

Matter 1 – Legal Compliance

Issue 2 – Public Consultation

Q1 Has public consultation been carried out in accordance with the Council's Statement of Community Involvement, the Framework, the PPG and the requirements of the 2004 Act and 2012 Regulations?

1.1 Yes, public consultation has been carried out in accordance with the Council's Statement of Community Involvement, the NPPF, the NPPG and the legislative and regulatory requirements.

1.2 Section 19(3) of the Planning and Compulsory Purchase Act 2004 (as amended) states that:

In preparing the local development documents (other than their statement of community involvement) the authority must also comply with their statement of community involvement.

1.3 Paragraph: 034 Reference ID: 61-034-20190315 of the National Planning Policy Guidance says that:

Authorities preparing local plans should assess future needs and opportunities for their area, explore and identify options for addressing these, and then set out a preferred approach (except where this has already been dealt with through a spatial development strategy). This involves gathering evidence, carrying out a Sustainability Appraisal to inform the preparation of local plans and effective engagement and consultation with local communities, businesses and other interested parties.

There is considerable flexibility open to local planning authorities in how they carry out the initial stages of local plan production, provided they comply with the specific requirements in regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, ('the Local Plan Regulations') on consultation, and with the commitments in their Statement of Community Involvement. It is important to make clear how any consultation fits within the wider local plan process.

1.4 Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 states that:

"A local planning authority must notify [such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan; such of the general consultation bodies as the local planning authority consider appropriate; and such residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations]; of the subject of a local plan which the local planning authority propose to prepare, and invite each of them to make

representations to the local planning authority about what a local plan with that subject ought to contain. In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under [the above]”.

- 1.5 Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 states that:

“Before submitting a local plan to the Secretary of State under section 20 of the Act, the local planning authority must make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with regulation 35, and ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation 18.”

- 1.6 The Environmental Assessment of Plans and Programmes Regulations 2004 contain equivalent regulations on the consultation of the draft Plan and its Environmental Report (the Sustainability Appraisal Report).
- 1.7 St Albans and City District Council (SADC) adopted its current Statement of Community Involvement (SCI) in February 2023. It sets out how SADC will consult on the emerging Local Plan and when.
- 1.8 Paragraph 4.5 of the SCI states that:

There are two key stages of community consultation in the Local Plan Regulations:

- Plan preparation (Regulation 18 consultation) – At this stage, the Council will invite representations about what the Local Plan ought to contain for a minimum of six weeks.*
- Plan publication (Regulation 19 consultation) – This is a statutory stage. At this stage, the Council will publish a full draft Local Plan which it intends to submit to the Planning Inspectorate for Examination in Public. Representations will be open for a minimum of 6 weeks for all stakeholders. At this stage, the consultation will focus on if the proposed local plan is legally compliant, sound in line with the National Planning Policy Framework and complies with the Duty to Cooperate.*

- 1.9 Paragraph 4.7 of the SCI sets out the consultation methods that SADC will use when consulting on the emerging Local Plan. The table below summarises how the consultation methods set out in the SCI have been used at the Regulation 18 and Regulation 19 stages of preparation of the emerging Local Plan.

Consultation method stated in the SCI	How the consultation method was used at the Regulation 18 stage	How the consultation method was used at the Regulation 19 stage
<p>Making documents and staff available to assist</p> <p>- All documents associated with a DPD will be available for inspection online at: https://www.stalbans.gov.uk/planning-policy. Our staff in the Spatial Planning Team responsible for this work can be contacted via email (planning.policy@stalban.s.gov.uk) or via telephone (01727 866100). The Council will regularly review and update the Planning Policy pages of our website</p>	<p>SADC consulted between 12 July and 25 September 2023 on a full draft version of the Local Plan (including a full Spatial Strategy, Site Allocations and Development Management policies) that combined the updated evidence base, and technical assessments.</p> <p>Paper copies of consultation material was issued to all libraries in the District as well as specific libraries in Dacorum and Hertsmere) and at the Civic Centre.</p> <p>Staff could be contacted by phone or e-mail for queries, or at the Civic Centre.</p> <p>Staff were also available at exhibitions (details below).</p> <p>Subsequent to the close of the formal consultation period, all documents remained on the Council's website, with new evidence being uploaded when it was presented to SADC's Planning Policy and Climate Committee.</p>	<p>SADC published the Regulation 19 Draft Local Plan on 26 September 2024. The period for making representations on the Regulation 19 Draft Local Plan ran from 26 September to 8 November 2024.</p> <p>The draft Local Plan and associated documents were available for inspection (online, in the Council's Civic Centre and in each of the public libraries in the District as well as Hemel Hempstead, Leverstock Green and Radlett libraries in neighbouring districts).</p> <p>Staff could be contacted by phone or e-mail for queries, or at the Civic Centre.</p> <p>Subsequent to the close of the formal consultation period, all documents remained on the Council's website.</p>
<p>Early stakeholder engagement - The Council may conduct</p>	<p>As part of the Duty to Co-operate the Council engaged with strategic</p>	<p>A further Call for Sites for Gypsy and Traveller</p>

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early outreach on topics that will influence a DPD. For example, a review of Green Belt land that will inform the Local Plan and Joint Strategic Plan or exploring cross boundary issues with neighbouring local authorities. It may be necessary to engage with landowners and developers as well as local amenity or specialist interest groups and affected parish councils too.	<p>partners throughout the plan making process. Further details can be found in the Council's response to Matter 1 Issue 2, and in the Duty to Co-operate Statement of Compliance (LPCD 06.01).</p> <p>A Call for Sites with local stakeholders and landowners took place between 25 January 2021 and 8 March 2021. The outcomes of this exercise informed the preparation of the Housing And Economic Land Availability Assessment (HELAA) Report (HELAA 01.01).</p>	sites was carried out in the summer of 2024.
<p>Making documents associated with a DPD available to the public during statutory consultation stages –</p> <p>The Council will place all documents on the Council's "Objective" web based consultation portal. You can register on the consultation portal here: https://stalbands-consult.objective.co.uk/portal/ by selecting Login/Register at the top of the page. The portal offers the best opportunity to get the most up to date information and can be accessed from anywhere at any time. The Council will also put consultation documents at the Civic Centre in St Albans and</p>	<p>All consultation documents were made available via the Council's website (https://www.stalbans.gov.uk/draft-local-plan-2041-regulation-18-consultation-closed) and the Objective web based consultation portal (https://stalbands-consult.objective.co.uk/kse/event/37561).</p>	<p>All consultation documents were made available via the Council's website (https://www.stalbans.gov.uk/draft-local-plan-publication) and the Objective web based consultation portal (https://stalbands-consult.objective.co.uk/kse/event/42CC50BC-5FAD-4ED5-B011-F564B3AD5F24).</p>

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<p>in libraries across the district. This will only happen outside of COVID-19, when it is safe to do so. It may be necessary to book appointments for public viewing of these documents.</p>		
<p>Publicising DPD consultations – The Council will go over and above the minimum publicity in the Local Plan 2012 Regulations, which require documents to be made available for public inspection and published on the Councils' website. The Council will consider innovative methods such as making use of online engagement including the use of social media as appropriate such as platforms like Twitter and Facebook. This is to enable a wider demographic to be reached. The Council will also place all documents on the Council's "Objective" web based consultation portal (details set out above). The Council will also issue press releases, as appropriate. These will be aimed at varied sources, for example local newspapers (e.g. the St Albans Review and the Herts Advertiser); local radio (e.g. BBC Three Counties, Heart Radio, Jack FM); TV stations</p>	<p>The Council consulted between 12 July and 25 September 2023 on a full draft version of the Local Plan (including a full Spatial Strategy, Site Allocations and Development Management policies) that combined the updated evidence base, and technical assessments. The consultation included the following required features:</p> <ul style="list-style-type: none"> • The SADC website was used as the primary method of presenting the consultation materials. These comprised of the draft Local Plan and its appendices along with a 3 minute explanatory video, a brief online survey, a link to the detailed online portal (Objective) for more detailed responses, and a Frequently Asked Questions document. There were also links to 	<p>The Council published the Regulation 19 Draft Local Plan under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 on 26 September 2024. The period for making representations on the Regulation 19 Draft Local Plan ran from 26 September to 8 November 2024.</p> <p>All persons and parties notified at the Regulation 18 stage were invited to make representations on the Regulation 19 Draft Local Plan. The letter/e-mail sent to each person or party formed the statement of representations procedure and a statement of the fact that the draft Local Plan and associated documents were available for inspection (online, in the Council's Civic Centre and in each of the public libraries in the District as well as Hemel Hempstead, Leverstock Green and Radlett libraries in neighbouring</p>

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<p>and magazines (e.g. Hertfordshire Life). The Council will also, as appropriate, include publicity about the DPD in our Council newsletter 'Community News' which is delivered to over 58,000 homes in the District.</p>	<p>SADC evidence documents, for example, the Green Belt Review. Paper copies of the consultation documents were available at the public exhibitions.</p> <ul style="list-style-type: none"> Email notifications were sent on 12 July to all statutory consultees, stakeholders and interested parties already registered for online consultation; in total approximately 3,000 notifications were sent. <p>The engagement was digitally led and employed a range of tools and approaches to raise awareness and increase response rates to the consultation material, including:</p> <ul style="list-style-type: none"> A 3 minute video; A short 6 question survey; A social media based campaign, supported by the short video; Online portal (Objective) to facilitate detailed responses; Paper copies of consultation material issued to all libraries (including specific libraries in Dacorum 	<p>districts). The letter/e-mail also set out how representations could be made on the Regulation 19 Draft Local Plan.</p> <p>The engagement was digitally led and employed a range of tools and approaches to raise awareness and increase response rates to the consultation material, including:</p> <ul style="list-style-type: none"> Posting details of the consultation on the Council's Facebook feed (reaching 5,400 followers and beyond) Online portal (Objective) to facilitate detailed responses; An article in the St Albans Community News newsletter; A press release.

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	<p>and Hertsmere) and at the Civic Centre</p> <ul style="list-style-type: none"> • Direct notification emails (and a small number of letters) to all key consultation bodies listed in the Statement of Community Involvement, plus other groups and individuals on the SADC consultation database • Articles in newsletters; • Press releases; • Prominent wording on SADC website homepage; • An updated 'Frequently asked Questions' on the Councils website. Social Media and Online Video <p>The Local Plan video was available to view on YouTube directly or through a link on the Council's website and as part of a Facebook campaign. On YouTube, (in total), the video was viewed 2,214 times. The video has been 'liked' nine times. There were no 'dislikes'.</p> <p>On Facebook, the video had a 'reach' of over 28,000 people (number of unique people who</p>	

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	were offered the video in their Facebook feeds).	
<p>Public exhibitions – The Council will hold public exhibitions to further allow local people to comment on the DPD. This will only happen outside of COVID-19, when it is safe to do so. The Council will also consider holding virtual consultation events.</p>	<p>In line with the Council's Statement of Community Involvement the consultation included a series of exhibitions where Spatial Planning staff were on hand to explain what the Local Plan was about and guide stakeholders and residents in understanding the draft Plan and its evidence base, as well as how to make comments. A variety of materials were available, including the Exhibition Boards (https://www.stalbans.gov.uk/sites/default/files/attachments/A1%20Info%20Boards%20-%20web%20version.pdf), large format copies of the Policies Map, and the 'call for sites' maps.</p> <p>The exhibitions were held at:</p> <ul style="list-style-type: none"> • Colney Heath - Colney Heath Village Hall, 83 High Street, AL4 0NS - Saturday 2 September 2pm - 8pm • Redbourn - Redbourn Parish Centre, The Park, AL3 7LR - Monday 4 September 2pm - 8pm 	<p>In line with the Council's Statement of Community Involvement the consultation included two exhibitions. Given the more formal nature of the Regulation 19 stage, these exhibitions were unstaffed.</p> <p>The exhibitions took place at the St Albans Civic Centre between 7 October to 18 October, and 28 October to 7 November 2024.</p> <p>Copies of all consultation documents were also available to view at the same location throughout the consultation period (including the exhibition dates).</p>

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	<ul style="list-style-type: none"> • Bricket Wood - The Parish Centre, Station Road, AL2 3PJ <ul style="list-style-type: none"> - Wednesday 6 September 2pm - 8pm • Wheathampstead – Wheathampstead Memorial Hall, Marford Road, AL4 8AY <ul style="list-style-type: none"> - Thursday 7 September 2pm - 8pm • Leverstock Green – Leverstock Green Village Hall, Hemel Hempstead, HP3 8QG <ul style="list-style-type: none"> - Friday 8 September 2 pm – 8 pm • St Albans - District Council Offices, Civic Centre, AL1 3LD <ul style="list-style-type: none"> - Monday, 11 September 2pm - 8pm • Sandridge - Marshalswick Community Centre, The Ridgeway, AL4 9TU <ul style="list-style-type: none"> - Tuesday 12 September 2pm - 8pm • Harpenden - The Restaurant, Rothamsted Enterprises, West Common, Harpenden, AL5 2JQ <ul style="list-style-type: none"> - Wednesday 13 September 2pm - 8pm 	

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	<ul style="list-style-type: none"> • London Colney - Caledon Community Centre, 29 Caledon Rd, AL2 1PS <ul style="list-style-type: none"> - Thursday, 14 September 2pm - 8pm • Harpenden - Youth Council session Young People's Centre above the Library <ul style="list-style-type: none"> - Monday, 18 September 18:30 – 20:30 	
<p>Reporting feedback received - The Spatial Planning Team will report the views and comments expressed during consultation to relevant committees, which will include the Council's Local Plan Advisory Group. Its meetings are open to the public. It will also produce consultation reports in line with the Local Plan Regulations 2012 which will be made available on the Council website.</p>	<p>Following conclusion of the consultation carried out under Regulation 18, comprehensive reports on the outcomes of the consultation were prepared and presented to the Council's Planning Policy and Climate Committee responsible for the Local Plan. These reports went to the Planning Policy and Climate Change Committee on the 14 November 2023 (https://stalbands.modern.gov.co.uk/ieListDocuments.aspx?CId=615&MId=10819&Ver=4) and 12 December 2023 (https://stalbands.modern.gov.co.uk/ieListDocuments.aspx?CId=615&MId=10820&Ver=4) and set out a summary of responses made during the consultation.</p> <p>All responses to the Regulation 18 consultation can be found on the Council's</p>	<p>Following conclusion of the consultation carried out under Regulation 19 a report on the outcomes of the consultation was prepared and presented to SADC's Planning Policy and Climate Committee. This report went to the committee on the 28 November 2024 (https://stalbands.modern.gov.co.uk/documents/s50070586/PPC%2028%20November%202024%20-%20Local%20Plan%20Regulation%2019%20Publication.pdf).</p> <p>Further details on the responses to main issues were included in an update to the Statement of Participation published as <i>SADC Response to Inspectors' Question Paragraph 8</i> on 5 March 2025 (https://www.stalbands.gov.uk/sites/default/files/attachments/Planning%20P</p>

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	Objective web based consultation portal at https://stalbands-consult.objective.co.uk/kse/event/37561/peoplesubmissions/ .	olicy/Exa/SADCED36%20Initial%20Questions%20-%20Paragraph%208.pdf) . All responses to the Regulation 19 consultation can be found on the Council's Objective web based consultation portal at https://stalbands-consult.objective.co.uk/kpse/event/42CC50BC-5FAD-4ED5-B011-F564B3AD5F24/peoplesubmissions .

Q2 How has the Council taken into account representations made in response to public consultation?

- 2.1 Following the conclusion of the consultation carried out under Regulation 18, comprehensive reports on the outcomes of the consultation were prepared and presented to the Council's Planning Policy and Climate Committee, which is responsible for the Local Plan. These reports went to the Planning Policy and Climate Change Committee on the 14 November 2023 (<https://stalbands.moderngov.co.uk/ieListDocuments.aspx?CId=615&MId=10819&Ver=4>) and 12 December 2023 (<https://stalbands.moderngov.co.uk/ieListDocuments.aspx?CId=615&MId=10820&Ver=4>) and set out a summary of responses made during the consultation.
- 2.2 These reports identified the main and other issues raised during the Regulation 18 consultation. The Council's response to the main issues is set out in Section 4 of the Local Plan Reg 22(c) Statement of Participation (2024) (LPCD 05.01).
- 2.3 All changes made following the Regulation 18 consultation (other than minor typographical corrections) were presented to the Council's Planning Policy and Climate Committee alongside the draft Regulation 19 Local Plan on 23 September 2024 (<https://stalbands.moderngov.co.uk/documents/s50069599/Regulation%2019%20Cover%20Report.pdf>, <https://www.stalbans.gov.uk/sites/default/files/attachments/Planning%20Policy/Reg%2019%20Local%20Plan%20PART%20A%20-%20trk%20chgs.pdf> and <https://www.stalbans.gov.uk/sites/default/files/attachments/Planning%20Policy/Reg%2019%20Local%20Plan%20Part%20B%20-%20trkd%20chgs.pdf>).
- 2.4 Following the conclusion of the consultation on the Regulation 19 draft Local Plan, the Council reviewed all representations made and reported them to the Council's Planning Policy and Climate Committee on 28 November 2024 (<https://stalbands.moderngov.co.uk/documents/s50070586/PPC%2028%20November%202024%20-%20Local%20Plan%20Regulation%2019%20Publication.pdf>).
- 2.5 The Council has also considered whether potential modifications to the Plan, necessary solely for soundness, may be required. An update to Section 6 of the Local Plan Reg 22(c) Statement of Participation (2024) (SADC Response to Inspectors' Question Paragraph 8) (SADC/ED36) detailed where potential main modifications may be required in association with the main issues raised.