

**Hearing Position Statement from Ian Yenney, local resident and sustainability planning policy professional, towards St Albans Local Plan examination. 09/12/2019**

The majority of the comments I made as a local resident towards the draft St Albans Local Plan during the consultation period in 2018 regarded environmental sustainability and the lack of clear and effective policy wording to address this. I classed these elements of the local plan as not sound, because in my professional experience as a sustainability consultant, the proposed wordings encourage but do not require high sustainability standards and do not clearly define the criteria for compliance. Stakeholders tend to aim for the regulatory minimum that they are required to meet (i.e. the minimum level set by UK Government if no effective local plan wording) and hence, such local plan policy does not tend to achieve its aims. When stakeholders submit plans to the local planning department, the planning officers will look to the policy for support in achieving their aims; if the policy is unclear and ineffective, the officer will have limited grounds to push back against proposals that fail to meet the intent of the policy.

Furthermore, many examples of alternative wordings exist in other local authority local plans that require high standards and are proven to be effective in ensuring that local stakeholders deliver on the intent e.g. the GLA London Plan energy policies. The St Albans Local Plan should draw on the many relevant examples of clear and effective policy wording and provide a Local Plan that is set-up to deliver on its intent towards promoting exemplary sustainability.

Since I made the comments on the draft St Albans Local Plan, I've been seconded to the GLA as an energy officer, reviewing energy statements from developers to ensure that they meet London Plan policy; every day in this role, I have witnessed first-hand the power of having effective planning policy wording. The target for each policy is clearly defined and I can review energy statements and be confident in pushing back where policy is not met. Policy targets are ambitious but achievable, for instance zero carbon (for regulated energy uses) for new residential development, which has applied since 2016. The success of London Plan policy can be seen in the Annual Energy Monitoring Reports published by GLA; these provide evidence to show that major developments in London are proposing significantly higher sustainability standards than the minimum required by UK Government.

Moreover, since I made the comments on the draft St Albans Local Plan, the context for sustainability policy has significantly changed. UK Government and SADC have both declared Climate emergencies, and what is considered to be "sustainable development" has moved on, for instance with aims/terms such as Net Positive (not seeking to just mitigate negative impacts of new development but to provide positive environmental benefits) coming into more common use. UK Government and SADC have moral obligations to respond to the Climate emergency, and effective Local Plan policy wording is a highly significant tool for responding to this as it sets the context for numerous local stakeholder activities. The local plan policy wording was not fit for the time it was written, and is even less fit for the current time when it is now being discussed. The NPPF supports the objective of sustainable development, including the following text extracts:

*"At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs."*

*“an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”*

*“Plans should:*

*a) be prepared with the objective of contributing to the achievement of sustainable development;*

*b) be prepared positively, in a way that is aspirational but deliverable;”*

*d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;”*

*“20. Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:*

*d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.”*

Given the current context for sustainable development, the proposed draft local plan is clearly substandard regarding sustainable development when considered against the standards of the NPPF and the examples set by other local plans. What is now required is clear, ambitious and effective policy wordings. Generally I recommend that as a local authority that is inextricably linked economically to London, SADC should consider the body of work undertaken by GLA towards London Plan policy approaches, and where relevant incorporate policies into the SADC Local Plan. My experience (and much evidence) suggests that London Plan policies are clear, ambitious and effective. If London Plan policies are not preferred by SADC, there are plenty of other good examples of clear, ambitious and effective local authority planning policy towards sustainable development.

When seeking to resolve the deficiencies in the proposed Local Plan, the inspectors and SADC may wish to consider which items are strategic and require explicit inclusion in the Local Plan, and which items may be able to be addressed through the release of a Supplementary Planning Document e.g. a sustainability SPD. Again, they may wish to use the London Plan and associated SPDs such as “Energy Planning Guidance” as a reference when considering this. Key strategic policies may include for instance, zero carbon (for regulated energy uses) for new residential development. In many cases, relatively minor changes to the wording of the draft Local Plan may better secure the intent of the policy intent, resulting in clear, ambitious and effective policy wordings, including targets. Further details on the approved method for implementation can follow in the SPDs.

I am happy to provide further detail to support any of the points I have raised, if this is useful to the inspectors or SADC in determining a suitable policy wording for the SADC Local Plan to truly promote high levels of sustainable development in the district.