

Regulation 22(1)(c) Statement of Participation

St Albans City and District Council

in support of

St Albans Local Plan 2041

(based on a template from the Planning Advisory Service)

November 2024

Section 1: Introduction

1.1 Purpose

This Statement of Participation has been prepared in accordance with Regulation 22(1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012. It sets out how St Albans City and District Council has involved residents and stakeholders in the preparation of the St Albans Local Plan 2041 and provides a summary of what they said during consultations on the emerging Local Plan, how comments have influenced the draft St Albans Local Plan, and a summary of the main issues raised on the draft Local Plan.

This statement explains how the engagement during the preparation of the St Albans Local Plan 2041 has been in accordance with the Council's adopted Statement of Community Involvement (SCI) of February 2023. The SCI sets out how the Council will consult and involve public and statutory consultees in planning matters, including the preparation of the District's Local Plan. The SCI itself can be viewed at <https://www.stalbans.gov.uk/sites/default/files/attachments/Statement%20of%20Community%20Involvement%20Adopted%20February%202023.pdf>.

1.2 Background

This Statement of Participation describes how the Council has undertaken community participation and stakeholder involvement in the production of the Local Plan, setting out how such efforts have shaped the Plan and the main issues raised by consultation / representations.

The Council began preparing a new Local Plan for the District in 2020. The new Local Plan sets out the strategic vision, objectives and spatial strategy for the District, as well as the planning policies which will guide future development to 2041. It establishes policies and guidance to ensure local development is built in accordance with the principles set out in the National Planning Policy Framework (NPPF).

The Local Plan will wholly replace the Saved Policies of the St Albans and District Local Plan (1994) that currently set out the planning policies and proposals for the District.

The Council's Proposed Submission Local Plan and supporting documents, including the Sustainability Appraisal, were published in accordance with Regulation 19 for a six week and one day consultation period lasting from Friday 26 September until Friday 8 November 2024. The Council consulted specific consultation and statutory bodies, local amenity and residents' groups, businesses and individual residents as set out in the adopted SCI.

1.3 Structure of Statement

This statement of Participation comprises five sections:

This section, Section 1, is an introduction.

Section 2 sets out the timeline which has been followed in preparing the Local Plan which is accordance with the up to date Local Development Scheme (www.stalbans.gov.uk/sites/default/files/attachments/SADC%20Local%20Development%20Scheme%20-%20Sep%202024%20-%20Final.pdf).

Section 3 sets out which bodies and persons the Council invited to make representations under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, and how those bodies were invited to make representations.

Section 4 summarises the main issues raised during the course of the consultation carried out under Regulation 18 and how the comments received have been taken into account by the Council.

Section 5 sets out which bodies and persons the Council invited to make representations under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, and how those bodies were invited to make representations.

Section 6 summarises the main issues raised during the course of the consultation carried out under Regulation 19.

Section 2: Plan Production Timeline

The creation of a new Local Plan requires a number of thorough and robust stages of consultation. This is to enable early and ongoing engagement with the local community, businesses and organisations to develop a comprehensive document, tailored to the needs of the district in terms of strategy and the policies required.

The below timetable outlines main consultation stages of the emerging Local Plan up until the Submission date of the 29 of November 2024.

Key Local Plan Stages Undertaken

1: Draft Local Plan consultation– 12 July – 25 September 2023

The Council consulted on a full draft version of the Local Plan (including a full Spatial Strategy, Site Allocations and Development Management policies) that combined the updated evidence base, and technical assessments. Consultation was open for a 10½ week period.

3: Plan amendments – 2023-2024

The Council took on board comments received during the draft Local Plan consultation. Further evidence base documents were updated (eg Sustainability Appraisal) or commissioned (Viability Assessment) to improve the Local Plan ready for formal Regulation 19 Publication/Submission.

4: Publish the Plan (Pre-Submission Consultation Reg 19) – 26 September – 8 November 2024

A submission ready version of the plan was made available for stakeholders and the public to comment on for 6 weeks and 1 day. In accordance with the Local Plan Regulations, this consultation was formal and statutory seeking specifically representations in relation to the Duty to Cooperate, Legal Compliance and the Plan's soundness for Examination in Public.

5: Submission to the Secretary of State: November 2024

The Council assessed the comments received during the Regulation 19 formal consultation and considered that the Local Plan met the Duty to Cooperate, is Legally Compliant and is sound, therefore, can be submitted for Examination in Public (EiP). The Plan was submitted to the Secretary of State on the 29 November 2024.

6: Examination: - December 2024 – February 2026

The Plan will be examined by an independent Planning Inspector.

Section 3: Bodies and persons the Council invited to make representations under Regulation 18

The Council consulted between 12 July and 25 September 2023 on a full draft version of the Local Plan (including a full Spatial Strategy, Site Allocations and Development Management policies) that combined the updated evidence base, and technical assessments.

The consultation included the following required features:

- The SADC website was used as the primary method of presenting the consultation materials. These comprised of the draft Local Plan and its appendices along with a 3 minute explanatory video, a brief online survey, a link to the detailed online portal (Objective) for more detailed responses, and a Frequently Asked Questions document. There were also links to SADC evidence documents, for example, the Green Belt Review. Paper copies of the consultation documents were available at the public exhibitions.
- Email notifications were sent on 12 July to all statutory consultees, stakeholders and interested parties already registered for online consultation; in total approximately 3,000 notifications were sent.

The engagement was digitally led and employed a range of tools and approaches to raise awareness and increase response rates to the consultation material, including:

- A 3 minute video;
- A short 6 question survey;
- A social media based campaign, supported by the short video;
- Online portal (Objective) to facilitate detailed responses;
- Paper copies of consultation material issued to all libraries (including specific libraries in Dacorum and Hertsmere) and at the Civic Centre
- Direct notification emails (and a small number of letters) to all key consultation bodies listed in the Statement of Community Involvement, plus other groups and individuals on the SADC consultation database
- Articles in newsletters;
- Press releases;
- Prominent wording on SADC website homepage;
- An updated 'Frequently asked Questions' on the Councils website. Social Media and Online Video

The Local Plan video was available to view on YouTube directly or through a link on the Council's website and as part of a Facebook campaign. On YouTube, (in total), the video was viewed 2,214 times. The video has been 'liked' nine times. There were no 'dislikes'.

On Facebook, the video had a 'reach' of over 28,000 people (number of unique people who were offered the video in their Facebook feeds).
Draft Local Plan Consultation Exhibitions

In line with the Council's Statement of Community Involvement the consultation included a series of exhibitions where Spatial Planning staff were on hand to explain what the Local Plan was about and guide stakeholders and residents in understanding the draft Plan and its evidence base, as well as how to make comments. A variety of materials were available, including the Exhibition Boards (<https://www.stalbans.gov.uk/sites/default/files/attachments/A1%20Info%20Boards%20-%20web%20version.pdf>), large format copies of the Policies Map, 'call for sites' maps etc. The exhibitions were held at:

COLNEY HEATH - Colney Heath Village Hall, 83 High Street, AL4 0NS

- **Saturday 2 September** 2pm - 8pm

REDBOURN - Redbourn Parish Centre, The Park, AL3 7LR

- **Monday 4 September** 2pm - 8pm

BRICKET WOOD - The Parish Centre, Station Road, AL2 3PJ

- **Wednesday 6 September** 2pm - 8pm

WHEATHAMPSTEAD – Wheathampstead Memorial Hall, Marford Road, AL4 8AY

- **Thursday 7 September** 2pm - 8pm

LEVERSTOCK GREEN – Leverstock Green Village Hall, Hemel Hempstead, HP3 8QG

- **Friday 8 September** 2 pm – 8 pm

ST ALBANS - District Council Offices, Civic Centre, AL1 3LD

- **Monday, 11 September** 2pm - 8pm

SANDRIDGE - Marshalswick Community Centre, The Ridgeway, AL4 9TU

- **Tuesday 12 September** 2pm - 8pm

HARPENDEN - The Restaurant, Rothamsted Enterprises, West Common, Harpenden, AL5 2JQ

- **Wednesday 13 September** 2pm - 8pm

LONDON COLNEY - Caledon Community Centre, 29 Caledon Rd, AL2 1PS

- **Thursday, 14 September** 2pm - 8pm

HARPENDEN Youth Council session Young People's Centre above the Library

- **Monday, 18 September 18:30 – 20:30**

Local Plan consultation documents were also made available at the following locations for interested persons to read:

In St Albans City and District Area

- St Albans Civic Centre
- St Albans Library
- Harpenden Library
- London Colney Library
- Marshalswick Library
- Redbourn Community Library
- Wheathampstead Community Library

In the Dacorum Borough Council area

- Hemel Hempstead Library
- Leverstock Green Library

In the Hertsmere Borough Council area

- Radlett Library

In total 2,568 stakeholders were invited to make comments including the following 634 organisations, in line with the Council's Statement of Community Involvement.

51 Pegasus Ltd	AITCHISON RAFFETY	Arriva PLC
A D Practice Ltd	Alban Developments Ltd	Axess Developments LLP
Abbey Developments Ltd	Albert Bygrave Centre	Aylett Nurseries Limited
Abbey Flyer Users Group	Aldenham Parish Council	Ayot St Lawrence Parish Council
Abbey Precincts Residents Association	Aldi Store Ltd	Ayot St Peter Parish Council
Abbey Theatre	Aldwyck Housing Association Ltd	Barker Parry Town Planning Limited
Abbots Langley Parish Council	Aldwyck Housing Group	Barratt Homes North London
Abbots Park Residents Association	Alexandra Road Residents Association	Barton Willmore
Aboyne Residents Association	All Saints Pastoral Centre	Barwood Land & Estates Ltd
Access Ability	Ambulance Service	Batchwood School
Active Travel England	AMEC Environment & Infrastructure UK Limited	Batford Community Action Group
Adlington Planning Team	Amec Foster Wheeler	Beaumont School
Adrian Irving and Alban Developments Ltd	Anchor Trust Housing Association	Bedford Borough Council
Adrian Salt and Pang Ltd	Anderson Group	Beechwood Homes
Affinity Water	Aplins Close Residents Association	Beechwood Homes
Age Concern Hertfordshire	Aragon Land & Planning	Belgrave Land (Northern) No 2 Limited
AIM Securities Limited	Arcus Consultancy Services Ltd	Belgrave Property Developments Ltd

Bellway Homes Ltd (North London Division)	Broxbourne Borough Council	Castleoak Care Developments
Berkeley Strategic	BT Open Reach (Network Alt.)	Catalyst Housing Limited
Berkhamsted Residents Action Group (BRAG)	Bugler Group Ltd	Catesby Property Group
Bernards Heath Infant School	Building Research Establishment	Cathedral Property Committee
Bidwells	Burhill Developments Ltd	CBRE
Blaze Neon Ltd	Burhill Golf & Leisure Ltd	CBRE Global Investors
Bloor Homes Ltd	Burston Nurseries PLC	CDA Herts
Bloor Homes South Midlands	Bushey and District Footpaths Assoc	CEG
Bovis Homes (Central Region)	Butterfly World Project Ltd	Cell Barnes Lane Residents Association
Bowes Lyon Mews Residents Association	Cadent Gas	Central Bedfordshire Council
Bowmans Leisure Ltd	CALA Group	Centre 33
Boyer Planning	Camphill St Albans	Centre for Voluntary Service St Albans
BRE	Canal & River Trust	Centrebus
Breakspears	Cancer Research UK Shop	Centurion Golf Club
Breheny Group	Cannon, Morgan & Rheinberg Partnership	Cerda Planning Ltd
Bricket Wood Country Club	Carlisle and Waverly Area Residents Association (CWARA)	CgMs Consulting
Bricket Wood Residents' Association	Carter Jonas LLP	Challain Limited
Briffa Phillips	Castleoak Care Communities	Chamber of Commerce
		Churches Together

Churches Together Harpenden

Citizens' Advice Bureau (St Albans)

Civic Construction

Civil Aviation Authority

Civil Service Pensioners Alliance

Clarke & Whalen Architects

CLASH Campaign by Locals Against Sewel Housing

Clive Miller & Associates Ltd

CMYK(Planning & Design)

Colney Heath Parish Council

Comer Group

Communities 1st

Community Development Agency for Hertfordshire

Connected Counties

Consent Disability Services

Consolidated Property Group

Constable Homes Ltd

Countryside Properties

Countryside Properties Plc

CP Holdings

CPRE Hertfordshire

CPRE The Hertfordshire Society

Cranford Developments Ltd

Cravells Area Residents Association

Crest Strategic Projects

Crest Strategic Projects and Bloor Homes

Crown Estate

Cunningham Hill Infant School

Cunningham Hill Road and Cunningham Avenue Residents Association

CWC Group

D Laing Design

D2 Planning Limited

Dacorum Borough Council

D'Arblay Investments

David Turner Chartered Building Surveyor

Davies Ridler Yates Ltd

Dawn to Dusk

DB Cargo (UK) Limited

DB Rees (Builders) Ltd

Decathlon

Department for Business, Energy & Industrial Strategy

Department for Culture, Media & Sport

Department for Education

Department for Environment, Food and Rural Affairs

Department for Transport

Department for Work & Pensions

Department of Health

Department of Health & Social Care and Bloor Homes

Department of Health and Social Care

Design & Plan

Diocese of St Albans

Diocese of St Albans Board of Finance

Divine Ideas Architects

DLA Town Planning Ltd	Environment Agency	Friends of the Earth
DLP (Planning) Ltd	Environmental Economics Ltd	Friends of the Mimram
DLP Consultants	ERLP 1 Sarl	Friends of the Nickey Line
DLP House	Eskmuir Properties Ltd	Friends, Families and Travellers Planning
Earthworks	Essex and Herts Community NHS Trust	G Pearce and A Pearce
East And North Herts NHS Trust	Fairview	Gallagher Estates
East Herts Council	Fairview New Homes Ltd	Gate Herts
East Midlands (and East of England), Community Health Partnerships	Faith & Cultural Enterprise	GB Railfreight Limited
East of England Co-operative Society	Fir Trees Farm Ltd	Gerald Eve LLPÂ
Eaton Lodge	Firstplan	Gladman Developments Ltd
Education Funding Agency	Flamstead Parish Council	Glinwell PLC
Edward Lloyd Johnston	Folly Fields Residents Association	Goodman
EE	Fonthillcare	Gorhambury Estates Company Limited
Elite Econoloft Ltd	Forest House Education Centre	Governing Body of Townsend School
Ellenbrook Area Residents Association Committee	Forestry Commission England	Grand Union Investments Ltd
English Heritage	Forestry England	Great Gaddesden Parish Council
English Partnerships	Forty Plus Cycling Club	Greater London Authority
Enterprise PLC	Freight on Rail	Groundwork Hertfordshire
	Friends of Bernards Heath	Grove House

HACRO	HCC - Adult Care Services	Hertfordshire Community NHS Trust
Hallam Land Management Limited	HCC - Children's Services (Early Childhood Services)	Hertfordshire Constabulary
Hallam Land Management Ltd and St Albans School	HCC - Children's Services (School Place Planning)	Hertfordshire Constabulary Commissioner
Hallam Land Management South East Region	HCC - Health and Community Services	Hertfordshire Constabulary/CDRP
Harpenden Academy	HCC - Libraries	Hertfordshire County Council
Harpenden Gateway Club	HCC - Passenger Transport Unit	Hertfordshire County Council (Development Services-Property)
Harpenden Green Belt Association	HCC - Transport (Rail)	Hertfordshire County Council (Growth & Infrastructure Unit)
Harpenden Library	HCC - Transport Planning	Hertfordshire County Council (Highways)
Harpenden Mencap	HCC - Waste Planning	Hertfordshire County Council (Minerals Planning)
Harpenden Methodist Church	Health & Safety Executive (HSE)	Hertfordshire County Council (Waste Planning)
Harpenden New Farm Protection Group	Heathlands School	Hertfordshire County Council Property
Harpenden Parents Group	Heaton Planning Ltd	Hertfordshire County Council Transport
Harpenden Rural Parish Council	Helioslough Ltd	Hertfordshire County Council Wider Determinants Public Health
Harpenden Society (Committee)	Hertford Planning Service	Hertfordshire Enterprise Zone
Harpenden Town Council	Hertfordshire Architects Ltd	Hertfordshire Fire and Rescue Service
Harrold Investments	Hertfordshire Association of Town and Parish Councils	
HATBC	Hertfordshire Chamber Of Commerce & Industry	
Hatfield Town Council		

Hertfordshire Gardens Trust	Highways England	Ivory and Rodell
Hertfordshire Land Ltd	Hill Residential	Jackson Kent Associates
Hertfordshire Local Enterprise Partnership	Hill Residential and the Lawes Agricultural Trust	Jane & Dada
Hertfordshire Partnership Foundation Trust	Hilton House Properties	Jarvis Homes
Hertfordshire Police Authority	Historic England	JB Planning Associates Limited
Hertfordshire Trading Standards	Hitchin & Harpenden Liberal Democrats	Jersey Farm Residents Association
Hertfordshire Youth Service	Holby Nesbit Partnership	JMC Building Surveyors Ltd
Herts & Middlesex Wildlife Trust	Home Builders Federation Ltd	JW Pigott and Son
Herts and Middlesex Badger Group	Home Extension Team (Hitchin) Ltd	Kentucky Fried Chicken (Great Britain) Limited
Herts Environmental Records Centre	Home Plans	Kimpton Parish Council
Herts GATE (Gypsy & Traveller Empowerment)	Homes & Communities Agency	Kingsholme Conservatories
Herts Valleys Clinical Commissioning Group	Homes England	Knight Frank
Hertsmere Borough Council	Howard Pease Architects	L & G Estates
Highcroft Planning	Howarth Homes	La Salle Investment Management
Highfield Park Trust	Hunston Properties Limited	Ladies Circle (Harpenden)
Hightown Housing Association	Hyde Parish Council	Lawes Agricultural Trust
Highways Agency	ICENI Projects	Legal & General Investment Management
	Insulating Windows Ltd	Legal and General
	Intrasales Ltd	Legal and General Property

Leisure Connection	Luton Borough Council	McDonalds Restaurants
Leverstock Green Village Association	M Scott Properties Ltd	Meacher & Smith
Lightwood	Maddox Associates	MENCAP (St Albans)
Lime Tree Place Residents Association	Maltings Surgery PPG	Messrs William Boyer & Sons
Linden Homes	Maple School	Metroline
Linden Homes and Wates Developments	Marine Management Organisation	Michael V S Hardiman & Associates Ltd
Linden Wates (Bricket Wood) Limited	Maritime Transport Limited	Military Aviation Authority Secretariat (Ministry of Defence)
Local Access Forum	Marshals Drive Residents Association	Miller Homes Ltd-Southern Region
Local Members of Parliament	Marshalswick Baptist Free Church	Millhaven Management Ltd
London and Cambridge Properties Ltd	Marshalswick Estate Residents Association	Minister Court Frogmore Ltd
London Colney Library	Marshalswick North Residents Association	Ministry of Housing, Communities & Local Government
London Colney Limited	Marshalswick S E Residents Association	Mitie Group PLC
London Colney Parish Council	Marshalswick Traders Association	Modus Operations Ltd
London Colney Village Concern	Martin Grant Homes and Kearns Land	Molyneux Planning
London Gypsies and Travellers Unit	Martin Robeson	Montway Property Developments Limited
London Luton Airport Ltd	Mayor of London	Morrison Supermarkets
London Luton Airport Operations Ltd	McCarthy & Stone Retirement Lifestyles Ltd	Mount Pleasant Lane JMI
Longacres Residents Association		MRP Planning
Longbourn Estates		

NALC
 Napsbury Lane Residents Association
 Nash Mills Parish Council
 Nathaniel Lichfield & Partners
 National Asthma Campaign
 National Federation of Gypsy Liaison Groups
 National Grid
 National Grid (Avison Young)
 National Highways
 Natural England
 Network Rail
 Network Rail (Infrastructure) Ltd
 Network Rail Town Planning Team
 New Greens Residents Association
 New Milton Catering Limited
 NHS England
 NHS Property Services
 North Hertfordshire District Council
 North Mymms Parish Council

Northern Trust
 Notcutts Limited
 Oaklands College
 Office of Rail and Road
 Old Road Securities Plc
 Onyx
 Open Spaces Society
 Orchestra Land Ltd
 Paddington Churches Housing Association
 Park Street and District Residents
 Park Street and Frogmore Society
 Park Street Baptist Church & Bloor Homes Ltd
 Park Street C of E Primary School & Nursery
 Park Street Residents Association (PSRA)
 Patchetts Green Riding Club
 Peacock and Smith
 Pegasus Group

Pennard Holdings Ltd
 Pentangle Design
 Perry M Jones Ltd
 Peter Rice Developments
 Philip Bailey Architects
 Philip Dean Limited
 Phillips Planning Svs
 Pigeon Investment Management Ltd
 Planning Potential Ltd
 Planware Ltd
 PLI
 Plotolders Land Management Group Ltd
 Populous
 PPML Consulting Ltd
 Prospect Planning
 PUTTERILLS LAND & NEW HOMES
 Queens Court Residents Association
 Quod Planning
 Radlett Society & Green Belt Association (RSGBA)

RAGE (Redbourn Against Greenbelt Erosion)

Ralph Catton Family Trust

Ramblers Association

Rapleys LLP

RDS on behalf of Telereal Services Limited

Redbourn Parish Council

Regrowth

Rentplus

RF Sinclair and Sons

Rialto Homes Limited

Rice Group

Richard Ronald Associates

Richborough Estates

Ridge Parish Council

Ridgmont Rd Residents' Association

Right School Right Place

Rippon Development Services

Robinson and Hall

Roger Carter Architects

Roger Miles Planning Limited

Romans Land and New Homes

Royal Mail Group Ltd

RPS Planning & Development

RSPB

Rumball Sedgwick

Rural Solutions

SAGBA

Sainsbury's Supermarkets Ltd

Salvation Army

Samaritans (Harpenden and Villages)

Samuel Ryder Academy

Sanders Laing

Sandridge Parish Council

Sandridge Primary School

Sandridge Road Residents Association

Sandridge School

Sandringham School

Save Our Sleep Action Group

Savills

Scott Property Group

Settle

Shenley Parish Council

Sherwoods Rise Residents

Shire Consulting

Shonleigh Nominees

Shopmobility (St Albans & Harpenden)

Signature Senior Lifestyle

Simco Homes Ltd

Skyline

Skyswood Primary School

Smallford Residents Association

Society of St Michael's and Kingsbury

Somerfield Stores Limited

Sopwell Residents Association

South Birklands Residents' Association

South Herts Cyclists Touring Club

South Mimms Ridge Parish Council
 South West Hertfordshire Joint Strategic Plan
 Special Olympics St Albans
 Sport England
 St Albans & District Footpaths Society
 St Albans and Harpenden Patient Group (SAPG)
 St Albans and Herts Arc & Arc
 St Albans BID
 St Albans Cathedral
 St Albans Chamber
 St Albans Chamber of Commerce
 St Albans City and District Access Group
 St Albans City Football Club
 St Albans Civic Society
 St Albans Community Forest Assoc
 St Albans Cycle Campaign
 St Albans Deanery Synod

St Albans District Association of Local Councils
 St Albans District Centre for Voluntary Service
 St Albans District Green Party
 St Albans Green Belt Association
 St Albans Judo Club
 St Albans Labour Party
 St Albans Masorti Synagogue
 St Albans School
 St Albans Visitor Partnership
 St John Fisher Primary School
 St Leonards Church
 St Lukes School
 St Mary's Church
 St Michael Parish Council
 St Michael's Primary School
 St Peters Church
 St Stephen Parish Council

St. Adrian's Catholic Primary School St. Adrian's Catholic Primary School
 St. Albans Arts
 St. Albans Enterprise Agency
 Stackbourne Limited
 Stebbings Associates
 Stevenage Borough Council
 Storey Homes
 STRIFE
 Strongway Nominees Ltd
 Strutt & Parker
 Swingcroft Limited
 Tarmac
 Taylor Wimpey
 Taylor Wimpey North Thames
 Taylor Wimpey Strategic Land
 Terence O'Rourke
 Thakeham Homes
 Thames Water
 Thamesleigh (UK) Limited

The Ayot Estate	Transport for London (TFL)	Walton and co
The British Horse Society	Triad Planning And Design Ltd	Waters Edge (St Albans) Management Company
The Coal Authority	Troy Planning	Watford Borough Council
The Emerson Group	Trustees of Superfine Tapes Co	Watling View School
The Football Association	Trustees of the Tyttenhanger Estate	Weal Architects
The Glass House	Turley Associates	Welwyn Hatfield Borough Council
The Harpenden Society	UK Islamic Mission	West Hertfordshire Hospitals NHS Trust
The National Trust	UK Power Networks	Westminster Lodge Leisure Centre
The Showmen's Guild of Great Britain	University of Hertfordshire	Wheatfields Primary School
The Theatres Trust	Universitybus Limited	Wheathampstead Parish Council
The Woodland Trust	Ver Valley Society	Whitcroft and Meadowcroft Residents Association
Threads	Verulam Cycling Club	Willows Farm Village
Three	Verulam Golf Club	Wood Plc on behalf of National Grid
Three Rivers District Council	Verulam Residents Association	Wrenbridge Land Ltd
Trans Link London Ltd & Secretary of State for Health	Virgin Media	Youth Justice Board
Transco	Vodafone and O2	Youth With A Mission
	VRG Planning Ltd	

Section 4: Main issues raised during the course of the consultation carried out under Regulation 18

The table below sets out the main issues raised between 12 July – 25 September 2023 during the consultation carried out under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The table also sets out how the Council has responded to each of the main issues raised.

Chapter of the Reg 18 consultation draft Local Plan	Main issues raised	Issue raised by	How the Council has responded to the main issue in the Regulation 19 draft Local Plan
Chapter 1 – A Spatial Strategy for St Albans City and District	Principle of having a broad location in Redbourn	Residents	No changes made – the settlement of Redbourn continues to have a broad location for growth commensurate with the findings of the Arup review of the District’s Green Belt, and Redbourn’s place in the settlement hierarchy / the access to local services available in Redbourn.
Chapter 2 – Climate Emergency	Policies too prescriptive / not prescriptive enough on measures for carbon reduction and tackling climate change	<ul style="list-style-type: none"> • The Crown Estate • Residents • Friends of the Earth • Hertfordshire LEP • Bloor Homes 	Policies amended to remove specific targets (now covered sufficiently by the relevant Building Regulations) but emphasise that all developments must minimise carbon emissions.
	Need for more specific targets and measures for carbon reduction embedded in policies	<ul style="list-style-type: none"> • Sustainable St Albans • Residents 	

Chapter of the Reg 18 consultation draft Local Plan	Main issues raised	Issue raised by	How the Council has responded to the main issue in the Regulation 19 draft Local Plan
	The effects of climate change have not been considered in the Plan	Residents	
	Standards are inconsistent with national policy.	Home Builders Federation	
Chapter 3 – Sustainable Use of Land and the Green Belt	Use of the Standard Method as basis for the housing target	<ul style="list-style-type: none"> • St Stephen Parish Council • Residents • CPRE Herts • Ver Valley Society 	No changes made to ensure that the Plan is consistent with national policy
	The allocation of sites in the Green Belt	<ul style="list-style-type: none"> • Residents • Redbourn Parish Council • Ver Valley Society 	The Council is taking a brownfield sites first approach, but there are insufficient sites to meet the District's growth needs
	Hemel Garden Communities sites not recommended by ARUP Green Belt study	Residents	Hemel Garden Communities is a longstanding proposed extension to Hemel Hempstead that St Albans is taking forward jointly with Dacorum Borough Council, Hertfordshire County Council and Hertfordshire LEP to meet the growth needs of both local authorities. It has MHCLG Garden Community status and was partly recommended by the ARUP Green Belt study.

Chapter of the Reg 18 consultation draft Local Plan	Main issues raised	Issue raised by	How the Council has responded to the main issue in the Regulation 19 draft Local Plan
	Timescales for delivery of Hemel Garden Communities sites are overly ambitious	<ul style="list-style-type: none"> • Legal and General (Strategic Land Harpenden) • Redbourn Parish Council 	The Council has worked with the Crown Estate and landowners to ensure that the timescales for delivery at Hemel Garden Communities sites reflect realistic planned delivery timelines.
	Coalescence of Redbourn and Hemel Hempstead	Residents	No changes made – the gap between Redbourn and Hemel Garden Communities will be maintained by the presence of a new country park and significant greenspace.
	Use of a stepped housing trajectory	<ul style="list-style-type: none"> • Bidwells and Jarvis Homes • Home Builders Federation 	The Trajectory follows a reasonable assessment of deliverability and developability timescales and had been regularly updated to reflect the most up to date assessment.
	Repetition between policies and consistency of wording	<ul style="list-style-type: none"> • Miller Homes • DLA Town Planning • Ramblers Hertfordshire and North Middlesex • Pigeon (Hemel Hempstead) • St Albans and District Footpaths Society • BRiCS Development 	Policies reviewed for consistency of wording and amendments made

Chapter of the Reg 18 consultation draft Local Plan	Main issues raised	Issue raised by	How the Council has responded to the main issue in the Regulation 19 draft Local Plan
	Effectiveness of specific policy clauses	<ul style="list-style-type: none"> • Bloor Homes South Midlands • Sport England • Residents • Owner of Land Piggotshill Lane • McCarthy and Stone • Taylor Wimpey Strategic Land • Hertfordshire County Council • DLA Town Planning 	Policies reviewed for effectiveness and amendments made
Chapter 4 – Housing	Affordable housing requirements and how those affordable homes will meet need in the District	<ul style="list-style-type: none"> • Residents • Crest Nicholson • Trustees of the M E Simons Trust and Mr and Mrs R Wimms • Hightown Housing Association 	Local Plan Viability Report outlines the viability of the approach to affordable housing in the draft Local Plan.
	Flexibility of housing mix policy and whether it will meet housing needs	<ul style="list-style-type: none"> • St Albans Diocesan Board of Finance Frogmore • Crest Nicholson • Taylor Wimpey Strategic Land • Hightown Housing Association • BRiCS Development • Hertfordshire County Council (as landowner) 	Amendments made to mix of affordable housing by size and an allowance to factor in specialist units in considering mix of units in Broad Locations.
	Affordable housing for C2 and Supported Living accommodation	McCarthy Stone	No changes considered to be necessary

Chapter of the Reg 18 consultation draft Local Plan	Main issues raised	Issue raised by	How the Council has responded to the main issue in the Regulation 19 draft Local Plan
	Target for, and deliverability of wheelchair accessible and adaptable homes	<ul style="list-style-type: none"> • McCarthy Stone • Martin Grant Homes and Kearns Land Ltd 	No changes considered to be necessary
	Deliverability of requirements for self-build homes	<ul style="list-style-type: none"> • Home Builders Federation • BRiCS Development 	Amendments made to exclude entirely flatted urban schemes
	Gypsy and Traveller Accommodation Needs Assessment is out of date, deliverability and quantum of sites to be provided.	GATE Herts	A new and updated Gypsy and Traveller Accommodation Needs Assessment has been prepared which has informed the Reg 19 draft Local Plan, and the allocation of sites within.
Chapter 5 – Employment	Watford BC has a shortfall of land for industrial and logistics premises and would like this to be reflected in SADC Local Plan	Watford Borough Council	The Reg 19 draft Local Plan allocates more land for industrial and logistics premises than is required for St Albans City and District alone, to help meet the needs of the wider South West Hertfordshire sub-region.
	Plan is based on pre-Covid data for employment	Resident	A new and updated SW Herts Economic Study has been produced which has informed the Reg 19 draft Local Plan.
	Imbalance between growth in housing and amount of employment land in some settlements (Wheathampstead in particular)	Wheathampstead Businesses	No changes made to the Plan.

Chapter of the Reg 18 consultation draft Local Plan	Main issues raised	Issue raised by	How the Council has responded to the main issue in the Regulation 19 draft Local Plan
	SRFI should be removed from Green Belt as contrary to Para 143 of the NPPF if remains as Green Belt	SEGRO (Radlett)	Green Belt boundaries will be reviewed in a future Local Plan when the SRFI is completed.
	Insufficient controls over HGV movements to and from SFRI	<ul style="list-style-type: none"> Residents Colney Heath Parish Council 	No changes made to the Plan as the SRFI already has planning permission granted, which controls HGV movements, by the government.
	Policy on Principal Office Locations is not flexible enough to respond to market changes	Clearbell Capital LLP	No changes made to the Plan as the policy as drafted does not preclude changes of use or redevelopment of existing office buildings. It also encourages active frontages of non-office uses on ground floors of office buildings.
Chapter 6 – City, Town, Village Centres and Retail	Approach towards hot food takeaways	Residents	No changes made
	Approach to protection of existing retail units	<ul style="list-style-type: none"> Wheathampstead Businesses Residents Whitcroft and Meadowcroft Residents Association 	Due to the government’s permitted development rights there is little that the Local Plan can do to protect existing retail units beyond the support expressed in the the draft policies.
	Facilitating active travel to St Albans City Centre and retail parks	Hertfordshire County Council	Policy TCR3 amended to make more reference to facilitating active travel.

Chapter of the Reg 18 consultation draft Local Plan	Main issues raised	Issue raised by	How the Council has responded to the main issue in the Regulation 19 draft Local Plan
Chapter 7 – Community Infrastructure	Impact on infrastructure of planned growth and how new infrastructure will be provided	<ul style="list-style-type: none"> • Campaign by Locals Against Sewell Housing • Residents 	An updated Infrastructure Delivery Plan has been prepared alongside the Regulation 19 draft Local Plan.
	Allocated sites for schools in Green Belt locations should be removed from the Green Belt	Hertfordshire County Council	Without details of where the school buildings are to be located it is not possible to remove school sites from the Green Belt
	The proposed school at Ariston Works is not shown in the correct location on the draft Policies Map	Hertfordshire County Council	Hertfordshire County Council has confirmed that the site is no longer required for a primary school
Chapter 8 – Transport	The impact of proposals on the strategic route network (the M1, M25 and A1(M))	National Highways	Transport Modelling has been undertaken to support the preparation of the draft Local Plan and the modelling has informed the Infrastructure Delivery Plan that supports the draft Local Plan
	Localised traffic issues in specific locations across the District	Residents	Transport Impact Assessments have been prepared for each site allocation. Most sites will provide funding and in some instances physical infrastructure to support active travel and public transport use.
Chapter 9 – Utilities Infrastructure	Ability to service new development with water and waste water treatment	Thames Water	Policy SP9 amended to make reference to the potential need for phasing conditions where they are

Chapter of the Reg 18 consultation draft Local Plan	Main issues raised	Issue raised by	How the Council has responded to the main issue in the Regulation 19 draft Local Plan
			necessary to ensure that development is not occupied until necessary utilities infrastructure is provided.
Chapter 10 - Natural Environment and Biodiversity	Chapter also includes Green Infrastructure which should be reflected in title and content	Hertfordshire County Council	Chapter title amended.
	References to specific green spaces not included	<ul style="list-style-type: none"> Residents Open Space Society 	Figure 10.1 updated in the Regulation 19 draft Local Plan to include additional sites.
	Effectiveness of Policy NEB1 as worded	<ul style="list-style-type: none"> Friends of Jersey Lane Crest Nicholson Verulam Residents Association Residents Natural England Herts and Middlesex Wildlife Trust Hertfordshire County Council 	Amendments made to Policy NEB1.
	Effectiveness of Policy NEB8 as worded	<ul style="list-style-type: none"> Thames Water Environment Agency Hertfordshire County Council 	Policy NEB8 redrafted.
	The green space standards proposed and whether they are excessive or not	<ul style="list-style-type: none"> Joint Allotments Group of St Albans Home Builders Federation 	Amendments made to Policy NEB12 which includes standards for green space provision.

Chapter of the Reg 18 consultation draft Local Plan	Main issues raised	Issue raised by	How the Council has responded to the main issue in the Regulation 19 draft Local Plan
Chapter 11 – Historic Environment	<i>No main issues</i>	<i>n/a</i>	<i>n/a</i>
Chapter 12 – High Quality Design	Justification for, and deliverability of a requirement for a minimum of 40 dwellings per hectare	<ul style="list-style-type: none"> St Albans Diocesan Board of Finance Frogmore Pigeon Investment Management Ltd and the Gorhambury Estate 	No change made to policy
	Effectiveness of Policy DES4	<ul style="list-style-type: none"> DLA Planning Resident 	No change made to policy in relation to the comments made.
	Justification for, and effectiveness of the zones of visibility and public viewpoints (Policy DES6)	Pigeon Investment Management Ltd and the Gorhambury Estate	St Albans City Centre, Building Height, Roofscape and Skyline Viewpoint Review (2024) published to support the Regulation 19 draft Local Plan and related changes made to DES6
Chapter 13 – Public Health and Wellbeing	Impact on air quality and pollution of house building in areas with no or limited public transport	Resident	The Council has worked with Herts County Council as the Highway Authority and prepared transport impact assessments for the Reg 19 draft Plan.
	Groundwater contaminated land should be addressed more directly	Environment Agency	Additional text added to Chapter 13 to cover groundwater contaminated land
	Not justified to require Health Impact Assessments on all residential developments of 100 or more units	Home Builders Federation	This requirement is in line with the County Council Position Statement regarding 100 or more residential

Chapter of the Reg 18 consultation draft Local Plan	Main issues raised	Issue raised by	How the Council has responded to the main issue in the Regulation 19 draft Local Plan
			units. This approach was accepted by PINS for the Watford Local Plan.
Chapter 14 – Implementation	The viability of infrastructure should be established before the Local Plan is adopted	District Councillor	A whole plan Viability Assessment has been undertaken for the Reg 19 draft Local Plan.
	Cumulative impacts of development on healthcare provision and cost associated with providing that healthcare (and how development can contribute to those costs)	<ul style="list-style-type: none"> NHS Property Services NHS Hertfordshire and West Essex ICB 	Cumulative impacts are referenced in Policy SP14.
	Impact of Policy IMP1 on the timescales at which major development can be brought forward	Home Builders Federation	Amendments made to Policy IMP1.
Appendix 1 – Site Allocations	Redeveloping main car parks without committing to providing alternative transport links/car parks well used	Residents	Applicable allocations either require an appropriate level of car parking for existing and new development; or require a survey of car park usage before proceeding with any proposals.
	Public rights of way across sites	Ramblers Hertfordshire and North Middlesex	References to public rights of way added to relevant site allocations.
	The Council has overestimated the supply of homes from brownfield sites/Proposed density of development on some sites is out of character with surrounding area/Site	DLA Town Planning	Capacities of all sites have been reassessed and are consistent with policy and constraints.

Chapter of the Reg 18 consultation draft Local Plan	Main issues raised	Issue raised by	How the Council has responded to the main issue in the Regulation 19 draft Local Plan
	promotor requests a lower amount of development on a site		
	Consideration of cross-boundary infrastructure requirements to be further developed	<ul style="list-style-type: none"> • Hertsmere Borough Council • Three Rivers District Council 	The Council has continued to engage with neighbouring local planning authorities under the Duty to Co-operate on cross-boundary infrastructure requirements.
	Site-specific heritage impact assessments are needed	<ul style="list-style-type: none"> • Historic England • Redbourn Parish Council 	Site specific heritage impact assessments have been produced and have been published alongside the draft Local Plan. Relevant policy updates have been made.
	Certain allocations fall within the impact risk zone for the Chilterns Beechwood SAC, and certain allocations fall within a proposed area of search for a possible boundary amendment to the Chilterns Area of Outstanding Natural Beauty	Natural England	Some sites have been removed from the draft Local Plan due to the potential for their inclusion within the intended extension to the Chilterns National Landscape (AONB) area. Where sites are in the zone of influence for the Chilterns Beechwood SAC this is referenced as part of the site allocation so it is considered as part of any planning application.
	Ecological value of certain sites and the lack of an Ecological Study	Herts and Middlesex Branch of Butterfly Conservation	It is not a requirement that the Council undertake a full ecological survey before allocating a site. Relevant

Chapter of the Reg 18 consultation draft Local Plan	Main issues raised	Issue raised by	How the Council has responded to the main issue in the Regulation 19 draft Local Plan
			Ecological designations have been taken into account.
	Traffic generation assumes modal shift to active travel modes but Plan does not set out how that modal shift will be achieved, so underestimates traffic generation.	<ul style="list-style-type: none"> Resident St Albans Cycle Campaign 	Transport Impact Assessments have been completed for all site allocations, and these set out LCWIP projects which will be wholly or partly funded by development, which will help to achieve a modal shift.
	The sites of proposed school buildings and associated hardstanding should be removed from Green Belt	Hertfordshire County Council	Without details of where the school buildings are to be located it is not possible to remove school sites from the Green Belt
	Provision of extra-care and supported living in Broad Locations	Hertfordshire County Council	Allocation text has been amended.
	Percentage of affordable housing viable on specific sites	Blair. R. of Flamsteadbury Farm	A whole plan Viability Assessment has been undertaken for the Reg 19 draft Local Plan.
	Proximity of existing waste management facilities, and one allocated site for minerals extraction, to site B5	Hertfordshire County Council	Allocation text has been amended.
	The Green Belt assessment and how this has been applied to the site allocations within the draft Local Plan	Residents	The Council is taking a brownfield sites first approach, but there are insufficient sites to meet the District's growth needs.

Chapter of the Reg 18 consultation draft Local Plan	Main issues raised	Issue raised by	How the Council has responded to the main issue in the Regulation 19 draft Local Plan
	(in particular Hemel Garden Communities)		<p>In addition to the Green Belt Review, the Site Selection assessment considered constraints such as environmental considerations like flood risk and wildlife conservation, and other planning factors such as distance to facilities, heritage and access.</p> <p>Hemel Garden Communities is a longstanding proposed extension to Hemel Hempstead that St Albans is taking forward jointly with Dacorum Borough Council, Hertfordshire County Council and Hertfordshire LEP to meet the growth needs of both local authorities. It has MHCLG Garden Community status and was partly recommended by the ARUP Green Belt study.</p>
	The proximity of a working quarry to Site B8 and impact on the workings of the quarry, including a large part of the 250m rail buffer identified in the	<ul style="list-style-type: none"> • Hertfordshire Country Council • Tarmac 	Amendments made to wording of the site allocation.

Chapter of the Reg 18 consultation draft Local Plan	Main issues raised	Issue raised by	How the Council has responded to the main issue in the Regulation 19 draft Local Plan
	adopted Hertfordshire Minerals and Waste Local Plan. Part of the site also overlaps with a site identified as a Waste Allocation site. Overall impact on use and capacity.		
	Site M3 would qualify as a local wildlife site and the only reason that it is not designated as such is because the landowner permission required to designate the site has not been given.	Herts and Middlesex Wildlife Trust	Amendments made to the site allocation to reference protected species and relatively rare species-rich grassland in the northern part of the site.
	Flood risk issues in parts of specific sites.	<ul style="list-style-type: none"> • Hertfordshire County Council • Redbourn Parish Council • Residents 	A Level 1 Strategic Flood Risk Assessment Addendum and a Level 2 Strategic Flood Risk Assessment has been prepared and published alongside the draft Local Plan. The findings of the assessment have been included within the text of relevant site allocations.
	Restricted access (narrow) to some urban capacity sites.	Residents	Hertfordshire County Council as highways authority have not objected to the allocation of the sites with narrower access so no changes have been made to the draft Local Plan.
	Displacement of car parking for residents arising from the	<ul style="list-style-type: none"> • Residents • Skyswood Management Ltd 	Applicable allocations either require an appropriate level of car parking for

Chapter of the Reg 18 consultation draft Local Plan	Main issues raised	Issue raised by	How the Council has responded to the main issue in the Regulation 19 draft Local Plan
	redevelopment of some urban capacity sites/lack of alternative provision for existing residents.	<ul style="list-style-type: none"> • Verulam Road and Adjoining Roads Residents Association 	existing and new development; or require a survey of car park usage before proceeding with any proposals.
	Various Green Belt sites that should be considered for inclusion in the draft Local Plan	<ul style="list-style-type: none"> • Fairview New Homes • Owners of The Dak • SageHaus Living • Sainsburys Supermarkets • Eddy Cowen • Bellway Homes (North London) Limited • PJB Planning • Redington Capital Limited and CALA Homes • Julie Bennett • Longbourn Estate • LVW Property Brixton Hill Ltd • Axess Developments LLP • CBRE/Tinkers End Developments • 51 Pegasus Ltd • Verulam Cycling Club • D'Arblay Investments Limited • River Junction Ltd • L&Q Estates • Vistry Homes 	None of these sites were recommended for further consideration in the Arup Green Belt study and none were considered appropriate for allocation in the Site Selection work, so they have not been included in the draft Local Plan.

Chapter of the Reg 18 consultation draft Local Plan	Main issues raised	Issue raised by	How the Council has responded to the main issue in the Regulation 19 draft Local Plan
		<ul style="list-style-type: none"> • The Franklin Family • Lightwood Strategic • Felton. G. • Catesby Estates • Universities Superannuation Scheme Ltd • Trustees of the Shonleigh Trust • Trustees of the G. A. Simons Trust • Stonebond • Notcutts Limited • Redington Developments (Chiswell Green) Ltd • Jarvis Homes • The Trustees of the RE Simons Will Trust • CALA Homes • The owners of land at Brinsmead • Burhill Developments Ltd • Bloor Homes and the Dept of Health and Social Care • Landowners of The Stables • Convene Construction Ltd 	

Chapter of the Reg 18 consultation draft Local Plan	Main issues raised	Issue raised by	How the Council has responded to the main issue in the Regulation 19 draft Local Plan
		<ul style="list-style-type: none"> • The owners of land at Noke Side, Chiswell Green • Land Improvement Holdings • HGH Consulting on behalf of Edit Land • Montway Limited • Pigeon Investment Management Ltd and the Gorhambury Estate • Pigeon IML and D'Arblay IL • Smug Oak Lane Ltd • St Congar Developments • Greenbelt Plot Owners at Harpenden Road • Inspired Villages • Hertfordshire County Council (as a landowner) 	
	<p>"Land at Blackwater Lane, south east of Hemel Hempstead (Bretherens Meeting Hall)" should be included in the draft Local Plan</p>	<p>New Gospel Hall Trust</p>	<p>The site is previously developed and has been included in the draft Local Plan as a previously developed site in the Green Belt.</p>
	<p>Various urban sites that should be considered for inclusion in the draft Local Plan</p>	<ul style="list-style-type: none"> • TT Group • Clearbell Capital LLP • Minotaur Ltd 	<p>Sites UC54, UC55 and UC58 have been added to the draft Local Plan.</p>

Chapter of the Reg 18 consultation draft Local Plan	Main issues raised	Issue raised by	How the Council has responded to the main issue in the Regulation 19 draft Local Plan
		<ul style="list-style-type: none"> • Network Rail • Solum Regeneration • Affinity Water • District Councillor • Hertfordshire County Council (as a landowner) 	
Appendix 2 – Parking standards	Balance between car parking and cycle parking is incorrect	<ul style="list-style-type: none"> • St Albans Cycle Campaign • Sustainable St Albans • Residents 	Cycle parking standards amended.

Following conclusion of the consultation carried out under Regulation 18, comprehensive reports on the outcomes of the consultation were prepared and presented to the Council's Planning Policy and Climate Change Committee responsible for the Local Plan. These reports went to the Planning Policy and Climate Change Committee on the 14 November 2023 (<https://stalbans.moderngov.co.uk/ieListDocuments.aspx?CId=615&MId=10819&Ver=4>) and 12 December 2023 (<https://stalbans.moderngov.co.uk/ieListDocuments.aspx?CId=615&MId=10820&Ver=4>) and set out a summary of responses made during the consultation.

Section 5: Consultation carried out under Regulation 19

The Council published the Regulation 19 Draft Local Plan under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 on 26 September 2024. The period for making representations on the Regulation 19 Draft Local Plan ran from 26 September to 8 November 2024.

All persons and parties notified at the Regulation 18 stage were invited to make representations on the Regulation 19 Draft Local Plan. The letter/e-mail sent to each person or party formed the statement of representations procedure and a statement of the fact that the draft Local Plan and associated documents were available for inspection (online, in the Council's Civic Centre and in each of the public libraries in the District as well as Hemel Hempstead, Leverstock Green and Radlett libraries in neighbouring districts). The letter/e-mail also set out how representations could be made on the Regulation 19 Draft Local Plan.

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
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, 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)
	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)
	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

Chapter of the Reg 19 publication draft Local Plan	Main issues raised	Issue raised by
		Verulam Golf Club (332-1), Pigeon Capital Management 4 Limited and the Gorhambury Estate (365-2)
	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)
	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), Notcutts Ltd (162-2, 162-4), Greenbelt (257-1), D'Arblay Investments (363-2), Residents (76-1)
	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

Chapter of the Reg 19 publication draft Local Plan	Main issues raised	Issue raised by
		(315-4), Taylor Wimpey Strategic Land (317-3), Julie Bennett (190-1)
	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)
	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)
Chapter 2 – Climate Emergency	Interrelationship between policy requirements and Building Regulations	Richborough Estates (329-15), Hill Residential (350-4)
	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)
	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)
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,

Chapter of the Reg 19 publication draft Local Plan	Main issues raised	Issue raised by
		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 (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)
	The housing trajectory <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)
	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, 145-15), 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)

Chapter of the Reg 19 publication draft Local Plan	Main issues raised	Issue raised by
	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)
	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)
	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)
	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)
	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)
	Proposed school allocations remaining in Green Belt	Hertfordshire County Council (Growth and Infrastructure Unit) (328-5)

Chapter of the Reg 19 publication draft Local Plan	Main issues raised	Issue raised by
	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 Piggottshill Lane (198-1), DLA Town Planning Ltd (202-1),
	Vague criteria in policies/duplication/inconsistencies between policies (LG1, LG2, LG4, LG6, HOU1, TRA1, SP10, NEB1, NEB5, NEB8, NEB12, DES3	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)
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 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

Chapter of the Reg 19 publication draft Local Plan	Main issues raised	Issue raised by
		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),
	Are the affordable housing requirements of Policy HOU2 flexible enough to respond to future changes in construction costs	Home Builders Federation Ltd (318-4)
	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 (302-2), Hertfordshire County Council (Growth and Infrastructure Unit) (328-6)
	Meeting the need for specialist housing	Jarvis Homes (206-1), BRiCS Development (290-3), Hertfordshire County Council (Growth and Infrastructure Unit) (328-2)
	Meeting the demand for Self Build and Custom Housebuilding	Martin Holderness (23-1), Richborough Estates (329-7)
	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)
	<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>
Chapter 5 – Economy and Employment	<i>See Chapter 1 - A Spatial Strategy for St Albans City and District</i>	

Chapter of the Reg 19 publication draft Local Plan	Main issues raised	Issue raised by
Chapter 6 – City, Town and Village Centres and Retail	<i>No main issues</i>	<i>n/a</i>
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)
	Impact of growth on emergency services	Hertfordshire and West Essex ICB (356-6), Hertfordshire Constabulary (203-4)
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)
	<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>
Chapter 9 – Utilities Infrastructure	<i>No main issues</i>	<i>n/a</i>
Chapter 10 – Natural	Policy NEB9 requires a detailed survey of agricultural land put forward for development unless allocated in the	Redbourn Parish Council (283-27)

Chapter of the Reg 19 publication draft Local Plan	Main issues raised	Issue raised by
Environment, Biodiversity and Green Infrastructure	Local Plan, yet not all agricultural land allocated in the Plan has a detailed survey <i>Vague criteria in policies/duplication/inconsistencies between policies (LG1, LG2, LG4, LG6, HOU1, TRA1, SP10, NEB1, NEB5, NEB8, NEB12, DES3</i>	See Chapter 3
Chapter 11 - Historic Environment	<i>No main issues</i>	n/a
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 <i>Vague criteria in policies/duplication/inconsistencies between policies (LG1, LG2, LG4, LG6, HOU1, TRA1, SP10, NEB1, NEB5, NEB8, NEB12, DES3</i>	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) See Chapter 3
Chapter 13 – Health and Wellbeing	<i>No main issues</i>	n/a
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)
Glossary and Appendices	<i>No main issues</i>	n/a
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

Chapter of the Reg 19 publication draft Local Plan	Main issues raised	Issue raised by
		<p>(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 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>
	Proposed new allocation in Green Belt (employment)	<p>Convене Construction Ltd (220-2), Success Properties Consortium (225-2), Hemel Business Park Ltd (294-2), Convене Construction Ltd (221-2)</p>

Chapter of the Reg 19 publication draft Local Plan	Main issues raised	Issue raised by
	Proposed new allocation in Green Belt (Gypsy and Traveller pitches)	Myles Green (158-2), James Cash (109-2)
	Proposed new allocation (non-Green Belt)	TT Group (334-1)
	Sites delivering infrastructure instead of just contributing to the cost of new infrastructure	Hertfordshire County Council (Growth and Infrastructure Unit) (328-22)
	Green Belt boundaries around the Hemel Garden Communities	The Crown Estate (272-7)
	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)
	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)
	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)
	Owner of Site P1 wishes for it to be allocated for employment rather than residential use	Smallford Business Park Ltd (295-3)
	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)
Sustainability Appraisal	None of the growth scenarios assessed seem to exhibit a level of growth on the edge of the St. Albans urban settlement - the most sustainable location in the District as identified in the proposed Settlement Hierarchy	Julie Bennett (190-2)

Chapter of the Reg 19 publication draft Local Plan	Main issues raised	Issue raised by
	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)
	The SA does not consider reasonable alternatives for employment growth	Clowes Developments (327-2)

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.