

**St Albans City and District
Local Plan 2020-2036**

**Self-Assessment of Soundness and Legal
Compliance of the Plan**

April 2019

Self-Assessment of the Soundness and Legal Compliance of the Plan.

Note: All reference documents referred to below (indicated in *italic text*) are available in the Local Plan Document (evidence) Library – which is indexed in other submission documents. Other references are included in the List of references at the end of this document, with web links where appropriate.

Introduction

This Statement provides a self-assessment of the soundness and legal compliance of the *St Albans City and District Council (SADC) Local Plan (LP) 2020-2036 Publication Draft 2018*.

It responds to the request for a Local Planning Authority (LPA) self-assessment at Para 1.12 of The Planning Inspectorate (PINS) 'Procedural Practice in Examination of Local Plans June 2016 (4th Edition V1)'. As suggested by PINS, the Statement follows the general guidance and document templates provided by the Planning Advisory Service (PAS).

SADC has followed all appropriate advice on soundness and legal compliance.

PAS Soundness Template

LP Document Library references are in italics.

PAS Legal Compliance Template

LP Document Library references are in italics.

SOUNDNESS SELF-ASSESSMENT CHECKLIST APRIL 2019

The Tests of Soundness at Examination. The starting point for the examination is the assumption that the Council has submitted what it considers to be a sound plan. Those seeking changes should demonstrate why the plan is unsound by reference to one or more of the soundness criteria.

The tests of soundness are set out in the National Planning Policy Framework (NPPF) (para 35):

“Local Plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:

- i) Positively Prepared: providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

This means that the Development Plan Document (DPD) should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, The NPPF, together with the Marine Policy Statement set out principles through which the Government expects sustainable development can be achieved.

- ii) Justified: an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. This means that the DPD should be based on a robust and credible evidence base involving:
 - Research/fact finding: the choices made in the plan are backed up by facts;
 - Evidence of participation of the local community and others having a stake in the area; and
 - The DPD should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal. The DPD should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved. iii) Effective: deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.
- iii) This means the DPD should be deliverable, requiring evidence of:

- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners who are signed up to it;
- Coherence with the strategies of neighbouring authorities, including neighbouring marine planning authorities; and
- The DPD should be flexible and able to be monitored.

The DPD should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the DPD should make clear that major changes may require a formal review including public consultation. Any measures which the Council has included to make sure that targets are met should be clearly linked to the authority's monitoring reporting.

iv) Consistent with national policy: enabling the delivery of sustainable development in accordance with the policies in this Framework (the NPPF).

The PAS templates contain suggestions for evidence which could be used to support these requirements. However, PAS advise that these must be viewed in the context of the plan being prepared. It should not be assumed that all need to be provided as they are just suggestions of what could be relevant.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<i>Positively Prepared: Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development (para 35)</i>		

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p><i>Vision and Objectives</i></p> <p>Has the LPA clearly identified what the issues are that the DPD is seeking to address? Have priorities been set so that it is clear what the DPD is seeking to achieve?</p> <p>Does the DPD contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives?</p> <p>Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD?</p> <p>Have reasonable alternatives to the quantum of development and overall spatial strategy been considered?</p> <p>Are the policies internally consistent?</p> <p>Are there realistic timescales related to the objectives?</p> <p>Does the DPD explain how its key policy objectives will be achieved?</p>	<ul style="list-style-type: none"> Sections of the DPD and other documents which set out (where applicable) the vision, strategic objectives, key outcomes expected, spatial portrait and issues to be addressed. Relevant sections of the DPD which explain how policies derive from the objectives and are designed to meet them. The strategic objectives of the DPD, and the commentary in the DPD of how they derive from the spatial portrait and vision, and how the objectives are consistent with one another. Sections of the DPD which address delivery, the means of delivery and the timescales for key developments through evidenced infrastructure delivery planning. Confirmation from the relevant agencies that they support the objectives and the identified means of delivery. Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure. 	<p>Paragraphs 2.1 -2.3 provide a clear vision and specific objectives that are well related to the <i>NPPF</i> and the local <i>Sustainable Community Strategy</i>. The strategic policies reflect the three overarching objectives set out in paragraph 8 of <i>NPPF</i>.</p> <p>Relevant evidence includes but it is not limited to:</p> <p><i>St Albans and District Sustainable Community Strategy: Shaping our District together for 2021: Revised June 2009</i></p> <p><i>Hertfordshire 2021 A brighter Future (Hertfordshire Sustainable Community Strategy)</i></p> <p><i>Infrastructure Delivery Plan (IDP) and the Local Development Scheme (LDS)</i></p> <p>Policy L17 details how the strategy will be delivered by the provision of infrastructure (page 40-41). Policy S4 provides a realistic timescale for housing delivery; this can be evidenced by Appendix 2.</p> <p>Reasonable alternatives to the quantum of development and overall spatial strategy been considered as part of the process throughout plan preparation. Documents supporting decisions on alternatives and any preferred strategy. Regulation 22 (c) statement sets out the decision making process, including relevant planning policy committee reports.</p>
<p><i>The presumption in favour of sustainable development (NPPF para 11)</i></p> <p>a) plans should positively seek</p>	<ul style="list-style-type: none"> An Evidence base which establishes the development needs of the area (see Justified below) and includes a flexible approach to delivery (see 'Section 3 Effective' below). An audit trail showing how and why the quantum of 	<p>The plan is based upon a robust evidence- based assessment of the needs for growth. This includes housing delivery based on the Government's 'Standard Methodology'.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;</p> <p>b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:</p> <p>i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or</p> <p>ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.</p>	<p>development, preferred overall strategy and plan area distribution of development were arrived at.</p> <ul style="list-style-type: none"> Evidence of responding to opportunities for achieving sustainable development in different areas (for example, conservation areas). 	<p>The overall scale of growth identified provides for the delivery and can deal with potential challenges through the provision of a range of sites. Policy S6 provides more detail on the sites proposed.</p> <p>Paragraph 2.7 and Appendix 3 set out how delivery of the plan will be monitored. This ensures accountability as delivery will be maintained and subject to meeting the targets set out. This supports sustainable development by providing a flexible and effective strategy.</p> <p>See also:</p> <p><i>Green Belt Review</i></p> <p><i>South West Hertfordshire Strategic Housing Market Assessment January 2016</i></p> <p><i>South West Hertfordshire Economic Study 2016</i></p> <p><i>South West Hertfordshire Economic Study Emerging Draft 2019</i></p> <p><i>St Albans City District Council Economic Development and Land Evidence Technical Report</i></p>
<p>Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development</p>	<ul style="list-style-type: none"> A policy or policies which reflect the principles of the presumption in favour of sustainable development (see model policy at www.planningportal.gov.uk) 	<p>Policy S1 and S2 set out an overarching settlement strategy which aims to meet the housing need whilst minimising the adverse impacts on the purposes of</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.</p>		<p>the Metropolitan Green Belt.</p> <p>Policy S1 (page 7) provides detail on sustainable development principles and our overall approach to new development.</p> <p>The Broad Locations identified in Policy S6 set out council-led master planning which will speed up housing delivery in combination with specific objectives for each location.</p> <p>Policy L23 (page 51) sets out detail on sustainable design and construction for new developments whilst policy L25 (page 57) encourages sustainable development by setting out energy and environmental performance proposals for new developments.</p> <p>This ensures that sustainable development would be approved, if in accordance with the Development Plan, without delay.</p>
<p><i>Objectively assessed needs</i></p> <p>The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues.</p> <p>Note: Meeting these needs should be subject to the caveats specified in Paragraph 11 b. i. and ii. of the NPPF (see above).</p>	<ul style="list-style-type: none"> • Background evidence papers demonstrating requirements based on population forecasts, employment projections and community needs. • Technical papers demonstrating how the aspirations and objectives of the DPD are related to the evidence, and how these are to be met, including from consultation and associated with the Duty to Co-operate. 	<p>Evidence includes but is not limited to:</p> <ul style="list-style-type: none"> • Government's 'Standard Methodology' for housing • <i>South West Herts Strategic Housing Market Assessment January 2016 and St Albans SHMA Update 2015</i> - provides technical evidence upon which housing needs for St Albans have been identified. • <i>Strategic Housing Land Availability Assessment (SHLAA) Update 2018</i> - considers the suitability for development of a range of sites across the

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>District.</p> <ul style="list-style-type: none"> • <i>Green Belt Review Sites and Boundary Study 2014</i> – a detailed and robust assessment of each of the eight strategic sub areas in the district identified for further investigation in the Green Belt Review. Land was assessed based on the 5 Green Belt purposes as noted by the NPPF. • <i>South West Herts Economic Study 2016</i> • <i>South West Herts Economic Study Update Emerging Draft February 2019</i> • <i>St Albans Economic Development and Employment Land Evidence Technical Report April 2016</i> <p>Paragraph 1.4 provides soundness by highlighting the influence surrounding regions have on housing through economic, social and environmental factors.</p> <p>Cross boundary issues have been identified through ongoing Duty To Cooperate work. The local plan addresses these accordingly in the development strategy.</p> <p>See also:</p> <p><i>South West Herts Statement of Common Ground</i></p> <p><i>Duty to Co-operate statement of compliance</i></p>
NPPF Principles: Delivering sustainable development		
3. Plan making (paras 15 – 37)		

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Plans should be positively prepared with the objective of contributing to the achievement of sustainable development in a way that is aspirational but deliverable. Plans should also be shaped by early, proportionate and effective engagement and contain policies that are clearly written and unambiguous, accessible through use of digital tools and avoid unnecessary duplication of policies that apply to a particular area (including the NPPF). (NPPF para 16)</p>	<ul style="list-style-type: none"> • Background evidence papers demonstrating requirements based on population forecasts, employment projections and community needs. • Technical papers demonstrating how the aspirations and objectives of the DPD are related to the evidence, and how these are to be met, including from consultation and associated with the Duty to Co-operate 	<p>Paragraph 2.1 provides a positive vision for the District, deliverable through objectives set out in paragraph 2.3. Policy L17 details how the strategy will be delivered by the provision of infrastructure (page 40-41). Policy S4 provides a realistic timescale for housing delivery; this can be evidenced by Appendix 2.</p> <p>Evidence includes but is not limited to:</p> <ul style="list-style-type: none"> • Government's 'Standard Methodology' for housing • <i>South West Herts Strategic Housing Market Assessment January 2016 and St Albans SHMA Update 2015</i> - provides technical evidence upon which housing needs for St Albans have been identified. • <i>Strategic Housing Land Availability Assessment (SHLAA) Update 2018</i> - considers the suitability for development of a range of sites across the District. • <i>Green Belt Review Sites and Boundary Study 2014</i> – a detailed and robust assessment of each of the eight strategic sub areas in the district identified for further investigation in the Green Belt Review. Land was assessed based on the 5 Green Belt purposes as noted by the NPPF. <p>Policies related to strategic sites set out clear requirements for future development and work with relevant local communities and key stakeholders in the masterplanning process. Policies Map in combination with Public GIS mapping system (para.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		1.10) provide detailed information on area constraints, supporting relevant policies in the development plan.
5. Delivering a sufficient supply of homes (paras 59 – 79)		
Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of 5%, 10% or 20% (moved forward from later in the plan period) to ensure a choice and competition in the market for land. 10% applies where the LPA has published an annual position statement, 20% buffer applies where there has been significant under delivery of housing over the previous 3 years (NPPF paras 67 and 73 refer)	<ul style="list-style-type: none"> • Identification of five years or more supply of specific deliverable sites; plus the buffer as appropriate reflecting results of the housing delivery test or annual published statement. • Where this element of housing supply includes windfall sites, inclusion of 'compelling evidence' to justify their inclusion (NPPF paragraph 70) • A Strategic Housing Land Availability Assessment (SHLAA) 	<p>Policy S4 highlights the council's target to deliver a total of 14,608 additional homes at an overall average of 913 homes per annum. This will be split into three time periods to reflect realistic rated of delivery for both homes and required infrastructure. Appendix 2 sets out the overall housing trajectory which includes a 20% buffer for the first five years of the Plan.</p> <p>Strategic Policy S1 and S2 provide an overarching development strategy based on settlement hierarchy which indicates where development approval is most likely to be granted.</p> <p>Relevant evidence includes but is not limited to:</p> <ul style="list-style-type: none"> • <i>Government's 'Standard Methodology' for housing</i> • <i>South West Hertfordshire Strategic Housing Market Assessment Report January 2016</i> • <i>Housing Needs Assessment Update: 2014- based Subnational Population and Household Projections (September 2016)</i>
Identify a supply of developable sites or broad locations for years 6-10 and, where possible years 11-15 (NPPF para 67)	<ul style="list-style-type: none"> • Identification of a supply of developable sites or broad locations for: a) years 6-10; b) years 11-15 	See above and Policy S6 which identifies Broad Locations of sufficient scale to provide soundness in this respect. Appendix 2 sets out timescales for the

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>delivery of housing.</p> <p>See also:</p> <p><i>Authorities Monitoring Report</i> and supplementary papers on 2016 Housing Update including windfall assumptions</p>
<p>Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five year supply will be maintained. (NPPF paras 73, 74 and 75)</p>	<ul style="list-style-type: none"> • A housing trajectory • Monitoring of completions and permissions • Updated and managed SHLAA 	<p>Appendix 2 provides a clear housing trajectory of the Local Plan.</p> <p>Policy S4 provides a clear framework to inform how the Council's housing requirement will be achieved.</p> <p>See also:</p> <p>Appendix 5: List of small residential sites with permission</p> <p><i>Strategic Housing Land Availability Assessment</i></p> <p>Monitoring of completions and permissions (Appendix 5 of DPD)</p>
<p>Plan for a mix of housing based on current and future demographic and market trends and needs of different groups and caters for housing demand and scale of housing supply to meet this demand. (NPPF para 61)</p>	<ul style="list-style-type: none"> • Policy on planning for a mix of housing (including self-build, and housing for older people) • SHMA • Identification of size, type, tenure and range of housing required in particular locations, reflecting local demand. • Evidence for housing required in particular locations, reflecting local demand • Evidence for housing provision based on up to date, 	<p>Policy L1, L2 and L3 provide soundness in respect by providing size, type, mix and density including elderly housing provisions and affordable housing.</p> <p>Policy S6 provides soundness in respect of self-build opportunities.</p> <p>Appendix 6 provides context which directs housing mix calculations for new developments.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>objectively assessed needs derived through a Local Housing Need Assessment- based upon the standard methodology or other approach where exceptional circumstances exist.</p> <ul style="list-style-type: none"> • Policy on affordable housing and consideration for the need for on-site provision or if off-site provision or financial contributions are sought, where these can be justified and to what extent do they contribute to the objective of creating mixed and balanced communities. 	<p>Evidence includes but is not limited to:</p> <p><i>South West Hertfordshire Housing Market Assessment 2016</i></p> <p><i>Brownfield Register 2018</i></p> <p><i>St Albans SHMA Update 2015</i></p>
<p>In rural areas, be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (NPPF para 77).</p> <p>In rural areas housing should be located where it will enhance or maintain the vitality of rural communities. (NPPF para 78)</p>	<ul style="list-style-type: none"> • Consideration of allowing some market housing to facilitate the provision of significant additional affordable housing to meet local needs. • Examples of special circumstances to allow new isolated homes listed at paragraph 79 of the NPPF. 	<p>Policy L4 provides soundness in respect of affordable housing in the green belt, including rural exception sites. The LP is also envisaged as providing a framework for delivery of further small scale and longer term housing developments through Neighbourhood Plans and Local Plan review (information on evidence and initial policy development is available on request). Policy S3 is also relevant to this.</p>
6. Building a strong, competitive economy (paras 80-84)		
<p>Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth and is flexible to needs not anticipated in the Plan (NPPF para 81)</p>	<ul style="list-style-type: none"> • Articulation of a clear economic vision and strategy for the plan area linked to the Economic Strategy, LEP Strategy and marine policy documents where appropriate. 	<p>The overall Vision set out in the St Albans City and District Local Plan articulates clear vision for economic development focused upon the District's strengths in knowledge-based service provision. Policy S1 'Spatial Strategy and Settlement Hierarchy' provides the overall spatial context whilst Policy S5 'Economic Development Strategy and Employment Land Provision' sets out the framework upon which provision of land for economic development is set.</p>

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		<p>This policy supports key objectives for the sub region reflected by Hertfordshire LEP and the <i>Hertfordshire's Economic Development Strategy 2009-2021</i>, particularly in relation to East Hemel Hempstead (Central) Broad Location (Policy S6 ii) and the provision of a major new Enviro-Tech focused employment location. Additionally, Policy L11 refers to BRE (Bricket Wood) and Rothamsted Research (Harpenden) as key strategic employment land sites within the St Albans District.</p> <p>Chapter 2 "Homes, Affordable Homes and Workplaces" (Policies L9 / L10 / 11) comprises a sound plan in respect of this topic.</p> <p>See also:</p> <p><i>South West Herts Economic Study 2016</i></p> <p><i>South West Herts Economic Study Update Emerging Draft February 2019</i></p> <p><i>St Albans Economic Development and Employment Land Evidence Technical Report April 2016</i></p>
<p>Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure services or housing (NPPF para 81)</p>	<ul style="list-style-type: none"> • A criteria- based policy which meets identified needs and is positive and flexible in planning for specialist sectors, regeneration, infrastructure provision, environmental enhancement. 	<p>Policy S5, and Policy L9 outline the most significant barriers to investment within the District. Policy S5 sets out an overall supply strategy and intent to support business start-ups and provision of additional floor-space for uses in the B Use Classes (B1, B2 and B8) whilst policy L9 stimulates the provision of business floor space by minimising the loss of land and premises in Class B use.</p> <p>Policy S6 (ii) sets out criteria for employment site</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>development in respect of noise and air pollution.</p> <p>Policy L11 provides for specialist sectors by providing flexibility to operational and long term expansion needs in the Green Belt.</p> <p>Policy L17 sets out improvements to the digital infrastructure facilitating business creation and economic growth.</p> <p>See:</p> <p><i>Infrastructure Delivery Plan (IDP)</i></p> <p><i>Economic Development and Employment Land Evidence Technical Report April 2016</i></p> <p><i>South West Herts Economic Study 2016</i></p> <p><i>South West Herts Economic Study Update Emerging Draft February 2019</i></p>
<p>Supporting a prosperous rural economy (NPPF paras 83 and 84). Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development (83).</p>	<ul style="list-style-type: none"> Where relevant include a policy or policies which support the sustainable growth of rural businesses; promote the development and diversification of agricultural businesses; support sustainable rural tourism and leisure developments and support local services and facilities. 	<p>Policies S1 and S2 set out the general development strategy of the district.</p> <p>Policy S3 sets out how green belt land will be proactively managed, providing support for farming and forestry needs.</p> <p>Policy L15 includes information on general leisure uses for rural areas.</p> <p>Policy L17 sets out improvements to the digital infrastructure facilitating business creation and economic growth.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
7. Ensuring the vitality of town centres (paras 85-90)		
<p>Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period (85)</p> <p>Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community services and residential development needed in town centres (85)</p>	<ul style="list-style-type: none"> The Plan and its policies may include such matters as: definition of networks and hierarchies; defining town centres; encouragement of residential development on appropriate sites; allocation of appropriate edge of centre sites where suitable and viable town centre sites are not available; consideration of retail and leisure proposals which cannot be accommodated in or adjacent to town centres. 	<p>Policy L12 outlines the policy's hierarchy of retailed centres in the District; this is informed by the <i>South West Hertfordshire Retail and Leisure Study September 2018</i>.</p> <p>This had built on extensive earlier work, including:</p> <p><i>St Albans City & District Council Retail and Leisure Study January 2006</i></p> <p><i>St Albans City & District Council 2009 Retail Study Update</i></p> <p><i>St Albans City & District Council Retail Study Economic Capacity Update (April 2010)</i></p> <p>The Policy sets out a framework through which retail development is directed towards and encouraged to support growth and investment within each centre, whilst setting appropriate measures to consider retail development proposals at the edge of centre and out of centre locations. Additionally, measures are in place to enable change of use and redevelopment within town centres that support the viability and vitality of those centres.</p> <p>Policy L13 sets out how cultural and civic areas will be managed and encourage business, commercial, cultural and visitor activities.</p> <p>Policy L15 'Leisure Uses' permits high intensity leisure uses in defined town centre and district location</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		areas.
Policy informing the Local Authorities approach to application of the sequential test and identification of a locally set threshold for impact assessments or a national threshold of 2,500sqm. (para 86-90)	<ul style="list-style-type: none"> An assessment of the need to expand (the) town centre(s), considering the needs of town centre uses. Primary and secondary shopping frontages identified and allocated. 	Policy L14 refers to the need for a sequential approach to be taken into account for the location of non-residential uses defined as main town centre uses.
8. Promoting healthy and safe communities (paras 91-101)		
Planning policies and decisions should aim to achieve healthy, inclusive and safe places by promoting community interaction, including through mixed-use development; are safe and accessible environments; and are accessible developments (NPPF para 91)	<ul style="list-style-type: none"> Inclusion of a policy or policies on inclusive communities. Promotion of opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments which bring together those who work, live and play in the vicinity; safe and accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion; and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas. (91- 95) 	<p>The plan's vision notes the importance of a thriving community. This is also reflected in the local plan's objective (paragraph 2.3) to provide infrastructure and community facilities to support and enhance communities.</p> <p>The plan encourages Neighbourhood planning work by assisting communities in the process of producing Neighbourhood Plans (para 1.2). Policy S6 also supports collaborative working by encouraging local communities to take part in the masterplanning of the broad locations for development. Furthermore, setting a 40% minimum affordable housing target for the developments encourages social cohesion and community interaction.</p> <p>Policy L1: Promotes mixed use developments whilst providing a framework for ensuring a housing delivery that supports a mixed community.</p> <p>Policy L7: Meeting the needs of gypsy, traveller and</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>travelling showpeople.</p> <p>Policy L17: Infrastructure delivery facilitates community interaction through the provision of a wide range of infrastructure and related facilities, to provide inclusive and accessible environments whilst encouraging social interaction.</p> <p>Policy L12: Restrictions of hot food takeaways in close proximity to local secondary schools encourages the creation of healthy communities.</p> <p>Policy L18: Improving accessibility and transport is focused upon ensuring that new development promotes safety, security and opportunities for healthy lifestyle choices.</p> <p>Policy L21: Schools serve a community joint use function whilst encouraging the creation of safe and inclusive communities. Their provision also contributes to creating safe places.</p> <p>Policy L22 supports the retention of existing community, leisure and sports buildings and facilities whilst encouraging new ones to be created supports inclusivity and safe communities.</p>
<p>Policies should plan positively for the provision and use of share space, community facilities and other local services (NPPF para 92)</p>	<ul style="list-style-type: none"> • Inclusion of a policy or policies addressing community facilities and local service. • Positive planning for the provision and integration of community facilities and other local services to enhance the sustainability of communities and residential environments; safeguard against the unnecessary loss of valued facilities and services; ensure that established shops, facilities and services are able to develop and modernize; and ensure that 	<p>Policy L22 provides soundness in respect of retention, refurbishment and provision of new community, leisure and sports facilities in existing and new centres, including those with multi-purpose / joint use.</p> <p>Public Houses are identified as a valued community asset, and change of use or demolition will be resisted</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure.</p>	<p>unless justified through criterion set out in the policy.</p> <p>L12 provides an overall strategy for the enhancement and protection of local centres.</p> <p>Policy S6 (i-xi) applies these general policies to the Broad Locations for major development to ensure this location are sustainable for new housing.</p>
<p>Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these (NPPF para 96).</p>	<ul style="list-style-type: none"> • Identification of specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. (73) • A policy protecting existing open space, sports and recreational buildings and land from development, with specific exceptions. (74) • Protection and enhancement of rights of way and access. (75) 	<p>Policy L26 designates local green space across the district for protection and enhancement.</p> <p>Policies L27 protects existing public and private green space from development unless not considered to be of sufficient value.</p> <p>Policy L28 sets out required amount and type of green space required for new developments as calculated by development size. The policy also sets out priority provision for each broad location.</p> <p>L29 provides landscape context for new developments by setting out Countryside Access and Rights of Way as well as specific areas of opportunity for improvements to green infrastructure.</p> <p>The DLP will provide further policy on this (information on evidence and initial policy development is available on request).</p> <p>See also:</p> <p><i>St Albans City and District Playing Pitch Strategy 2019</i></p>
<p>Enable local communities, through local and neighbourhood plans, to</p>	<ul style="list-style-type: none"> • Policy enabling the protection of Local Green Spaces. (Local Green Spaces should only be designated when a plan is 	<p>Para 1.2 demonstrates the councils support of neighbourhood planning. Policy L26 supports this by</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
identify special protection green areas of particular importance to them – ‘Local Green Space’ (NPPF paras 100-101).	prepared or reviewed, and be capable of enduring beyond the end of the plan period. The designation should only be used when it accords with the criteria in para 77). Policy for managing development within a local green space should be consistent with policy for Green Belts. (78)	allowing Neighbourhood Plans to supplement the local green space network.
9. Promoting sustainable transport (paras 102-111)		
<p>Plans should actively manage patterns of growth so that:</p> <ul style="list-style-type: none"> • Potential impacts of development on transport network are addressed; • Opportunities from existing or proposed transport infrastructure, or changing transport technology and usage, are realised; • Opportunities to promote walking, cycling and public transport use are identified and pursued; • Environmental impacts of traffic and transport infrastructure taken into account – including opportunities to avoid and mitigate adverse effects, and for net environmental gains; • Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and 	<ul style="list-style-type: none"> • Joint working with adjoining authorities, transport providers and Government Agencies on infrastructure provision in order to support sustainable economic growth with particular regard to the facilities referred to in paragraph 104. • Policies encouraging development which facilitates the use of sustainable modes of transport and a range of transport choices where appropriate, particularly the criteria in paragraph 102. • A spatial strategy and policy which seeks to reduce the need to travel through balancing housing and employment provision. • Policy for major developments which promotes a mix of uses and access to key facilities by sustainable transport modes. • If local (car parking) standards have been prepared, are they justified and necessary? (105-106) <p>Identification and protection of sites and routes where infrastructure could be developed to widen transport choice linked to the Local Transport Plan.</p>	<p>Policies S1 and S2 sets out the location of development in accordance with a settlement hierarchy focused around larger urban centres that offer a greater accessibility to public transport.</p> <p>S6 sets out development of Masterplans for each Broad Location, a criterion for transport, energy efficiency and air pollution.</p> <p>Policies S1 and S2 sets out the location of development in accordance with a settlement hierarchy focused around larger urban centres that offer a greater accessibility to public transport.</p> <p>Policy S6 (i-xi) requires Broad Locations to provide transport network and public transport upgrades.</p> <p>Policy L17 sets out the provision of development through the Infrastructure Development Schedule, set out in Appendix 4, and outlined in the <i>Infrastructure Development Plan</i>. Developers will be required to work with the council and partners to deliver infrastructure improvements.</p> <p>Policy 17 sets out the provision of policies in accordance with <i>IDP</i>, programme outlined in</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>contribute to making high quality places. (NPPF paras 102 and 103)</p> <ul style="list-style-type: none"> • Significant development should be focused on locations which are or can be made sustainable. Opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account. (NPPF para 103) <p>Planning policies should support an appropriate mix of uses across an area and be prepared with the active involvement of transport infrastructure providers and operators; and recognise the importance of maintaining a national network of general aviation airfields.(NPPF para 104)</p> <p>Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities. (NPPF para 107)</p> <p>When assessing sites that may be allocated for development in the Plan, ensure that they provide</p>		<p>Appendix 4.</p> <p>L18 identify the overall approach of policies embedded throughout the Local Plan to work in conjunction with HCC and HE led Transport Planning, providing relevant transport infrastructure and approaches which promote sustainable modes and create the foundations for enabling significant changes in travel behaviour.</p> <p>L18 provides relevant transport infrastructure, to encourage and enable shorter journeys to be made by sustainable means. Where possible, the positive provision of sustainable alternatives to the private car will be required.</p> <p>L18 sets out provisions of related transport infrastructure and requires major developments to provide an assessment on air quality impacts and development must include proposals to limit or mitigate these impacts.</p> <p>L19 states new development which will introduce a significant about of traffic, involves the creation or improvement of a significant access on the public highway must address fundamental highways considerations such as Road Safety, Road Hierarchy, and detailed advice by the Highways Authority. A Travel and Traffic Assessment will be required for major developments.</p> <p>Policy L20 sets out the parking requirements for new development. Appendix 1 sets out required parking standards for new development, including B8, storage</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>opportunities for sustainable transport, provide safe and suitable access, and impacts upon highway safety or highway capacity or congestion can be effectively mitigated to an acceptable degree (NPPF para 108)</p>		<p>and distribution.</p> <p>Policies L17, L18 and Appendix 1 facilitate the provision of sustainable transport modes and measures.</p> <p>The district does not contain any general aviation airfields.</p> <p>See Also:</p> <p><i>Infrastructure Delivery Plan</i></p> <p><i>Appendix 4: Infrastructure Delivery Schedule</i></p>
<p>Supporting high quality communications infrastructure (paras 112-116)</p>		
<p>Support the expansion of the electronic communications networks, including telecommunications’ masts and high speed broadband. (112)</p> <p>Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. (114)</p>	<p>Policy supporting the expansion of electronic communications networks, including telecommunications and high-speed broadband, noting the caveats in para 114.</p>	<ul style="list-style-type: none"> • Policy L17 “Planning for Broadband” supports the provision of high speed broadband by encouraging full fibre access for all developments of 30 dwellings or more of 3,000 sq. m or more of commercial floor space. This aims to facilitate home working, business creation and economic growth in the district. • Policy L9 supports the provision of high speed broadband and next-generation telecommunication, given it is compatible with local context, including design policies and impacts on residential amenity and highways. <p>See also:</p> <p>Also see Appendix 4</p> <p><i>Infrastructure Delivery Plan (IDP)</i></p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<i>Hertfordshire LEP Strategic Economic Plan</i>
11. Making effective use of land (NPPF paras 117-123)		
Set out the authority's approach to housing density to reflect local circumstances (NPPF para 123)	<ul style="list-style-type: none"> Policy on the density of development 	<p>Policy S1 requires developments to make effective use of land by increasing the density and height, particularly in main urban settlements.</p> <p>Policy S4 sets out the required housing target of the 16 year period and overall average per annum.</p> <p>Policy S6 (i-xi) requires broad locations to provide a minimum density of 40 dwellings per hectare.</p> <p>Appendix 2 sets out a trajectory for providing urban optimisation.</p> <p>Policy L1 requires the density of new developments to be consistent with achieving high density, sustainable design which does not compromise the distinctive character of the area.</p>
12. Achieving well-designed places		
Set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable (NPPF para 125)	<ul style="list-style-type: none"> Inclusion of policy or policies which seek to increase the quality of development through the principles set out at para 127 and approaches in paras 128- 132, linked to the vision for the area and specific local issues. 	<p>Policy S6 states design policies should be developed with local communities so they reflect local aspirations and are grounded in an understanding and evaluation of each area's defining characteristics.</p> <p>Policy L23 states Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		Policy S6 requires development within the Broad Locations to materially accord with Masterplans which have been approved by the Council following consultation with local communities and key stakeholders.
13. Protecting Green Belt land (NPPF paras 133- 147)		
<p>Local planning authorities should plan positively to enhance the beneficial use such as looking for opportunities to provide access; for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (NPPF para 141)</p> <p>When drawing up or reviewing green belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development (138) and use of readily recognisable features that are likely to be permanent when defining boundaries (139).</p> <p>Boundaries should be set using 'physical features likely to be permanent' amongst other things (139).</p>	<p>Where Green Belt policies are included, these should reflect the need to:</p> <ul style="list-style-type: none"> • Enhance the beneficial use of the Green Belt. (141) • Accord with criteria on boundary setting, and the need for clarity on the status of safeguarded land in particular. (139) 	<p>Policy S1 set out the settlement hierarchy in which to ensure sustainable development. Policy S2 sets out the exceptional circumstances that necessitate major development in locations previously designated as Green Belt. These locations are identified in Figure 1, and have been identified by the Green Belt Review 2014.</p> <p>Policy S3 sets out development that maybe considered appropriate within the Green Belt.</p> <p>Policies L4, L5 and L6 set out the assessment criterion for affordable house, small scale development in green belt settlements, and extension or replacement dwellings respectively.</p> <p>Policy L29 sets out a proposed 'Key Green Infrastructure Network, set out in Figure 2, with aims to conserve and enhance public access to this network as a high priority. The condition and strength of character of the Districts landscapes will be conserved managed and where appropriate, enhanced. The policy also sets out how designated areas, sites and networks of importance for biodiversity will be conserved, enhanced and managed.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
14. Meeting the challenge of climate change, flooding and coastal change (NPPF paras 148 – 169)		
<p>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations (149)</p>	<ul style="list-style-type: none"> Planning of new development in locations and ways which reduce greenhouse gas emissions. 	<p>One of St Albans District Council's Local Plan objectives (para 2.3) seeks to design, conserve and enhance the natural environment. This includes addressing the challenges associated with climate change such as flood risk, water supply and demand considerations.</p> <p>Policy S1 & S2: The plan's spatial strategy is based upon delivering the district's housing needs in sustainable, accessible locations.</p> <p>Policy L18: The policy will give consideration to planning for infrastructure for sustainable travel within new development and support the provision of improvements of existing infrastructure and networks. The council encourages the use of sustainable modes of transport, particularly for shorter journeys, to enable significant changes in travel behaviour to take place.</p> <p>Policy L23 also provide soundness in respect of the energy and environmental performance in the built environment by setting out a number of design and layout requirements for new builds. This is also evidenced by policy S6 (i-x) require energy efficiency and renewable energy production in all the Broad Locations.</p> <p>Policy L25: The Council encourages the use and supply</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>of renewable low carbon energy for new development.</p> <p>Policy L29 provides soundness in respect of the water environment and flood risk.</p> <p><i>See also:</i></p> <ul style="list-style-type: none"> • <i>Herts. Renewable and Low Carbon Energy Study</i> • <i>St Albans Energy Opportunities Study</i> • <i>St Albans Water Cycle Study Report</i> • <i>Strategic Flood Risk Assessment</i> • <i>Infrastructure Delivery Plan (IDP)</i>
<p>Help increase the use and supply of renewable energy and low carbon energy and heat (151)</p>	<ul style="list-style-type: none"> • A strategy and policies to promote and maximise energy from renewable and low carbon sources, • Identification of suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (see also NPPF footnote 17) • Identification of where development can draw its energy supply from decentralised, renewable or low carbon supply systems and for co-locating potential heat customers and suppliers. (97) 	<p>Policy L25: Renewable energy encourages the use and supply of all renewable and low carbon energy provided any adverse impacts can be satisfactory addressed. See above.</p> <ul style="list-style-type: none"> • Policies L23 and / 25 provide soundness in respect of this energy and environmental performance in the built environment. Policy S6 (i-x) requires energy efficiency and renewable energy production in all the Broad Locations. <p><i>See also:</i></p> <ul style="list-style-type: none"> • <i>Herts. Renewable and Low Carbon Energy Study</i> • <i>St Albans Energy Opportunities Study</i>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<ul style="list-style-type: none"> • <i>St Albans Water Cycle Study Report</i> • <i>Strategic Flood Risk Assessment</i> • <i>Infrastructure Delivery Plan (IDP)</i>
Avoid increased vulnerability to climate change and manage the risk of flooding (150)	<ul style="list-style-type: none"> • Account taken of the impacts of climate change. (99). • Allocate, and where necessary re-locate, development away from flood risk areas through a sequential test, based on a SFRA. (158) • Policies to manage risk, from a range of impacts, through suitable adaptation measures. 	<p>Policy L23: Applications for ‘major development’ must include a detailed drainage, surface water management and flooding assessment/ strategy. The policy states that Sustainable Urban Drainage Systems (SUDS) will be applied in deciding on the acceptability of the proposal.</p> <p>Policy L29: the policy states that the council will seek to avoid development in areas at risk from flooding in accordance with national policy and ensure that water management and flood risk issues are fully addressed by new development. Additionally, SUDS approaches should be taken for all new development schemes.</p> <p>See above.</p> <p>Policy L29 provides soundness in respect of seeking to avoid development in areas at risk of flooding, and for flood risk issues to be fully addressed in new development.</p>
Take account of the UK Marine Policy Statement (166)	<ul style="list-style-type: none"> • Ensure early and close co-operation on relevant economic, social and environmental policies with the Marine Management Organisation • Review the aims and objectives of the Marine Policy Statement, including local potential for marine-related economic development • Integrate as appropriate marine policy objectives into 	Not Applicable.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>emerging policy</p> <ul style="list-style-type: none"> Support of integrated coastal management (ICM) in coastal areas in line with the requirements of the MPS 	
Reduce risk from coastal change (167)	<ul style="list-style-type: none"> Identification of where the coast is likely to experience physical changes and identify Coastal Change Management Areas, and clarity on what development will be allowed in such areas. Provision for development and infrastructure that needs to be re-located from such areas, based on SMPs and Marine Plans, where appropriate. 	Not Applicable.
15. Conserving and enhancing the natural environment (NPPF paras 170 – 183)		
Protect valued landscapes (170)	<ul style="list-style-type: none"> A strategy and policy or policies to create, protect, enhance and manage networks of biodiversity and green infrastructure. Policy which seeks to minimise the loss of higher quality agricultural land and give great weight to protecting the landscape and scenic beauty of National Parks, the Broads and AONBs. 	<p>Policy L29 sets out a proposed 'Key Green Infrastructure Network, set out in Figure 2, with aims to conserve and enhance public access to this network as a high priority. The policy also sets out how the condition and strength of character of the District landscapes will be conserved managed and where appropriate, enhanced.</p> <p>Policy L29 sets out how the condition and strength of character of the Districts landscapes will be conserved managed and where appropriate, enhanced.</p> <p>Policy L29 also sets out how designated areas, sites and networks of importance for biodiversity, will be conserved, enhanced and managed.</p> <p>These issues are also considered in a Green Belt context as above.</p> <p>See Also</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<i>Environmental Capacity of St Albans City and District: Defining a Sustainable Level of Development</i> <i>Green Infrastructure Plan</i>
Prevent unacceptable risks from pollution and land instability (178)	<ul style="list-style-type: none"> Any development site is suitable for its proposed use taking account of ground conditions. (178) Policy which seeks development which is appropriate for its location having regard to the effects of pollution on health, the natural environment or general amenity. (180) Sustain and contribute towards compliance with relevant limit values or national objectives for pollutants. (181) 	<p>Policy L18: Major transport related developments must take air pollution into consideration by providing an assessment of air quality impacts from traffic. The plans must also include proposals to limit and mitigate those impacts. This is particularly the case if there is an effect on a designated Air Quality Management Area (AQMA).</p> <p>In terms of pollution, L18 sets out a reduction in transport related emissions and improvement in air quality.</p> <p>This will be considered in more detail in the <i>DLP</i> (information on evidence and initial policy development is available on request).</p> <p>Policy L25: Supports standalone renewable energy proposals in or close to locations where there is a sufficient demand arising from a mix of land uses (existing or planned). For major developments, an environmental performance and sustainability statement will be requested as part of the pre-planning procedures; this should demonstrate how environmental issues have been fully considered.</p> <p>Policy S6: Broad location housing developments will be expected to deliver renewable/ low- carbon energy supply and design which mitigates adverse impacts from motorway noise and air pollution.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		Land instability is not a significant issue in the District.
<p>Planning policies should protect and enhance biodiversity and geodiversity (174)</p> <p>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (171)</p>	<ul style="list-style-type: none"> • Identification and mapping of local ecological networks and geological conservation interests. • Policies to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species 	<p>Policy L29 sets out how designated areas, sites and networks of importance for biodiversity, will be conserved, enhanced and managed. Figure 2 identifies key green infrastructure areas across local authority boundaries. Conservation and enhanced public access improvements to this Green Infrastructure Network is a high priority.</p> <p>Areas of importance to geodiversity will be conserved and managed; development will be refused if harmful to sites of wildlife, geological and geomorphological importance.</p>
16. Conserving and enhancing the historic environment (paras 184 – 202)		
<p>Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (185)</p>	<ul style="list-style-type: none"> • A strategy for the historic environment based on a clear understanding of the cultural assets in the plan area, including assets most at risk. • A map/register of historic assets (187) • A policy or policies which promote new development that will make a positive contribution to character and distinctiveness. (185) 	<p>The St Albans City and District Local Plan's vision and objective (paras 2.1-2.3) clearly articulate the overall strategy to conserve and enhance the historic environment.</p> <p>Heritage assets have been included on SADCs public GIS (paragraph 1.10).</p> <p>Policy L30: Historic Environment's supporting text sets out the understanding of the historic environment in the District, including the heritage currently recognised at risk.</p> <p>The policy sets out the considerations in assessing proposals that would affect heritage assets so that significance would not be unjustifiably harmed. The policy highlights that heritage assets must be</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>conserved in an appropriate manner, and development which affects heritage assets must have regards to its significance.</p> <p>Policy L23 supports this, by requiring designs for commercial frontages/shopfronts and advertisements to be sensitively considered in relation to the host building and street scene.</p> <p>See also:</p> <p><i>Conservation Area Character Statements</i></p>
17. Facilitating the sustainable use of minerals (NPPF paras 203 – 211)		
<p>It is essential that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since materials are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long term conservation (203)</p> <p>Minerals planning authorities should plan for a steady and adequate supply of industrial materials (208)</p>	<p>Account taken of the matters raised in relation to paragraph 143 and 145, including matters in relation to land in national / international designations; landbanks; the defining of Minerals Safeguarding Areas; wider matters relating to safeguarding; approaches if non-mineral development is necessary within Minerals Safeguarding Areas; the setting of environmental criteria; development of noise limits; reclamation of land; plan for a steady and adequate supply of aggregates. This could include evidence of co-operation with neighbouring and more distant authorities.</p>	<p>St Albans City and District Council is not the Minerals and Waster Planning Authority for the area.</p> <p>The plan's Duty to Cooperate Statement sets out that the Council has worked closely with Hertfordshire County Council, in its role as the Minerals and Waster Planning Authority, when developing the strategy for meeting the District's housing needs to ensure that development does not sterilise existing mineral deposits.</p> <p>The local plan must be read in conjunction with the statutory minerals and waste plans which identify substantial parts of the District where development proposals should take account of mineral resources whilst safeguarding areas of land important to infrastructure facilities (paragraph 2.8).</p> <p>The Policy S6 v) requires the best and most</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>appropriate use of existing sand and gravel resources on site, rather than prior extraction.</p> <p>See also:</p> <p><i>Mineral Consultation Areas in Hertfordshire</i></p> <p><i>Hertfordshire Minerals Local Plan Review 2002-2016</i></p>
<p>Justified: <i>The plan should be an appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.</i></p> <p>To be 'justified' a DPD needs to be:</p> <ul style="list-style-type: none"> • Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area. • The most appropriate strategy when considered against reasonable alternatives. 		
<p>Participation</p> <p>Has the consultation process allowed for effective engagement of all interested parties?</p>	<p>The consultation statement. This should set out what consultation was undertaken, when, with whom and how it has influenced the plan. The statement should show that efforts have been made to consult hard to reach groups, key stakeholders etc. Reference SCI</p>	<p>The Council is fully committed to meaningful and on-going engagement in the planning process to ensure that the needs and aspirations of the community and stakeholders are fully taken into account in the preparation of the Plan that will help to shape the future development of the District over the next 15 years.</p> <p>SADC has undertaken extensive consultation over a significant period of time. An up to date <i>Statement of Community Involvement (SCI)</i> is available. The Report of Consultation records the most recent (Regulation 19) consultation stage in 2018 in detail and also outlines earlier work on alternative Plan options / strategies. It explains how, and to what degree, the views of interested parties have been taken into account in the Local Plan.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		The plan preparation process has clearly provided participation opportunities for all interests.
<p><i>Research / fact finding</i></p> <p>Is the plan justified by a sound and credible evidence base? What are the sources of evidence? How up to date, and how convincing is it? What assumptions were made in preparing the DPD? Were they reasonable and justified?</p>	<ul style="list-style-type: none"> The studies, reports and technical papers that provide the evidence for the policies set out in the DPD, the date of preparation and who they were produced by. <p>AND</p> <ul style="list-style-type: none"> Sections of the DPD (at various stages of development) and SA Report which illustrate how evidence supports the strategy, policies and proposals, including key assumptions. <p>OR</p> <ul style="list-style-type: none"> A very brief statement of how the main findings of consultation support the policies, with reference to: reports to the council on the issues raised during participation, covering both the front-loading and formulation phases; and any other information on community views and preferences. <p>OR</p> <ul style="list-style-type: none"> For each policy (or group of policies dealing with the same issue), a very brief statement of the evidence documents relied upon and how they support the policy (where this is not already clear in the reasoned justification in the DPD). 	<p>The Council has developed and maintained a comprehensive suite of evidence to inform the preparation of sound and deliverable policies and proposals contained within this Plan. The Council has endeavoured to ensure information available at the time has been made accessible to consultees as part of each of the formal local plan consultation and representations stages.</p> <p>The full suite of evidence used to inform the Plan has been available through the Council's webpages. A full schedule of submitted documents identifying relevant and most up to date studies, reports and technical reports that the PSD version of the plan relies on, has been prepared and submitted.</p> <p>The SADC LP is structured to provide an outline of the relevant evidence and issues affecting the District that each policy seeks to address.</p> <p>The LP is based on a comprehensive evidence base. This is recorded in the <i>Library of Documents</i> published and indexed on the SADC web site.</p> <p>Planning Policy Committee (PPC) Meetings and Reports since October 2013 are outlined in <i>CD 022</i> and summarised in <i>Regulation 22 statement (CD 005)</i> set out the decision making process which directed the formation of the policies set out in the Local Plan.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>The Policies and objectives of the Local Plan document were informed by the results of the Regulation 18 consultation which took place January 8 – February 21, 2018.</p> <p>Chapter 1 ‘Development Strategy and Metropolitan Green Belt’</p> <p>This section sets out the overall development strategy for the District, identifying a settlement hierarchy for existing development as well as broad locations for new development. This is based on the local authority green belt review. This approach was informed by the sustainability appraisal, carried out in 2018.</p> <p>The scale of development, including housing targets, has been informed by the government’s ‘standard methodology’ for housing, South West Hertfordshire SHMA 2016 and St Albans SHMA Update 2015.</p> <p>Chapter 2 ‘Homes, Affordable Homes and Workplaces’</p> <p>This chapter specifically aims to deliver district housing and employment requirements. Housing numbers, mix and tenure has calculated based on previously published <i>Strategic Housing Market Assessment (SHMA)</i> and <i>South West Hertfordshire SHMA 2016</i>. This requirement has also set out the basis of the broad locations and density of development, minimising the impact of development.</p> <p>Employment requirements, including existing, have been identified in the <i>South West Hertfordshire Economic Study 2016</i>, <i>South West Hertfordshire</i></p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p><i>Economic Study Emerging Draft 2019</i> and the <i>St Albans City District Council Economic Development and Land Evidence Technical Report</i> as well as through cross boundary co-operation with neighbouring authorities and engagement with the Hertfordshire LEP.</p> <p>Chapter 3 ‘Retail, Leisure and Commercial Uses and Development’</p> <p>The evidence from the <i>South West Hertfordshire retail and leisure study 2018</i> highlighted the issues and challenges facing centres within the district and wider area. Chapter 3 addresses that by providing policies which aim to enhance and protect the vitality and viability to towns, district and local centres.</p> <p>Chapter 4 ‘Infrastructure and Community Facilities’</p> <p>In facilitating the development needs identified in chapter 1, 2 and 3 as well as improving existing infrastructure. Evidence such as <i>the Infrastructure Delivery Plan (IDP)</i> and results from the <i>HCC COMET</i> model runs show these provisions as well as improvement of infrastructure.</p> <p>The <i>HCC Secondary School Capacity Summary</i> demonstrates that existing schools are currently up to or close to capacity and justifies the requirement for new schools in the broad locations. The <i>St Albans Primary School Site Search</i>, last updated 2017, provided alternative sites for educational infrastructure based on the requirement for new primary schools from broad location development.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Chapter 5 ‘Design, Conservation and Enhancement of the Natural, Built and Historic Environment’</p> <p>Chapter 5 aims to address the need to ensure and provide sustainable development in a natural, built and historic context. Policy L23 is informed by existing LP policy, experience and the <i>Building Futures Sustainable Design Toolkit</i> which provides sustainable design principles for new developments. The <i>Playing Pitch Strategy 2019</i> sets out the need to maintain existing and create new green local spaces, including playing pitch provision, as reflected in policies L27 and L28.</p> <p>L29 has been development on the basis of the evidence set out in, amongst others, the <i>South West Hertfordshire Strategic Flood Risk Assessment 2018</i> and the <i>Environmental Capacity of St Albans City and District 2012</i>.</p> <p>Evidence base documents referenced within the Document Index Library and the Local Plan have been instrumental to informing preparation of each policy. These have been submitted for examination, and in the Council’s view, these are considered comprehensive, proportionate and robust to inform a sound understanding of the needs and constraints of the District and wider area.</p>
<p><i>Alternatives</i></p> <p>Can it be shown that the LPA’s chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable</p>	<ul style="list-style-type: none"> • Reports and consultation documents produced in the early stages setting out how alternatives were developed and evaluated, and the reasons for selecting the preferred strategy, and reasons for rejecting the alternatives. This should include options covering not just the spatial strategy, 	<p>Plan alternatives have been considered at several levels.</p> <p>Taking an overview of the whole Plan preparation process and initial consultation under Regulation 18,</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why the decisions were taken?</p> <p>Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?</p>	<p>but also the quantum of development, strategic policies and development management policies.</p> <ul style="list-style-type: none"> • An audit trail of how the evidence base, consultation and SA have influenced the plan. • Sections of the SA Report showing the assessment of options and alternatives. • Reports on how decisions on the inclusion of policy were made. • Sections of the consultation document demonstrating how options were developed and appraised. • Any other documentation showing how alternatives were developed and evaluated, including a report on how sustainability appraisal has influenced the choice of strategy and the content of policies. 	<p>alternatives strategies for accommodating different levels of development have been considered. This is explained in the <i>Regulation 22 statement</i> and <i>SA Reports</i>.</p> <p>For the more recent stages of the Plan process the alternative levels of development that could be planned for and alternative development site and development strategy (of site / locations combination) options were considered. They were evaluated on the basis of the <i>Green Belt Review</i> and NPPF SD principles. The evaluation was integrated with the independent SA.</p>
<p>Effective: <i>the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.</i></p> <p>To be 'effective' a DPD needs to:</p> <ul style="list-style-type: none"> • Be deliverable • Demonstrate sound infrastructure delivery planning • Have no regulatory or national planning barriers to its delivery • Have delivery partners who are signed up to it • Be coherent with the strategies of neighbouring authorities • Demonstrate how the Duty to Co-operate has been fulfilled • Be flexible • Be able to be monitored 		
<p><i>Deliverable with no regulatory or national planning barriers</i></p> <ul style="list-style-type: none"> • Is it clear how the policies will meet the Plan's vision and objectives? Are there any obvious 	<ul style="list-style-type: none"> • Sections of the DPD which address delivery, the means of delivery and the timescales for key developments and initiatives. • Confirmation from the relevant agencies that they support the objectives and the identified means of delivery, such as 	<p>Paragraph 2.2 sets out the district's vision; this directly correlates to the objectives set out in paragraph 2.3. This includes an overall strategy for the pattern and scale of development to achieve this vision. This</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>gaps in the policies, having regard to the objectives of the DPD?</p> <ul style="list-style-type: none"> • Are the policies internally consistent? • Are there realistic timescales related to the objectives? • Does the DPD explain how its key policy objectives will be achieved? 	<p>evidence that the plans and programmes of other bodies have been taken into account (e.g. Water Resources Management Plans and Marine Plans).</p> <ul style="list-style-type: none"> • Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure. • Section in the DPD that shows the linkages between the objectives and the corresponding policies, and consistency between policies (such as through a matrix). 	<p>development strategy is set out in Policy S2.</p> <p>The objectives (paragraph 2.3) are reflected in the chapters of the Local Plan (paragraph 3.2). Paragraph 3.1 sets out how the development plan should be read and notes direct between different policies within.</p> <p>The LP approach to deliverability is set out at Policy S4. Timescales for housing delivery are detailed in the housing trajectory at LP Appendix 2.</p> <p>Overall Plan viability is considered in the <i>St Albans District Council Development Economics Study</i>. The analysis there is supported in the <i>Community Infrastructure Levy Economic Viability Study 2012 and updated draft 2017</i>. Both studies are robust to changing economic fortunes, as they demonstrate viability at a time when general economic conditions were relatively poorer than today. The <i>Report of Consultation</i> and records of related landowner / developer engagement with those who control the Broad Locations (see Planning Policy Committee papers) show that the landowners and developers consider that the LP proposals can be delivered.</p> <p>Information on the policy structure can be found in the up to date <i>LDS</i>.</p> <p>The Plan is sound in this respect because economic conditions in the District currently, and for the foreseeable future, make the forms of development proposed commercially viable.</p>
<p><i>Infrastructure Delivery Planning</i></p> <ul style="list-style-type: none"> • Have the infrastructure 	<ul style="list-style-type: none"> • A section or sections of the DPD where infrastructure needs are identified and the proposed solutions put forward. 	<p>This is detailed in the LP <i>Infrastructure Delivery Schedule</i> (LP Appendix 4) and the <i>Infrastructure</i></p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>implications of the policies clearly been identified?</p> <ul style="list-style-type: none"> • Are the delivery mechanisms and timescales for implementation of the policies clearly identified? • Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies? 	<ul style="list-style-type: none"> • A schedule setting out responsibilities for delivery, mechanisms and timescales, and related to a CIL schedule where appropriate. • Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery, or a plan for resolving issues. • Demonstrable plan-wide viability, particularly in relation to the delivery of affordable housing and the role of a CIL schedule. 	<p><i>Delivery Plan (IDP)</i>. The <i>IDP</i> has been prepared in parallel with the LP process. It is published at the point of submission to detail the current position on infrastructure planning work being undertaken by SADC and infrastructure providers.</p> <p>The <i>IDP</i> demonstrates the important LP infrastructure dependencies. The Plan is sound because the available evidence is that necessary infrastructure can be provided within the Plan period.</p> <p><i>CIL and Viability Report Final Draft 2017 (INFR 009)</i> demonstrates planning wide viability in relation to the role of CIL and affordable housing.</p>
<p><i>Co-ordinated Planning</i></p> <p>Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use planning by bringing together and integrating policies for the development and use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?</p>	<ul style="list-style-type: none"> • Sections of the DPD that reflect the plans or strategies of the local authority and other bodies • Policies which seek to pull together different policy objectives • Expressions of support/representations from bodies responsible for other strategies affecting the area 	<p>The LP is firmly based on the concept of spatial planning (linking land use decisions to wider community and stakeholder needs and aspirations).</p> <p>The soundness of the Plan in this respect is demonstrated at Paragraphs 1.2, setting out the council's support of the production of Neighbourhood Plans. The delivery aspects of LP Policy S4 detail the approach to implementation of the major developments proposed at the broad locations. There is evidence of strong partnership working with landowners / developers on implementation. The <i>IDP</i> is also relevant to this (see above).</p> <p><i>Duty to Co-operate statement</i> confirms the support of the strategies proposed from joining authorities, prescribed bodies and other key agencies.</p>
<p><i>Co-operation</i></p>	<ul style="list-style-type: none"> • A succinct Duty to Co-operate Statement which flows from 	<p>There is considerable evidence to demonstrate that</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<ul style="list-style-type: none"> Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being examined? Is it clear who is intended to implement each part of the DPD? Where the actions required are outside the direct control of the LPA, is there evidence that there is the necessary commitment from the relevant organisations to the implementation of policies? 	<p>the strategic issues that have been addressed jointly. A 'tick box' approach or a collection of correspondence is not sufficient, and it needs to be shown (where appropriate) if joint plan-making arrangements have been considered, what decisions were reached and why.</p> <ul style="list-style-type: none"> The Duty to Co-operate Statement could highlight: the sharing of ideas, evidence and pooling of resources; the practical policy outcomes of co-operation; how decisions were reached and why; and evidence of having effectively co-operated to plan for issues which need other organisations to deliver on, common objectives for elements of strategy and policy; a memorandum of understanding; aligned or joint core strategies and liaison with other consultees as appropriate. 	<p>the Duty to Co-operate has been complied with. This is detailed in a separate <i>Duty to Co-operate Statement</i>.</p> <p>As set out in the <i>IDP</i>, relevant organisations and neighbouring authorities have been identified and consulted to implement policies set out in the LP. For example, Dacorum Borough Council are a key partner in delivery of the East and North Hemel Hempstead Broad Locations and the associated cross-boundary Enterprise Zone, sitting within the wider designated Hemel Garden Communities.</p>
<p><i>Flexibility</i></p> <ul style="list-style-type: none"> Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances? Does the DPD include the remedial actions that will be taken if the policies need adjustment? 	<ul style="list-style-type: none"> Sections of the DPD setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed. Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor: <ul style="list-style-type: none"> the effectiveness of policies and what evidence is being collected to undertake this changes affecting the baseline information and any information on trends on which the DPD is based Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances Sections within the DPD dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and how that would impact on other aspects of the strategy and on 	<p>The LP provides for flexibility in its combination of policies for continued development within existing urban areas and at identified green-field Green Belt Broad Locations. The Broad Location developments will be of varied scale and will proceed on different timescales (see LP Appendix 2 Housing Trajectory). This aids flexibility and provides a variety of opportunities; smaller scale relatively shorter term Broad Locations at North West Harpenden and East St Albans and more complicated strategic developments beneficial to wider economic development and regeneration aims at East Hemel Hempstead and Park Street Garden Village. There is flexibility in the potential for some Broad Locations to come forward more quickly than set out in the trajectory, allowing for the possibility that some may come forward more</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>infrastructure provision</p> <ul style="list-style-type: none"> Sections of the DPD identifying the key indicators of success of the strategy, and the remedial actions which will be taken if adjustment is required. 	<p>slowly.</p> <p>The scale of development at East and North Hemel Hempstead is sufficient to offer scope for phased development, with safeguarded land excluded from the Green Belt for development beyond the Plan period. (This approach adds to flexibility)</p> <p>As set out in Appendix 3 'Monitoring Framework', as well as through the local authorities <i>Annual Monitoring Report</i>, the delivery of policy targets will be monitored. See below.</p>
<p><i>Monitoring</i></p> <ul style="list-style-type: none"> Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)? Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report? Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report? 	<ul style="list-style-type: none"> Sections of the DPD setting out indicators, targets and milestones Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories Reference to any other reports or technical documents which contain information on the delivery of policies Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the DPD against the sustainability appraisal 	<p>Paragraph 2.7 states the plan will be reviewed within 5 years of adoption, with paragraph 2.6 breaking down the overall plan period into two periods of 5 years and one of six.</p> <p>Appendix 2 sets out the housing trajectory over the Local Plan period by which development should be achieved. Appendix 3 sets out the Monitoring Framework provides progress indicators which will contribute to the effective monitoring of the strategies.</p> <p>The current <i>Authority's Monitoring Report (AMR)</i> series (AMR 2018 based April 2018, published December 2018) monitors adopted Local Plan policies by providing extensive and detailed information also relevant to the LP. When the Local Plan progresses to adoption it is intended that the Local Plan Monitoring Framework will form the basis of a revised <i>AMR</i>. This will enable the <i>AMR</i> to measure LP targets annually and ensuring any uprising challenges to be addressed</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>and dealt with in a timely manner.</p> <p>Any significant effects identified in the <i>Sustainability Appraisal Report 2018</i> will be taken forward in the <i>SA/SEA</i> monitoring, which will take place as part of the overall monitoring of the Local Plan. This will be published as part of the <i>AMR</i> and will be the responsibility of SADC.</p>
<p>Consistent with national policy: <i>the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</i></p> <p>The DPD should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.</p>		
<ul style="list-style-type: none"> Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification? Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included? 	<ul style="list-style-type: none"> Sections of the DPD which explain where and how national policy has been elaborated upon and the reasons. Studies forming evidence for the DPD or, where appropriate, other information which provides the rationale for departing from national policy. Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement. Where appropriate, evidence of consistency with national marine policy as articulated in the UK Marine Policy Statement Reports or copies of correspondence as to how representations have been considered and dealt with. 	<p>SADC considers that the policies set out in the Local Plan are fully consistent with national policy.</p> <p>Where policy proposals include changes to key policy such as green belt, the Council considers that the approach taken to identify amendments to boundaries accord with the policy guidance and need to demonstrate exceptional circumstances as set out in paragraphs 136-138 of the <i>NPPF 2018</i> against which St Albans City and District council is being examined.</p> <p>The policies proposed are underpinned and informed by evidence and have been reviewed for their sustainability effects, with appropriate mitigation in place where necessary to address potential negative effects.</p>

Planning policy for traveller sites

Planning Policy for Traveller Sites was published in 23 March 2012 and came into effect on 27 March 2012 before being updated August 2015. Circular 01/06: Planning for Gypsy and Traveller Caravan Sites and Circular 04/07: Planning for Travelling Showpeople have been cancelled. Planning Policy for Traveller Sites should be read in conjunction with the National Planning Policy Framework, including the implementation policies of that document.

The government's aim in relation to planning for traveller sites is:

'To ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic life of travellers whilst respecting the interests of the settled community'.

Government's aims in respect of traveller sites are:

- That local planning authorities (LPAs) make their own assessment of need for the purposes of planning
- That LPAs work collaboratively, develop fair and effective strategies to meet need through the identification of land for sites
- Plan for sites over a reasonable timescale
- Plan-making should protect green belt land from inappropriate development
- Promote more private traveller site provision whilst recognising that there will always be those travellers who cannot provide their own sites
- Aim to reduce the number of unauthorised developments and encampments and make enforcement more effective.
-

In addition local planning authorities should:

- Include fair, realistic and inclusive policies
- Increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply
- Reduce tensions between settled and traveller communities in plan-making and decision-taking
- Enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure
- Have due regard to protection of local amenity and local environment

Policy Expectations	Possible Evidence	Evidence Provided
Policy A: Using evidence to plan positively and manage development (para 7)		
Early and effective community engagement with both settled and traveller communities.	<ul style="list-style-type: none"> • Early and effective engagement undertaken, including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups. 	<p><i>Gypsy and Traveller Accommodation Needs Assessment (GTAA) 2015</i> was formulated using a variety of stakeholder engagement techniques across the settled and traveller community. The 2015 study and the 2019 update to the document informs the approach set out in policy L7.</p> <p>The regulation 18 and 19 consultations provided an opportunity for members of the settled and traveller community to participate in shaping aspects of the Local Plan through engagement and communicate their needs as a community.</p>

Policy Expectations	Possible Evidence	Evidence Provided
<p>Co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of likely permanent and transit accommodation needs of their areas.</p>	<ul style="list-style-type: none"> • Demonstration of a clear understanding of the needs of the traveller community over the lifespan of your development plan. • Collaborative working with neighbouring local planning authorities. • A robust evidence base to establish accommodation needs to inform the preparation of your local plan and make planning decisions. 	<p>As mentioned above, both versions of the <i>GTAA</i> are designed to provide a clear understanding of the needs of the travelling community.</p> <p>The Council is working jointly with neighbouring authorities on the provision of a sites which would provide the specific accommodation needs of the settled and traveller community. This has been identified in both <i>2015 GTAA</i> and the <i>2019 update</i>.</p> <p>Up to date evidence / research is available on needs in the <i>Gypsy and Traveller Accommodation Needs Assessment 2015</i> and <i>January 2019 Update</i>. This was the subject of consultation / direct</p>

Policy Expectations	Possible Evidence	Evidence Provided
		engagement with the gypsy and traveller community.
Policy B: Planning for traveller sites (paras 8-13)		
<p>Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in your area, working collaboratively with neighbouring LPAs.</p> <p>Set criteria to guide land supply allocations where there is identified need.</p> <p>Ensure that traveller sites are sustainable economically, socially and environmentally.</p>	<ul style="list-style-type: none"> • Identification, and annual update, of a supply of specific, deliverable sites sufficient to provide 5 years worth of sites against locally set target. Identification of a supply of specific, developable sites or broad locations for growth for years 6-10, and, where possible, for years 11-15. • An assessment of the need for traveller sites, and where an unmet need has been demonstrated a supply of specific, deliverable sites been identified. • Policy which takes into account criteria a-h of para 13 	<p>The LP is positive in its response to this issue.</p> <p>The Plan is sound on the basis that it proposes a combination of two site allocations for significant new traveller accommodation sites at the East Hemel Hempstead South and Central Broad Location, and two site allocations at Park Street Garden Village (Policy L7 and policy S6).</p> <p>These broad location have been identified as sustainable locations as set out in policy S1 and S2 and L7.</p> <p>As set out in Appendix 3 'Monitoring Framework', and</p>

Policy Expectations	Possible Evidence	Evidence Provided
		the local authorities <i>Annual Monitoring Report (AMR)</i> , the delivery of the policy approach and target will be monitored.
Policy C: Sites in rural areas and the countryside (para 14)		
When assessing the suitability of sites in rural or semi-rural settings LPAs should ensure that the scale of such sites do not dominate the nearest settled community.		As set out in development strategy S1 and S2 and broad location policy S6 the proposed pitches are allocated in broad locations. Policy L7 sets out the criteria for considering the suitability of extending existing sites.
Policy D: Rural exception sites (para 15)		
If there is a lack of affordable land to meet local traveller needs, LPAs in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable travellers' sites.	<ul style="list-style-type: none"> If a rural exception site policy is used, and if so clarity that such sites shall be used for affordable traveller sites in perpetuity. 	As set out in development strategy S1 and S2 the proposed pitches are allocated in Broad Locations. Policy L7 sets out the criteria for considering the suitability of

Policy Expectations	Possible Evidence	Evidence Provided
		extending existing sites.
Policy E: Traveller sites in Green Belt (paras 16 -17)		
<p>Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development.</p> <p>Exceptional limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site ... should be done only through the plan-making process.</p>	<ul style="list-style-type: none"> Green Belt boundary revisions made in response to a specific identified need for a traveller site, undertaken through the plan making process. 	<p>The proposed sites allocated in broad locations as identified in Policy S1 and S2 and as such have been considered as part of the plan making process.</p>
Policy F: Mixed planning use traveller sites (paras 18 - 20)		
<p>Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents.</p>	<ul style="list-style-type: none"> Consideration of the need for sites for mixed residential and business use (having regard to safety and amenity of the occupants and neighbouring residents), or separate sites in close proximity to one another. N.B. Mixed use should not be permitted on rural exception sites 	<p>Policy S6 ii) East Hemel Central includes one 15 pitch traveller site within the employment zone.</p>

Policy Expectations	Possible Evidence	Evidence Provided
Policy G: Major development projects (para 21)		
<p>Local planning authorities should work with the planning applicant and the affected traveller community to identify a site or sites suitable for relocation of the community if a major development proposal requires the permanent or temporary relocation of a traveller site.</p>	<ul style="list-style-type: none"> Where a major development proposal requires the permanent or temporary relocation of a traveller site, the identification of a site or sites suitable for re-location of the community. 	<p>As identified in the development strategy found in policies S1 and S2, major developments create the opportunity to provide additional traveller sites.</p> <p>No existing authorised sites would be directly affected by any of the proposed Broad Locations requiring their relocation.</p>



Local Plan Legal Compliance Checklist (April 2019)

The St Albans District Local Plan has been formally submitted to the Secretary of State. The plan will now be examined by an independent inspector to assess whether it has been prepared in accordance with the legal and procedural requirements as set out by the Town and Country Planning (Local Planning) (England) Regulations 2012 ("2012 Regulations") and whether the plan is "sound".

To facilitate the examination process and for the benefit of the planning inspector and other examination participants, local planning authorities are encouraged to submit a completed Legal Compliance Checklist.

This document sets out the completed Legal Compliance Checklist. It seeks to provide succinct reference points that demonstrate how the St Albans District Local Plan is legally compliant. The responses to the checklist further signpost the reader to a range of other supporting evidence that has been prepared and the processes undertaken to get the Plan to this point. Through the examination process additional information may be required to be developed and published in support of the Plan. All such information will be published on the Council's website and clearly referenced and recorded as additional documents submitted to inform the examination process.



Stage one: The early stages

Where the 'possible evidence' column refers to a document that will not be complete until a later stage (for example, the sustainability appraisal report), documents that will contribute to that report are relevant at the earlier stages. This way, the submitted report provides the evidence at submission, with an audit trail back to its source.

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In terms of legal compliance, the main issues for the early stage are in relation to:

- planning for community engagement
- planning the sustainability appraisal (including consultation with the statutory environment consultation bodies)
- identifying significant cross boundary and inter-authority issues
- ensuring that the plan rests on a credible evidence base, including meeting the Act's requirement for keeping matters affecting the development of the area under review.

Regulation 17 notes that a statement setting out which bodies and people the council invited to make representations under Regulation 18 is one of the proposed submission documents. In this tool, the term 'consultation statement' is used to describe this statement.

Section 33A of the Act (introduced by the Localism Act 2011) introduces a duty to cooperate as a mechanism to ensure that local planning authorities and other bodies engage with each other on issues which are likely to have a significant effect on more than one planning area. This pervades every stage of the plan preparation. A plan may be found unsound if a council cannot show that it has taken reasonable steps to comply with the duty.

Stage one: The beginning

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence	(Possible) Evidence – outline points and references only
1. Is the DPD identified in the adopted LDS? 2. Have you recorded the timetable for its production?	The Act section 15(2) and section 19(1)	NPPF para 15		i. The adopted LDS at the time of commencement, publication and submission of the DPD ii. The relevant authority monitoring report (if changes need to be explained)	The LP is identified in the <i>LDS</i> . The LP is on time with the timetable set out in current <i>LDS</i> . The full process is set out in the <i>LP Regulation 22 Statement</i> .
2. How will community engagement be programmed into the preparation of the DPD?	The Act section 19(3) Regulation 18	NPPF paras 16, 25	If the SCI is up-to-date, use that. If not set out any changes to community engagement as a result of changes in legislation.	i. The SCI ii. The project plan for the DPD	For each stage of the Plan's production, published consultation reports have been prepared detailing how community engagement has been undertaken. The full history consultation process is set out in the

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence	(Possible) Evidence – outline points and references only
					<p><i>Regulation 22 Statement.</i> The Council also maintains a Consultee Database.</p> <p>The <i>SCI</i> is up to date. It and earlier versions have guided the consultation process.</p>
3. Have you considered the appropriate bodies you should consult?	Regulation 18	NPPF paras 24, 25	<p>Regulation 2 defines the general and specific consultation bodies.</p> <p>The possible evidence may duplicate each other. Only use what you need to.</p>	<p>i. The <i>SCI</i></p> <p>ii. Reports and decisions setting out the approach to specific and general</p> <p>lii. consultation bodies</p>	<p>Yes – the general range of consultees that the Council consults are set out in the <i>SCI</i> and reported in the <i>Regulation 22 Statement</i>.</p> <p>The Council also maintains a Consultee Database.</p>
4. How you will co-operate with other local planning authorities, including counties, and prescribed bodies, to identify and address any issues or	<p>The Act section 33A(1)(a) and (b), section 33A(3)(d) (e) & (4)</p> <p>The Act Section 20(5)(c)</p>	<p>NPPF paras 26, 27</p> <p>Under NPPF Para 35, to be 'Effective' a plan should be based on effective joint working on</p>	<p>Section 33A (4) defines a "strategic matter".</p> <p>Under section 33A(6) the required engagement includes considering joint approaches to the plan</p>	<p>i. Reports and decisions setting out the approach to be taken</p> <p>ii. Consultation statement</p>	<p>A separate <i>Duty to Cooperate (DtC) Statement</i> and <i>Statement of Common Ground</i> explains the approach to this legal requirement.</p>

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence	(Possible) Evidence – outline points and references only
strategic priorities that will have a significant impact on at least two planning areas?	Regulation 4	cross-boundary strategic priorities. Strategic priorities are listed at NPPF Para 21	making activities (including the preparatory activities) and considering whether to agree joint local development documents under section 28. The bodies prescribed by section 33A(1)(c) are set out at Regulation 4(1).		
5. How you will co-operate with any local enterprise partnerships (LEP) or local nature partnerships (LNP) to identify and address any issues or strategic priorities that will have a significant impact on at least two planning areas?	The Act section 33A(1)(c) and section 33A(9), section 33A(3)(d) and (e) The Act section 20(5)(c). Regulation 4	NPPF paras 24 to 27	Section 33A(4) defines a "strategic matter". Regulation 4(2) prescribes LEPs and LNPs for the purposes of section 33A(9). Under section 33A(6) the required engagement includes consulting on joint approaches to	i. Reports and decisions setting out the approach to be taken. ii. Consultation statement	The LP responds to the <i>LEP (Herts (HLEP) Strategic Economic Plan (SEP)</i> and substantial ongoing engagement, for example through work on the Hertfordshire Enterprise Zone, Hemel Garden Communities. In 2014-15 the LNP were engaged through the Hertfordshire Planning Group (HPG) and the

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence	(Possible) Evidence – outline points and references only
			relevant activities.		<p>Hertfordshire Infrastructure and Planning Partnership (HIPP). Through that joint work, the LNP set out six high level principles that are expected to be reflected when considering biodiversity and the natural environment. These have been incorporated into the development of the LP – primarily at L29 and through the SA.</p> <p>Liaison with the Herts LNP (HLNP) has been limited primarily to statutory consultation stages more recently because of their lack of resources.</p> <p>The <i>Duty to Cooperate Statement</i> also sets out how the Council has involved and worked with the Hertfordshire LEP and LNP.</p>
6. Is baseline	The Act section13	NPPF paras 31		i. Documents	The document library submitted with the LP

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence	(Possible) Evidence – outline points and references only
information being collected and evidence being gathered to keep the matters which affect the development of the area under review?				dealing with collection of baseline information ii. Relevant technical studies iii. The annual monitoring report	demonstrate the collection evidence used to support the development of the plan. <i>The Annual Monitoring Report</i> is updated annually.
7. Is baseline information being collected and evidence being gathered to set the framework for the sustainability appraisal?	The Act section19(5)	NPPF 31 Strategic Environmental Assessment Guide, chapter 5		i. Sustainability report scoping document ii. Sustainability appraisal report	Document Library includes full series of <i>SA Working Notes and Reports</i> that have tracked the LP process
8. Have you consulted the statutory environment consultation bodies for five weeks on the scope and level of detail of the	Regulations 9 and 13 of The Environmental Assessment of Plans and Programmes Regulations 2004	NPPF paras 32 SEA Guide chapter 3	The Strategic Environmental Assessment consultation bodies are also amongst the 'specific consultation bodies' which are defined in Regulation 2).	Copies of the consultation letters sent to and any responses from the bodies	All relevant bodies have been included in consultations at Local Plan Regulation 18 and 19 stages. Details of responses are available in the SADC Consultation Portal database which is publically accessible

Activity	Legal requirement	Guidance reference	Additional notes	Possible evidence	(Possible) Evidence – outline points and references only
environmental information to be included in the sustainability appraisal report?	No 1633.				through the SADC website. Comments received were duly considered and incorporated into the consultation reports.



Stage two: Plan preparation - frontloading phase

Information assembled during this phase contributes to:

- showing that the procedures have been complied with
- demonstrating cooperation with statutory cooperation bodies
- developing alternatives and options and appraising them through sustainability appraisal and against evidence.

The council should record actions taken during this phase as they will be needed to show that the plan meets the legal requirements. They will also show that a realistic and reasonable approach has been taken to plan preparation.

Stage two: Plan preparation

Activity	Legal requirement	Guidance reference	Additional notes	Possible Evidence	(Possible) Evidence – outline points and references only
1. Have you notified: <ul style="list-style-type: none"> the specific consultation bodies? the general consultation bodies that have an interest in the subject of the DPD and invited them to make representations about its contents? 	Regulation 18(1) and (2)(a) (b)	NPPF paras 16, 25	Specific and general consultation bodies are defined in Regulation 2.	i. Consultation statement ii. Copies of documents consulting these bodies iii. Record of discussions iv. Copies of representations made v. A brief statement setting out the reasons why any bodies have been omitted from or included in consultation	Full information on consultation responses at Local Plan Regulation 18 and 19 stage are included in the <i>Regulation 22</i> Statement and held in the SADC Consultation Portal (as above) The Council also maintains a Consultee Database. The duty to cooperate statement provides reference to and some records of discussions.
2. Are you inviting representations from people resident or carrying	Regulation 18(1) and (2)(c)	NPPF paras 16		i. Consultation statement	See sections above

Activity	Legal requirement	Guidance reference	Additional notes	Possible Evidence	(Possible) Evidence – outline points and references only
out business in your area about the content of the DPD?				<ul style="list-style-type: none"> ii. Copies of documents consulting these persons iii. Record of discussions iv. Copies of representations made 	The <i>Regulation 22 Statement</i> , <i>SCI</i> and <i>DtC</i> sets out the bodies consulted. Wider business interest consultation at the later stages of the LP process.
3. Are you engaging with stakeholders responsible for delivery of the strategy?	Regulation 18	NPPF para 16	NPPF paras 25 give examples of relevant bodies which should be consulted.	<ul style="list-style-type: none"> i. Consultation statement ii. Copies of documents consulting these people iii. Record of discussions 	<p>Work with landowners / developers is recorded in the <i>Regulation 22 Statement</i> and <i>Duty to Cooperate</i>.</p> <p>Further detailed engagement with those involved in the Broad Locations that are included in the LP is reported in papers of SADC Planning Policy Committee (PPC). These papers are publically accessible through the SADC website.</p>

Activity	Legal requirement	Guidance reference	Additional notes	Possible Evidence	(Possible) Evidence – outline points and references only
					Work with infrastructure providers is recorded in detail in the <i>IDP</i> in the Document Library
4. Are you taking into account representations made?	Regulation 18(3)	NPPF para 15 and 25-27	Evidence from participation is part of the justification. Show how you have taken representations into account.	<ul style="list-style-type: none"> i. Consultation statement ii. Any reports on the selection of alternatives and options for the DPD 	See <i>Regulation 22 Statement</i> and PPC references in the appendix below.
5. Does the consultation contribute to the development and sustainability appraisal of alternatives?	<p>The Act section 19(5)</p> <p>Regulations 12 and 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633</p>	<p>NPPF paras 32 and 35</p> <p>SEA Guide, chapter 3</p>		<ul style="list-style-type: none"> i. Consultation statement ii. Any reports on the selection of alternatives and options for the DPD iii. Sustainability appraisal report 	<p>See <i>Regulation 22 Statement</i> and PPC references in the appendix below.</p> <p>The <i>SA Reports</i> in the Document Library explain the consideration of alternatives for the overall Plan in detail and set out the relationship with the Plan evaluation process and consultation stages.</p> <p>It should be noted that the</p>

Activity	Legal requirement	Guidance reference	Additional notes	Possible Evidence	(Possible) Evidence – outline points and references only
					<p>consultation stages in Plan preparation were lengthy and involved preparation and consultation on different versions of the Plan. These different versions of the Plan in themselves demonstrate wide ranging / detailed consideration and evaluation of alternatives. The chronology for this consideration is summarised in the <i>Regulation 22 Statement</i>.</p> <p>The SA report details the method of evaluation of alternatives used in the later stages of Plan formulation. This is integrated with consideration of alternatives.</p>
<p>6. Is the participation:</p> <ul style="list-style-type: none"> • following the principles set out in your SCI? • integrating involvement 	The Act section19(3)	NPPF para 16		<ul style="list-style-type: none"> i. Consultation Statement ii. The SCI iii. The relevant sustainable 	<p><i>Regulation 22 Statement</i> demonstrates consultation / participation compliance with the <i>SCI</i> (available in the Document Library).</p>

Activity	Legal requirement	Guidance reference	Additional notes	Possible Evidence	(Possible) Evidence – outline points and references only
<p>with the sustainable community strategy?</p> <ul style="list-style-type: none"> proportionate to the scale of issues involved in the DPD? 				community strategies (SCS)	<p>At each stage, the Council has widely advertised consultation. The range of measures applied through development of the plan as a whole include:</p> <ul style="list-style-type: none"> - Contacting people on the Consultee Database - Using the Council's website - Press releases and articles in the Council's own publications - Holding exhibitions and drop in events
<p>7. Are you keeping a record of:</p> <ul style="list-style-type: none"> the individuals or bodies invited to make representations? how this was done? the main issues raised? 	<p>The Act section20(3)</p> <p>Regulation 17</p>	<p>NPPF paras –26 and 35</p>	<p>You will need to submit a statement of representations under Regulation 22 (1) (c): see Submission stage below.</p> <p>Regulation 35 deals with the availability of documents and the time of their removal.</p>	<p>i. Consultation statement</p> <p>ii. Reports by the council on the consultation</p> <p>iii. Copies of representations and relevant correspondence</p> <p>iv. Technical reports</p>	<p>The Council maintains a Consultee Database, which records the individuals and bodies invited to make representations.</p> <p>The <i>Regulation 22 Statement</i> sets out how this consultation was carried out and the main issues raised.</p>

Activity	Legal requirement	Guidance reference	Additional notes	Possible Evidence	(Possible) Evidence – outline points and references only
				on the engagement process	
8. Are you inviting representations on issues that would have significant impacts on both your areas from another local planning authority? Or county issues from an affected county council that is not a planning authority? Or significant cross-boundary issues and strategic priorities of a body prescribed under Section 33A(1)(c)?	The Act section 33A(1)(a) (b) and (c), section 33A(3)(d) & (e) section 33A(4) section 33A(9) The Act section 20 (5)(c)	NPPF paras 24 to 27	Section 33A(3)(d) and (e) requires cooperation on significant cross-boundary issues before and during plan preparation. Section 33A(2) requires you to engage constructively, actively and on an ongoing basis.	i. Consultation statement ii. Reports by the council on the consultation iii. Copies of representations and relevant correspondence iv. Technical reports on the engagement process	Neighbouring authorities and other cross-boundary bodies have been consulted as part of the Local Plan development (LP). A separate <i>DtC</i> Statement explains the approach to this legal requirement.
9. Are you inviting representations on cross-boundary issues and strategic priorities from a local enterprise partnership (LEP) or a local nature partnership (LNP)?	The Act section 33A(1)(c) and Section 33A(9). The Act section 20(5) (c).	NPPF paras 24 to 27	Section 33A(3)(d) and (e) requires cooperation on significant cross-boundary issues before and during plan preparation.	i. Consultation statement ii. Reports by the council on the consultation iii. Copies of representations and relevant	Yes- Representation have been sought from the Herts LEP and Herts LNP. These have been taken into account in the drafting of the LP. This is detailed in our <i>Regulation 22 Statement</i> .

Activity	Legal requirement	Guidance reference	Additional notes	Possible Evidence	(Possible) Evidence – outline points and references only
	Regulation 4		Section 33A(2) requires you to engage constructively, actively and on an ongoing basis.	correspondence iv. Technical reports on the engagement process	
10. Are you developing a framework for monitoring the effects of the DPD?	The Act section 35 Regulation 34 Regulation 17 of The Environmental Assessment of Plans and Programmes Regulations 2004 No1363	NPPF para 31 SEA Guide, Chapter 5	It is a matter for each council to decide what to include in their monitoring reports while ensuring they are prepared in accordance with relevant UK and EU legislation” Chief Planning Officer letter 30 March 2011 withdrawing ODPM guidance.	i. Sustainability appraisal report ii. The authority monitoring report iii. Reports or documents setting out the appraisal and monitoring framework iv.	The LP Monitoring Framework is set out at LP Appendix 3 and has been subject to full consultation during Plan preparation. The <i>AMR</i> will be the mechanism through which delivery is assessed and triggers for action identified. The <i>AMR</i> also be the process through which any significant effects on the SA Objectives will be monitored.



Stage three: Plan preparation - formulation phase

This stage has many legal matters, for process and content, to address. The council should be beginning to formulate the preferred strategy for the local plan or supplementary planning document with which the council chooses to address Regulation 18 requirements, using the information gathered and previous collaborative work with stakeholders.

Para 35 of the NPPF makes it clear that explicit consideration of alternatives is a key part of the plan making process.

You should evaluate the reasonable alternatives identified in 'stage two: frontloading phase – plan preparation' phase against the:

- completed body of information from evidence gathering
- results of sustainability appraisal
- findings from community participation
- findings from engagement with statutory cooperation bodies.

This may be written up as a preferred strategy report. The results of participation on the preferred strategy and an accompanying sustainability report will enable the council to gauge the community's response and receive additional evidence about the options. The council can then decide whether, and how, the preferred strategy and policies should be changed for publishing the finished DPD.

Alternatives developed from the evidence and engagement during the frontloading stage need to be appraised to decide on the preferred strategy. Participation will also need to be carried out on it.

These matters need to be considered, and dealt with, in good time, and not left until publication. Supporting documents will assist in providing evidence that decisions on alternatives and strategy are soundly based. These documents will, in due course, become part of the proposed submission documents in stage four.

The council should tell all parties that this is the main participation opportunity on the emerging plan. The publication stage is a formal opportunity for anyone to comment on an aspect of the DPD's soundness, and to propose a change to the plan accordingly. The more effectively this message is put across, the lower the chance of late changes being brought forward following publication.

Stage three: Plan preparation – writing the plan

Activity	Statutory requirement	Guidance reference	Additional notes	Possible Evidence	(Possible) Evidence – outline points and references only
1. Are you preparing reasonable alternatives for evaluation during the preparation of the DPD?	Regulation 12 (2) of The Environmental Assessment of Plans and Programmes Regulations 2004 No. 1633	NPPF para 35 SEA Guide, Chapter 5	The sustainability appraisal report and supporting documents relevant to the preparation of the DPD are part of the proposed submission documents (see Regulation 17).	Documents supporting decisions on alternatives and any preferred strategy.	Yes, preferred alternative options have formed part of the process throughout plan preparation. <i>Regulation 22 Statement</i> sets out the decision making process, including relevant planning policy committee reports.
2. Have you assessed alternatives against: <ul style="list-style-type: none"> consistency with national policy? 	The Act section 19 (2), section 24	NPPF para 35	For London boroughs and local authorities where regional strategies are still in force general conformity is tested formally later but you need to consider it during preparation of the DPD.	i. Supporting documents ii. Correspondence with Mayor of London (London Boroughs and Mayoral Development Corporations only)	These SA objectives have been informed by the consideration of national policy. Furthermore, all policies have been assessed in terms of their compatibility with national policy. <i>Green Belt Review</i> demonstrates that alternative measures were explored. See <i>Document Index Library</i> .
3. Are you co-operating with other local planning authorities including	The Act section 33A(2)(a)	NPPF paras	.	i. Supporting documents ii. Correspondence	<i>DtC Statement</i> explains the approach to this legal requirement.

Activity	Statutory requirement	Guidance reference	Additional notes	Possible Evidence	(Possible) Evidence – outline points and references only
counties, to address significant cross boundary issues? Have you discussed doing joint local development documents?	Section 33A(6)(a)(b) Section 20(5) (c)	24to 27		with LPA/County Council	Cooperation with districts in South West Hertfordshire can be found within the <i>Draft Statement of Common Ground Officer agreed draft 2019</i> . SADC is co-operating with Dacorum Borough Council regarding East and North Hemel Hempstead in particular.
4. Are you cooperating with a person prescribed for the purposes of Regulation 33A(1)(c) to address significant cross boundary issues including preparing joint approaches?	The Act section 33A(2)(a), section 33A(6)(a) The Act section 20 (5) (c) Regulation 4	NPPF paras 24 to 27	The bodies prescribed by The Act section 33A(1)(c) are set out at Regulation 4 (1).	i. Supporting documents ii. Correspondence with prescribed bodies	A separate <i>DtC Statement</i> explains the approach to this legal requirement. See above.
5. Are you cooperating with having regard to the activities of the LEP and	The Act section 33A(2)(b) and section 33A(9).	NPPF paras 24 to 27		i. Supporting documents ii. Correspondence with LEP/LNP	Yes – The Hertfordshire Local Enterprise Partnership (HLEP) involvement is detailed in the <i>DtC Statement</i> . The HLEP has been

Activity	Statutory requirement	Guidance reference	Additional notes	Possible Evidence	(Possible) Evidence – outline points and references only
LNP?	Regulation 4 (2)				<p>directly consulted as part of the formal consultation stages.</p> <p>The Local Nature Partnership has also been consulted as part of the formal stages of consultation (which again is given more detail within the <i>DtC Statement</i>).</p>
<p>6. Are you having regard to:</p> <ul style="list-style-type: none"> • your sustainable community strategy or of other authorities whose area comprises part of the area of the council? • any other local development documents adopted by the council? 	The Act section19(2)			<p>i. Supporting documents</p> <p>ii. The sustainable community strategies</p> <p>iii. Relevant local development documents</p> <p>iv. Correspondence with the local strategic partners</p>	<p>The LP has had regard to, and is aligned with, the aims of the <i>Sustainable Community Strategy</i> (Updated 2009).</p> <p>The LP has regard to the <i>Harpenden Neighbourhood Plan</i>, adopted February 2019. Also see <i>Document Index Library</i> and <i>DtC Statement</i>.</p>
7. Do you have regard to other matters and relevant strategies relating to:	The Act section19(2)		As well as the matters and strategies listed in the Act and Regulations there are	<p>i. Supporting documents</p> <p>ii. Correspondence with the relevant bodies</p>	<i>Document Index Library</i> sets out relevant strategies at a District, Regional and County scale which have informed the development of

Activity	Statutory requirement	Guidance reference	Additional notes	Possible Evidence	(Possible) Evidence – outline points and references only
<ul style="list-style-type: none"> resources the local/regional economy the local transport plan and transport facilities and services waste strategies hazardous substances 	Regulation 10		likely to be other matters identified in planning policy statements, regional and local strategies that you will need to have regard to in preparing the DPD.		the LP.
8. Are you having regard to the need to include policies on mitigating and adapting to climate change?	The Act section19(1A)	NPPF paras 149 to 154		Supporting documents	<p>This issue is addressed in Policy L29.</p> <p><i>Hertfordshire Renewable and Low Carbon Energy Study, St Albans Energy Opportunities, St Albans Water Cycle Study Report and Strategic Flood Risk Assessment, The Environmental Capacity of St Albans City and District: Defining a Sustainable Level of Development</i> in the Document Library provide detailed evidence that has been taken into account in preparing the LP.</p>

Activity	Statutory requirement	Guidance reference	Additional notes	Possible Evidence	(Possible) Evidence – outline points and references only
9. Have you undertaken the sustainability appraisal of alternatives, including consultation on the sustainability appraisal report?	The Act section 19(5) Regulation 12 and 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633	NPPF para 32 SEA Guide, Chapter 5	Regulation 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633 sets out the consultation procedures.	i. Reports on the sustainability of alternatives ii. Record of work undertaken on sustainability appraisal iii. Supporting documents	Yes, the SA included alternatives. Also see paragraph 1.6 of the LP.
10. Are you setting out reasons for any preferences between alternatives?	Regulation 8(2)	NPPF para 32 and 35	This will include Information from the sustainability appraisal.	i. Any reports setting out alternatives and choices considered ii. Supporting documents	See sections above and SA Report. Preferences for a certain direction above have been set out and considered through the <i>Regulation 22 Statement</i> and relevant <i>PPC</i> reports.
11. Have you taken into account any representations made on the content of the DPD and the sustainability appraisal? Are you keeping a	Regulations 17, 18(3) and 22 (1) (c) (iv) Regulation 13(4) of The Environmental	NPPF paras 16 and 32	Records on the sustainability appraisal should also include recording any assessment made under the Habitats Directive.	i. Correspondence from those making representations ii. Reports on issues raised iii. Consultation	See sections above and <i>Regulation 22 Statement</i> / Consultation Portal. These have been: - -Reported through and considered by the Council's formal

Activity	Statutory requirement	Guidance reference	Additional notes	Possible Evidence	(Possible) Evidence – outline points and references only
record?	Assessment of Plans and Programmes Regulations 2004 No 1633			statement iv. Sustainability appraisal report	<p>committee processes</p> <ul style="list-style-type: none"> - Used to inform the next iteration of the Plan - Published giving respondents the feedback to the comments they have made. <p>These are fully reported in the Council's <i>Regulation 22 Statement</i> which further sets out how representations have been taken account of.</p>
<p>12. Where sites are to be identified or areas for the application of policy in the DPD, are you preparing sufficient illustrative material to:</p> <ul style="list-style-type: none"> • enable you to amend the currently adopted policies map? • inform the community about the 	Regulations 5 (1)(b) and 9	NPPF paras 20 to 23	<p>Regulation 2 defines the terms 'submission' and 'adopted' proposals map.</p> <p>A map showing changes to the adopted policies map is part of the proposed submission documents defined in Regulation</p>	<p>i. Adopted policies map</p> <p>ii. Any reports on proposals to amend the policies map</p> <p>iii. Illustrative material that shows how the policies map will be amended or replaced</p>	<p>The LP relies on identification of diagrammatic 'Broad Locations' (see LP Figure 1) and in detail in the Policies Map. These were consulted on as part of LP regulation 19 and an earlier iteration as part of Regulation 18.</p>

Activity	Statutory requirement	Guidance reference	Additional notes	Possible Evidence	(Possible) Evidence – outline points and references only
location of proposals?			17.		
13. Are the participation arrangements compliant with the SCI?	The Act, section 19(3) Regulation 18	NPPF paras 16 and 25		i. The SCI ii. Consultation statement	Yes – the arrangements for the consultations were in full compliance with the <i>SCI</i> and the following consultation reports were prepared against the <i>SCI</i> . This is set out in the <i>Council's Regulation 22 Statement</i> .



Stage four: Publication

Under Regulation 20, the period for formal representations takes place **before** the DPD is submitted for examination in accordance with a timetable set out in the statement of the representations procedure which is made available at the council's office and published on its website.

When moving towards publication stage, the council should consider the results of participation on the preferred strategy and sustainability appraisal report and decide whether to make any change to the preferred strategy. In the event that changes are required, the council will need to choose either to:

- do so and progress directly to publication
- OR
- produce and consult on a revised preferred strategy.

The latter may be appropriate where the changes to the DPD bring in changed policy or proposals not previously covered in community participation and the sustainability appraisal. It avoids having to treat publication as if it were a consultation, which it is not. It also provides insurance in relation to compliance with the Strategic Environmental Assessment Regulations. Legally, during any participation on a revised preferred strategy, you should:

- comply with the requirements of the SCI
- update the sustainability appraisal report.

The council should then produce the DPD in the form in which it will be published. This includes removing material dealing with the evaluation of alternatives and the finalisation of the text. The council should be happy to adopt the DPD in this form, and satisfied that it is sound and fit for examination.

The six weeks publication period is the opportunity for those dissatisfied (or satisfied) with the DPD to make formal representations to the inspector about its soundness. Only people proposing a change to the plan can expect to be heard at examination.

The possibility of change under certain circumstances (which should be exceptional) is allowed for in the new procedures, and is described in 'stage five: submission'.

Stage four: Publication

Activity	Statutory requirement	Guidance reference	Additional notes	Evidence Base	(Possible) Evidence – outline points and references only
1. Have you prepared the sustainability appraisal report?	The Act section 19(5) Regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004 No 1633	NPPF paras 32 SEA Guide Chapter 5		Sustainability appraisal report	Yes, the SA process has been conducted from the outset of LP preparation.
2. Have you made clear where and within what period representations must be made?	Regulation 17, 19, 20 and 35		The period must not be less than 6 weeks from when you publish under Regulations 19 and 35 (see below).	i. Report or record of decisions ii. The statement of community interest	The representations period is recorded in the SADC Consultation Portal. This process has also been set out within the <i>Regulation 22 Statement</i> .
3. Have you made copies of the following available for inspection: <ul style="list-style-type: none">the proposed submission	Regulation 19(a)		Regulation 17 gives definitions.	i. Copies of the relevant statements ii. Report on where and when	The publication documents are recorded in the SADC website. Copies of the LP were available for inspection at deposit points (parish councils, libraries, Council Offices)

Activity	Statutory requirement	Guidance reference	Additional notes	Evidence Base	(Possible) Evidence – outline points and references only
documents? <ul style="list-style-type: none"> the statement of the representations procedure? 				made available iii. Record of where and when made available	Details of the consultation process have been set out in the <i>Regulation 22 Statement</i> .
4. Have you published on your website: <ul style="list-style-type: none"> the proposed submission documents? the statement of the representations procedure? statement and details of where and when documents can be inspected? 	Regulations 19 and 35		Regulations 2 and 17 give definitions.	Record of publication	Yes, all documentations were made available on the Council's website; https://www.stalbans.gov.uk/planning/Planningpolicy/library/ And consultation made available on the councils website; https://stalbands-consult.objective.co.uk/portalplanning_policy/localplan2018regulation19/lp2018r19
5. Have you sent to each of the specific consultation bodies invited to make representations under Regulation 18(1): <ul style="list-style-type: none"> A copy of each of the proposed submission 	Regulation 19(b)		Regulations 2 and 17 give definitions.	i. Copies of correspondence ii. Record of sending	Yes – letters/emails were sent to all consultees (including the specific and general bodies) that clearly identified where the documents could be inspected (including on-line) and how and when representations could be submitted.

Activity	Statutory requirement	Guidance reference	Additional notes	Evidence Base	(Possible) Evidence – outline points and references only
documents <ul style="list-style-type: none"> The statement of the representations procedure? 					<p>Full detail of how the Local Plan was consulted upon is set out in the Council's <i>Regulation 22 Statement</i>.</p> <p>The Local Authority has maintained a consultation spreadsheet and consultation database.</p>
<p>6. Have you sent to each of the general consultation bodies invited to make representations under Regulation 18(1):</p> <ul style="list-style-type: none"> the statement of the representations procedure? where and when the documents can be inspected? 	Regulation 19(b)		Regulations 2 and 17 give definitions.	<p>i. Copies of correspondence</p> <p>ii. Record of sending</p>	<p>Yes – letters/emails were sent to all consultees (including the specific and general bodies) that clearly identified where the documents could be inspected (including on-line) and how and when representations could be submitted.</p> <p>Full detail of how the Local Plan was consulted upon is set out in the Council's <i>Regulation 22 Statement</i>.</p> <p>The Local Authority has maintained a consultation spreadsheet and consultation database.</p>
7. Have you requested the opinion of the Mayor of London (if a London Borough or Mayoral DC)	<p>The Act section 24</p> <p>Regulation 21</p>		The request must be made on the day you publish the documents under	Copies of correspondence	Not applicable.

Activity	Statutory requirement	Guidance reference	Additional notes	Evidence Base	(Possible) Evidence – outline points and references only
on the general conformity of the DPD spatial development strategy?			Regulation 19(a) and a response must be made within six weeks from the request (Regulation 21).		

Stage five: Submission

At the submission stage, the council should receive and collate any representations made at publication stage. You don't have to report these representations to councillors but there may be requirements deriving from other legislation, Standing Orders or council procedures that must be considered. Or you might just think it is a good idea to report on it anyway.

If they are reported it should be on the facts of the representations made, not the results of a consultation process by the council. They should not be treated as a consultation or an opportunity to make changes or answer representations. NB: under the 2012 Regulations there is no longer any requirement to give notice by local advertisement.

You should ensure you are in legal compliance with the SCI, the Habitats Directive and the Strategic Environmental Assessment Directive in any additional work. Any formal publication of additional or changed matters would need to allow at least a six-week period for representations to be made.

There are different approaches that could be taken to changes. You should be satisfied that you remain fully compliant with the legal requirements if any changes are made (and any consequential effects on the DPD as a whole).

Apart from notification of the examination, this tool does not deal with the legal requirements that need to be followed after submission.

Stage five: Submission

Activity	Legal requirement	Guidance reference	Additional notes	Possible Evidence	(Possible) Evidence – outline points and references only
1. Has the DPD been prepared in accordance with the LDS? Does the DPD's listing and description in the LDS match the document? Have the timescales set out in the LDS been met?	The Act section 19(1)		The Act section 15(2) sets out the matters specified in the LDS. As at January 2013, no further matters are prescribed in the Regulations.	i. The LDS ii. Explanation of any changes from the milestones set out in the LDS iii. Relevant authority monitoring reports	The Plan is in the form described and on timetable in respect of the current published LDS.

Activity	Legal requirement	Guidance reference	Additional notes	Possible Evidence	(Possible) Evidence – outline points and references only
2. Has the DPD had regard to any sustainable community strategy for its area (like a county and district)?	The Act section 19(2)	NPPF para 35		<ul style="list-style-type: none"> i. The sustainable community strategy(ies) ii. Reference to sections of the DPD showing how regard has been had to them 	<p>The LP has had regard to, and is aligned with, the aims of the District and County level SCSs:</p> <p><i>St Albans and District Sustainable Community Strategy: Shaping our District together for 2021: Revised June 2009</i></p> <p><i>Hertfordshire 2021 A brighter Future (Hertfordshire Sustainable Community Strategy)</i></p>
3. Is the DPD in compliance with the SCI (where one exists)? Has the council carried out consultation as described in the SCI?	<p>The Act section 19(3)</p> <p>Regulation 22(1)(c)</p>		Before the SCI is formally amended to take into account the changes in the regulations, you may need to set out how the community engagement that you carried out met the regulations (as amended).	<ul style="list-style-type: none"> i. The SCI ii. The Regulation 22(1)(c) statement 	<p>All consultation has been carried out in accordance with the adopted <i>SCI</i>. Also see <i>Regulation 22 Statement</i>.</p> <p>Prior to formal submission, the Council has identified a small number of suggested Minor Modifications to the Plan – they are minor in nature and therefore no additional</p>

Activity	Legal requirement	Guidance reference	Additional notes	Possible Evidence	(Possible) Evidence – outline points and references only
					formal Regulation 19 consultation stage is required.
4. Have you identified and addressed any issues which are likely to have a significant impact on at least two planning areas. In doing so, have you co-operated with other local planning authorities, county councils where they are not a planning authority, LEPs, LNPs and the prescribed bodies in identifying and addressing any strategic cross-boundary issues If you have not agreed on the approach is there a justification?	The Act section 33A(1) and section 20(5)	NPPF paras 24 to 27	Under NPPF para 27, the plan should be based on effective joint working on cross-boundary strategic priorities to be found 'Effective'.	Statement identifying any strategic cross-boundary issues or impacts on county matters addressed in the document and explaining the approach taken to co-operate with the relevant bodies. Supporting correspondence and reports e.g. Memorandum of Understanding, shared and agreed evidence	The <i>DtC Statement</i> and <i>SWH Statement of Common Ground</i> set out key issues that will have an impact on at least two planning areas, and the approach taken to cooperate with the relevant bodies.
5. Has the DPD been subject to sustainability appraisal? Has the council provided a final report of the findings of the appraisal?	The Act section 19(5) Regulation 22(1)(a)	NPPF para 32 SEA Practical Guide, chapter 5		Sustainability appraisal report	Yes – DPD has been subject to a sustainability appraisal, and the council has provided a final report of its findings.
6. Is the DPD to be submitted consistent with national policy?	The Act section 19(2) and Schedule 8	NPPF para 35		i. Correspondence with PINS? ii. PAS Soundness self assessment checklist	Yes – the Council considers this LP is consistent with national policy.

Activity	Legal requirement	Guidance reference	Additional notes	Possible Evidence	(Possible) Evidence – outline points and references only
					Soundness self / external assessment is dealt with elsewhere in this document.
<p>7. Has the council published the prescribed documents, and made them available at their principal offices and their website?</p> <p>Has the council notified the relevant statutory and non-statutory bodies, and all persons invited to make representations on the plan?</p> <p>Does the DPD contain a list of superseded saved policies?</p>	<p>The Act section 20(2), 20(3) and 20(5)(b)</p> <p>Regulations 8 and 19</p>	NPPF para 35	Requirements relating to publication of the prescribed documents are listed later in this table.	<p>i. The documents prescribed at Regulation 22(1)</p> <p>ii. Relevant authority monitoring reports</p> <p>iii. Records of the actions undertaken (see below)</p>	<p>All submission requirements / document publication requirements are met and recorded on the SADC website.</p> <p>Notification of the relevant statutory consultees and all persons invited to make representations was undertaken at the Regulation 19 stage. Formal submission notification will be undertaken as soon as practicable during w/c 1 April 2019.</p> <p>Paragraph 1.2 clarifies that the submitted plan once adopted would replace the existing <i>District Local Plan</i></p>

Activity	Legal requirement	Guidance reference	Additional notes	Possible Evidence	(Possible) Evidence – outline points and references only
					<i>Review 1994</i> in full, in combination with 'made' Neighbourhood Plans and adopted Minerals and Waste Plans.
<p>8. Are there any policies applying to sites or areas by reference to an Ordnance Survey map or to amend an adopted policies map?</p> <p>If yes, have you prepared a submission policies map?</p>	Regulations 5(1) (b), 9 (1), 17 & 22(1)			<p>i. Submission policies map</p> <p>ii. Brief statement if a submission policies map is not required</p>	<p>Yes – a number of policies across the scope of this Local Plan make direct reference to Ordnance Survey data.</p> <p>Yes – a submission full Policies Map has been prepared to support the LP, referencing every policy which has a spatial component including designation of the green belt and site allocations for a range of land-uses such as residential and economic development.</p>
9. Is the DPD consistent with any other adopted DPDs for the area? If the DPD is intended to supersede any adopted development plan policies,	Regulation 8(3) and (4) Regulation		Development Plan is defined in Section 38 of the Act.	<p>i. The core strategy</p> <p>ii. Documents or reports demonstrating conformity</p>	Paragraph 1.2 clarifies that the submitted plan once adopted would replace the existing

Activity	Legal requirement	Guidance reference	Additional notes	Possible Evidence	(Possible) Evidence – outline points and references only
does it state that fact and identify the superseded policies?	8(5)				<i>District Local Plan Review 1994</i> in full, in combination with 'made' Neighbourhood Plans and adopted Minerals and Waste Plans.
10. Have you prepared a statement setting out: <ul style="list-style-type: none"> Which bodies and persons were invited to make representations under Regulation 18? How they were invited? A summary of the main issues raised? How the representations have been taken into account? 	The Act section 20 (3) Regulation 22(1)(c)		This will bring forward material from the Consultation statement (see Stage 2 above).	i. Consultation statement ii. The Statement as required in Regulation 22(1)(c)	These are fully reported in the Council's <i>Regulation 22 Statement</i> .
11. Have you prepared a statement giving: <ul style="list-style-type: none"> the number of representations made under Regulation 22? a summary of the main issues raised? OR <ul style="list-style-type: none"> that no representations were made? 	The Act section 20(3) Regulation 22(1)(c)			The Statement as required in Regulation 22(1)(c)	These are fully reported in the Council's <i>Regulation 22 Statement</i> which further sets out how representations have been taken account of.

Activity	Legal requirement	Guidance reference	Additional notes	Possible Evidence	(Possible) Evidence – outline points and references only
12. Have you collected together all the representations made under Regulation 28?	The Act section 20(3) Regulation 22(1)(e)			Copies of representations	See submission documents. All full representation documents are also recorded and publically accessible in the SADC Consultation Portal. See sections above
13. Have you assembled the relevant supporting documents?	The Act section 20(3) Regulation 22(1)(g)			All necessary evidence and records of decisions relevant to the DPD	See submission documents and <i>Document Library</i> . See sections above
14. Has your council approved the DPD for submission?			Check the LPA's constitution/standing orders for the authorisation process appropriate for the type of DPD.	Report and resolution of the appropriate council body	Decision of SADC Cabinet March 2019. The decision report and minutes are publically accessible on the SADC website.
15. Have you sent the Secretary of State (the Planning Inspectorate) both a paper copy and an email of the following: <ul style="list-style-type: none">the DPD?the submission policies map (unless there are no site	The Act section 20(1) and 20(3) Regulations 22(1) and 22(2)		Regulation 35 deals with the availability of documents and the time of their removal. Electronic copies of some of the representations and supporting documents may not be practicable.	i. Record of sending ii. Reasons why documents cannot be sent electronically	Paper and electronic copies of the required documentation has been sent to the Planning Inspectorate, and have been made available on the website.

Activity	Legal requirement	Guidance reference	Additional notes	Possible Evidence	(Possible) Evidence – outline points and references only
allocation policies)? <ul style="list-style-type: none"> the documents prescribed in Regulation 22(1)? 			Regulation 35 deals with the availability of documents and the time of their removal.		
16. Have you made the following available at the same places where the proposed submission documents were to be seen: <ul style="list-style-type: none"> The DPD? The documents prescribed in Regulation 22(1)? 	Regulation 22(3)		You should do this as soon as reasonably practicable after submission.	Record of where and when made available	Yes – letters/emails were sent to all consultees (including the specific and general bodies) that clearly identified where the documents could be inspected (including on-line) and how and when representations could be submitted.
17. On your website, have you published the: <ul style="list-style-type: none"> DPD? submission policies map? sustainability appraisal report? Regulation 22(1)(c) statement? supporting documents (where practicable) ? representations made under Regulation 20 (where practicable) ? statement as to where and 	Regulation 22(3) and 35(1)(b)		You should do this as soon as reasonably practicable after submission.	Record of publication	Yes – All documentation has been made available on the website.

Activity	Legal requirement	Guidance reference	Additional notes	Possible Evidence	(Possible) Evidence – outline points and references only
when the DPD and the documents are available?					
<p>18. For each general consultation body invited to make representations under Regulation 18(1), have you sent:</p> <ul style="list-style-type: none"> notification that the documents prescribed in Regulation 22(3)(a)(i)-(iii) are available for inspection where and when they can be inspected? 	Regulation 22(3)(b)		You should do this as soon as reasonably practicable after submitting to the Secretary of State.	<ul style="list-style-type: none"> i. Copies of correspondence ii. Record of sending 	Yes – letters/emails were sent to each general consultation body that clearly identifies where the documents could be inspected (including on-line).
19. Have you given notice to persons who have requested to be notified that submission has taken place?	Regulation 22(3)(c)		You should do this as soon as reasonably practicable after submitting to the Secretary of State.	<ul style="list-style-type: none"> i. Copies of correspondence ii. Record of sending 	Yes – letters/emails were sent to all persons who have requested to be notified.
<p>20. If an examination is being held, at least six weeks before its opening has the Programme Officer:</p> <ul style="list-style-type: none"> published the time and place of the examination and the name of the person appointed to carry out the examination on your website? notified those who have made representations on the published DPD which have not 	<p>The Act section 20</p> <p>Regulations 24 and 35</p>			<ul style="list-style-type: none"> i. Record of publication of information ii. Record of sending iii. Copies of correspondence iv. Copy of advertisement 	

Activity	Legal requirement	Guidance reference	Additional notes	Possible Evidence	(Possible) Evidence – outline points and references only
been withdrawn of these details?					

List of Sources of Information / References (with web links)

1. The Planning Inspectorate (PINS) 'Procedural Practice in Examination of Local Plans June 2016 (4th Edition V1) [PINS guidance](#)
2. SADC Planning Policy web pages [St Albans City & District Council - Spatial Planning & Design \(Planning Policy\)](#)
3. SADC Planning Policy Local Plan Document Library [St Albans City & District Council - Evidence base library contents](#)
4. SADC Consultation Portal (Local Plan sections) [St Albans District Council - Consultation Home](#)
5. Local Plan SADC Committee papers (Planning Policy Committee – PPC) See below, which includes a Quick Reference Guide [St Albans City & District Council - Browse meetings - Planning Policy Committee](#)