

Initial Questions for Examination – Paragraph 8 request to assist the Examination

8. *To assist the examination, it would be useful for the Council to set out in more detail where matters are not agreed, and whether it is common ground that any main modifications are necessary for soundness. That could be achieved by adding the Council's position alongside the 'issue raised by' column of the table under section 6 of the Council's Regulation 22(c) Statement (LPCD05.01).*

Explanatory text

This document sets out a revised Section 6 of the Regulation 22(c) Statement of Participation. The revision comprises the addition of a new column setting out the Council's position on each main issue raised, including where the Council considers that a main modification may be required. Only main modifications that relate to Main Issues raised are included below. The Council considers that other main modifications may be required, related to other matters raised during the consultation carried out under Regulation 19 that are not main issues.

Section 6: Main issues raised during the course of the consultation carried out under Regulation 19

In total 264 individual parties made representations on the Regulation 19 Draft Local Plan between 26 September – 8 November 2024 during the publication period for the draft Local Plan carried out under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

As some parties made more than one representation a total of 371 representations were made. The main issues raised in these representations are set out in the table below.

Chapter of the Reg 19 publication draft Local Plan	Main issues raised	Issue raised by	Council's position
Chapter 1 - A Spatial Strategy for St Albans City and District	The consultation on Reg 18 and the Council's response to it	Residents (34-1, 258-1, 261-1, 42-1, 165-1, 209-2, 231-3, 252-1, 45-1, 65-1, 228-1, 22-1, 242-2, 247-1, 258-4, 27-1, 43-2, 48-2, 60-2, 239-1, 309-2,	The Reg 18 consultation was in accordance with the Statement of Community Involvement. The Plan has

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		296-1), CPRE Hertfordshire (288-1), Moralis Group (343-2), Keep Chiswell Green (342-4, 342-2), DosTwo Ltd (20-1, 20-2), Greenbelt (353-1, 257-1, 353-3), Look! St Albans (308-3)	been prepared in accordance with the Regulations.
	Timing of Reg 19 re: NPPF publication	LIH (178-5), BRiCS Development (290-2), Moralis Group (343-2), Catesby Estates PLC (193-1), Home Builders Federation Ltd (318-1), Legal and General (Strategic Land Harpenden) Ltd (351-1), Brian Parker (180-4), Greenbelt (353-3)	SADC does not consider the timing of the Regulation 19 technical consultation, and its relationship to the publication of the new NPPF to be a soundness or legal compliance matter. It has been included as a main issue due to the volume of representors who raised it.
	The length of the Plan Period (it should be extended)	Taylor Wimpey Strategic Land (317-1), D'Arblay Investments (363-2, 363-3), Pigeon Capital Management 4 Ltd & D'Arblay Investments Limited (364-3, 364-4), Linden Wates (Bricket Wood) Limited (316-2), Lightwood Strategic (167-4), Beechwood Homes Contracting and Verulam Golf Club (332-1), Pigeon Capital Management 4 Limited and the Gorhambury Estate (365-2)	The Local Plan period runs to 2041 which is fifteen years after adoption on the basis that the Local Plan is adopted in 2026.

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	Lack of policy on an early review of the Local Plan upon adoption	Catesby Estates (145-4), Lightwood Strategic (167-4), Bloor Homes and Department of Health & Social Care (315-4), Legal and General (Strategic Land Harpenden) Ltd (351-2), Stonebond Properties Ltd (Smallford) (204-2), Landowners of Sites M4 and OS1 (135-1), The owners of land north of Wheathampstead Road (105-1), Jarvis Homes (173-1), The owners of land at Piggottshill Lane (196-1), Miller Homes (212-1), CALA Group Ltd (216-1), The owners of the Albert Bygrave Retail Park (88-1), The owner of land at Wood End, Hatching Green (90-1), The owners of land at Bucknalls Drive, Bricket Wood (95-1)	<p>The Council expects to undertake an early review of the Local Plan in the light of the new NPPF. The Council does not consider it necessary to include a specific early review policy in the Plan.</p> <p>SADC considers the draft Local Plan to be sound with regard to the issue raised.</p>
	Whether the strategy constitutes sustainable growth in the context of climate change and reducing greenhouse gas emissions	Catesby Estates PLC (193-2, 145-10, 193-11, 193-15), Redington Capital Limited & CALA Homes (224-1, 224-4, 224-9), St Albans Council Labour Group (352-2), Hallam Land Management and St Albans School (273-28), Longbourn Estates (325-1), Pigeon Capital Management 4 Ltd & D'Arblay Investments Limited (364-1),	<p>SADC considers the draft Local Plan to be sound with regard to the issue raised.</p> <p>The Council believes that the strategy does constitute sustainable growth in the context of climate change and reducing greenhouse</p>

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		Notcutts Ltd (162-2, 162-4), Greenbelt (257-1), D'Arblay Investments (363-2), Residents (76-1)	gas emissions. It focusses growth to the largest, most sustainable settlements, and seeks to reduce the need to travel/promote active travel from new development.
	Housing supply in the District	Hallam Land Management (273-1), TT Group (334-2), Crest Nicholson Partnerships and Strategic Land (266-8), Bloor Homes and Department of Health & Social Care (315-4), Taylor Wimpey Strategic Land (317-3), Julie Bennett (190-1)	The Local Plan plans to meet the full housing need of the district (as calculated under the December 2023 NPPF). No change is required. SADC considers the draft Local Plan to be sound with regard to the issue raised.
	Exceptional circumstances for release of land in the Green Belt	Redbourn Parish Council (283-3, 283-7), Residents (115-4, 260-3), Notcutts Ltd (162-4), Bellway Homes (North London) Limited (207-10), CPRE Hertfordshire (288-13, 288-5, 288-11), EDIT Land Ltd (304-7, 362-2), Cllr David Mitchell (111-1), Leverstock Green Village Association (292-1)	SADC considers the draft Local Plan to be sound with regard to the issue raised. The Council has considered all other reasonable options for delivering the housing need of the district before concluding that Green Belt will need to be released.

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	Meeting employment land needs in the District and wider SW Herts area / Defining the quantum of employment land required	Hemel Business Park Ltd (294-1, 294-4, 294-3), Smallford Business Park Ltd (295-1, 295-4, 295-2), Clowes Development (327-1), Redbourn Parish Council (283-17)	<p>SADC considers the draft Local Plan to be sound with regard to the issue raised.</p> <p>The Council considers that it is not a requirement of the NPPF to set a target for employment land to be provided. Given the nature of employment land and how it is developed the Council does not consider it appropriate to provide a specific target. However, the quantum of land allocated in the Plan reflects the findings of the SW Herts Employment Land Study, and meets both locally arising need and some of the needs of the wider SW Herts Area.</p>
Chapter 2 – Climate Emergency	Interrelationship between policy requirements and Building Regulations	Richborough Estates (329-15), Hill Residential (350-4)	SADC considers the draft Local Plan to be sound with regard to the issue raised.

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	Need for specific targets for carbon reduction	Redbourn Parish Council (283-5, 283-6), McCarthy & Stone Retirement Lifestyles Ltd, Jarvis Homes, and Wheathampstead Land (183-7), McCarthy Stone and Churchill Living (302-4)	SADC considers the draft Local Plan to be sound with regard to the issue raised.
	Interrelationship between policy CE2 and Historic Environment policies of the Plan	St Albans Cathedral (155-3), MFS Resolution (335-2), Radlett Society & Green Belt Association (RSGBA) (32-2)	SADC considers the draft Local Plan to be sound with regard to the issue raised.
Chapter 3 – Sustainable Use of Land and Green Belt	ARUP Green Belt Review <ul style="list-style-type: none"> - Use of/interpretation of findings - scale of sites considered 	Save North St Albans Greenbelt (368-4), The owners of land at Noke Side (152-1), Notcutts Ltd (162-4), Stonebond Properties Ltd (Smallford) (204-5), St Albans Council Labour Group (352-3), D'Arblay Investments (363-3), Pigeon Capital Management 4 Limited and the Gorhambury Estate (365-3), Keep Chiswell Green (342-4, 342-2), Residents (260-1, 29-1, 72-1, 72-2, 30-3, 241-1, 76-1, 57-1), St Michael Parish Council (268-1), Greenbelt (353-1, 257-1), Clowes Developments (327-4), Jarvis Homes (173-1), Pigeon Capital Management 4 Ltd & D'Arblay Investments Limited	See responses to Q9 and Q10 of Initial Questions for Examination

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		(364-3), Higgins Group (341-3), Bellway Homes (North London) Limited (207-9), EDIT Land Ltd (304-4), Cllr David Mitchell (111-3, 111-4, 111-5, 111-6), LIH (178-6), St Congar (99-3)	
	<p>The housing trajectory</p> <ul style="list-style-type: none"> - over reliant on large, complex sites - does not contain sufficient buffer should a large site be delayed 	Higgins Group (341-1), EDIT Land Ltd (304-1, 362-1, 304-7), Pigeon Capital Management 4 Ltd & D'Arblay Investments Limited (364-4), Affinity Water (83-1), Notcutts Ltd (162-3), Mr and Mrs Robert and Karen Choppin (172-3), Bellway Homes (North London) Limited (207-10)	The Local Plan contains a variety of site types, and SADC has worked closely with landowners on the timescales for delivery of sites. Planning applications have been submitted for several Broad Locations, and others are subject of Planning Performance Agreements, indicating that the Local Plan is not over reliant on large, complex sites. There are sufficient sites within the Plan to accommodate delay on another site.
	Justification for timings of sites coming forward in the housing trajectory	Home Builders Federation Ltd (318-3), Higgins Group (341-5), Catesby Estates (145-3, 145-8, 145-14, 145-	See response to Q13 of Initial Questions for Examination

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		15), Lightwood Strategic (167-3), Redbourn Parish Council (283-22, 283-23, 283-25), Legal and General (Strategic Land Harpenden) Ltd (351-2)	
	The stepped trajectory/low level of housing delivery in the first five years of the Plan	Redington Capital Limited & CALA Homes (224-2), Home Builders Federation Ltd (318-2), Bloor Homes and Department of Health & Social Care (315-6), Notcutts Ltd (162-3), Stonebond Properties Ltd (Gustard Wood) (194-2), D'Arblay Investments (363-1), Stonebond Properties Ltd (Smallford) (204-2), Taylor Wimpey Strategic Land (317-2), Hill Residential (350-6)	See response to Q13 of Initial Questions for Examination
	Level of supply of housing on windfall sites/reliance on windfall in the first five years of the Plan	Affinity Water (83-1), Mr and Mrs Robert and Karen Choppin (172-3), Stonebond Properties Ltd (Gustard Wood) (194-2), Stonebond Properties Ltd (Smallford) (204-2)	SADC considers the draft Local Plan to be sound with regard to the issue raised. The supply of housing on windfall sites is based on strong evidence of historic delivery rates and is expected to be delivered.

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	Unmet housing need (arising from the cap in the December 2023 NPPF standard methodology)	Legal and General (Strategic Land Harpenden) Ltd (351-2), Lightwood Strategic (167-4), Julie Bennett (190-1), Stonebond Properties Ltd (Gustard Wood) (194-1), Stonebond Properties Ltd (Smallford) (204-1), Higgins Group (341-5), LIH (178-7)	SADC considers the draft Local Plan to be sound with regard to the issue raised.
	Unmet need for housing in neighbouring authorities/wider South West Hertfordshire area	Home Builders Federation Ltd (318-8), Mr and Mrs Robert and Karen Choppin (172-1), Legal and General (Strategic Land Harpenden) Ltd (351-2)	SADC has not received any requests from neighbouring authorities for assistance in meeting unmet need for housing.
	Other available previously-developed sites/reducing amount of Green Belt required for development	TT Group (334-4), Residents (115-4), St Albans Council Labour Group (352-3), Save North St Albans Greenbelt (368-1), CPRE Hertfordshire (288-4)	The Council has considered all sites identified throughout the Plan process, including through the Housing and Economic Land Availability Assessment, Urban Capacity work, Green Belt Review etc. and all those sites capable and suitable for accommodating housing have been included in the draft Local Plan.

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	Infrastructure provision and impacts associated with Hemel Garden Communities	Nash Mills Parish Council (26-1), Residents (115-8, 97-6), Network Rail (243-1), Redbourn Parish Council (283-1), Leverstock Green Village Association (292-1), National Highways (323-2, 323-3, 323-4, 323-5, 323-6), Hertfordshire County Council (Growth and Infrastructure Unit) (328-9), The Crown Estate (272-1), Verulam Residents Association (270-1), Cllr David Mitchell (111-3, 111-4, 111-5, 111-6)	See response to Q16 of Initial Questions for Examination
	Proposed school allocations remaining in Green Belt	Hertfordshire County Council (Growth and Infrastructure Unit) (328-5)	SADC agrees that a main modification may be appropriate (subject to technical work by HCC not yet completed) to remove the build zone for proposed secondary schools in the Hemel Garden Communities area (site H2 and adjacent to H4) from the Green Belt.
	Application of Green Belt Compensatory Improvements to smaller sites	The owner of land at Wood End, Hatching Green (92-1), The owners of land north of Wheathampstead Road (107-1), The owners of land at	SADC considers the draft Local Plan to be sound with regard to the issue raised.

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	Vague criteria in policies/duplication/inconsistencies between policies (LG1, LG2, LG4, LG6, HOU1, TRA1, SP10, NEB1, NEB5, NEB8, NEB12, DES3)	Piggottshill Lane (198-1), DLA Town Planning Ltd (202-1), Historic England (248-19, 248-20, 248-21), Hertfordshire County Council (Growth and Infrastructure Unit) (328-9), The owners of the Albert Bygrave Retail Park (84-1), The owner of land at Wood End, Hatching Green (91-1, 92-1), The owners of land at Bucknalls Drive, Bricket Wood (96-1), The owners of land north of Wheathampstead Road (106-1, 107-1), Landowners of Burston Nurseries (Site L1) (131-1), Landowners of Sites M4 and OS1 (137-1), The owners of land at Piggottshill Lane (197-1, 198-1), DLA Town Planning Ltd (201-1), CALA Group Ltd (217-1, 218-1), BRiCS Development (290-7), Hill Residential (350-7), Miller Homes (213-1), Thames Water Utilities Limited (110-2), Martin Grant Homes and Kearns Land Ltd (222-8)	SADC agrees that LG2 requires a main modification to make it effective in regard to monitoring. SADC agrees that there is an inconsistency between HOU1 and DES3 and that a main modification is required to HOU1 to remove the inconsistency. SADC agrees that a main modification is required to make NEB8 clearer and effective. SADC considers the draft Local Plan to be sound with regard to the other policies raised.
Chapter 4 – Housing	Policy HOU1 is not flexible enough	Affinity Water (83-10), Hertfordshire County Council - Property Team (114-7), Denton Homes Ltd (166-5), Robert	SADC agree that a main modification is required to HOU1 to make the policy

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		and Karen Choppin (172-5), McCarthy & Stone Retirement Lifestyles Ltd, Jarvis Homes, and Wheathampstead Land (183-4), Bellway Homes (North London) Limited (207-1), Martin Grant Homes and Kearns Land Ltd (222-5), Bloor Homes (286-11), Pigeon (Hemel Hempstead) Ltd (289-16), McCarthy Stone and Churchill Living (302-1), EDIT Land Ltd (304-2, 363-3), Richborough Estates (329-10), Taylor Wimpey Strategic Land (330-5), TT Group (334-6),	effective. The modification covers the mix of units on urban brownfield sites which may need to differ to that listed in the policy, reflecting site characteristics, context and viability.
	Are the affordable housing requirements of Policy HOU2 flexible enough to respond to future changes in construction costs	Home Builders Federation Ltd (318-4)	SADC agree that a main modification is required to HOU2 to make the policy flexible enough to respond to changes in construction costs (specifically with regard to review mechanisms).
	Affordable housing requirements for specialist housing for older persons	McCarthy & Stone Retirement Lifestyles Ltd, Jarvis Homes, and Wheathampstead Land (183-5), BRiCS Development (290-8), McCarthy Stone and Churchill Living	SADC agree that a main modification is required to HOU3 to remove the requirement for affordable housing for Care Home

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		(302-2), Hertfordshire County Council (Growth and Infrastructure Unit) (328-6)	Accommodation as that type of accommodation is not provided as self-contained units and cannot support affordable housing.
	Meeting the need for specialist housing	Jarvis Homes (206-1), BRiCS Development (290-3), Hertfordshire County Council (Growth and Infrastructure Unit) (328-2)	<p>SADC agree that a main modification is required to introduce a new policy on provision of children's homes.</p> <p>SADC agree that a main modification is required to HOU3 to make the policy effective regarding consolidation of units in larger developments, and having regard to Hertfordshire County Council's guidance on service delivery and placemaking for specialist housing.</p> <p>SADC agree that main modifications are required to</p>

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			sites H1, H2, H4, B1, B2, B3, B4, B5, B6, and B7 regarding provision of housing with care units, supported living units and children's homes.
	Meeting the demand for Self Build and Custom Housebuilding	Martin Holderness (23-1), Richborough Estates (329-7)	SADC considers the draft Local Plan to be sound with regard to the issue raised.
	Meeting identified need for Gypsy and Traveller accommodation	Mr and Mrs Robert and Karen Choppin (172-4, 172-6), Dacorum Borough Council (271-6, 271-5, 271-2), James Cash (109-5, 109-3, 109-4), Affinity Water (83-11), Myles Green (158-1)	The identified need for Gypsy and Traveller accommodation can be met through a combination of the two allocated sites (at H3 and H4), and regularising, intensifying and/or expanding existing Gypsy and Traveller sites in the district.
	<i>Vague criteria in policies/duplication/inconsistencies between policies (LG1, LG2, LG4, LG6, HOU1, TRA1, SP10, NEB1, NEB5, NEB8, NEB12, DES3</i>	<i>See Chapter 3</i>	<i>n/a</i>
Chapter 5 – Economy and Employment	<i>See Chapter 1 - A Spatial Strategy for St Albans City and District</i>		
Chapter 6 – City, Town and	<i>No main issues</i>	<i>n/a</i>	<i>n/a</i>

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Village Centres and Retail			
Chapter 7 – Community Infrastructure	Providing health care facilities associated with new development/growth	Hertfordshire and West Essex ICB (356-6), Save North St Albans Greenbelt (368-9)	SADC considers the draft Local Plan to be sound with regard to the issue raised.
	Impact of growth on emergency services	Hertfordshire and West Essex ICB (356-6), Hertfordshire Constabulary (203-4)	SADC agree that a main modification is required to Strategic Policy SP3 so that all emergency services are referenced in the policy.
Chapter 8 – Transport	Transport impacts of proposed allocations and growth and whether it can be accommodated/Requirement for new transport infrastructure/Assumptions regarding shift from private car to active travel or public transport	Verulam Residents Association (270-1), Save North St Albans Greenbelt (368-10), Residents (250-1, 115-1, 299-1, 185-2, 97-3, 161-1), Central Bedfordshire Council (233-7, 233-8), Redbourn Parish Council (283-18, 283-19), National Highways (323-1, 323-8), Hertfordshire County Council (Growth and Infrastructure Unit) (328-8), Leverstock Green Village Association (292-7), Cllr David Mitchell (111-3, 111-2), Stop L & G and The Harpenden Green Belt Association (333-1)	SADC agree that a main modification is required to TRA1 to ensure infrastructure will be delivered at an early stage of development. SADC agree that a main modification is required to TRA3 regarding heavy goods vehicle movements to make the policy more effective.
	<i>Vague criteria in policies/duplication/inconsistencies between</i>	<i>See Chapter 3</i>	<i>n/a</i>

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	<i>policies (LG1, LG2, LG4, LG6, HOU1, TRA1, SP10, NEB1, NEB5, NEB8, NEB12, DES3</i>		
Chapter 9 – Utilities Infrastructure	<i>No main issues</i>	<i>n/a</i>	<i>n/a</i>
Chapter 10 – Natural Environment, Biodiversity and Green Infrastructure	Policy NEB9 requires a detailed survey of agricultural land put forward for development unless allocated in the Local Plan, yet not all agricultural land allocated in the Plan has a detailed survey	Redbourn Parish Council (283-27)	SADC considers the draft Local Plan to be sound with regard to the issue raised.
	<i>Vague criteria in policies/duplication/inconsistencies between policies (LG1, LG2, LG4, LG6, HOU1, TRA1, SP10, NEB1, NEB5, NEB8, NEB12, DES3</i>	<i>See Chapter 3</i>	<i>n/a</i>
Chapter 11 - Historic Environment	<i>No main issues</i>	<i>n/a</i>	<i>n/a</i>
Chapter 12 – High Quality Design	Appropriateness of a minimum overall net density of 40 dwellings per hectare, particularly for small and medium sites/application in urban areas	Martin Grant Homes and Kearns Land Ltd (222-3), TT Group (334-5), Colney Heath Parish Council (349-5), Trustees of the G A Simons Family Settlement (69-4), Trustees of the Shonleigh Trust (100-4), Colney Heath Parish Council (349-24), Residents (18-1)	SADC considers the draft Local Plan to be sound with regard to the issue raised.

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	<i>Vague criteria in policies/duplication/inconsistencies between policies (LG1, LG2, LG4, LG6, HOU1, TRA1, SP10, NEB1, NEB5, NEB8, NEB12, DES3</i>	<i>See Chapter 3</i>	<i>n/a</i>
Chapter 13 – Health and Wellbeing	<i>No main issues</i>	<i>n/a</i>	<i>n/a</i>
Chapter 14 – Implementation	Viability of infrastructure delivery associated with new development (including assumptions in the Plan-wide Viability Assessment on cost of infrastructure)	Hertfordshire County Council (Growth and Infrastructure Unit) (328-7)	SADC agrees that a main modification is required to Strategic Policy SP14 to add a review mechanism process for infrastructure delivery.
Glossary and Appendices	<i>No main issues</i>	<i>n/a</i>	<i>n/a</i>
Part B – Site Allocations	Proposed new allocation in Green Belt (residential)	Success Properties Consortium (225-2), EDIT Land Ltd (304-8, 362-8), Julie Bennett (190-5), Higgins Group (341-6), Linden Wates (Bricket Wood) Limited (316-5), Riverside Farm Trust (85-1), Stonebond Properties Ltd (Gustard Wood) (194-4), McCarthy & Stone Retirement Lifestyles Ltd, Jarvis Homes, and Wheathampstead Land (183-3), Oren Arush (31-1), Affinity Water (83-14), Trustees of the Shonleigh Trust (100-2), The owner of	SADC considers the draft Local Plan to be sound with regard to the issue raised.

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		<p>The Dak, Colney Heath Lane (120-2), 51 Pegasus Ltd (128-2), Catesby Estates (145-7), CALA Group Ltd (169-2), Robert and Karen Choppin (172-8), LIH (178-2), Julie Bennett (190-5), Lawes Agricultural Trust (200-5), Stonebond Properties Ltd (Smallford) (204-3), Jarvis Homes (205-2), Bellway Homes (North London) Limited (207-11), Redington Capital Limited & CALA Homes (224-3), Bloor Homes and Department of Health & Social Care (315-3), Taylor Wimpey Strategic Land (317-7), Clowes Developments (327-3), Moralis Group (343-5), D'Arblay Investments (363-5), Pigeon Capital Management 4 Ltd & D'Arblay Investments Limited (364-6), Pigeon Capital Management 4 Limited and the Gorhambury Estate (365-6), Trustees of the G A Simons Family Settlement (69-2), Longbourn Estates (325-2), St Congar (99-2)</p>	

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	Proposed new allocation in Green Belt (employment)	Convene Construction Ltd (220-2), Success Properties Consortium (225-2), Hemel Business Park Ltd (294-2), Convene Construction Ltd (221-2)	SADC considers the draft Local Plan to be sound with regard to the issue raised.
	Proposed new allocation in Green Belt (Gypsy and Traveller pitches)	Myles Green (158-2), James Cash (109-2)	SADC considers the draft Local Plan to be sound with regard to the issue raised.
	Proposed new allocation (non-Green Belt)	TT Group (334-1)	SADC considers the draft Local Plan to be sound with regard to the issue raised.
	Sites delivering infrastructure instead of just contributing to the cost of new infrastructure	Hertfordshire County Council (Growth and Infrastructure Unit) (328-22)	SADC agree that main modifications are required to the Key Development Requirements for specific sites to refer to the delivery of infrastructure as well as contributing or supporting infrastructure.
	Green Belt boundaries around the Hemel Garden Communities	The Crown Estate (272-7)	SADC considers the draft Local Plan to be sound with regard to the issue raised.
	Impact of proximity of the M1 on capacity of site B3	Catesby Estates (145-9, 193-10), Redington Capital Limited & CALA Homes (224-10), Redbourn Parish Council (283-9), National Highways (323-7)	SADC considers the draft Local Plan to be sound with regard to the issue raised.

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	Impact of residential development on site B8 on the operation of the safeguarded regionally significant minerals hub and Rail Aggregates Depot at Harper Lane	Tarmac (267-1), Hertfordshire County Council (Minerals and Waste Planning Policy Team) (287-5)	SADC considers the draft Local Plan to be sound with regard to the issue raised.
	Whether site M3 is developable due to biodiversity and heritage constraints	Catesby Estates (145-23, 193-21), Herts & Middlesex Wildlife Trust (191-1), CALA Group Ltd (215-1), Historic England (248-27), Residents (296-1)	SADC considers the draft Local Plan to be sound with regard to the issue raised. There has been a significant in reduction in indicative site capacity against a 'standard' calculation for a site's capacity to allow for appropriate consideration of constraints
	Owner of Site P1 wishes for it to be allocated for employment rather than residential use	Smallford Business Park Ltd (295-3)	SADC agree that a main modification is needed to remove site P1 from the Local Plan.
	Allocation of car park sites when it has not been established if the sites are still required for car parking	Taylor Wimpey Strategic Land (317-2), Stonebond Properties Ltd (Smallford) (204-3), Mercer & Hole (259-1), Redington Capital Limited & CALA Homes (224-21)	SADC considers the draft Local Plan to be sound with regard to the issue raised.
Sustainability Appraisal	None of the growth scenarios assessed seem to exhibit a level of growth on the edge of the	Julie Bennett (190-2)	SADC consider that the Sustainability Appraisal

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	St. Albans urban settlement - the most sustainable location in the District as identified in the proposed Settlement Hierarchy		considers reasonable alternatives.
	The SA does include additional assessment of higher growth scenarios, but these are limited in exploration and do not consider the high potential for alternative sites including those within the Green Belt to come forward as part of the spatial strategy to meet the intense need for housing within SACDC	Higgins Group (341-4), Catesby Estates PLC (193-3), Bloor Homes and Department of Health & Social Care (315-2)	SADC consider that the Sustainability Appraisal considers reasonable alternatives.
	The SA does not consider reasonable alternatives for employment growth	Clowes Developments (327-2)	SADC consider that the Sustainability Appraisal considers reasonable alternatives.

SADC have closely followed the relevant law, national policy and national planning practice guidance throughout the development of the Plan. The Plan meets the Government's Standard Method for housing need in full. We have undertaken thorough and effective Duty to Cooperate work and all Duty to Cooperate bodies consider that we have met the Duty to Cooperate. All adjoining and nearby Councils (including Hertfordshire County Council) support the Plan and wish it to be found sound and adopted. We have sought extensive check and challenge throughout and have received significant external validation of the approach taken. This external validation has included the involvement of the Planning Advisory Service, the East of England Local Government Association, Paul Shadarevian KC and three Planning Inspectorate Advisory Visits, the most recent being on 10 September 2024. We have also had roughly quarterly meetings with officials from MHCLG throughout the process, the latest being on 28 November 2024.

It is acknowledged that there has been a modest acceleration in the Local Plan timescale towards Submission in recent months. For the avoidance of doubt, SADC (and an extensive range of external check and challenge parties) consider that the Plan has met all the requirements of the Duty to Cooperate, is Legally Compliant and is fundamentally sound and well-evidenced.