

St Albans City & District Council Local Plan Examination

Historic England Regulation 19 Response and Resulting Proposed Plan Main Modifications

No.	Page	HE Recommendation (Summarised)	Result following Discussions with HE	Proposed Main Modification (MM)
1	2	General Part B: Policy wording for site allocations should incorporate HIA recommendations and be clearer, stronger and more specific.	Agreed no change required for soundness. Noted that Part A Policies LG1 q) and LG4 o), plus specific requirements identified in Part B on a site by site basis, generally suffice in this regard.	No change
2	2-3	General Part B: The criteria are also quite vague and rather weak ... We recommend two slight changes to policy wording throughout the Plan which would address this: i) Instead of minimise harm we would recommend minimise any harm <u>conserve and where appropriate enhance to the setting and significance of the...</u> [list assets] ii) We would recommend amending `may' to read `should include setbacks etc'.	Agreed no change required for soundness. Noted that the Council are seeking to minimise harm while also acknowledging that there will be some cases where a limited amount of harm may be caused which has to be balanced against other factors; and that at this stage the exact nature of mitigation / degree of set back is not fully known as that would only become clear during more detailed design work.	No change

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3	3	DES6 / Figure 12.1: Include a number of additional key viewpoints around the city and include these in the Review document. The map should also be amended accordingly. In addition, we have suggested some changes to the policy wording itself.	Agreed Modification Way forward agreed – inclusion of Sopwell Priory (Sopwell Nunnery), Bacons Mound and Gorhambury Estate Drive viewpoints. Agreed that it is not necessary to add the other suggested additional viewpoints (see more detail at Row No. 10 below)	Sopwell Priory, Bacons Mound and Gorhambury Estate Drive viewpoints to be added to Figure 12.1; and additional Viewpoint Review Sheets submitted in Evidence (equivalent of those for other viewpoints found in EDH 04.09 - Heritage Impact Assessment Building Height Control Area Viewpoint Review (2024).pdf)

4	3	Site M3 – Bedmond Lane: In the absence of additional archaeological assessment, we recommend that this site should be deleted.	Way forward not currently agreed <u>Council position:</u> The Council consider that KDR 4 (no new buildings in the most sensitive northern third of the site) would provide the required protection, and that even with reduced capacity the site would still be strongly viable, which the landowners have recently reconfirmed. The Council have passed on HE's comments to the site promoters and note that further archaeological investigation has now been carried out. <u>Historic England position:</u> While the recent archaeological investigation referenced above is helpful, its scope is too limited and does not adequately address the potential for burials or human remains – which remains our principal concern for this site. On this basis, we are not persuaded that even partial development of the site is justified. Therefore, based on the current understanding, we consider the allocation to be unsound. Further details of Historic England's position are set out in Matter 7 – Residential Site Allocations Issue 1 – St Albans Site Allocations Historic England,	No change
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			Hearing Statement September 2025, including: Recommended Modification: To make the Plan sound, we recommend that Policy M3 be removed from the allocation unless and until further appropriate field evaluation is undertaken to determine the presence and significance of archaeological remains, particularly Roman burials. This evaluation should be sufficiently broad in scope to assess the entire site, not just the conjectured Roman road route.	
5	4	HGC - Figure 3.2: appropriate protection of farmsteads / appropriate protection and enhancement of heritage assets	Agreed no change required for soundness. Agreement that existing Part B KDRs and proposed Main Modification (for next item) suffice	No change
6	4	HGC - Policy LG3: additional criterion	Agreed Modification	Additional criterion under LG3 Pillar 2 - Integrated Neighbourhoods: <i>To enable the transformation of Hemel Hempstead, the design and delivery of HGC Growth Areas within the Hemel Garden Communities Programme Area must to [sic] adhere to the following requirements:</i> ... <i><u>n) Provide protection and enhancement of heritage assets and their settings as appropriate, through sensitive masterplanning of the site;</u></i>

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7	5	HE2 / Appendix: The Plan should include criteria for the local designation.	Agreed no change required for soundness. Noted there is text setting out the process of local listing at https://www.stalbans.gov.uk/locally-listed-buildings .	No change
8	5	HE8 / para 11.29: Typo from, not form.	Agreed minor change	Changing 'form' to 'from' in 11.29 as a minor modification.
9	5	HE8 and Footnote 27: We also recommend including reference to our new Historic England Advice Note 18	Agreed no change required for soundness. Noted that the footnote 27 link links to the HE landing page, where latest guidance including HEAN 18, and future guidance, would be available.	No change
10	6-7, 8	DES6 / Figure 12.1: We suggest that a number of other views should also be considered.	Agreed Modification Way forward agreed – inclusion of Sopwell Priory (Sopwell Nunnery), Bacons Mound and Gorhambury Estate Drive viewpoints. Agreed that it is not necessary to add the suggested additional viewpoint at The Roman Theatre in the Gorhambury Estate, due to issues in gaining access and noting that the Gorhambury Estate Drive viewpoint is adjacent and would provide similar views. Having checked on site the other suggested viewpoints (Wheathampstead and amended viewpoint E), agreement no change required.	Sopwell Priory, Bacons Mound and Gorhambury Estate Drive viewpoints to be added to Figure 12.1; and additional Viewpoint Review Sheets submitted in Evidence (equivalent of those for other viewpoints found in EDH 04.09 - Heritage Impact Assessment Building Height Control Area Viewpoint Review (2024).pdf)

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11	7	DES6: should also refer to the need for applicants to demonstrate and quantify the potential harm of proposals for the significance of heritage assets.	Agreed no change required for soundness. The Policy is in the more general 'Design' chapter; the SADC position is that the policy protections in chapter 11 would secure appropriate protection to the settings of the heritage assets in the above views.	No change
12	7	The policy should refer to the importance of kinetic views.	Agreed Modification in supporting text	12.21 St Albans city centre sits on a hill adjacent to the Ver valley which allows for long-distance views of the historic city and its skyline. While the St Albans Cathedral dominates, there are other landmarks which punctuate the skyline, and the traditional clay and slate pitched roofs create a varied and interesting roofscape. <u>The views of the roofscape can be particularly appreciated while moving (termed 'kinetic' views).</u> St Albans has a Building Height Control Area (BHCA) that protects these important characteristics of the city, which also contribute to the significance of the St Albans Conservation Area, St Albans Abbey and the other identified heritage assets...
13	8-9	H1: Amend KDR 16 (along the lines of Row No. 2 above)	Agreed no change required for soundness. (See Row No. 2 above)	No change
14	9	H2: Amend KDR 17 (along the lines of Row No. 2 above)	Agreed no change required for soundness. (See Row No. 2 above)	No change
15	9-10	H3: Amend KDR 20 (along the lines of Row No. 2 above)	Agreed no change required for soundness. (See Row No. 2 above)	No change
16	10	H4: Amend KDR 19 (along the lines of Row No. 2 above)	Agreed no change required for soundness. (See Row No. 2 above)	No change

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17	11-12	B3: Incorporate additional requirements into KDR 5	Agreed no change required for soundness. Noted that KDR 5 plus the relevant policy in chapters 3, 11 and 12 of Part A would provide an appropriate degree of protection.	No change
18	12	B6: Make KDR 7 more specific and reflect the recommendations of the HIA.	Agreed no change required for soundness. Noted that KDR 7 plus the relevant policy in chapters 3, 11 and 12 of Part A would provide an appropriate degree of protection.	No change
19	13	L1: Make it clear that development in the western part of the site and eastern part left open to protect setting of the Listed Building	Agreed no change required for soundness. Noted that KDR 4 plus the relevant policy in chapters 3, 11 and 12 of Part A would provide an appropriate degree of protection.	No change
20	13	L2: potential to impact the Park Street and Frogmore Conservation Area through a change in its setting, and HA recommends linear form of development (along Roman Road); this should be reflected in the policy wording.	Agreed no change required for soundness. Noted that the HIA states that the proposed Allocation is unlikely to affect the setting, and thereby significance, of the Park Street and Frogmore Conservation Area; and the HIA recommendation for linear form of development would need to be addressed in an application as a result of LG4 o)	No change
21	14	M1a: reference the Conservation Area	Agreed no change required for soundness. (Draft Reg 18 allocation removed for Reg 19)	No change
22	14-15	M2: An approximately 60-40 split between development and open land (with 40% of site being left open at eastern end), and funding for improved management of the monument, should be included in the policy.	Agreed no change required for soundness. Noted that KDR 4 plus the relevant policy in chapters 3, 11 and 12 of Part A would provide an appropriate degree of protection.	No change

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23	15-16	M3: Recommend deletion, on the basis of the current understanding of the site, unless further archaeological assessment is undertaken to inform suitability as an allocation.	Way forward not currently agreed [See Row 4 for SADC and HE positions]	No change
24	16	M6: The policy should be more specific and draw on the recommendations from the HA.	Agreed no change required for soundness. Noted that KDR 7 plus the relevant policy in chapters 3, 11 and 12 of Part A would provide an appropriate degree of protection.	No change
25	16-17	M8: HA recommendations in relation to the scheduled monument at Sopwell Nunnery should be included in the policy.	Agreed Modification	6. The site lies adjacent to the St Albans Conservation Area and <u>development of the site has the potential to impact on the setting of the Scheduled Monument at Sopwell Nunnery</u> ; development should minimise any harm to, and where possible enhance, the setting and significance of this these heritage assets.
26	17-18	M18: The policy should include the recommendations from the HA relating to the retention of open space to the north and west of the listed buildings with built form located to the northeast of the Site as well as an appropriate landscaping scheme.	Agreed no change required for soundness. Noted that KDR 3 plus the relevant policy in chapters 3, 11 and 12 of Part A would provide an appropriate degree of protection.	No change
27	18	M21: The policy should include the recommendations from the HA relating to setbacks from the northern and eastern edges of the site as well as high quality materials to affect the local distinctiveness of the area.	Agreed no change required for soundness. Noted that KDR 6 plus the relevant policy in chapters 3, 11 and 12 of Part A would provide an appropriate degree of protection.	No change

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28	21	UC6: Development of the site has the potential to impact on the significance of the listed building to the north of the site. We therefore recommend that an additional criterion is added to the policy.	Agreed Modification	Additional KDR: <i>3. The site lies to the south of the Grade II Listed No. 3 Sutton Road and development proposals should minimise any harm to, and where possible enhance, the setting and significance of this heritage asset.</i>
29	22	UC14: KDR 5 references the Conservation Area and Locally Listed buildings but currently no reference to the listed buildings. The policy should be amended to include this.	Agreed Modification	Amended KDR: <i>5. The site lies within Harpenden Conservation Area and close to a number of Listed and Locally Listed Buildings. Development proposals should minimise any harm to, and where possible enhance, the setting and significance of these heritage assets.</i>
30	23	UC19: KDR 2 should be amended as there are two locally listed buildings within the site which should be retained.	Agreed Modification	Amended KDR: <i>2. The site contains a two Locally Listed Buildings, which must be retained.</i>
31	25	UC35: Given the presence of the Roman cemetery and potential impacts this should also be included in the policy criterion.	Agreed no change required for soundness. <i>Noted that there doesn't appear to be a Roman cemetery in the vicinity which would constrain development of the site.</i>	No change
32	25	UC36: Criterion 3 states that the site lies adjacent to the Conservation Area when part of the site lies within the Conservation Area. Please amend the wording accordingly.	Agreed no change required for soundness. <i>Noted that the site as reduced for the Regulation 19 Plan appears to be adjacent to but just outside the Conservation Area boundary.</i>	No change
33	28	UC57: The policy should also discuss the issue of height.	Agreed no change required for soundness. <i>Noted that the LG4 o) requirement to address the HIA recommendations, plus the policy protections in Chapters 11 and 12, would provide an appropriate degree of protection.</i>	No change

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34	28-29	OS2: We recommend that a criterion is added to the policy to conserve and enhance the significance of the scheduled monument and reference to potential for contributions to improved management and promotion of the monument.	Agreed Modification	Additional KDR: <u>5. The site lies approximately 150m from Batch Wood Moated Manorial Site Scheduled Monument. Development proposals should minimise any harm to, and where possible enhance, the setting and significance of this heritage asset. Development proposals should also demonstrate how they will contribute to improved management and promotion of the monument.</u>
35	29	OS3: We recommend that an HA should be prepared for this site.	Agreed no change required for soundness. The SADC proforma HIA was acceptable, and existing KDR 4 would provide an appropriate degree of protection.	No change
36	29-30	OS4: Recommend additional KDR: <i>Development should be discreet and of high-quality design, with a maximum height of 2.5 storeys. Consideration should be given to both summer and winter views.</i>	Agreed no change required for soundness. Noted that KDRs 1 and 5 plus the relevant policy in chapters 3, 11 and 12 of Part A would provide an appropriate degree of protection.	No change