

### Policy S6 vii) North East Harpenden Broad Location

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Harpenden has existing infrastructure issues that will be exacerbated by the proposed development	Batford Community Action Group (1185696) 789007 1183112 1183210 1184567 1056907 1185775 1185714	Noted	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process.	IDP will be updated on an ongoing basis.
The proposed Broad Location is a significant distance from the town centre, and is unsustainable	1185775	Disagree	Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.  Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.  Many facilities are in close proximity such as schools and town centre relatively accessible	No change
Support transport network improvements	St Albans & District Footpaths Society (723340)	Noted	Support noted	No change

	<p>The British Horse Society (1187597)</p> <p>Wheathampstead Parish Council (51941)</p>			
Countryside access links must be provided	<p>Ramblers Association (52420)</p> <p>St Albans &amp; District Footpaths Society (723340)</p> <p>The British Horse Society (1187597)</p> <p>St Albans Cycle Campaign (346623)</p>	Agree	This is part of the masterplanning process.	No change
Should be required to deliver walking and cycling facility improvements to promote car free access, which should be adequately maintained	<p>St Albans Cycle Campaign (346623)</p> <p>Hertfordshire County Council (837689)</p> <p>Batford Community Action Group (1185696)</p> <p>1048449</p>	Agree	<p>Cross reference Policy L18</p> <p>This approach is integral to the policy.</p>	No change
Further work needs to be carried out on infrastructure, including highways, parking, water, sewerage	<p>Hertfordshire County Council (837689)</p> <p>Batford Community Action Group (1185696)</p> <p>1185775</p>	Noted	These points are generally recognised. These matters can be properly detailed through the master planning process / planning application / EIA processes, with statutory consultation.	No change

	Wheathampstead Parish Council (51941)  Harpenden Greenbelt Association (866541)  Harpenden Society (1156761)  115365  1056907  118571  498103  867312  1183112  1183210  1184567			
Policy should consider social and pastoral needs of future occupants and include requirements for a community facility e.g. a community hall	St Albans Deanery Synod (1185929)	Noted	Refer to Policy L22 which encourages opportunities for new provision of places of worship as part of development of the Local Centres in Broad Locations.	No change

Have infrastructure requirements been viability tested to comply with national policy	Hertsmere Borough Council (51934)  Harpenden Society (1156761)	Noted	Updated evidence regarding economic viability of development has been made available on the council website.	No change
Major infrastructure must be provided up front	Colney Heath Parish Council (51891)  London Colney Parish Council (52477)	Noted	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process	IDP will be updated on an ongoing basis.
Broad locations lack a neighbourhood centre and are unsustainable.	Batford Community Action Group (1185696)  Harpenden Green Association (866541)  115365	Disagree	Cross reference with L22, which identifies Local Centres in Broad Locations.  This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
Improvements of PROW	Footpaths coordinator (723340)  Wheathampstead Parish Council (51941)	Noted	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process	IDP will be updated on an ongoing basis.
The policy should clearly demonstrate how impact on infrastructure will be mitigated	Harpenden Town Council (51870)	Noted	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process	IDP will be updated on an ongoing basis.

The policy should state that development will be required to provide new neighbourhood centre	Harpenden Town Council (51870)	Noted	Cross reference with L22, which identifies Local Centres in Broad Locations.  This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
Both strategic and local public space must be provided	Ramblers Association (52420)  St Albans & District Footpaths Society (723340)  The British Horse Society (1187597)  Batford Community Action Group (1185696)  1184750	Agree	This is part of the masterplanning process	No change
Development would result in loss of Greenacres Equestrian Centre These facilities should be re-provided nearby.	The British Horse Society (1187597)  114567	Disagree	Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.  The main site owners have promoted the site as available and deliverable for housing.	No change
Policy should include the requirement for outdoor sports provisions, and clarify whether open	Sports England (824971)	Disagree	Cross reference Policy L22 and L26 – 28.  The policy refers to strategic and local public open space. Open space is defined under the NPPF as all space of public value, land and water which offer important opportunities for sport and recreation. It is clear that this is therefore outdoor in	No change

space or recreation space includes outdoor sports provisions			<p>nature. The policy also refers to recreation space and community facilities which would capture indoor sports facilities.</p> <p>This matter can be properly detailed through the Masterplanning process.</p>	
Request policy gives consideration to extending or enhancing sports facilities in the proposed secondary school adjoin the site.	Sports England (824971)	Agree	<p>Cross reference Policy L22 and L26 – 28.</p> <p>As per Policy L22 the Council would support new facilities in appropriate and sustainable locations and joint use of facilities near to new housing areas to meet sustainability objectives.</p> <p>This is part of the Masterplanning process.</p>	No change
Proposed development would have impact on the natural environment	Batford Community Action Group (1185696)	Disagree	Development covered by EIA are set out in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Council will determine likely impact through a 'screening' procedure and whether an EIA is required. Cross reference with L29.	No change
Clarity needed on whether specific deliverables such as school buildings will be accommodated in the Broad Location or Green Belt	<p>St Albans &amp; District Footpaths Society (723340)</p> <p>The British Horse Society (1187597)</p>	Noted	Primary school site in the land to be taken out of GB. Cross reference L21 and Policies Map.	No change
Plan should include a Greater focus on the archaeological potential and history	789007	Disagree	Appropriate policy is applicable to the whole District. The proposed development at S6vii NE Harpenden will be subject to masterplanning and will accord with policy L30 regarding historic environment and archaeology.	No change

within Batford (Harpenden)				
Heritage environment /assets have not been considered and lack of criteria to protect assets	Historic England (929489)	Disagree	<p>Cross reference Policy L30</p> <p>This supports conservation of heritage assets appropriate to their significance and seeks that development which may affect such assets is accompanied by a Heritage Statement.</p> <p>Such heritage assets form only a small proportion of the overall Broad Location, are acknowledged and will be treated appropriately as part of the Masterplanning / planning application processes.</p>	No change
Strongly support allocation and safeguarding of land for schools	Department for Education (1186955)	Noted	Support noted	No change
School site locations should be identified	Hertfordshire County Council (837689)	Disagree	Primary school site in the land to be taken out of GB. Cross reference L21 and Policies Map.	No change
School building areas should be removed from green belt	<p>Department for Education (1186955)</p> <p>Hertfordshire County Council (837689)</p>	Noted	<p>Primary school site in the land to be taken out of GB. Cross reference L21 and Policies Map.</p> <p>This matter can be properly detailed through the master planning process / planning application / EIA processes, with statutory</p>	No change
S6 vii) and viii) unclear on whether it is one school between one site or one school for each.	1153741	Disagree	S6 vii and S6 viii required the provision of 2FE primary school in each Broad Location.	No change

Does not provide sufficient justification that the schools will be financially sustainable, or impact upon the sustainability of existing school.	1153741	Disagree	<p>Updated evidence regarding economic viability of development has been made available on the council website.</p> <p>This is a specific policy requirement in the Plan. All requirements set out in the Broad Location policies, have been agreed as deliverable by the landowners/developers.</p>	No change
Point 10 amended to "A site for and appropriate contributions towards a 2FE primary school (inc early years) or delivery of the school by the site developers"	Crest Strategic Projects and Bloor Homes (1158079)	Disagree	Policy wording is appropriate. This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
40dph too high	<p>Batford Community Action Group (1185696)</p> <p>Harpenden Greenbelt Association (866541)</p> <p>1184750</p>	Disagree	This is an appropriate minimum density to make best use of land and to avoid further pressure on loss of greenfield land/ Green Belt. The NPPF supports optimisation of residential density.	No change
Broad Locations should use Design Codes	<p>Harpenden Town Council (51870)</p> <p>Batford Community Action Group (1185696)</p>	Disagree	This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change



Further clarity in details needed in due course, which may be part of the masterplan discussion.	1153650	Noted	This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
Excellence in design, energy efficient and water management is required in all Broad Locations	St Albans Civic Society (1156974)	Noted	Requirements for BL set out in Policy L25.	No change
Point 5 amended to "minimum overall net density per hectare provided the development is in keeping with the character and appearance of the surrounding area"	Crest Strategic Projects and Bloor Homes (1158079)	Disagree	This is an appropriate minimum density to make best use of land and to avoid further pressure on loss of greenfield land/ Green Belt. The NPPF supports optimisation of residential density.	No change
Point 12 amended to "3% if homes provided to be self/custom build housing"	Crest Strategic Projects and Bloor Homes (1158079)	Disagree	This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
Should be more housing provided for elderly and disabled people	Harpenden Society (1156761)	Disagree	Housing for the elderly, including downsizers is a key part of the LP. There are clear standards in Policy L1 and L2.	No change

Point 14 amended to "High quality design, energy efficiency and waste management"	Crest Strategic Projects and Bloor Homes (1158079)	Disagree	There are clear standards in Plan Policy. This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
Point 15 amended to "Appropriate renewable energy production and supply mechanisms, where feasible and viable"	Crest Strategic Projects and Bloor Homes (1158079)	Disagree	There are clear standards in Plan Policy. This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
Housing figures should be maximum, not minimum	Batford Community Action Group (1185696)  Harpenden Town Council (51870)	Disagree	Housing requirement/targets are based on the standard methodology set out by the government – see S4.  Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.  Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.	No change
Is there a need for the amount of flexi-care provision required?	St Stephen Parish Council (51804)	Noted	Evidence available in full, including in HCC documents and representations. Policy L2 sets out an appropriate approach.	No change
Policy should include land size requirement for flexi-care home	Hertfordshire County Council (837689)	Disagree	Requirement as set out in Policy L2.  Size requirements can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change

40% affordable housing is welcome, but should be amended to 'meet local need'	Batford Community Action Group (1185696)	Noted	There are clear standards in Policy L1 and L2.	No change
Support inclusion of Sauncey Wood Lodge, however proposed housing figure should more accurately reflect that of expected housing delivery.	1153650	Disagree	Support noted. Housing trajectory at appendix 2 shows indicative delivery rates.	No change
It is unclear whether Porters Hill Play Park forms part of the broad location. Its loss if opposed.	Harpenden Greenbelt Association (866541)	Noted	Porters Hill Play Park is not located within the Broad Location.	No change
Land east of Common Lane should be included in the Broad Location	1186108	Disagree	Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.	No change
As part owners of the site support the Proposal	978393 1187423	Noted	Support noted	No change

Policy should consider the requirement for 'community led' development, particularly in the masterplan process.	Batford Community Action Group (1185696)	Noted	This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
What masterplanning collaboration has there been?	St Stephen Parish Council (51804)	Noted	Masterplanning is at the very earliest stages. Collaboration with residents and stakeholders will take place as progress is made.	No change
Collaboration with neighbouring Councils needed	1181750 1182733	Noted	There has been ongoing joint working with neighbouring local authorities including the South West Herts Group.	No change
Lack of cooperation with neighbouring authorities	Batford Community Action Group (1185696)  Harpenden Green Association (866541)  1185714	Disagree	There has been ongoing joint working with neighbouring local authorities including the South West Herts Group. DtC considered to be met.	No change
Key documentation will not be provided until after regulation 19, meaning public would be unable to comment.	Batford Community Action Group (1185696)  Harpenden Green Association (866541)  1185714	Disagree	Evidence is available in full and where required has been and will be further updated.	No change
Support DtC discussions on North East Harpenden	Central Bedfordshire Council (861963)	Noted	Support noted	No change

Support sufficient assets to provide sustainable management of community facilities, open spaces and parklands	St Albans & District Footpaths Society (723340)  The British Horse Society (1187597)	Noted	Support noted	No change
No information provided on strategy or delivery, just a wishlist	Aurora Properties Limited (1151817)	Disagree	The development requirements are clear and the Masterplan process will provide more specific proposals in due course.	No change
No Sequential test based on the Latest SFRA. Request amendment to state no develop in areas at risk of flooding (Zones 2 and 3) taking future impact of climate change into account.	Environmental Agency (1147557)	Noted	Cross reference to Policy L29 and NPPF/NPPG.  Updated Flood Risk Assessment has been prepared and added to the website.	No change
Development will exacerbate Flood Risk	Batford Community Action Group (1185696)	Noted	Cross reference to Policy L29 and NPPF/NPPG.  Updated Flood Risk Assessment has been prepared and added to the website.	No change
Should include requirement to design to mitigate adverse air quality impacts, as in S6 i), ii) and iii).	Hertfordshire County Council (837689)	Disagree	Cross reverence to Policy L18 which requires major developments to provide proposals for limiting and mitigating air quality impacts.	No change

### Policy S6 viii) North West Harpenden Broad Location

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Harpenden has existing infrastructure issues that will be exacerbated by the proposed development	Batford Community Action Group (1185696)  Harpenden Greenbelt Association (866541)  789007  1055683  1185775  1185714	Disagree	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process	IDP will be updated on an ongoing basis.
Support walking/cycling facility improvements to promote car-free access	The British Horse Society (1187597)  Friends of the Nickey Line (1184312)  1048449	Noted	Support noted	No change
Should require improved road safety for non-motorised users	The British Horse Society (1187597)	Noted	Requirements set out in L19.	No change.
Countryside access links must be provided	Ramblers Association (52420)	Agree	This is part of the masterplanning process	No change

	<p>St Albans &amp; District Footpaths Society (723340)</p> <p>The British Horse Society (1187597)</p> <p>St Albans Cycle Campaign (346623)</p>			
Support transport network improvements	<p>St Albans &amp; District Footpaths Society (723340)</p> <p>Ramblers Association (52420)</p> <p>Friends of the Nickey Line (1184312)</p>	Noted	Support noted	No change
Should be required to deliver walking and cycling facility improvements to promote car free access, which should be adequately maintained	<p>St Albans Cycle Campaign (346623)</p> <p>Hertfordshire County Council (837689)</p> <p>Friends of the Nickey Line (1184312)</p> <p>1153741</p> <p>1048449</p>	Agree	<p>Cross reference Policy L18</p> <p>This approach is integral to the policy.</p>	No change
Further work needs to be carried out on infrastructure, including highways,	Hertfordshire County Council (837689)	Noted	These points are generally recognised. These matters can be properly detailed through the master planning process /	No change

parking, water, sewerage	Batford Community Action Group (1185696)  1185775  1185714  498103  867312		planning application / EIA processes, with statutory consultation.	
Policy should consider social and pastoral needs of future occupants and include requirements for a community facility e.g. a community hall	St Albans Deanery Synod (1185929)	Noted	Refer to Policy L22 which encourages opportunities for new provision of places of worship as part of development of the Local Centres in Broad Locations.	No change
Support sufficient assets to provide sustainable management of community facilities, open spaces and parklands	St Albans & District Footpaths Society (723340)  Ramblers Association (52420)	Noted	Support noted	No change
Have infrastructure requirements been viability tested to comply with national policy	Hertsmere Borough Council (51934)  Harpenden Society (1156761)	Noted	Updated evidence regarding economic viability of development has been made available on the council website.	No change



Planning Contributions should go towards the resurfacing of the Nickey Line.	Friends of the Nickey Line (1184312)	Noted	The Nickey Line footpath / cycleway is an important landscape, commuting and recreational route feature. There are considerable opportunities for enhancement. Masterplanning will consider opportunities and if appropriate S106 contributions provided.	No change
Improvements of PROW	Footpaths coordinator (723340)	Noted	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process	IDP will be updated on an ongoing basis.
The policy should clearly demonstrate how impact on infrastructure will be mitigated	Harpenden Town Council (51870)	Noted	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process	IDP will be updated on an ongoing basis.
The policy should state that the development will be required to provide new neighbourhood centre	Harpenden Town Council (51870)	Noted	Cross reference with L22, which identifies Local Centres in Broad Locations.  This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
Major infrastructure must be provided up front	Colney Heath Parish Council (51891)  London Colney Parish Council (52477)	Noted	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process	IDP will be updated on an ongoing basis.
Broad locations lack a neighbourhood centre and are unsustainable.	Batford Community Action Group (1185696)	Disagree	Cross reference with L22, which identifies Local Centres in Broad Locations.  This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change

School building areas should be removed from green belt	Department for Education (1186955) Hertfordshire County Council (837689)	Disagree	Primary school site in the land to be retained in GB. Cross reference L21 and Policies Map.	No change
Clarity needed on whether specific deliverables such as school buildings will be accommodated in the Broad Location or Green Belt	St Albans & District Footpaths Society (723340) The British Horse Society (1187597)	Disagree	Primary school site in the land to be retained in GB. Cross reference L21 and Policies Map.	No change
S6 vii) and viii) unclear on whether it is one school between one site or one school for each.	1153741	Noted	S6 vii and S6 viii required the provision of 2FE primary school in each Broad Location.	No change
Strongly support allocation and safeguarding of land for schools	Department for Education (1186955)	Noted	Support noted	No change
Policy should include indication of school site size required	Department for Education (1186955)	Noted	Add reference in IDP to HCC size requirements as set out in response to L21	IDP will be updated on an ongoing basis.
Does not provide sufficient justification that the schools will be financially sustainable, or impact upon the	1153741	Disagree	Updated evidence regarding economic viability of development has been made available on the council website.	No change

sustainability of existing school.			This is a specific policy requirement in the Plan. All requirements set out in the Broad Location policies, have been agreed as deliverable by the landowners/developers.	
Support provision of recreational space and public open space	The British Horse Society (1187597)	Noted	Support noted	No change
Policy should include the requirement for outdoor sports provisions, and clarify whether open space or recreation space includes outdoor sports provisions	Sports England (824971)	Disagree	<p>Cross reference Policy L22 and L26 – 28.</p> <p>The policy refers to public open space. Open space is defined under the NPPF as all space of public value, land and water which offer important opportunities for sport and recreation. It is clear that this is therefore outdoor in nature. The policy also refers to recreation space and community facilities which would capture indoor sports facilities.</p> <p>This matter can be properly detailed through the Masterplanning process.</p>	No change
Should state Ancient Woodland bordering the site should be retained and protected	Harpenden Greenbelt Association (866541)	Disagree	<p>Importance of Ancient Woodland acknowledged. Cross reference Policy L30, which supports the protection of ancient woodlands.</p> <p>This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.</p>	No change
The location of the proposed school would be detrimental to the Green Belt	Harpenden Greenbelt Association (866541)	Noted	Site selection is firmly based on comprehensive GB work and the most appropriate locations have already been selected.	No change
The required housing number is	1055683	Disagree	Housing requirement/targets are based on the standard methodology set out by the government – see S4.	No change

overestimated, and does not justify the release of Greenbelt			<p>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.</p> <p>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p> <p>Calculation basis set out at Annex 1.</p>	
The Policy should include “provisions of green links connecting North West Harpenden to the surrounding countryside, which will enhance the recreation and leisure use of the Green Belt beyond Harpenden to the north of the site”	CEG (1158030)	Disagree	Requirement set out in Policies L28 and L29. This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No Change
Both strategic and local public space must be provided	<p>Ramblers Association (52420)</p> <p>St Albans &amp; District Footpaths Society (723340)</p> <p>1184750</p>	Agree	This is part of the masterplanning process	No change
40dph too high	<p>1184750</p> <p>Harpenden Greenbelt Association (866541)</p>	Disagree	This is an appropriate minimum density to avoid further pressure on loss of greenfield land/ Green Belt. The NPPF supports optimisation of residential density.	No change

	Batford Community Action Group (1185696)			
Housing figures should be maximum, not minimum	Harpenden Town Council (51870)  Harpenden Greenbelt Association (866541)	Disagree	Housing requirement/targets are based on the standard methodology set out by the government – see S4.  Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.  Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.	No change
Site is of insufficient size to provide 580 dwellings.	Harpenden Greenbelt Association (866541)	Disagree	Some parts of the Broad Location will be at higher and lower density. Overall the land can accommodate the dwelling numbers in the Plan. Calculation basis set out at Annex 1.	No change
Should be more housing provided for elderly and disabled people	Harpenden Society (1156761)	Disagree	Housing for the elderly, including downsizers is a key part of the LP. There are clear standards in Policy L1 and L2.	No change
“Broad Locations’ should be changed to ‘Specific deliverable sites’ and deliverable within 5 years	CEG (1158030)  Legal and General (1051022)	Disagree	Local Plan wording reflects NPPF wording.	No change
Supports the allocation of the site	CEG (1158030)  Legal and General (1051022)	Noted	Support noted	No change
Is there a need for the amount of flexi-	St Stephen Parish Council (51804)	Noted	Evidence available in full, including in HCC documents and representations. Policy L2 sets out an appropriate approach.	No change

care provision required?				
Policy should include land size requirement for flexi-care home	Hertfordshire County Council (837689)	Disagree	Requirement as set out in Policy L2.  Size requirements can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change
Support DtC discussions on North West Harpenden	Central Bedfordshire Council (861963)	Noted	Support noted	No change
What masterplanning collaboration has there been?	St Stephen Parish Council (51804)	Noted	Masterplanning is at the very earliest stages. Collaboration with residents and stakeholders will take place as progress is made.	No change
Collaboration with neighbouring Councils needed	1181750 1182733	Noted	There has been ongoing joint working with neighbouring local authorities including the South West Herts Group.	No change
Key documentation will not be provided until after regulation 19, meaning public would be unable to comment.	Batford Community Action Group (1185696)  Harpenden Green Association (866541)  1185714	Disagree	Evidence is available in full and where required has been and will be further updated.	No change
Lack of cooperation with neighbouring authorities	Batford Community Action Group (1185696)  Harpenden Green Association (866541)	Disagree	There has been ongoing joint working with neighbouring local authorities including the South West Herts Group. DtC considered to be met.	No change

	1185714			
Broad Locations should use Design Codes	Harpenden Town Council (51870) Batford Community Action Group (1185696)	Disagree	This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change
Density would be out of character with the surrounding area.	Harpenden Greenbelt Association (866541)	Disagree	This is an appropriate minimum density to make best use of land and to avoid further pressure on loss of greenfield land/ Green Belt. The NPPF supports optimisation of residential density.  Cross reference to policy L1 which does not compromise the distinctive character of areas where new developments will be based.	No change
The policy should read 'the masterplanning process should be conducted in parallel with the preparation of the Local Plan, to enable timely site delivery'	Legal and General (1051022) CEG (1158030)	Disagree	Masterplanning is at an early stage but will continue to support LP process. No need to change LP text.	No change
Excellence in design, energy efficient and water management is required in all Broad Locations	St Albans Civic Society (1156974)	Noted	Requirements for BL set out in Policy L25.	No change

Should include requirement to design to mitigate adverse air quality impacts, as in S6 i), ii) and iii).	Hertfordshire County Council (837689)	Disagree	Cross reference to Policy L18 which requires major developments to provide proposals for limiting and mitigating air quality impacts.	No change
Development will exacerbate Flood Risk	Batford Community Action Group (1185696)	Noted	Cross reference to Policy L29 and NPPF/NPPG.  Updated Flood Risk Assessment has been prepared and added to the website.	No change
Impact listed building / its setting should be made clear.	Harpenden Greenbelt Association (866541)	Disagree	Cross reference Policy L30  This supports conservation of heritage assets appropriate to their significance and seeks that development which may affect such assets is accompanied by a Heritage Statement.	No change
Heritage environment /assets have not been considered and lack of criteria to protect assets	Historic England (929489)	Disagree	Cross reference Policy L30  This supports conservation of heritage assets appropriate to their significance and seeks that development which may affect such assets is accompanied by a Heritage Statement.	No change
No information provided on strategy or delivery, just a wishlist	Aurora Properties Limited (1151817)	Disagree	The development requirements are clear and the Masterplan process will provide more specific proposals in due course.	No change



### Policy S6 ix) West of London Colney Broad Location

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Green routes required for London Colney children to access secondary schools	London Colney Parish Council (52477)	Noted	<p>Policy L29 sets out the proposed key green infrastructure network. Enhanced public access improvements to this network is a key priority. S6 ix regarding the BL for London Colney requires a transport network of walking and cycling links.</p> <p>This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.</p>	No change
Countryside access links must be provided	<p>Ramblers Association (52420)</p> <p>St Albans &amp; District Footpaths Society (723340)</p> <p>The British Horse Society (1187597)</p> <p>St Albans Cycle Campaign (346623)</p>	Agree	This is part of the masterplanning process.	No change
Support transport network improvements	<p>St Albans &amp; District Footpaths Society (723340)</p> <p>Ramblers Association (52420)</p>	Noted	Support noted	No change

Should be required to deliver walking and cycling facility improvements to promote car free access, which should be adequately maintained	St Albans Cycle Campaign (346623)  Hertfordshire County Council (837689)  1048449	Agree	Cross reference Policy L18  This approach is integral to the policy.	No change
Further work needs to be carried out on infrastructure, including highways, parking, water, sewerage	Hertfordshire County Council (837689)  London Colney Parish Council (52477)  498103  867312  1185583  1185821	Noted	These points are generally recognised. These matters can be properly detailed through the master planning process / planning application / EIA processes, with statutory consultation.	No change
Policy should consider social and pastoral needs of future occupants and include requirements for a community facility e.g. a community hall	St Albans Deanery Synod (1185929)	Noted	Refer to Policy L22 which encourages opportunities for new provision of places of worship as part of development of the Local Centres in Broad Locations.	No change

Have infrastructure requirements been viability tested to comply with national policy	Hertsmere Borough Council (51934)	Noted	Updated evidence regarding economic viability of development has been made available on the council website.	No change
Major infrastructure must be provided up front	Colney Heath Parish Council (51891)  London Colney Parish Council (52477)	Noted	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process.	IDP will be updated on an ongoing basis.
Existing infrastructure issues will be exacerbated by the proposed development	London Colney Parish Council (52477)  Bricketwood Residents Association (1186066)  1182733  1185583  1185821	Noted	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process	IDP will be updated on an ongoing basis.
The development will result in strain on facilities and services for existing residents.	Bricketwood Residents Association (1186066)	Noted	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process	IDP will be updated on an ongoing basis.
School building areas should be removed from green belt	Department for Education (1186955)  Hertfordshire County Council (837689)	Disagree	Primary and secondary 'all-through' school site in the land to be retained in GB. Cross reference L21 and Policies Map.	No change

Must include a secondary school	London Colney Parish Council (52477)	Agree	Policy S6 ix) sets out this requirement.	No change
Clarity needed on whether specific deliverables such as school buildings will be accommodated in the Broad Location or Green Belt	St Albans & District Footpaths Society (723340)  The British Horse Society (1187597)	Noted	Primary and secondary 'all-through' school site in the land to be retained in GB. Cross reference L21 and Policies Map.	No change
Strongly support allocation and safeguarding of land for schools	Department for Education (1186955)	Noted	Support noted	No change
Policy should include indication of school site size required	Department for Education (1186955)	Noted	Add reference in IDP to HCC size requirements as set out in response to L21.	IDP will be updated on an ongoing basis.
London Colney already has three primary schools, with a secondary school close by.	1055738	Noted	London Colney has grown to the stage where it is a small town in terms of its overall scale, population level and number of households. A new secondary school and primary school is a key part of providing appropriate facilities for London Colney.	No change
Support provision of recreational space and public open space	The British Horse Society (1187597)  Bricketwood Residents Association (1186066)	Noted	Requirements set out in Policy L27 and L28. This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
Both strategic and local public space must be provided	Ramblers Association (52420)	Agree	Requirements set out in Policy L27 and L28. This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change

	St Albans & District Footpaths Society (723340)  1184750			
Support sufficient assets to provide sustainable management of community facilities, open spaces and parklands	St Albans & District Footpaths Society (723340)  Ramblers Association (52420)  Bricketwood Residents Association (1186066)	Noted	Support noted	No change
Policy should include the requirement for outdoor sports provisions, and clarify whether open space or recreation space includes outdoor sports provisions	Sports England (824971)	Disagree	Cross reference Policy L22 and L26 – 28.  The policy refers to public open space. Open space is defined under the NPPF as all space of public value, land and water which offer important opportunities for sport and recreation. It is clear that this is therefore outdoor in nature. The policy also refers to recreation space and community facilities which would capture indoor sports facilities.  This matter can be properly detailed through the Masterplanning process.	No change
Should include a commitment to working closely with Hertsmere BC, particularly in relation to infrastructure	Hertsmere Borough Council (51934)  1182733	Noted	There has been and will be ongoing joint working with neighbouring local authorities including Hertsmere the South West Herts Group. DtC considered to be met.	No change

Hertsmere BC should be partners for masterplanning work	Hertsmere Borough Council (51934)	Noted	SADC and HBC are working together through the SWH JSP process. For all issues where there might be a cross-boundary implication for Hertsmere/SADC then appropriate involvement in Masterplanning will take place in due course.	No change
Support discussions between SADC and Parish Council	London Colney Parish Council (52477)	Noted	Support noted	No change
What masterplanning collaboration has there been?	St Stephen Parish Council (51804)	Noted	Masterplanning is at the very earliest stages. Collaboration with residents and stakeholders will take place as progress is made.	No change
Collaboration with neighbouring Councils needed	London Colney Parish Council (52477)  1181750  1182733  1185583  1185821	Noted	There has been ongoing joint working with neighbouring local authorities including the South West Herts Group.	No change
Should have a maximum capacity of 440 homes, not a minimum	London Colney Parish Council (52477)	Disagree	Housing requirement/targets are based on the standard methodology set out by the government – see S4. Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy. Calculation basis set out at Annex 1.	No change
40dph too high	1184750  1185821	Disagree	This is an appropriate minimum density to avoid further pressure on loss of greenfield land/ Green Belt. The NPPF supports optimisation of residential density.	No change

Under councils own guidance of a minimum of 500 dwellings.	1185775	Disagree	Site selection methodology set out site area or site capacity as criteria for assessment. This BL falls within that site area criteria.	No change
Is there a need for the amount of flexi-care provision required?	St Stephen Parish Council (51804)	Noted	Evidence available in full, including in HCC documents and representations. Policy L2 sets out an appropriate approach.	No change
Policy should include land size requirement for flexi-care home	Hertfordshire County Council (837689)	Disagree	Requirement as set out in Policy L2.  Size requirements can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change
The 440 homes should be provided within the Park Street Garden Village.	1055738	Disagree	Housing requirement/targets are based on the standard methodology set out by the government – see S4.  Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.  Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.	No change
Adverse impact on Napsbury Historic Park and Conservation Area	1055738	Disagree	Cross reference Policy L30  This supports conservation of heritage assets appropriate to their significance and seeks that development which may affect such assets is accompanied by a Heritage Statement.	No change
Heritage environment /assets have not been considered and lack	Historic England (929489)	Disagree	Cross reference Policy L30	No change

of criteria to protect assets			This supports conservation of heritage assets appropriate to their significance and seeks that development which may affect such assets is accompanied by a Heritage Statement.	
Excellence in design, energy efficient and water management is required in all Broad Locations	St Albans Civic Society (1156974)	Agree	Cross reference to Policies L23/25 which set out requirements for achieving high quality design and sustainable energy?	No change
Broad Locations should use Design Codes	Harpenden Town Council (51870)	Disagree	This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change
Should include requirement to design to mitigate adverse air quality impacts, as in S6 i), ii) and iii).	Hertfordshire County Council (837689)	Disagree	Cross reference to Policy L18 which requires major developments to provide proposals for limiting and mitigating air quality impacts.	No change
The development will have a detrimental impact on air quality	Bricketwood Residents Association (1186066)	Disagree	Cross reference to Policy L18 which requires major developments to provide proposals for limiting and mitigating air quality impacts.  SADC takes into consideration the need to minimise the impact on air quality	No change
The development will have a detrimental impact on ecology	Bricketwood Residents Association (1186066)  Hertfordshire County Council (837689)	Noted	Development covered by EIA are set out in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Council will determine likely impact through a 'screening' procedure and whether an EIA is required. Cross reference with L29.	No change



No Sequential test based on the Latest SFRA. Request amendment to state no develop in areas at risk of flooding (Zones 2 and 3) taking future impact of climate change into account.	Environmental Agency (1147557)	Noted	Cross reference to Policy L29 and NPPF/NPPG.  Updated Flood Risk Assessment has been prepared and added to the website.	No change
Maybe opportunity for mineral extraction at this broad location. A mineral resource assessment should be carried out.	Hertfordshire County Council (837689)	Disagree	An Environmental Impact Assessment (EIA) would be required for developments that are prescribed by the EIA Regulations.	No change
Why is London Colney identified as a Town when it is a village?	1185583 118775 1185821	Disagree	London Colney has grown to the stage where it is a small town in terms of its overall scale, population level and number of households.	No change
As landowner supports broad location. Technical and environmental studies conclude that there are no significant impediments to development.	Hertfordshire County Council Property (1185913)	Noted	Support noted	No change

It is recommended that the southern site boundary is extended to accommodate the country park and community playing fields as proposed on the masterplan.	Hertfordshire County Council Property (1185913)	Disagree	Site selection and boundaries are firmly based on comprehensive GB work and the most appropriate locations have already been selected.	No change
No information provided on strategy or delivery, just a wishlist	Aurora Properties Limited (1151817)	Disagree	The development requirements are clear and the Masterplan process will provide more specific proposals in due course.	No change
Planning contributions should be sought, to be spent by local groups / parishes	Bricketwood Residents Association (1186066)	Noted	<p>Planning contributions may be sought by way of S106 agreements during the planning application stage / set out in the regulation 123 List on adoption of CIL.</p> <p>This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.</p>	No change

### Policy S6 x) West of Chiswell Green Broad Location

Representation Point	Representor Raising Point	Outline Reply	Recommended Reply (including notes and references)	Suggested Actions (including any Changes to Plan)
Should include flexi-care provision	St Stephen Parish Council (51804)	Disagree	Evidence available in full, including in HCC documents and representations. Policy L2 sets out an appropriate approach.	No change
Policy should include land size requirement for flexi-care home	Hertfordshire County Council (837689)	Disagree	Requirement as set out in Policy L2.  Size requirements can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change
40dph too high	1184750	Disagree	This is an appropriate minimum density to avoid further pressure on loss of greenfield land/ Green Belt. The NPPF supports optimisation of residential density.	No change
Is there a need for the amount of flexi-care provision required?	St Stephen Parish Council (51804)	Disagree	Evidence available in full, including in HCC documents and representations. Policy L2 sets out an appropriate approach.	No change
Strongly against new homes being built in this Broad Location	1185629 1186774	Disagree	Housing requirement/targets are based on the standard methodology set out by the government – see S4.  Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.  Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.	No change

365 dwellings is below the strategic threshold for the number of dwellings (500)	973643 977724	Disagree	Site selection methodology set out site area or site capacity as criteria for assessment. This BL falls within that site area criteria.	No change
365 dwellings is not sufficient to fill a 2fe primary school, and the site should be increased / smaller sites allocated to deliver this.	973643 977724	Disagree	Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.  This is a specific policy requirement in the Plan. All requirements set out in the Broad Location policies have been agreed as deliverable by the landowners/developers.	No Change
Clarity needed on whether specific deliverables such as school buildings will be accommodated in the Broad Location or Green Belt	St Albans & District Footpaths Society (723340)  The British Horse Society (1187597)	Noted	Primary school site in the land to be taken out of GB. Cross reference L21 and Policies Map.	No change
Strongly support allocation and safeguarding of land for schools	Department for Education (1186955)  St Stephen Parish Council (51804)	Noted	Support noted	No change
Policy should include indication of school site size required	Department for Education (1186955)	Noted	Add reference in IDP to HCC size requirements as set out in response to L21	IDP will be updated on an ongoing basis.
School site locations should be identified	Hertfordshire County Council (837689)	Noted	Primary school site in the land to be taken out of GB. Cross reference L21 and Policies Map.	No change

School building areas should be removed from green belt	Department for Education (1186955) Hertfordshire County Council (837689)	Noted	Primary school site in the land to be taken out of GB. Cross reference L21 and Policies Map.	No change
Existing schools in the area are already crowded	1185469 1186780	Disagree	Cross Reference L21. Primary school to be provided.  Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.	No change
Existing infrastructure issues will be exacerbated by the proposed development	Bricketwood Residents Association (1186066) St Stephen Parish Council (51804)  863091  871923  1182697  1184271  1184839  1158536  1184864  1185244  1185469  1185633	Disagree	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process	IDP will be updated on an ongoing basis.

	1185640 1156288 1182480 1186780 1183783 1187008 1185640 1187590 1186783 1185482 1185481 1185478 1185479			
Improving Public Transport / Waking / Cycling Links will not be sufficient	1182697	Disagree	Cross reference Policy L18 This approach is integral to the policy.	No change

Countryside access links must be provided	<p>Ramblers Association (52420)</p> <p>St Albans &amp; District Footpaths Society (723340)</p> <p>The British Horse Society (1187597)</p> <p>St Albans Cycle Campaign (346623)</p>	Agree	This is part of the masterplanning process	No change
Support transport network improvements	<p>St Albans &amp; District Footpaths Society (723340)</p> <p>Ramblers Association (52420)</p>	Noted	Support noted	No change
Should be required to deliver walking and cycling facility improvements to promote car free access, which should be adequately maintained	<p>St Albans Cycle Campaign (346623)</p> <p>Hertfordshire County Council (837689)</p> <p>1048449</p>	Agree	<p>Cross reference Policy L18</p> <p>This approach is integral to the policy.</p>	No change
Further work needs to be carried out on infrastructure, including highways,	<p>Hertfordshire County Council (837689)</p> <p>498103</p> <p>867312</p>	Noted	These points are generally recognised. These matters can be properly detailed through the master planning process / planning application / EIA processes, with statutory consultation.	No change

parking, water, sewerage				
Have infrastructure requirements been viability tested to comply with national policy	Hertsmere Borough Council (51934)	Noted	Updated evidence regarding economic viability of development has been made available on the council website.	No change
Major infrastructure must be provided up front	Colney Heath Parish Council (51891) London Colney Parish Council (52477)	Noted	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process	IDP will be updated on an ongoing basis.
Broad Location at Chiswell Green will worsen parking issues	1187590	Disagree	Cross reference with policy L20 and appendix 1, which sets out the Local Authority's parking standards for new development.  New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process.	IDP will be updated on an ongoing basis.
Policy should consider social and pastoral needs of future occupants and include requirements for a community facility e.g. a community hall	St Albans Deanery Synod (1185929)	Noted	Refer to Policy L22 which encourages opportunities for new provision of places of worship as part of development of the Local Centres in Broad Locations.	No change



The site is not located in a sustainable location	Bricketwood Residents Association (1186066) 1185775 1186783	Disagree	Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.  Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.  The site is a relatively sustainable location and primary school provision, community facility provision and open space provision onsite will assist.	No change
Support sufficient assets to provide sustainable management of community facilities, open spaces and parklands	St Albans & District Footpaths Society (723340)  Ramblers Association (52420)	Noted	Support noted	No change
Support provision of recreational space and public open space	The British Horse Society (1187597)	Noted	Support noted	No change
Both strategic and local public space must be provided	Ramblers Association (52420)  St Albans & District Footpaths Society (723340)  1184750	Agree	This is part of the masterplanning process	No change
Policy should include the requirement for outdoor sports	Sports England (824971)	Disagree	Cross reference Policy L22 and L26 – 28.  The policy refers to public open space. Open space is defined under the NPPF as all space of public value, land and water	No change

provisions, and clarify whether open space or recreation space includes outdoor sports provisions			<p>which offer important opportunities for sport and recreation. It is clear that this is therefore outdoor in nature. The policy also refers to recreation space and community facilities which would capture indoor sports facilities.</p> <p>This matter can be properly detailed through the Masterplanning process.</p>	
Development will have an impact on the destruction of trees and hedgerows	87923	Noted	<p>Cross reference Policy L29, which sets out the requirements for the protection of existing woodland, trees and landscape features.</p> <p>This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.</p>	
The development will have a detrimental impact on ecology	<p>Bricketwood Residents Association (1186066)</p> <p>1158536</p>	Disagree	Development covered by EIA are set out in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Council will determine likely impact through a 'screening' procedure and whether an EIA is required. Cross reference with L29.	No change
Should include requirement to design to mitigate adverse air quality impacts, as in S6 i), ii) and iii).	Hertfordshire County Council (837689)	Disagree	Cross reference to Policy L18 which requires measures to improve air quality.	No change
The development will have a detrimental impact on air quality	<p>Bricketwood Residents Association (1186066)</p> <p>1184271</p> <p>1184839</p>	Disagree	Cross reference to Policy L18 which requires measures to improve air quality.	No change

	1158536			
	1184864			
	1185244			
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	1185479			
	1185633			
	1185640			
	1156288			
	1182480			
	1186780			
	1187008			
	1185640			
	1187590			
	863091			
	871923			

Broad Locations should use Design Codes	Harpenden Town Council (51870)	Disagree	This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change
Excellence in design, energy efficient and water management is required in all Broad Locations	St Albans Civic Society (1156974)	Noted	Requirements for BL set out in Policy L25.	No change
Increasing village by 30% will have a detrimental impact on character.	1182697 1184271 1184839 1158536 1184864 1185244 1185469 1185482 1185481 1185478 1185479 1185633 1185640	Disagree	<p>No reason for detrimental impact on character. Masterplanning is at the very earliest stages. Collaboration with residents and stakeholders will take place as progress is made.</p> <p>Housing requirement/targets are based on the standard methodology set out by the government – see S4.</p> <p>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.</p> <p>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p>	No change

	1156288 1182480 1183783 1187008 1185640 1187590 863091 871923			
Supports the broad location. The site is deliverable, free from constraints and exceptional circumstances exist to release from the green belt.	Adrian Irving and Alban Developments Ltd (1147416)	Noted	Support noted	No change
Collaboration with neighbouring Councils needed	1181750 1182733	Noted	There has been ongoing joint working with neighbouring local authorities including the South West Herts Group.	No change
What masterplanning collaboration has there been?	St Stephen Parish Council (51804)	Noted	Masterplanning is at the very earliest stages. Collaboration with residents and stakeholders will take place as progress is made.	No change
Welcomes support with plan for	Bricketwood Residents Association (1186066)	Noted	Support noted	No change

neighbourhood planning				
Planning contributions should be sought, to be spent by local groups / parishes	Bricketwood Residents Association (1186066)	Noted	<p>Planning contributions may be sought by way of S106 agreements during the planning application stage / set out in the regulation 123 List on adoption of CIL.</p> <p>This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.</p>	No change
No information provided on strategy or delivery, just a wishlist	Aurora Properties Limited (1151817)	Disagree	The development requirements are clear and the Masterplan process will provide more specific proposals in due course.	No change
Heritage environment /assets have not been considered and lack of criteria to protect assets	Historic England (929489)	Disagree	<p>Cross reference Policy L30</p> <p>This supports conservation of heritage assets appropriate to their significance and seeks that development which may affect such assets is accompanied by a Heritage Statement.</p>	No change
Contradicts with S1, where Chiswell Green is a lower category to London Colney, but will receive a similar level of development.	1186783	Disagree	<p>Cross Reference Policy S1, S2.</p> <p>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.</p> <p>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p>	No change
BL should be increased to include	Butterfly World Ltd (1183965)	Disagree	Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.	No change

Butterfly World, rather than SRFI				
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**Policy S6 xi) Park Street Garden Village Broad Location**

<b>Representation Point</b>	<b>Representor Raising Point (see below for list of abbreviations)</b>	<b>Outline Reply</b>	<b>Recommended Reply (including notes and references)</b>	<b>Suggested Actions (including any Changes to Plan)</b>
Further technical and environmental studies would be required to develop the masterplan	Hertfordshire County Council Property (1185913)	Noted	Masterplanning is at the very earliest stages.	No change
If Park Street Garden Village comes forward for housing SADC should commit to joint working with Hertsmere BC and relevant infrastructure providers	Hertsmere Borough Council (51934)  1182733	Noted	There has been and will be ongoing joint working with neighbouring local authorities including Hertsmere the South West Herts Group. DtC considered to be met.	No change
No evidence to support increased frequency of Abbey Line service form first occupation or passing loop	Department of Health & Social Care and Bloor Homes (1156886)  M Scott Properties (1185993)  1185775	Disagree	Requirement for improved Abbey Line service. Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.  Long lead-in time acknowledged in timeline for delivery.	No change

Countryside access links must be provided	<p>Ramblers Association (52420)</p> <p>St Albans &amp; District Footpaths Society (723340)</p> <p>The British Horse Society (1187597)</p> <p>St Albans Cycle Campaign (346623)</p> <p>1157340</p>	Agree	This is part of the masterplanning process	No change
Support transport network improvements	<p>St Albans &amp; District Footpaths Society (723340)</p> <p>Ramblers Association (52420)</p> <p>Minister Court Frogmore Ltd (1185980)</p>	Noted	Support noted	No change
Rail improvement requires have limitations including no mention of off peak timetabling, and proximity of stations to developable area of site.	<p>Helioslough Ltd (1182085)</p> <p>Watford Borough Council (1122500)</p> <p>1181750</p> <p>1185775</p>	Noted	<p>Requirement for improved Abbey Line service. Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.</p> <p>Long lead-in time acknowledged in timeline for delivery.</p>	No change



Substantial road improvements will be required – those agreed for the SRFI are unlikely to be sufficient	Helioslough Ltd (1182085)	Noted	The need for a comprehensive package of transport measures is acknowledged in S6 xi, L18 etc. A transport evidence workplan has been agreed with HCC.	No change
Should be required to deliver walking and cycling facility improvements to promote car free access, which should be adequately maintained	St Albans Cycle Campaign (346623) Hertfordshire County Council (837689) Watford Borough Council (1122500) 1048449 1185744	Agree	Cross reference Policy L18  This approach is integral to the policy.	No change
Further work needs to be carried out on infrastructure, including highways, parking, water, sewerage	Hertfordshire County Council (837689) St Stephen Parish Council (51804) 498103 867312 1185775 1186081	Noted	Work on the infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.	IDP will be updated on an ongoing basis.

Have infrastructure requirements been viability tested to comply with national policy	Hertsmere Borough Council (51934)	Noted	Updated evidence regarding economic viability of development has been made available on the council website.	No change
Policy should consider social and pastoral needs of future occupants and include requirements for a community facility e.g. a community hall	St Albans Deanery Synod (1185929)	Noted	Refer to Policy L22 which encourages opportunities for new provision of places of worship as part of development of the Local Centres in Broad Locations.	No change
Major infrastructure must be provided up front	Colney Heath Parish Council (51891) London Colney Parish Council (52477)	Noted	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process	IDP will be updated on an ongoing basis.

Existing infrastructure issues will be exacerbated by the proposed development	St Stephen Parish Council (51804)  Bricket Wood Residents Association (1186066)  1181750  1182733  1185744  1185775  1186081	Noted	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process	IDP will be updated on an ongoing basis.
Any increased Abbey Line service not committed, and can only be supported if Cottonmill Lane crossing closed.	National Rail (1184616)	Noted	Long lead-in time acknowledged in timeline for delivery.  No evidence supplied to support closing of Cotton Mill Lane crossing. Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.	No change
The proposed park and rail will have a detrimental impact on public right of way	St Albans & District Footpaths Society (723340)	Disagree	Requirements set out in Policy L18. This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
No justification for the requirement for the Park and Rail facility	St Albans & District Footpaths Society (723340)  M Scott Properties (1185993)	Disagree	Evidence available, including in HCC documents and representations. Policy S6 xi sets out an appropriate approach. Further details can be found in IDP updates / master planning work / planning application process	No change

	1185775			
Rail improvement works need to be looked at realistically	St Stephen Parish Council (51804) St Albans Civic Society (1156974) 1185775	Noted	Required realism noted and already incorporated into Policy S6 xi.	No change
Improvements to the Abbey Line do not go far enough	1186081	Noted	Realism required about deliverability and incorporated into Policy S6 xi.	No change
Supports Improvements to the Abbey Line	Abbey Flyer Users Group (1156861) Watford Borough Council (1122500)	Noted	Support Noted	No change
Walking / Cycling Routes should be mapped conceptually to aid master planning	Watford Borough Council (1122500)	Disagree	This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
The development will result in strain on facilities and services for existing residents.	Bricket Wood Residents Association (1186066)	Noted	New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process	IDP will be updated on an ongoing basis.
PSGV is situated too far away to utilise Category 1 services and transport	CP Holdings (1158145)	Disagree	Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy. Piecemeal release of small	No change

			<p>greenfield Green Belt sites is not part of the strategy (albeit there are options to bring forward very small sites - See L4/5)</p> <p>New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process</p>	
<p>The Plan and SA have not been positively prepared as they disregard the draft permission for the SRFI</p>	<p>Helioslough Ltd (1182085)</p> <p>Department of Health &amp; Social Care and Bloor Homes (1156886)</p> <p>Maritime Transport Limited (1182715)</p> <p>1181750</p> <p>DB Cargo (UK) (1184888)</p> <p>National Rail (1184616)</p> <p>Butterfly World Project Ltd (1193965)</p> <p>Jarvis Homes (973180)</p> <p>CALA Homes (977724)</p> <p>Albert Bygave Centre (985070)</p> <p>Park Street Church and Bloor Homes Ltd (985300)</p> <p>Rice Group (1058426)</p>	Disagree	<p>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.</p> <p>The main site owner has promoted the site as available and deliverable for housing.</p> <p>Considerations have taken into account the existing planning permission for an alternative use and other relevant factors.</p>	No change

	Beechwood Homes (1123837)  Linden Homes (1153662)  Hertfordshire Land Ltd (1159845)  Aldwyck Housing Group (1186030)  Freight on Rail (1187503)  M Scott Properties (1185993)  Modus Operations Ltd (1187609)  GB Railfreight Ltd (1187613)  973643  1153651  1159948  1185775  1186108  1186128			
There are other Greenbelt options	Jarvis Homes (973180)  CALA Homes (977724)	Disagree	Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.	No change

<p>other than those affecting SRFI</p>	<p>Albert Bygave Centre (985070)</p> <p>Park Street Church and Bloor Homes Ltd (985300)</p> <p>Rice Group (1058426)</p> <p>Beechwood Homes (1123837)</p> <p>Linden Homes (1153662)</p> <p>Hertfordshire Land Ltd (1159845)</p> <p>Butterfly World Project Ltd (1193965)</p> <p>Aldwyck Housing Group (1186030)</p> <p>Department of Health &amp; Social Care and Bloor Homes (1156886)</p> <p>973643</p> <p>1153651</p> <p>1159948</p> <p>1186108</p> <p>1186128</p>		<p>The main site owner has promoted the site as available and deliverable for housing.</p> <p>Considerations have taken into account the existing planning permission for an alternative use and other relevant factors.</p> <p>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p>	
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There is no clear commitment from the Land owner, and could be open to legal challenge	<p>Jarvis Homes (973180)</p> <p>CALA Homes (977724)</p> <p>Albert Bygave Centre (985070)</p> <p>Park Street Church and Bloor Homes Ltd (985300)</p> <p>RF Sinclair &amp; Sons (1058251)</p> <p>Rice Group (1058426)</p> <p>Beechwood Homes (1123837)</p> <p>Linden Homes (1153662)</p> <p>Hertfordshire Land Ltd (1159845)</p> <p>Aldwyck Housing Group (1186030)</p> <p>Home Builders Federation (1156936)</p> <p>CP Holdings (1158145)</p> <p>973643</p> <p>1153651</p> <p>1159948</p>	Disagree	<p>The main site owner has promoted the site as available and deliverable for housing.</p> <p>All requirements set out in the Broad Location policy has been agreed as deliverable by the main landowner.</p>	No change
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	1185775 1186108 1186128			
The Broad Location will not produce jobs / result in a loss of employment from SFRI	51 Pegasus Ltd (1186098) 1186081	Disagree	<p>The main site owner has promoted the site as available and deliverable for housing.</p> <p>Considerations have taken into account the existing planning permission for an alternative use and other relevant factors.</p> <p>Cross refer to Policy S5 which supports employment land provision</p> <p>The EZ has important functions supporting business start-ups and attracting UK and international investment.</p>	No change
What masterplanning collaboration has there been?	St Stephen Parish Council (51804)	Noted	Masterplanning is at the very earliest stages. Collaboration with residents and stakeholders will take place as progress is made.	No change
Collaboration with neighbouring Councils needed	1181750 1182733	Noted	There has been ongoing joint working with neighbouring local authorities including the South West Herts Group.	No change
Hertsmere BC should be partners for masterplanning work	Hertsmere Borough Council (51934)	Noted	SADC and HBC are working together through the SWH JSP process. For all issues where there might be a cross-boundary implication for Hertsmere/SADC then appropriate involvement in Masterplanning will take place in due course.	No change
Planning contributions should be sought, to be	Bricketwood Residents Association (1186066)	Noted	Planning contributions may be sought by way of S106 agreements during the planning application stage / set out in the regulation 123 List on adoption of CIL.	No change

spent by local groups / parishes			This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	
Welcomes support with plan for neighbourhood planning.	Bricketwood Residents Association (1186066)	Noted	Support Noted	No change.
Amend the phrase “master planned development led by the Council...” to read “master planned development led by the Developer in collaboration with the Council”	Home Builders Federation (1156936)	Disagree	Policy S6 sets out a very clear approach. Masterplanning will be Council-led, in collaboration with developers, residents and other stakeholders.	No change
No information provided on strategy or delivery, just a wishlist	Aurora Properties Limited (1151817)	Disagree	The development requirements are clear and the Masterplan process will provide more specific proposals in due course.	No change
Park Street Garden Village Broad Location was a mineral extraction / landfill site. Suitability for housing queried.	Ver Valley Society (826041)	Noted	Evidence suggests that this land use history is not a fundamental constraint on development for housing. There is a long lead time to delivery.	No change

Both strategic and local public space must be provided	<p>Ramblers Association (52420)</p> <p>St Albans &amp; District Footpaths Society (723340)</p> <p>The British Horse Society (1187597)</p> <p>1184750</p>	Noted	Requirements set out in Policy L27 and L28. This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.	No change
Must provide/support the country park	<p>Ramblers Association (52420)</p> <p>St Albans &amp; District Footpaths Society (723340)</p> <p>The British Horse Society (1187597)</p> <p>1184750</p> <p>1185037</p>	Noted	Policy S6 xi) sets out requirement for new Country Park.	No change.
Support sufficient assets to provide sustainable management of community facilities, open spaces and parklands	<p>St Albans &amp; District Footpaths Society (723340)</p> <p>Ramblers Association (52420)</p>	Noted	Support Noted	No change
No justification for park and ride that benefits would	The British Horse Society (1187597)	Noted	Park and rail proposed, not park and ride.	No change

outweigh harm to Green Belt	St Albans & District Footpaths Society (723340)			
SRFI is not a residential development, therefore no justification it would have the same or less impact on GB as PSGV	CP Holdings (1158145)	Disagree	Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.	No change
Welcome requirement for protection of existing woodland, new managed woodland and encourage provision of street trees	The Woodland Trust (1185811)	Noted	Support Noted	No change
Park and rail facility (presumed to be located within north-west corner of the site) would have a significant adverse impact on the Ver Valley Meadows Local Wildlife site.	Helioslough Ltd (1182085) Ramblers Association (52420) St Albans & District Footpaths Society (723340) 1185775	Noted	Policy S6 xi within the BL allocation stipulates managed woodland and ecological network links and countryside access links and new country park. Broad locations will be subject to masterplanning which will incorporate the rivers and wildlife. There is a long lead time to delivery to allow full consideration of these issues.	No change

Support Park Street Garden Village BL subject to safeguarding and improvement of the Ver Valley as a waterway and recreation facility. Suggest mention of specific rivers rather than watercourse	Ver Valley Society (826041)	Noted	Support noted. Policy S6 xi within the BL allocation stipulates managed woodland and ecological network links and countryside access links and new country park. Broad locations will be subject to masterplanning which will incorporate the rivers and wildlife. There is a long lead time to delivery to allow full consideration of these issues.	No change
Park Street Garden Village site has constraints that will hinder delivery of S6 (xi) requirements, including in relation to flood risk and biodiversity.	Helioslough Ltd (1182085)	Disagree	<p>Cross reference to Policy L29 and NPPF/NPPG.</p> <p>Updated Flood Risk Assessment has been prepared and added to the website.</p> <p>Development covered by EIA are set out in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Council will determine likely impact through a 'screening' procedure and whether an EIA is required. Cross reference with L29.</p>	No change
Policy should include the requirement for outdoor sports provisions, and clarify whether open space or recreation space includes outdoor sports provisions	Sports England (824971)	Noted	<p>Cross reference Policy L22 and L26 – 28.</p> <p>The policy refers to public open space. Open space is defined under the NPPF as all space of public value, land and water which offer important opportunities for sport and recreation. It is clear that this is therefore outdoor in nature. The policy also refers to recreation space and community facilities which would capture indoor sports facilities.</p> <p>This matter can be properly detailed through the Masterplanning process.</p>	No change

Important to maintain gap between St Albans and the Garden Village.	Ramblers Association (52420)  St Albans & District Footpaths Society (723340)	Noted	Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.  Gaps between settlements part of that site selection process. See also S3.  This matter can be properly detailed through the Masterplanning process.	No change
The broad location should be reduced in size to protect the Green Belt.	867068	Disagree	Housing requirement/targets are based on the standard methodology set out by the government – see S4.  Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.  Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.	No change
Proposals map shows the school within the Broad Locations, outside the Green Belt, contrary to Policy S3	1186783	Disagree.	Primary and secondary schools sites in the land to be excluded from the GB. Cross reference L21 and Policies Map.  This matter can be properly detailed through the Masterplanning process.	No change
Support provision of recreational space and public open space	The British Horse Society (1187597)  Bricketwood Residents Association (1186066)	Noted	Support Noted	No change

Clarity needed on whether specific deliverables such as school buildings will be accommodated in the Broad Location or Green Belt	St Albans & District Footpaths Society (723340)  The British Horse Society (1187597)	Noted	Primary and secondary schools sites in the land to be excluded from the GB. Cross reference L21 and Policies Map.  This matter can be properly detailed through the Masterplanning process.	No change
Strongly support allocation and safeguarding of land for schools	Department for Education (1186955)	Noted	Support Noted.	No change
Policy should include indication of school site size required	Department for Education (1186955)	Noted	Add reference in IDP to HCC size requirements as set out in response to L21	IDP will be updated on an ongoing basis.
School site locations should be identified	Hertfordshire County Council (837689)	Noted	Primary and secondary schools sites in the land to be excluded from the GB. Cross reference L21 and Policies Map.  This matter can be properly detailed through the Masterplanning process.	No change
School building areas should be removed from green belt	Department for Education (1186955)  Hertfordshire County Council (837689)	Noted	Primary and secondary schools sites in the land to be excluded from the GB. Cross reference L21 and Policies Map.  This matter can be properly detailed through the Masterplanning process.	No change
Supports proposed new school as could be used for relocation of existing	1186117	Noted	Support Noted	No change

The site does not provide any source of employment other than Schools and Shops, and will lead to an increase in Carbon Emissions.	Helioslough Ltd (1182085)	Disagree	Cross reference to Policy L18 which requires measures to improve air quality.	No change
No reference to tourist development.	1181750	Disagree	Policy L13 set out a very clear approach	No change
Unrealistic timeframe for delivery.	Jarvis Homes (973180) CALA Homes (977724) Albert Bygave Centre (985070) Park Street Church and Bloor Homes Ltd (985300) RF Sinclair & Sons (1058251) Rice Group (1058426) Beechwood Homes (1123837) Linden Homes (1153662) Hertfordshire Land Ltd (1159845) Aldwyck Housing Group (1186030)	Disagree	Housing trajectory at appendix 2 shows indicative delivery rates. Long lead-in time acknowledged in timeline for delivery.	No change



	Aurora Properties Limited (1151817)  973643  1153651  115948  1186108  1186128			
40dph too high	1184750	Disagree	This is an appropriate minimum density to avoid further pressure on loss of greenfield land/ Green Belt. The NPPF supports optimisation of residential density.	No change
40dph inconsistent with L4	M Scott Properties (1185993)	Disagree	The BL sites are to be taken out of the GB, as set out in policy S1, and are not 'rural exception sites'.	No change
Is there a need for the amount of flexi-care provision required?	St Stephen Parish Council (51804)	Disagree	Evidence available in full, including in HCC documents and representations. Policy L2 sets out an appropriate approach.	No change
Policy should include land size requirement for flexi-care home	Hertfordshire County Council (837689)	Disagree	Requirement as set out in Policy L2.  Size requirements can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change
Broad Locations should use Design Codes	Harpenden Town Council (51870)	Noted	This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.	No change
Excellence in design, energy	St Albans Civic Society (1156974)	Noted	Requirements for BL set out in Policy L25.	No change

efficient and water management is required in all Broad Locations				
The proposed development will have a potential impact on ground Archaeology	Helioslough Ltd (1182085)	Noted	<p>Cross reference Policy L30</p> <p>This supports conservation of heritage assets appropriate to their significance and seeks that development which may affect such assets is accompanied by a Heritage Statement.</p> <p>This matter can be properly detailed through the Masterplanning process.</p>	No change
Heritage environment /assets have not been considered and lack of criteria to protect assets	Historic England (929489)	Disagree	<p>Cross reference Policy L30</p> <p>This supports conservation of heritage assets appropriate to their significance and seeks that development which may affect such assets is accompanied by a Heritage Statement.</p> <p>This matter can be properly detailed through the Masterplanning process.</p>	No change
Should include requirement to design to mitigate adverse air quality impacts, as in S6 i), ii) and iii).	Hertfordshire County Council (837689)	Disagree	Cross reference to Policy L18 which requires measures to improve air quality.	No change
The development will have a detrimental impact on air quality	Bricket Wood Residents Association (1186066)	Disagree	Cross reference to Policy L18 which requires measures to improve air quality.	No change

No Sequential test based on the Latest SFRA. Request amendment to state no develop in areas at risk of flooding (Zones 2 and 3) taking future impact of climate change into account.	Environmental Agency (1147557)	Noted	Cross reference to Policy L29 and NPPF/NPPG.  Updated Flood Risk Assessment has been prepared and added to the website.	No change
The development will have a detrimental impact on ecology	Bricket Wood Residents Association (1186066)  Hertfordshire County Council (837689)	Disagree	Development covered by EIA are set out in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Council will determine likely impact through a 'screening' procedure and whether an EIA is required. Cross reference with L29.	No change