Abbey Line do not go far enough	1186081	Noted	Realism required about deliverability and incorporated into Policy S6 xi.	No change
Supports Improvements to the Abbey Line	Abbey Flyer Users Group (1156861) Watford Borough Council (1122500)	Noted	Support Noted	No change
Walking / Cycling Routes should be mapped conceptually to aid master planning	Watford Borough Council (1122500)	Disagree	This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
The development will result in strain on facilities and services for existing residents.	Bricket Wood Residents Association (1186066)	Noted	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process	IDP will be updated on an ongoing basis.
PSGV is situated too far away to utilise Category 1 services and transport	CP Holdings (1158145)	Disagree	Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy. Piecemeal release of small	No change

			<p>greenfield Green Belt sites is not part of the strategy (albeit there are options to bring forward very small sites - See L4/5)</p> <p>New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process</p>	
<p>The Plan and SA have not been positively prepared as they disregard the draft permission for the SRFI</p>	<p>Helioslough Ltd (1182085)</p> <p>Department of Health & Social Care and Bloor Homes (1156886)</p> <p>Maritime Transport Limited (1182715)</p> <p>1181750</p> <p>DB Cargo (UK) (1184888)</p> <p>National Rail (1184616)</p> <p>Butterfly World Project Ltd (1193965)</p> <p>Jarvis Homes (973180)</p> <p>CALA Homes (977724)</p> <p>Albert Bygave Centre (985070)</p> <p>Park Street Church and Bloor Homes Ltd (985300)</p> <p>Rice Group (1058426)</p>	Disagree	<p>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.</p> <p>The main site owner has promoted the site as available and deliverable for housing.</p> <p>Considerations have taken into account the existing planning permission for an alternative use and other relevant factors.</p>	No change

	<p>Beechwood Homes (1123837)</p> <p>Linden Homes (1153662)</p> <p>Hertfordshire Land Ltd (1159845)</p> <p>Aldwyck Housing Group (1186030)</p> <p>Freight on Rail (1187503)</p> <p>M Scott Properties (1185993)</p> <p>Modus Operations Ltd (1187609)</p> <p>GB Railfrieght Ltd (1187613)</p> <p>973643</p> <p>1153651</p> <p>1159948</p> <p>1185775</p> <p>1186108</p> <p>1186128</p>			
There are other Greenbelt options	<p>Jarvis Homes (973180)</p> <p>CALA Homes (977724)</p>	Disagree	Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.	No change

<p>other than those affecting SRFI</p>	<p>Albert Bygave Centre (985070)</p> <p>Park Street Church and Bloor Homes Ltd (985300)</p> <p>Rice Group (1058426)</p> <p>Beechwood Homes (1123837)</p> <p>Linden Homes (1153662)</p> <p>Hertfordshire Land Ltd (1159845)</p> <p>Butterfly World Project Ltd (1193965)</p> <p>Aldwyck Housing Group (1186030)</p> <p>Department of Health & Social Care and Bloor Homes (1156886)</p> <p>973643</p> <p>1153651</p> <p>1159948</p> <p>1186108</p> <p>1186128</p>		<p>The main site owner has promoted the site as available and deliverable for housing.</p> <p>Considerations have taken into account the existing planning permission for an alternative use and other relevant factors.</p> <p>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p>	
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<p>There is no clear commitment from the Land owner, and could be open to legal challenge</p>	<p>Jarvis Homes (973180) CALA Homes (977724) Albert Bygave Centre (985070) Park Street Church and Bloor Homes Ltd (985300) RF Sinclair & Sons (1058251) Rice Group (1058426) Beechwood Homes (1123837) Linden Homes (1153662) Hertfordshire Land Ltd (1159845) Aldwyck Housing Group (1186030) Home Builders Federation (1156936) CP Holdings (1158145) 973643 1153651 1159948</p>	<p>Disagree</p>	<p>The main site owner has promoted the site as available and deliverable for housing. All requirements set out in the Broad Location policy has been agreed as deliverable by the main landowner.</p>	<p>No change</p>
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	1185775 1186108 1186128			
The Broad Location will not produce jobs / result in a loss of employment from SFRI	51 Pegasus Ltd (1186098) 1186081	Disagree	The main site owner has promoted the site as available and deliverable for housing. Considerations have taken into account the existing planning permission for an alternative use and other relevant factors. Cross refer to Policy S5 which supports employment land provision The EZ has important functions supporting business start-ups and attracting UK and international investment.	No change
What masterplanning collaboration has there been?	St Stephen Parish Council (51804)	Noted	Masterplanning is at the very earliest stages. Collaboration with residents and stakeholders will take place as progress is made.	No change
Collaboration with neighbouring Councils needed	1181750 1182733	Noted	There has been ongoing joint working with neighbouring local authorities including the South West Herts Group.	No change
Hertsmere BC should be partners for masterplanning work	Hertsmere Borough Council (51934)	Noted	SADC and HBC are working together through the SWH JSP process. For all issues where there might be a cross-boundary implication for Hertsmere/SADC then appropriate involvement in Masterplanning will take place in due course.	No change
Planning contributions should be sought, to be	Bricketwood Residents Association (1186066)	Noted	Planning contributions may be sought by way of S106 agreements during the planning application stage / set out in the regulation 123 List on adoption of CIL.	No change

spent by local groups / parishes			This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	
Welcomes support with plan for neighbourhood planning.	Bricketwood Residents Association (1186066)	Noted	Support Noted	No change.
Amend the phrase “master planned development led by the Council...” to read “master planned development led by the Developer in collaboration with the Council”	Home Builders Federation (1156936)	Disagree	Policy S6 sets out a very clear approach. Masterplanning will be Council-led, in collaboration with developers, residents and other stakeholders.	No change
No information provided on strategy or delivery, just a wishlist	Aurora Properties Limited (1151817)	Disagree	The development requirements are clear and the Masterplan process will provide more specific proposals in due course.	No change
Park Street Garden Village Broad Location was a mineral extraction / landfill site. Suitability for housing queried.	Ver Valley Society (826041)	Noted	Evidence suggests that this land use history is not a fundamental constraint on development for housing. There is a long lead time to delivery.	No change

Both strategic and local public space must be provided	Ramblers Association (52420) St Albans & District Footpaths Society (723340) The British Horse Society (1187597) 1184750	Noted	Requirements set out in Policy L27 and L28. This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
Must provide/support the country park	Ramblers Association (52420) St Albans & District Footpaths Society (723340) The British Horse Society (1187597) 1184750 1185037	Noted	Policy S6 xi) sets out requirement for new Country Park.	No change.
Support sufficient assets to provide sustainable management of community facilities, open spaces and parklands	St Albans & District Footpaths Society (723340) Ramblers Association (52420)	Noted	Support Noted	No change
No justification for park and ride that benefits would	The British Horse Society (1187597)	Noted	Park and rail proposed, not park and ride.	No change

outweigh harm to Green Belt	St Albans & District Footpaths Society (723340)			
SRFI is not a residential development, therefore no justification it would have the same or less impact on GB as PSGV	CP Holdings (1158145)	Disagree	Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.	No change
Welcome requirement for protection of existing woodland, new managed woodland and encourage provision of street trees	The Woodland Trust (1185811)	Noted	Support Noted	No change
Park and rail facility (presumed to be located within north-west corner of the site) would have a significant adverse impact on the Ver Valley Meadows Local Wildlife site.	Helioslough Ltd (1182085) Ramblers Association (52420) St Albans & District Footpaths Society (723340) 1185775	Noted	Policy S6 xi within the BL allocation stipulates managed woodland and ecological network links and countryside access links and new country park. Broad locations will be subject to masterplanning which will incorporate the rivers and wildlife. There is a long lead time to delivery to allow full consideration of these issues.	No change

<p>Support Park Street Garden Village BL subject to safeguarding and improvement of the Ver Valley as a waterway and recreation facility. Suggest mention of specific rivers rather than watercourse</p>	<p>Ver Valley Society (826041)</p>	<p>Noted</p>	<p>Support noted. Policy S6 xi within the BL allocation stipulates managed woodland and ecological network links and countryside access links and new country park. Broad locations will be subject to masterplanning which will incorporate the rivers and wildlife. There is a long lead time to delivery to allow full consideration of these issues.</p>	<p>No change</p>
<p>Park Street Garden Village site has constraints that will hinder delivery of S6 (xi) requirements, including in relation to flood risk and biodiversity.</p>	<p>Helioslough Ltd (1182085)</p>	<p>Disagree</p>	<p>Cross reference to Policy L29 and NPPF/NPPG.</p> <p>Updated Flood Risk Assessment has been prepared and added to the website.</p> <p>Development covered by EIA are set out in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Council will determine likely impact through a 'screening' procedure and whether an EIA is required. Cross reference with L29.</p>	<p>No change</p>
<p>Policy should include the requirement for outdoor sports provisions, and clarify whether open space or recreation space includes outdoor sports provisions</p>	<p>Sports England (824971)</p>	<p>Noted</p>	<p>Cross reference Policy L22 and L26 – 28.</p> <p>The policy refers to public open space. Open space is defined under the NPPF as all space of public value, land and water which offer important opportunities for sport and recreation. It is clear that this is therefore outdoor in nature. The policy also refers to recreation space and community facilities which would capture indoor sports facilities.</p> <p>This matter can be properly detailed through the Masterplanning process.</p>	<p>No change</p>

<p>Important to maintain gap between St Albans and the Garden Village.</p>	<p>Ramblers Association (52420) St Albans & District Footpaths Society (723340)</p>	<p>Noted</p>	<p>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. Gaps between settlements part of that site selection process. See also S3. This matter can be properly detailed through the Masterplanning process.</p>	<p>No change</p>
<p>The broad location should be reduced in size to protect the Green Belt.</p>	<p>867068</p>	<p>Disagree</p>	<p>Housing requirement/targets are based on the standard methodology set out by the government – see S4. Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p>	<p>No change</p>
<p>Proposals map shows the school within the Broad Locations, outside the Green Belt, contrary to Policy S3</p>	<p>1186783</p>	<p>Disagree.</p>	<p>Primary and secondary schools sites in the land to be excluded from the GB. Cross reference L21 and Policies Map. This matter can be properly detailed through the Masterplanning process.</p>	<p>No change</p>
<p>Support provision of recreational space and public open space</p>	<p>The British Horse Society (1187597) Bricketwood Residents Association (1186066)</p>	<p>Noted</p>	<p>Support Noted</p>	<p>No change</p>

Clarity needed on whether specific deliverables such as school buildings will be accommodated in the Broad Location or Green Belt	St Albans & District Footpaths Society (723340) The British Horse Society (1187597)	Noted	Primary and secondary schools sites in the land to be excluded from the GB. Cross reference L21 and Policies Map. This matter can be properly detailed through the Masterplanning process.	No change
Strongly support allocation and safeguarding of land for schools	Department for Education (1186955)	Noted	Support Noted.	No change
Policy should include indication of school site size required	Department for Education (1186955)	Noted	Add reference in IDP to HCC size requirements as set out in response to L21	IDP will be updated on an ongoing basis.
School site locations should be identified	Hertfordshire County Council (837689)	Noted	Primary and secondary schools sites in the land to be excluded from the GB. Cross reference L21 and Policies Map. This matter can be properly detailed through the Masterplanning process.	No change
School building areas should be removed from green belt	Department for Education (1186955) Hertfordshire County Council (837689)	Noted	Primary and secondary schools sites in the land to be excluded from the GB. Cross reference L21 and Policies Map. This matter can be properly detailed through the Masterplanning process.	No change
Supports proposed new school as could be used for relocation of existing	1186117	Noted	Support Noted	No change

The site does not provide any source of employment other than Schools and Shops, and will lead to an increase in Carbon Emissions.	Helioslough Ltd (1182085)	Disagree	Cross reference to Policy L18 which requires measures to improve air quality.	No change
No reference to tourist development.	1181750	Disagree	Policy L13 set out a very clear approach	No change
Unrealistic timeframe for delivery.	Jarvis Homes (973180) CALA Homes (977724) Albert Bygave Centre (985070) Park Street Church and Bloor Homes Ltd (985300) RF Sinclair & Sons (1058251) Rice Group (1058426) Beechwood Homes (1123837) Linden Homes (1153662) Hertfordshire Land Ltd (1159845) Aldwyck Housing Group (1186030)	Disagree	Housing trajectory at appendix 2 shows indicative delivery rates. Long lead-in time acknowledged in timeline for delivery.	No change

	Aurora Properties Limited (1151817) 973643 1153651 115948 1186108 1186128			
40dph too high	1184750	Disagree	This is an appropriate minimum density to avoid further pressure on loss of greenfield land/ Green Belt. The NPPF supports optimisation of residential density.	No change
40dph inconsistent with L4	M Scott Properties (1185993)	Disagree	The BL sites are to be taken out of the GB, as set out in policy S1, and are not 'rural exception sites'.	No change
Is there a need for the amount of flexi-care provision required?	St Stephen Parish Council (51804)	Disagree	Evidence available in full, including in HCC documents and representations. Policy L2 sets out an appropriate approach.	No change
Policy should include land size requirement for flexi-care home	Hertfordshire County Council (837689)	Disagree	Requirement as set out in Policy L2. Size requirements can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change
Broad Locations should use Design Codes	Harpenden Town Council (51870)	Noted	This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change
Excellence in design, energy	St Albans Civic Society (1156974)	Noted	Requirements for BL set out in Policy L25.	No change

efficient and water management is required in all Broad Locations				
The proposed development will have a potential impact on ground Archaeology	Helioslough Ltd (1182085)	Noted	Cross reference Policy L30 This supports conservation of heritage assets appropriate to their significance and seeks that development which may affect such assets is accompanied by a Heritage Statement. This matter can be properly detailed through the Masterplanning process.	No change
Heritage environment /assets have not been considered and lack of criteria to protect assets	Historic England (929489)	Disagree	Cross reference Policy L30 This supports conservation of heritage assets appropriate to their significance and seeks that development which may affect such assets is accompanied by a Heritage Statement. This matter can be properly detailed through the Masterplanning process.	No change
Should include requirement to design to mitigate adverse air quality impacts, as in S6 i), ii) and iii).	Hertfordshire County Council (837689)	Disagree	Cross reference to Policy L18 which requires measures to improve air quality.	No change
The development will have a detrimental impact on air quality	Bricket Wood Residents Association (1186066)	Disagree	Cross reference to Policy L18 which requires measures to improve air quality.	No change

<p>No Sequential test based on the Latest SFRA. Request amendment to state no develop in areas at risk of flooding (Zones 2 and 3) taking future impact of climate change into account.</p>	<p>Environmental Agency (1147557)</p>	<p>Noted</p>	<p>Cross reference to Policy L29 and NPPF/NPPG. Updated Flood Risk Assessment has been prepared and added to the website.</p>	<p>No change</p>
<p>The development will have a detrimental impact on ecology</p>	<p>Bricket Wood Residents Association (1186066) Hertfordshire County Council (837689)</p>	<p>Disagree</p>	<p>Development covered by EIA are set out in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Council will determine likely impact through a 'screening' procedure and whether an EIA is required. Cross reference with L29.</p>	<p>No change</p>