The Planning Inspectorate

Examination of the St Albans City and District Local Plan

Matthew Birkinshaw BA(Hons) Msc MRTPI

Thomas Bristow BA Msc MRTPI

Inspectors appointed by the Secretary of State

Date 29 August 2025

Updated 16 October 2025

Matters, Issues and Questions for Stage 2

Published v2

Contents

Update – 16 October 2025

Following comments by representors, the MIQs have been updated and the following questions added:

Matter 7 – Residential Site Allocations

Issue 2 – Harpenden and Hatching Green Site Allocations

Policy M20 – Lower Luton Road, Harpenden

Q1 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Q2 Is the allocation justified, effective and consistent with national planning policy, having particular regard to flooding and flood risk?

Introduction

Prior to the forthcoming Stage 2 hearing sessions, responses are invited from participants on the following Matters, Issues and Questions ('MIQs'). The MIQs are based on the Main Issues identified by the Council and other relevant issues raised by representors.

Further information about the examination, hearings and format of written statements is provided in the accompanying Examination Guidance Note, which should be read alongside the MIQs.

As set out in the Examination Guidance Note, the deadline for submitting hearing statements will be as follows:

- For Hearing Weeks 2 and 3 the deadline is **Friday 26 September 2025**.
- For Hearing Weeks 4 and 5 the deadline is **Friday 17 October 2025**.

In responding to the MIQs, participants should be aware of the additional information and 'suggested changes' published by the Council and consulted upon between 4 July and 22 August 2025. All the documents published for consultation are available on the Examination website.

Participants should also be aware that Matter 6, Issues 1-6 (strategic matters relating to the Hemel Garden Communities) will be a joint session held between St Albans City and District Council and Dacorum Borough Council. Thereafter, matters relating to individual site allocations will be discussed with each local authority separately for the remainder of the examination.

Matter 1 – Legal Compliance

Issue 1 – Sustainability Appraisal

1. In response to the Stage 1 hearing sessions, the Council produced new information which has been subject to public consultation (Examination Documents SADC/ED76-SADC/ED81B). Amongst other things, that information included 'suggested' changes to the Plan. Changes include both the addition of new sites and the deletion/modification of existing ones.

   Q1 Has the Council updated the SA to reflect the suggested changes? Does the SA assess the proposed changes and compare these against all reasonable alternatives?

Issue 2– Strategic Flood Risk Assessment

2. At the Stage 1 hearings, the Council committed to providing further clarity regarding site allocations and flooding. The Flood Risk Addendum – July 2025 (Examination Document SADC/ED77) reassesses sites subject to flooding. In summary, it proposes the deletion and/or modification of 9 allocated sites.

   Q1 How does the additional evidence consider surface water flood risks?

   Q2 Are the suggested changes necessary to make the submitted Plan sound?

   Q3 Subject to the suggested changes, is the Plan consistent with national planning policy insofar as flood risk avoidance and mitigation is concerned?

Issue 3– Public Sector Equality Duty

3. Policy SP4 'Housing' sets out that to provide good quality housing that meets the needs of all parts of society, the Council seeks to address the needs of 'Gypsies, Travellers and Travelling Show People'. The Plan's approach is informed principally by the 2024 Gypsy and Traveller Accommodation Assessment ('GTAA'), along with the Evidence Paper and Evidence Paper Addendum.

4. At the Stage 1 hearing sessions, the Council explained that it has undertaken further work following the Evidence Paper Addendum to assess the delivery potential of pitches and plots. The updated evidence was published in Examination Document SADC/ED79 and made available for consultation. It describes a potential capacity for 162 pitches against a need figure of 95 pitches to 2041.

Q1 Is the minimum requirement figure based on a robust, objectively assessed analysis of needs over the plan period? Is the Plan effective in identifying the pitch requirement and stating how those needs will be met?

Q2 What process did the Council follow in seeking to meet the identified needs referred to above? How were potential sites identified and was this process robust?

Q3 If the accommodation needs of 23 households (who were found in the GTAA not to meet the PPTS 2023 definition of gypsies and travellers) are intended to be met through 'bricks and mortar' accommodation, is that expressly accounted for in the Plan's housing requirement?

Matter 2 – Housing Growth and the Spatial Strategy

Issue 1– Housing Requirement

5. Following discussions at the Stage 1 hearing sessions, the Council accepted that the annual housing requirement should be applied across the full plan period from April 2024 to March 2041. It was also accepted that a recalibration of the stepped housing requirement was needed to reflect the most up-to-date position on predicted housing delivery and the forward trajectory.

Q1 How should the minimum housing requirement be reflected in the Plan to address these soundness matters? Is there a need for the housing requirement to feature in Policies SP1 and SP3?

To assist with the examination hearing sessions, it would be useful for the Council to produce a new housing requirement figure and trajectory to replace Table 3.2.

Issue 2– Site Selection Methodology

6. Natural England has confirmed that it is no longer pursuing an extension to the Chilterns National Landscape (formerly referred to as the AONB). The potential extension of the AONB had previously informed the Council's decision not to allocate certain sites for development. Through Examination Document SADC/ED80B it is now suggested that the sites should form part of the Local Plan to ensure that it is justified and sound.

Q1 Why is it necessary for soundness to include allocations M14, M24 and M26 in the Plan? How would their allocation address specific soundness matters?

Q2 How have the site boundaries been established and are they justified and effective? Do any require alterations to the Green Belt boundary, and if so, what are the exceptional circumstances for doing so?

Q3 If the sites are necessary, are they justified, effective and consistent with national planning policy?

Q4 Are the additional sites developable within the Plan period?

Q5 What the consequences for allocating the sites on housing land supply, and conversely, the deletion and/or modification of sites subject to flooding?

Matter 3 – The Green Belt

Issue 1 – Green Belt Review

7. Following the Stage 1 hearings, the Council published and consulted on new evidence relating to the alteration of Green Belt boundaries. In particular, this considered how previously developed land was considered in the site selection process.

   Q1 With reference to paragraph 146a of the Framework, has the Council adequately demonstrated that the strategy makes as much use as possible of suitable brownfield sites and underutilised land?

   Q2 Does the additional evidence adequately demonstrate that the Plan is consistent with paragraph 147 of the Framework, which states that plans should give first consideration to land which has been previously-developed and/or is well-served by public transport?

   Q3 Does the evidence demonstrate that, at a strategic level, exceptional circumstances exist to alter Green Belt boundaries?

8. The application of some Green Belt policies (such as Policy LG8) rely on the Council's proposed boundaries to Green Belt settlements as shown on the policies map.

   Q4 What is the justification for defining boundaries for those settlements that remain washed over by the Green Belt? Are the boundaries justified and effective?

Matter 4 – Type and Mix of Housing

Issue 1 – Housing Mix and Density

Q1 Is Policy HOU1 justified by appropriate, available evidence?

Q2 Is the Plan sufficiently flexible enough to adapt to changing circumstances and needs over the plan period?

Q3 How is it intended that Policy HOU1 interacts with criterion b) of Policy HOU2 in terms of dwelling size?

Q4 Is Policy DES3 consistent with paragraphs 128 and 146 of the Framework insofar as making an efficient use of land is concerned?

Issue 2 – Affordable and Specialist Housing

Q1 What is the forecast level of affordable housing need arising over the Plan period? Is this set out in the Plan and clear to decision-makers, developers and local communities?

Q2 Will the Plan ensure that affordable housing needs are met? If not, what modifications could be made to ensure that needs are met in full?

Q3 What are the thresholds for the provision of affordable homes based on and is Policy HOU2 justified (including in respect of Class C2 accommodation)?

Q4 Is the viability review clause in Policy HOU2 justified and effective?

Q5 How have the figures in Policy HOU3 been established and is the policy justified?

Q6 How will the Plan be effective in meeting the needs identified in Policy HOU3? Is it sufficiently clear in this regard?

Q7 Collectively, do Policy HOU2 and HOU3 provide a clear basis for establishing what level of affordable housing is required from non-C3 Use Class development? Are the requirements deliverable and viable?

Issue 3 – Accessible and Adaptable Housing

Q1 What are the requirements in Policy HOU4 based on and are they deliverable and viable?

Issue 4 – Self-Build and Custom Housebuilding

Q1 What is the anticipated need for Self and Custom Build over the Plan period? Does Policy HOU5 provide an appropriate basis for meeting that need?

Q2 Are the requirements of Policy HOU5 justified, and will they be effective?

Issue 5 – Accommodation for Gypsies, Travellers and Travelling Showpeople

Q1 Does the Plan adequately set out the accommodation requirements for gypsies, travellers and travelling showpeople over the plan period?

Q2 Will the accommodation requirements be met through the allocations and policies in the Plan? If so, how? Should sites identified by the Council as contributing towards identified needs be allocated in the Plan?

Q3 Will there be a 5-year supply of deliverable pitches against the requirement?

Q4 What is the justification for the inclusion of pitches on sites at Hemel Garden Communities (South and Central)?[1] When and how are these sites going to be delivered? Are they justified and effective?

Q5 What is the justification for Policy HOU6(b) and (c) and are they sufficiently clear enough to be effective?

Q6 What effect will the provision of new pitches have on the Chilterns Beechwoods SAC from allocations in the Plan and how will any adverse impacts on the integrity of the site be avoided and/or mitigated?

Q7 How would decision-makers be expected to respond to windfall development proposals?

[1] Please also refer to Matter 6 relating to individual site allocations

Matter 5 – Economy and Employment

Issue 1 – Employment Land Requirement and Allocated Employment Sites[2]

Q1 Is the Plan's economic strategy based on proportionate and up-to-date evidence?

Q2 Noting the Council's hearing statement for Matter 1, Issue 1, Question 5, should the Plan establish requirements for office, industrial and warehousing provision over the Plan period?

Q3 Is the Plan positively prepared in respect of setting a strategy and identifying land to meet assessed employment needs?

Q4 How did the Council identify land to allocate for employment uses? Was the site selection process robust, justified and proportionate?

Q5 How will the allocated sites at East Hemel Hempstead (Central) and the Radlett Strategic Rail Freight Interchange assist Dacorum and potentially other South West Hertfordshire authorities in meeting some of their employment needs? Is the policy effective?

9. The 2024 South West Hertfordshire Economic Study states that the main barriers to economic growth are the available labour market, with particular reference to an ageing population demographic.

Q6 Taking this into account, are employment and housing requirements suitably aligned, and will the Plan provide sufficient labour to support the employment strategy?

Issue 2 – Protected Employment Areas and Principal Office Locations

Q1 Is the safeguarding of Protected Employment Areas and Principal Office Locations, including the extent of their boundaries, justified? What evidence is there to support Policy EMP1?

Q2 As part of the Plan's preparation, was consideration given to whether existing office, industrial or storage and distribution uses could be used for alternative uses, such as housing?

[2] Excluding East Hemel Hempstead (Central) – Please refer to Matter 6, Issue 9

Q3 Are the requirements of Policies EMP1 and EMP3 positively prepared and sufficiently flexible enough to account for changing circumstances over the plan period?

10. Paragraph 5.25 of the Plan sets out that the Building Research Establishment and Rothamstead campuses are within the 'Hertfordshire multi-site Envirotech Enterprise Zone', referred to as the Hertfordshire Innovation Quarter ('Herts IQ').

Q4 Is it sufficiently clear what uses are permitted on these sites?

Q5 Are sites OS3 and OS4 justified, effective and consistent with national planning policy?

Issue 3 – Reuse of Employment Land and Buildings

Q1 Is the Plan sufficiently clear, and thus effective, on how development proposals for the reuse of existing employment land and buildings will be considered?

Issue 4 – Strategic Rail Freight Interchange ('SRFI')

Q1 What is the latest position regarding development proposals at the SRFI?

Q2 What is the justification for Policy EMP2, which shows the SFRI on the policies map but states that it will only be removed from the Green Belt once development has been completed? Is this consistent with other policies in the Plan, which seek to remove land from the Green Belt in order to facilitate new development?

Issue 5 – Town, City and Village Centres

Q1 Is Table 6.1 justified and based on appropriate, available evidence? If not, what modifications would be necessary to make the Plan sound?

Q2 What are the anticipated needs for retail, leisure, office and other main town centre uses over the plan period and does the Plan allocate a range of suitable sites in town centres to meet the scale and type of development required, as advocated by paragraph 90 of the Framework?

Q3 How does the Plan define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre, as required by paragraph 90 of the Framework?

Q4 Is the Plan consistent with paragraphs 91-95 of the Framework, having particular regard to the application of the sequential and impact tests?

Q5 What is the justification for Policy TCR3? Is it sufficiently clear what uses and scale of development the policy allows for?

Q6 Is the Plan consistent with paragraph 88 of the Framework, which states that planning policies should enable the sustainable growth and expansion of all types of businesses in rural areas, both through the conversion of existing buildings and well-designed, beautiful new buildings?

Q7 Are Policies TCR4-TCR7 justified, effective and consistent with national planning policy?

Matter 6 – Hemel Garden Communities ('HGC')

Issue 1 – Justification for Strategic Growth

11. The HGC Evidence Paper prepared by St Albans City and District Council sets out the various stages in the evolution of HGC to date (Core Document HGC01.01). In 2019 the proposal was awarded Garden Town Status. The extent of the HGC Programme Area is shown on St Albans Local Plan Figure 3.1 and Dacorum Local Plan Figure 7.

Q1 What is the difference between the HGC Programme Area and the HGC Framework Plan area? Is it sufficiently clear in both the St Albans Local Plan, and the Dacorum Local Plan, what HGC is and which areas it relates to?

Q2 To be effective, should both Local Plans include a breakdown, in policy, which sets out the component parts of HGC and what is expected from each parcel?

Q3 How do the sites at Marchmont Farm, Spencer's Park, land West of Hemel Hempstead and land adjacent to the Manor Estate relate to the growth proposed at HGC?

Q4 Having established the principle of growth at and around Hemel Hempstead, how was the scale of development determined?

Q5 How did factors such as the Green Belt and proximity of the Chilterns National Landscape inform decisions around growth at Hemel Hempstead?

Issue 2 – Site Boundaries (including Green Belt alterations)

Q1 Having established at a strategic level that alterations were necessary to the Green Belt boundary, how did the Councils determine the extent of alterations required?

Q2 How do the proposed boundary alterations relate to the supporting evidence through the Green Belt Assessments and site selection methodology?

Q3 Are the proposed boundary alterations consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

Issue 3 – Highways and Transport

Q1 Is the strategic modelling an appropriate tool for assessing likely impacts of growth at HGC on the strategic road network, and, for determining necessary mitigation?

Q2 What are the implications of the growth proposed at HGC on the strategic road network, having particular regard to Junction 8 of the M1?

Q3 Can any significant highways impacts (in terms of capacity and congestion), or on highway safety, be cost effectively mitigated to an acceptable degree, consistent with paragraph 114 of the Framework? How have the need for highways improvements been costed, and will the sites proposed for allocation at HGC remain viable?

Q4 Where mitigation is required, is it sufficiently clear to users of the Plan what is required, and where and when it will be delivered as required by policy?

Q5 What is the justification for the sensitivity testing which looks at a reduced number of jobs at East Hemel Hempstead (Central)? How does this correlate to the allocation in the St Albans Local Plan and the mix of uses proposed?

Q6 What are the implications of the growth proposed at HGC on the local road network, having particular regard to the consequences of additional congestion and delays on the M1?

Q7 In assessing the impacts of cumulative growth at HGC, how does the evidence take into account the likelihood of modal shift away from private car use? Has this been applied consistently and is it justified?

Issue 4 – Infrastructure Provision

12. St Albans Local Plan Policy LG2 states that all development in the HGC Programme Area must follow a planned and coordinated approach to growth and infrastructure and is expected to be in accordance with Infrastructure Delivery Plans ('IDPs'). A similar requirement is set out in Dacorum Local Plan Policy HGC1.

Q1 Is there sufficient certainty regarding the total quantum, timing and cost of infrastructure necessary to facilitate the HGC in line with the Councils' expectations?

Q2 Is there appropriate evidence as to how different forms of infrastructure (including schools and open space) have been apportioned to different HGC allocations?

Q3 What is the justification for requiring accordance with the IDP, which is a non-statutory document intended to be updated regularly by each Council?

Q4 What is the purpose, role and function of the Transformation Supplementary Planning Document ('SPD') and the HGC Framework Plan? How do they relate to policies within each Plan?

Issue 5 – Growth Area Principles

13. St Albans Local Plan Policy LG3 and Dacorum Local Plan Policy HGC2 set out various elements of the '4 pillars' upon which the HGC concept is built, comprising 32 criteria, along with provisions in respect of delivery.

Q1 Are those policies clearly written and unambiguous so it is evident how a decision-maker should react to development proposals? Are all elements directive in terms of decision-taking, and clear and effective?

Q2 Are Policies LG3 and HGC2 suitably flexible so as to apply only to relevant types of development?

Q3 What is the justification for requiring compliance with 'future HGC guidance' in Policy LG3/HGC2? Is this clear, justified and effective?

Issue 6 – Viability and Deliverability

Q1 Which of the sources of housing and employment land will contribute, and to what extent, towards anticipated delivery at HGC during the plan period and beyond?

14. **To facilitate discussions around viability and deliverability, it would assist the examination if the Council could produce an updated trajectory for each individual site allocated at HGC.**

Q2 The Delivery Statement supporting the St Albans Local Plan is dated November 2024 (Core Document HGC 02.01), whereas that supporting the Dacorum Local Plan is dated March 2025 (HGC01.02). What are the differences between the two documents (if any) and which is correct?

Q3 Table 3.2 of the St Albans Local Plan envisages 100 houses completed at HGC in 2029/30, with development increasing thereafter up to 500 units per

year. What are the lead-in times and build-out rates based on, and are they reasonable and realistic assumptions around deliverability?

Q4 How do the lead-in times and build-out rates take into account the need for necessary strategic infrastructure requirements, especially strategic highway improvements?

Q5 What are the implications for both Plans if HGC does not deliver at the rates expected? Should the Plans be modified to include additional flexibility, or a fallback position if HGC proposals are delayed?

Q6 Has adequate viability testing been carried out to assess the cumulative costs associated with bringing forward the proposals at HGC? Are the component parts of the HGC viable, taking into account all likely costs, including strategic highways and infrastructure costs?

Issue 7 – North Hemel Hempstead (H1)

Q1 What is the site boundary based on and is it justified and effective? What is the justification for the area highlighted as excluded from the allocation?

Q2 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Q4 How have the landscape impacts of the allocation been considered, having particular regard to the setting of the Chilterns National Landscape?

Q5 How have the mix of uses been established and how will development proposals come forward in a coordinated and coherent manner that achieves the aims and objectives of the wider HGC proposals?

Q6 Can the allocation deliver the necessary mix of uses and supporting infrastructure? Is it developable within (and beyond) the plan period?

Q7 What effect will development have on the Chilterns Beechwoods Special Area of Conservation ('SAC') and how will any adverse impacts on the integrity of the site be avoided and/or mitigated?

Q8 Is Policy H1 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Issue 8 – East Hemel Hempstead (North) – H2

Q1 What is the site boundary based on and is it justified and effective?

Q2 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Q4 How have the landscape impacts of the allocation been considered, having particular regard to the setting of the Chilterns National Landscape?

Q5 How have the mix of uses been established and how will development proposals come forward in a coordinated and coherent manner that achieves the aims and objectives of the wider HGC proposals?

Q6 Can the allocation deliver the necessary mix of uses and supporting infrastructure? Is it developable within (and beyond) the plan period?

Q7 What effect will development have on the Chilterns Beechwoods Special Area of Conservation ('SAC') and how will any adverse impacts on the integrity of the site be avoided and/or mitigated?

Q8 Is Policy H2 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Issue 9 – East Hemel Hempstead (Central) – H3

15. Site H3 is allocated as an 'employment led mixed use (Enterprise Zone)'. Unlike allocations H1, H2 and H4, allocation H3 does not specify a quantum or capacity of employment land, nor what proportion of the site is anticipated to be developed within the plan period.

Q1 What is the scale of development proposed, how has it been established and is the Plan clear and effective around the types of development permitted?

Q2 How will development proposals come forward in a coordinated and coherent manner that achieves the aims and objectives of the HGC?

Q3 What is the justification for criterion 16 under Policy H3 which safeguards land to the east of Junction 8 of the M1? Does this form part of the allocated site, and if so, what are development proposals expected to do in order to achieve compliance with the policy?

Q4 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan

period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

Q5 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Q6 How have the landscape impacts of the allocation been considered, having particular regard to the setting of the Chilterns National Landscape?

Q7 What is the justification for criterion 29 and the requirements for contributions towards Strategic Access Management and Monitoring and the provision of Suitable Alternative Natural Greenspace?

Q8 What is the justification for the provision of accommodation to help meet the needs of gypsies and travellers on H3, and not all other sites within the HGC Programme Area?

Q9 Is Policy H3 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Issue 10 – East Hemel Hempstead (South) – H4

Q1 What is the site boundary based on and is it justified and effective?

Q2 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Q4 How have the mix of uses been established and how will development proposals come forward in a coordinated and coherent manner that achieves the aims and objectives of the wider HGC proposals?

Q5 Can the allocation deliver the necessary mix of uses and supporting infrastructure? Is it developable within (and beyond) the plan period?

Q6 What is the justification for the proposed deliver rates and density assumptions on site H4, when compared to other parts of the HGC area?

Q7 What effect will development have on the Chilterns Beechwoods Special Area of Conservation ('SAC') and how will any adverse impacts on the integrity of the site be avoided and/or mitigated?

Q8 What is the justification for the provision of accommodation to help meet the needs of gypsies and travellers on H4, and not all other sites within the HGC Programme Area?

Q9 Is Policy H4 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Matter 7 – Residential Site Allocations

Issue 1 – St Albans Site Allocations

Q1 Based on the discussions at the Stage 1 hearing sessions (where it was agreed that the 'Broad Locations' are specific site allocations), is Policy LG1 necessary, justified and effective?

Q2 Where necessary, do the relevant site allocations include a requirement to provide and/or contribute towards new infrastructure for health care and education?

Policy B1 – North St Albans

Q1 What is the site boundary based on and is it justified and effective?

Q2 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Q4 How have the mix of uses been established and how will development proposals come forward in a coordinated and coherent manner?

Q5 How have flood risk and ecology been taken in account as part of the site's allocation?

Q6 Can a safe and suitable access to the site be achieved? Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?

Q7 Is Policy B1 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Policy B4 – East St Albans

Q1 What is the site boundary based on and is it justified and effective?

Q2 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Q4 How have the risks from flooding been considered as part of the site's allocation, having particular regard to surface water flooding?

Q5 Is Policy B4 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Policy B5 – Glinwell, Hatfield Road

Q1 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

Q2 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Q3 Can a safe and suitable access to the site be achieved? Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?

Q4 Is any development proposed in areas at risk from flooding? If so, what is the justification for this?

Q5 Is Policy B4 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Policy M3 – Bedmond Lane

Q1 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to

demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

Q2 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Q3 How has the scale and quantum of development been determined, having particular regard to archaeological and ecological constraints?

Q4 Is Policy M3 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Policy M8 – Verulam Golf Club

Q1 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

Q2 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Q3 Is Policy M8 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Policy M18 North East of Austen Way

Q1 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

Q2 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Q3 How has the effect of development on the setting of designated heritage assets been considered, having particular regard to the Grade II listed buildings at Kay Walk?

Q4 Is Policy M18 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Policy P2 – Land at North Orbital Road

Q1 What is the current use of the site and is it available for development within the plan period?

Q2 What is the justification for not seeking to amend the Green Belt boundary in this location? Can the allocation be deliverable whilst retained in the Green Belt? Is the allocation effective?

Q3 Is Policy P2 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Policies UC6 (Sutton Road and Pickford Road, UC7 (Spencer Street), UC11 (Victoria Street), UC19 (Lemsford Road), UC28 (New Greens Residents Association), UC35 (Market Depot, Drovers Way) and UC57 (Telford Court, Alma Road)

Q1 Are the 'Urban Settlement' sites within St Albans justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Q2 What is the justification for the site boundary at Sutton Road and Pickford Road (UC6)? Can the site be developed in the manner envisaged?

Issue 2 – Harpenden and Hatching Green Site Allocations

Policy B2 – North East Harpenden

Q1 What is the site boundary based on and is it justified and effective? What is expected of development proposals within the area retained as Green Belt?

Q2 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Q4 How have the mix of uses been established and how will development proposals come forward in a coordinated and coherent manner?

Q5 Can a safe and suitable access to the site be achieved? Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?

Q6 How have the landscape impacts of the allocation been considered? Can the site be delivered in a way that avoids harmful landscape impact?

Q7 Is Policy B2 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Policy B7 – North West Harpenden

Q1 What is the latest position regarding the development proposals for the site?

Q2 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Q3 Is Policy B7 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Policy M7 – Townsend Lane

Q1 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

Q2 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Q3 What effect will development have on the Chilterns Beechwoods Special Area of Conservation SAC and how will any adverse impacts on the integrity of the site be avoided and/or mitigated?

Q4 Is Policy M7 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Policy M16 – Falconers Field

Q1 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

Q2 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Q3 Is Policy M16 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Policy M17 – Land North of Wheathampstead Road

Q1 What is the site boundary based on and is it justified and effective? What is the existing use of the site?

Q2 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Q4 Is Policy M17 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Policy M19 – Piggotshill Lane and UC47 – Crabtree Fields

Q1 What is the existing use of the combined site and what is the reason for having separate allocations?

Q2 Is it clear how the entire site will come forward for development? Is it deliverable?

Q3 What is the extent of the area to be removed from the Green Belt? How does this relate to the land allocated for development?

Q4 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Q5 Can a safe and suitable access to the site be achieved? Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?

Q6 Is Policy M19 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Policy M21 – Land at Rothamsted Lodge, Hatching Green

Q1 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

Q2 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Q3 Is Policy M21 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Policy M22 – Wood End, Hatching Lane

Q1 What is the site boundary based on and is it justified and effective? What is the existing use of the site?

Q2 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Q3 Is Policy M22 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Policy M25 – Wood End, Hatching Lane

Q1 What is the site boundary based on and is it justified and effective? What is the existing use of the site?

Q2 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Q3 How have the risks from flooding been considered as part of the site's allocation, having particular regard to surface water and ground water flooding?

Q4 Is Policy M25 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Issue 3 – London Colney Site Allocations

Policy B6 – West of London Colney

Q1 What is the site boundary based on and is it justified and effective? What is expected from the site area retained in the Green Belt?

Q2 How will the proposed secondary school be delivered, and what are the reasons for allocating land for the new school in this location?

Q3 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

Q4 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Q5 Can a safe and suitable access to the site be achieved? Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?

Q6 How has the effect of development on the setting of designated heritage assets been considered, having particular regard to the Napsbury Hospital Registered Park and Garden, the Napsbury Park Conservation Area and the All Saints Pastoral Centre?

Q7 Is Policy B6 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Policies U2 (Land south west of London Colney Allotments), UC20 (104 High Street) and UC27 (Berkely House)

Q1 Are the 'Urban Settlement' sites within London Colney justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Issue 4 – Wheathampstead Site Allocations

Policy M2 – Hill Dyke Road

Q1 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

Q2 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Q3 How have the effects of development on the setting and significance of the Devil's Dyke and Slad Scheduled Monument been taken into account in the allocation of the site, including any impacts on assets of archaeological significance?

Q4 Is Policy M2 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Policy M9 – Amwell Top Field

Q1 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

Q2 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Q3 How have the effects of development on the setting of the Amwell Conservation Area been taken into account in the allocation of the site?

Q4 What impact does the pipeline running through the site have on its deliverability for housing, when also considering the need for mitigation in response to Q3 above?

Q5 How will the site be accessed? Can a safe and suitable access be achieved if Amwell Lane is not to be used?

Q6 Is Policy M9 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Issue 5 – Redbourn and Hemel Hempstead Site Allocations

Policy B3 – West Redbourn

Q1 Is the scale of development proposed appropriate and proportionate to the scale, role and function of Redbourn?

Q2 Taking into account the need for relevant mitigation and open space, can the site accommodate the number of homes proposed?

Q3 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

Q4 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Q5 How have the landscape impacts of the allocation been considered, having particular regard to the setting of the Chilterns National Landscape?

Q6 How have the risks from flooding been considered as part of the site's allocation, having particular regard to fluvial flood risk?

Q7 What effect will development have on the Chilterns Beechwoods SAC and how will any adverse impacts on the integrity of the site be avoided and/or mitigated? Can mitigation be provided on site?

Q8 How have the effects of development on the setting of the Grade I listed Parish Church of St Mary and the Redbourn Conservation Area been taken into account in the allocation of the site?

Q9 Can a safe and suitable access to the site be achieved? Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?

Q10 Is Policy B3 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Policy M6 – Land south of Harpenden Lane

Q1 Is the scale of development proposed appropriate and proportionate to the scale, role and function of Redbourn?

Q2 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Q4 Can a safe and suitable access to the site be achieved? Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?

Q5 How have the risks from flooding been considered as part of the site's allocation, having particular regard to fluvial flood risk?

Q6 What effect will development have on the Chilterns Beechwoods SAC and how will any adverse impacts on the integrity of the site be avoided and/or mitigated? Can mitigation be provided on site?

Q7 Is Policy M6 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Policy P3 – Friends Meeting House, Blackwater Lane, Hemel Hempstead

Q1 What is the justification for not seeking to amend the Green Belt boundary in this location? Can the allocation be deliverable whilst retained in the Green Belt? Is the allocation effective?

Q2 What effect will development have on the Chilterns Beechwoods SAC and how will any adverse impacts on the integrity of the site be avoided and/or mitigated? Can mitigation be provided on site?

Q3 Is Policy P3 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Issue 6 – Bricket Wood Site Allocations

Policy M4/OS1 – North of Oakwood Road

Q1 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

Q2 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Q3 What is the justification for separate allocations, rather than a single site covering M4 and OS1? Is it sufficiently clear what is required by Policy M4(1) which refers to co-ordination between the two sites?

Q4 Can a safe and suitable access to the site be achieved? Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?

Q5 Are Policies M4/OS1 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Policy M15 – Bucknalls Drive

Q1 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Q2 Is Policy M15 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Policy M23 – Ashdale Lye Lane

Q1 What is the current use of the site and is it available for development within the plan period?

Q2 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Q4 Is Policy M23 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Issue 7 – How Wood Site Allocations

Policy L1 – Burston Nurseries

Q1 What is the site boundary based on and is it justified and effective?

Q2 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Q4 How have the mix of uses been established and how will development proposals come forward in a coordinated and coherent manner, taking into account any existing planning permissions on the site?

Q5 How has the effect of development on the setting of designated heritage assets been considered, having particular regard to the Grade II* listed Burston Manor House?

Q6 Is Policy L1 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Policy M10 – Tippendell Lane and Orchard Drive

Q1 What is the current use of the site and is it available for development within the plan period?

Q2 Is it sufficiently clear what is required of development proposals under Policy M10(1)?

Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Q4 Is Policy M10 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Issue 8 – Chiswell Green Site Allocations

Policy L3 - East and West of Miriam Lane

Q1 What is the current use of the site and is it available for development within the plan period?

Q2 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Q4 Is Policy L3 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Policy U4 – Greenwood United Reformed Church

Q1 What is the existing use of the site and is it developable within the plan period?

Q2 Is Policy U4 justified, effective and consistent with national planning policy

Policy UC25 – Watford Road, Chiswell Green

Q1 What is the existing use of the site and is it developable within the plan period?

Q2 Is Policy UC25 justified, effective and consistent with national planning policy

Issue 9 – Park Street Site Allocations

Policy L2 – West of Watling Street

Q1 What is the latest position regarding the development proposals for the site?

Q2 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Q4 Is Policy L2 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Issue 10 – Colney Heath and Radlett Site Allocations

Policy M13 – North of Boissy Close, Colney Heath

Q1 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Q2 Can a safe and suitable access to the site be achieved? Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?

Q3 Is Policy M13 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Policy P1 – Smallford Works, Colney Heath

Q1 What is the existing use of the site and is it developable within the plan period?

Q2 What is the justification for not seeking to amend the Green Belt boundary in this location? Can the allocation be deliverable whilst retained in the Green Belt? Is the allocation effective?

Q3 Is Policy P1 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Policy B8 Harper Lane, Radlett

Q1 What is the existing use of the site and is it developable within the plan period?

Q2 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Q4 How has the location of development been considered as part of the site allocation process, having particular regard to proximity of the railway line and existing commercial uses?

Q5 Can a safe and suitable access to the site be achieved? Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?

Q6 Is Policy B8 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

Issue 11 – Urban Car Parks and Garage Sites

16. The following car parks and garage sites are allocated in Part B of the Local Plan:

- UC1 (Sainsbury's Supermarket, St Albans)
- UC2 (Civic Close Car Park, St Albans)
- UC3 (London Road Car Park, St Albans),
- UC4 (Car Park Rear of Upper Marlborough Road, St Albans)
- UC5 (18-20 Catherine Street, St Albans)
- UC9 (Keyfield Terrace Car Park, St Albans)
- UC14 (Waitrose Car Park)
- UC15 (Bowers Way East Car Park)
- UC22 (Car Park rear of Hatfield Road, St Albans)
- UC48 (Car Park adjacent to Adelaide Street, St Albans)
- UC50 (Southview Carpark, Lower Luton Road)
- UC54 (Harpenden Railway Car Park)
- UC10 (Garages rear of Hughenden Road, St Albans)
- UC12 (Garages between Hughenden Road and The Ridgeway, St Albans)
- UC16 (Garages west of Thirlestane, St Albans)
- UC17 (Garages off Cotlandswick, London Colney)
- UC18 (Garages to front of Riverside Road, St Albans)
- UC21 (Garages off Chapel Place, St Albans)
- UC23 (Garages adjacent to Verulam Road, St Albans)
- UC26 (Garages at Malvern Close, St Albans)
- UC29 (Garages off Noke Shot, Harpenden)
- UC30 (Garages between Abbotts Avenue West and Abbey Line, St Albans)
- UC31 (Garages Rear of Tudor Road, St Albans)
- UC32 (Garages off Creighton Avenue, St Albans)
- UC33 (Land Rear of Snatchup, Redbourn)
- UC34 (Garages Rear of Hill End Lane, St Albans)
- UC40 (Land rear of New House Park Shops, St Albans)
- UC41 (Garages at Grindcobbe, St Albans)
- UC42 (Garages off Thirlmere Drive, St Albans)
- UC44 (Garages off Millford Hill)
- UC45 (Garages off Watling View, St Albans)
- UC49 (Garages rear of Furse Avenue, St Albans)
- UC51 (Garages south of Abbots Park, St Albans)
- UC52 (Garages off Tallents Crescent)
- UC56 (Garages rear of Portman House, St Albans)

Q1 What is the justification for allocating existing car parks and garages which remain in use? Are the sites available for development?

Q2 What is the justification for requiring surveys of car park usage before proceeding with development proposals as set out in Part B of the Plan? Has any evidence been provided at this stage to determine usage and consider the consequences of redevelopment on the availability of parking, highway safety, the living conditions of local residents and impacts on local businesses?

Matter 8 – Community Infrastructure

Issue 1 – Community Infrastructure – Policies SP7, SP14 and COM1-COM4

Q1 Are Policies SP7 and SP14 justified, effective and consistent with national planning policy? Will they enable the timely provision of new or enhanced infrastructure where needed to support growth proposed in the Plan?

Q2 What is the justification for the requirements for new schools under Policy COM1(d)? Is the approach consistent with paragraph 99 of the Framework, which states that local planning authorities should take a proactive, positive and collaborative approach to providing a sufficient choice of school places?

Q3 What is the justification for stating through Policy COM1 that playing pitches must be for community use?

Q4 Is Policy COM2 justified and effective in seeking to support expansion, but only where it minimises impacts on openness and the purposes of including land within the Green Belt?

Q5 For soundness, should Policy COM2 refer to the most up to date guidance on groundwater protection?

Q6 Is Policy COM3 effective in seeking to retain community, leisure and sports facilities, or is this achieved by other policies in the Plan?

Q7 Is Policy COM4 positively prepared in seeking to allow for the appropriate reuse of vacant land and buildings?

Issue 2 – St Albans City Football Club – Policy COM5

Q1 What is the justification for setting out what might constitute very special circumstances in Policy COM5? Would this not be a matter of judgement for the relevant decision-maker taking into account site specific circumstances and evidence available at the time? Does the Plan set out what constitutes very special circumstances for other types of development in the Green Belt?

Issue 3 – Utilities Infrastructure – Policies SP9 and UIN1-UIN2

Q1 Are policies SP9, UIN1 and UIN2 justified, effective and consistent with national planning policy?

Issue 4 – Health and Wellbeing – Policies S13 and HW1-HW5

Q1 Are policies SP13 and HW1-HW5 justified, effective and consistent with national planning policy?

Q2 Is it sufficiently clear to users of the Plan when a Health Impact Assessment is required? Is Policy HW5 effective in this regard?

Issue 5 – Strategic Scale Development – Policy IMP1

Q1 What is the justification for Policy IMP1? Does it establish planning policy, or set out validation requirements for planning applications?

Issue 6– Site OS2 – Land at Toulmin Drive, St Albans

Q1 What is the justification for the allocation and the extent of the site area?

Q2 Is the allocation developable within the plan period?

Matter 9 – Housing Land Supply

Issue 1 – Total Land Supply

Q1 What is the most up-to-date position regarding the projected total supply of housing over the plan period?

Q2 What is the windfall allowance based on and is it justified?

Q3 Is the projected supply of housing justified and has sufficient land been identified to ensure that housing needs will be met, including an appropriate buffer to provide flexibility and allow for changing circumstances? If not, what modifications can be made to the Plan in order to make it sound?

Issue 2 – Five-Year Housing Land Supply

Q1 What will be the five-year housing land requirement upon adoption of the Plan?[3]

Q2 Based on the housing trajectory, how many dwellings are expected to be delivered in the first five years following adoption of the Plan?

Q3 What evidence has the Council used to determine which sites will come forward for development and when? Is it robust?

Q4 Where sites have been identified in the Plan, but do not yet have planning permission, is there clear evidence that housing completions will begin within five years as required by the Framework?

Q5 What allowance has been made for windfall sites as part of the anticipated five-year housing land supply? Is there compelling evidence to suggest that windfall sites will come forward over the plan period, as required by the Framework?

Q6 What are the implications if some of the larger sites, such as the 'Broad Locations' and sites associated with the HGC do not deliver as expected? Is there sufficient flexibility to ensure that the Plan will not become out of date?

[3] Please also refer to Matter 2, Issue 1, Question 1

Matter 10 – Transport

Issue 1 – Transport Strategy – Policies SP8 and TRA1

Q1 Is it sufficiently clear when proposals will be required to submit Travel Plans, assess air quality impacts and provide mobility hubs under Policy SP8? Is it effective?

Q2 What is the justification for the separate requirements under Policy TRA1 based on size?

Q3 Are the requirements under Policy TRA1 consistent with the Framework, which states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe?

Issue 2 – Major Transport Schemes – Policies TRA2 and TRA3

Q1 Is it sufficiently clear what the 'package of measures' are for the M1 Junction 8 improvements and how they will be delivered under Policy TRA2? Is the policy effective?

Q2 What are the transport schemes 'identified in the IDP' for the purposes of Policy TRA2? If a major transport scheme is necessary to support the growth proposed in the Plan, should it be listed in the policy?

Q3 What is the justification for Policy TRA2(d)? What does it require from development proposals?

Issue 3 – Parking Standards – Policy TRA4 and Appendix 1

Q1 How has the Council considered accessibility, the type, mix and use of development, the availability and opportunities for public transport, local car ownership levels and the need to ensure an adequate provision of spaces for plug-in and ultra-low emission vehicles when determining the car parking standards in Policy TRA4 and Appendix 1?

Q2 What is the justification for taking a different approach with the 'broad locations' under Policy TRA4? Are the policy requirements justified and effective?

Q3 What is the justification for referring to Hertfordshire County Council guidance in Policy TRA4(h) and (i)? To be effective, should any requirements be contained in the Plan?

Matter 11 – The Natural Environment

Issue 1 – The Green Belt – Policies LG5 – LG9

Q1 Are any alterations proposed to the Green Belt boundary which do not form part of the site allocations under Matter 7? If so, what are the exceptional circumstances which justify the alterations proposed?

Q2 What is the rationale for Policy LG5 criterion a) and b), given that the overarching approach is to consider development proposals in the Green Belt against national planning policy?

Q3 Is Policy LG6 (and the Plan when read as a whole) consistent with paragraph 47 of the Framework, which states that plans should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements?

Q4 What is expected from development proposals on the smaller site allocations released from the Green Belt in Part B of the Plan? How will development proposals be expected to meet the requirements in Policy LG6?

Q5 What is the justification for referring to limited infilling in Policy LG7, which is concerned with rural exception sites?

Q6 What is the justification for referring to 'affordable-only' housing and setting a threshold of 9 dwellings in Policy LG7? Is this justified and consistent with national planning policy?

Q7 What is the rationale for Policy LG8, given that the overarching approach in Policy LG5 is to consider development proposals in the Green Belt against national planning policy? [4]

Q8 Is Policy LG8 consistent with national planning policy, with particular reference to whether the construction of new buildings is regarded as inappropriate development?

Q9 What is the justification for using prescribed amounts in Policy LG9? Is this justified, effective or consistent with national planning policy?

[4] Please also refer to Matter 3, Issue 1, Question 3

Issue 2 – Local Green Spaces – Policies NEB2 and NEB3

Q1 Does the Plan set out a composite list of all Local Green Space designations?

17. Paragraphs 105 to 107 of the Framework relate to the designation of land as Local Green Space. In summary, paragraph 106 states that Local Green Space should only be designated where it is a) in reasonably close proximity to the community it serves; b) demonstrably special and c) local in character and not an extensive tract of land.

Q2 Do the Local Green Space designations in the Plan meet these requirements? How were individual sites tested against the requirements of the Framework?

Q3 Is Policy NEB2 consistent with paragraph 107 of the Framework where development is proposed on an area of Local Green Space?

Q4 Is it sufficiently clear to users of the Plan what constitutes 'non-designated' areas of Local Green Space and 'significant publically accessible green areas'? Are Policies NEB3 and NEB4 effective?

Q5 Is the Plan consistent with paragraph 103 of the Framework where existing open space, sports and recreational land and buildings is concerned?

Issue 3 – Biodiversity and The Chilterns National Landscape – Policies SP10 and NEB5 – NEB12

Q1 Are Policies SP10 and NEB5 – NEB12 positively prepared, justified, effective and consistent with national planning policy?

Q2 What is the justification for stating that a net gain of higher than 10% is strongly encouraged in Policy NEB6? Could this lead to confusion as to what is required from development proposals?

Q3 Does Policy NEB7 provide sufficient flexibility to account for site specific circumstances?

Q4 What is the justification for Policy NEB11, especially criterion b)?

Matter 12 – Design Standards and the Historic Environment

Issue 1 – High Quality Design – Policies SP12 and DES1 – DES8

Q1 Are Policies SP12 and DES1-DES8 positively prepared, justified, effective and consistent with national planning policy?

Q2 Are Policies DES1/DES4 effective in setting a prescriptive requirement for all development to be set a minimum of 1m away from the neighbouring property / boundary above ground level?

Q3 What is the density requirement in Policy DES3 based on? Is it justified and will it be effective in St Albans?

Q4 What is the justification for referring to single storey extensions 'not normally' extending more than 3m along a party boundary. How does this take into account the context each site and the relationship between neighbouring properties? Is the policy effective?

Q5 What is the justification for the specific separation distances and sizes in Policy DES5? Does the policy include adequate flexibility to account for site specific factors where alternative arrangements may also be acceptable? Is the policy effective?

Q6 What is the justification for the Building Height Control Area in Policy DES6? Is it based on appropriate, available evidence and are the requirements clear, effective and justified?

Q7 Have an appropriate range of viewpoints been used to support Figure 12.1 and will be effective in managing development in the City Centre?

Q8 What is the justification for requiring accordance with 'current local and County Council guidance' in Policy DES7, which do not form part of the development plan?

Issue 2 – The Historic Environment – Policies SP11 and HE1 – HE8

Q1 Are Policies SP11 and HE1 – HE8 positively prepared, justified, effective and consistent with national planning policy?

Q2 Is the Plan supported by appropriate and proportionate evidence in respect of likely effects on the historic environment? How has that evidence guided the approach in the Plan?

Q3 Does Policy HE2 apply only to non-designated heritage assets which are locally listed? Are criteria used to establish whether something represents a non-designated heritage asset clear and effective?

Q4 What is the justification for Local Plan Appendices 2-5?

Issue 3 – Climate Change and Building Efficiency – Policies SP2, CE1 and CE2

Q1 Is the prioritisation of previously developed land in Policy SP2 consistent with national planning policy?

Q2 What is the justification for Policy SP2(k)? Is it effective and consistent with national planning policy?

Q3 What is the justification for Policy CE1(b)? Is it clear to users of the Plan precisely what is required? Is the policy effective?

Q4 How will decision-makers, developers and local communities determine if a proposal accords with Policy CE2(a) and (b)? Is the policy clear and effective?