

## New SADC Local Plan - Responding to Issues Raised by the Inspectors in 2020 – Evidence Paper

The Planning Inspectors set out their views and concerns to the Council primarily in their letter of 14 April 2020. To ensure that the new draft Local Plan responds to the issues raised by the Inspectors, the table below summarises the key points and how the Council has worked to resolve them. This document was created early in the work on the new draft Local Plan to help shape the Plan appropriately and reduce risks and has been iterated on several occasions. This version dates from September 2024.

Issue Raised by Inspector	How the Council is Responding	Status
<b>1. <u>Legal Compliance</u> – These issues must be satisfactorily resolved for an inspector to allow the Examination to proceed.</b>		
<p><b>A. Duty to Cooperate</b> - Failure to engage constructively and actively with neighbouring authorities on the strategic matters of (a) the Radlett Strategic Rail Freight Interchange proposal and (b) their ability to accommodate St Alban’s housing needs outside of the Green Belt.</p>	<ul style="list-style-type: none"> <li>i. The draft Local Plan Reg 19 allocates the SRFI site and assumes it will go ahead and the site is therefore not available for Park Street Garden Village.</li> <li>ii. The Council wrote to neighbouring authorities regarding Local Plan Vision, Strategic Priorities and Objectives, the Green Belt Methodology, and the SA Scoping Report in 2022 and the draft Local Plan Reg 18 in 2023. Pre-Reg 18 DtC Councillor meetings held 2022 during Reg 18 DtC Councillor meetings held Sept 2023 and during Reg 19 DtC Councillor meetings proposed for October 2024. SADC ‘Can you help us meet our need’ letters sent November 2022 and follow up letters on ‘can you help us meet our need’ sent 24.10.23 after Reg 18 and DtC Councillor meetings. Letters focus on the key issue of potential unmet housing need and approach to the Green Belt, and other cross boundary issues (including the SRFI, employment need, education provision etc.).</li> <li>iii. DtC Matrix approach taken by SADC with neighbouring Councils and key stakeholders endorsed by PAS as a robust approach. Initial draft Matrix sent 2022, updated for Reg 18, then post-Reg 18 Matrix sent November 2023 and proposed final Matrix sent out alongside Reg 19.</li> </ul>	<ul style="list-style-type: none"> <li>i. Actioned SRFI allocation in draft LP Reg 19 – continuous review for deliverability and has been partially implemented. Issue resolved.</li> <li>ii. Actioned; will update further at Submission stage.</li> <li>iii. DtC Matrix approach will continue and will evolve into overarching and bilateral Statements of Common Ground by time of Plan Submission. Overarching Statement of Common Ground published with Reg 19.</li> </ul>

<p><b>B. Statement of Community Involvement</b> – The SCI arguably sets up a reasonable expectation that the Council undertake a Preferred Options consultation prior to submission.</p>	<p>iv. The Council adopted a new SCI in Nov 2021 that sets out two key stages of community consultation as per the Local Plan Regulations: Plan Preparation (Reg 18) and Plan Publication (Reg 19). This clearly removes the need for a Preferred Options stage.</p>	<p>iv. Issue resolved.</p>
<p><b>2. Soundness</b> - The Inspectors did not reach final conclusions on these issues but they were highlighted to assist the Council with plan-making</p>		
<p><b>C. Green Belt</b> - Inadequate evidence to support the Council’s contention that exceptional circumstances exist to alter the boundaries of the Green Belt.</p>	<p>v. The 2013 Green Belt study focused on strategic sites and overlooked small sites with potential to deliver housing. The new Arup Green Belt Review Stage 2 methodology includes small sites.</p> <p>vi. Previously developed Green Belt land and/or land that is well served by public transport should be given first consideration.</p>	<p>v. The new Arup Green Belt Review Stage 2 study specifically includes small sites. Also, a Green Belt and Exceptional Circumstances - Evidence Paper has been produced for Reg 19. Issue resolved.</p> <p>vi. The Site Selection and Local Plan SA reasonable alternatives work addressed for Reg 18 and further addresses for Reg 19 these points. Issue resolved.</p>
<p><b>D. Sustainability Appraisal</b> - The SA did not consider some seemingly credible and obvious reasonable alternatives to the policies and proposals.</p>	<p>vii. AECOM undertook a comprehensive SA for the new Local Plan that fully assesses reasonable alternatives.</p>	<p>vii. Issue tackled by the new interim SA for Reg 18 and further addressed in SA for Reg 19. Issue resolved.</p>
<p><b>E. Meeting the Area’s Objectively Assessed Need</b> – Failure of the Plan to meet the ‘need’ for an SRFI and full local housing need as well.</p>	<p>viii. The new Local Plan Reg 19 allocates the permitted SRFI and allocates land to meet the Government’s Standard Method for local housing need in full.</p>	<p>viii. Approach was reviewed on an ongoing basis. The new Local Plan Reg 19 allocates the permitted SRFI and allocates land to meet the Government’s Standard Method for local housing need in full. Issue resolved.</p>

**3. Evidence Base – Issues with pieces of supporting evidence for the plan.**

<p><b>F.</b> There is no Heritage Impact Assessment in relation to the Broad Locations.</p> <p><b>G.</b> Windfall data is not available to support the reliance on them for future supply.</p> <p><b>H.</b> The Broad Locations are not supported by a Transport Impact Assessment even though most of them would be likely to require significant road improvements.</p> <p><b>I.</b> An updated Strategic Housing Market Assessment has not yet been published and there is therefore no up to date understanding of the different sizes of homes and types of affordable housing that may be required.</p>	<p>ix. High level HIAs were carried out on the sites identified in the emerging Local Plan between Reg 18 and Reg 19 stages.</p> <p>x. The updated methodology on historic windfall data was taken to Planning Policy Committee.</p> <p>xi. A high level TIA will be carried out on the larger identified sites between Reg 18 and Reg 19 stages.</p> <p>xii. The South West Herts Local Housing Needs Assessment (2020) was been published ahead of the Reg 18. This provided recommendations on the required level of affordable housing and the mix and type of housing. The new South West Herts LHNA 2024 provided recommendations on the required level of affordable housing and the mix and type of housing to support the Reg 19.</p>	<p>ix. HIA approach agreed with Historic England, published ahead of Reg 19 and relevant outputs inputted into Reg 19 LP. Joint approach with DBC to HGC. Issue resolved.</p> <p>x. Windfall methodology issue resolved. Housing Land Supply, Windfall &amp; Housing Capacity Evidence Paper published with Reg 19. Issue resolved.</p> <p>xi. Approach to TIA agreed with HCC, published ahead of Reg 19 and relevant outputs inputted into Reg 19 LP. Issue resolved.</p> <p>xii. South West Herts LHNA 2024 provided recommendations on the required level of affordable housing and the mix and type of housing to support the Reg 19. Issue resolved.</p>
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**Task colour code Key:**

Complete	Not commenced	Underway, not completed	Scheduled Future Task
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