

## **Appendix 1 - Publication Draft Local Plan - Analysis of Issues Arising (March 2019)**

## 1.2 – Neighbourhood Plans

| Representation Point   | Representor Raising Point (see below for list of abbreviations)   | Outline Reply | Recommended Reply (including notes and references)   | Suggested Actions (including any Changes to Plan)   |
|--|---|---------------|--|---|
| Lack of strategic framework for Neighbourhood Plan making due to out of date 1994 Plan | <p>Jarvis Homes (973180)</p> <p>CALA Group Ltd (977724)</p> <p>Albert Bygrave Centre (985070)</p> <p>Park Street BCh &amp; Bloor Homes Ltd (985300)</p> <p>Rice Group (1058426)</p> <p>Beechwood Homes (1123837)</p> <p>Linden Homes (1153662)</p> <p>Hertfordshire Land (1159945)</p> <p>Aldwyck Housing Group (1186030)</p> <p>DB Rees (Builders) Ltd (1160056)</p> <p>Land at the Dak (1186131)</p> <p>Hilton House Properties (1057476)</p> | Disagree      | Cross reference to S2. The NPPF and draft Local Plan support Neighbourhood planning. Given the specific wording used in the final NPPF 2018 (after the Council decision on 11 July 2018 based on the draft NPPF) a minor modification should be made to make clear that if detailed local evidence justifies development at a neighbourhood scale, on land currently designated as Green Belt, it is supported in principle. | <p>Minor modification to S2</p> <p>If detailed local evidence justifies development at a neighbourhood scale, on land currently designated as Green Belt, it is supported in principle.</p> |

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|   | <p>Owner of Land at Piggotshill Lane (1159948)</p> <p>Owners of Land South of Burydell Lane (1186128)</p> <p>1153651</p> <p>973643</p>   |          |   |           |
| <p>Not enough emphasis on promoting Neighbourhood Plan opportunities to deliver housing</p> | <p>Jarvis Homes (973180)</p> <p>CALA Group Ltd (977724)</p> <p>Albert Bygrave Centre (985070)</p> <p>Park Street BCh &amp; Bloor Homes Ltd (985300)</p> <p>Rice Group (1058426)</p> <p>Beechwood Homes (1123837)</p> <p>Linden Homes (1153662)</p> <p>Hertfordshire Land (1159945)</p> <p>Owner of Land at Piggotshill Lane (1159948)</p> <p>Aldwyck Housing Group (1186030)</p> | Disagree | <p>The Local Plan deals with the overall need for new housing and is not reliant on NPs. NPs are supported and must conform with the NPPF and in due course the draft LP.</p> | No change |

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|   | DB Rees (Builders) Ltd<br>(1160056)<br><br>Land at the Dak<br>(1186131)<br><br>Hilton House Properties<br>(1057476)<br><br>London Colney Limited<br>(977496)<br><br>Owners of Land South of<br>Burydell Lane (1186128)<br><br>973643<br><br>115365  |       |  |   |
| Policy should enable Neighbourhood Plans to deliver housing on Green Belt | Jarvis Homes (973180)<br><br>CALA Group Ltd<br>(977724)<br><br>Albert Bygrave Centre<br>(985070)<br><br>Park Street BCh & Bloor<br>Homes Ltd (985300)<br><br>Rice Group (1058426)<br><br>Beechwood Homes<br>(1123837)<br><br>Linden Homes<br>(1153662)<br><br>Hertfordshire Land<br>(1159945) | Noted | Cross reference to S2. The NPPF and draft Local Plan support Neighbourhood planning. Given the specific wording used in the final NPPF 2018 (after the Council decision on 11 July 2018 based on the draft NPPF) a minor modification should be made to make clear that if detailed local evidence justifies development at a neighbourhood scale, on land currently designated as Green Belt, it is supported in principle. | Minor modification to S2.<br><br>If detailed local evidence justifies development at a neighbourhood scale, on land currently designated as Green Belt, it is supported in principle. |

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|  | <p>Aldwyck Housing Group (1186030)</p> <p>Martin Grant Homes and Kearns Land (975683)</p> <p>DB Rees (Builders) Ltd (1160056)</p> <p>Land at The Dak (1186131)</p> <p>Hilton House Properties (1057476)</p> <p>London Colney Limited (977496)</p> <p>Owners of Land South of Burydell Lane (1186128)</p> <p>Owner of Land at Piggotshill Lane (1159948)</p> <p>1153651</p> <p>973643</p> |          |  |           |
| No recognition of sites allocated in the Redbourn Neighbourhood Plan | Martin Grant Homes and Kearns Land (975683)  | Disagree | Redbourn Neighbourhood Plan has not yet undergone an Examination process. The Local Plan deals with the overall need for new housing and is not reliant on NPs. NPs are supported and must conform with the NPPF and in due course the draft LP. | No change |
| Address the need for avoiding unnecessary policy duplication with    | 52064  | Disagree | Local Plans contain district-wide policies, whereas NPs contain neighbourhood level policies. Not all areas will likely  | No change |

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| Neighbourhood Plans. |  |  | 'produce 'made' Neighbourhood Plans. Some duplication may occur but should not prove problematic. |  |
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### 1.5 – Duty to Cooperate Neighbours – South West Hertfordshire

| Representation Point  | Representor Raising Point (see below for list of abbreviations)                    | Outline Reply | Recommended Reply (including notes and references)   | Suggested Actions (including any Changes to Plan) |
|---|--|---------------|--|---|
| London Colney will be overdeveloped by Hertsmeres proposals, therefore more co-operation for housing land allocation between authorities needed | 1182733  | Noted         | There has been and will be ongoing joint working with neighbouring local authorities including the South West Herts Group. DtC considered to be met.                   | No change   |
| A failure to co-operate with neighbouring councils on the Joint Strategic Plan (JSP) and the South-West Herts Group (SWHG)                      | 334023<br>1144419  | Disagree      | There has been and will be ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met. | No change   |
| St Albans has progressed too far ahead of the neighbouring authorities in the Joint Strategic Plan (JSP) that prevents cross boundary           | Redbourn Parish Council (759908)<br>Leverstock Green Village Association (1185907) | Disagree      | There has been and will be ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met. | No change   |

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| working for housing allocations.   |  |          |  |           |
| Lack of a timetable/plan to address concerns from adjoining Authorities in particular East Hemel and Dacorum Borough Council | Redbourn Parish Council (759908)<br>Jarvis Homes (973180)<br>CALA Group Ltd (977724)<br>Albert Bygrave Centre (985070)<br>Eaton Lodge (985289)<br>Park Street BCh & Bloor Homes Ltd (985300)<br>Rice Group (1058426)<br>Beechwood Homes (1123837)<br>Linden Homes (1153662)<br>Hertfordshire Land (1159945)<br>Aldwyck Housing Group (1186030)<br>Department of Health & Social Care and Bloor Homes (1156886)<br>Longbourn Estates (977635) | Disagree | There has been and will be ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met. | No change |

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|  | Leverstock Green Village Association (1185907)<br><br>973643<br><br>973659<br><br>1144419<br><br>1186108<br><br>1159948<br><br>1153650<br><br>1153651   |          |  |           |
| St Albans has not met the housing needs of Dacorum Borough Council and other neighbouring authorities, therefore may need to concede more land | Redbourn Parish Council (759908)<br><br>Jarvis Homes (973180)<br><br>CALA Group Ltd (977724)<br><br>Albert Bygrave Centre (985070)<br><br>Eaton Lodge (985289)<br><br>Park Street BCh & Bloor Homes Ltd (985300)<br><br>Rice Group (1058426)<br><br>Leverstock Green Village Association (1185907)<br><br>Beechwood Homes (1123837) | Disagree | There has been and will be ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met. | No change |



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|   | CP Holdings (1158145)<br>Linden Homes<br>(1153662)<br>Hertfordshire Land<br>(1159945)<br>Aldwyck Housing Group<br>(1186030)<br>Owners of Land South of<br>Burydell Lane (1186128)<br>1186108<br>973643<br>973659<br>1153650<br>1144419<br>1153651<br>1159948 |       |  |           |
| A Duty to Cooperate document should be published to illustrate how each LPA is meeting their housing need and how any unmet needs are addressed | Martin Grant Homes and Kearns Land (975683)  | Noted | There has been and will be ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met. | No change |

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| SADC should have had a Statement of Common Ground (SCG) published | <p>Martin Grant Homes and Kearns Land (975683)</p> <p>M Scott Properties (1185993)</p> <p>ERLP 1 Sarl (1123561)</p> <p>Dacorum Borough Council (1186054)</p> <p>CWC Group (1153869)</p> <p>Department of Health &amp; Social Care and Bloor Homes (1156886)</p> <p>Pennard Holdings Ltd (51983)</p> <p>London Colney Limited (977496)</p> <p>Longbourn Estates (977635)</p> <p>CEG (1158030)</p> <p>CP Holdings (1158145)</p> | Noted | A Memorandum of Understanding has been agreed with the SWHG and a Statement of Common Ground.  | No change |
| Lack of/no evidence of Joint Working/ Duty to Cooperate published | <p>Martin Grant Homes and Kearns Land (975683)</p> <p>Harpenden Green Belt Association (866541)</p> <p>Jarvis Homes (973180)</p> <p>CALA Group Ltd (977724)</p>   | Noted | There has been and will be ongoing joint working with neighbouring local authorities including the South West Herts Group. DtC considered to be met. A Memorandum of Understanding has been agreed with the SWHG and a Statement of Common Ground. | No change |

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|  | <p>Albert Bygrave Centre<br/>(985070)</p> <p>Eaton Lodge (985289)</p> <p>Park Street BCh &amp; Bloor<br/>Homes Ltd (985300)</p> <p>Rice Group (1058426)</p> <p>Beechwood Homes<br/>(1123837)</p> <p>CP Holdings (1158145)</p> <p>Linden Homes<br/>(1153662)</p> <p>Hertfordshire Land<br/>(1159945)</p> <p>Aldwyck Housing Group<br/>(1186030)</p> <p>M Scott Properties<br/>(1185993)</p> <p>ERLP 1 Sarl (1123561)</p> <p>Batford Community<br/>Action Group (1185696)</p> <p>Colney Heath Parish<br/>Council (51891)</p> <p>Burhill Developments Ltd<br/>(977347)</p> <p>Aurora Properties<br/>Limited (1151817)</p> |  |  |  |
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|  | Home Builders Federation Ltd<br>(1156936)<br><br>CWC Group (1153869)<br><br>Wrenbridge Land Ltd<br>(1187023)<br><br>Gladman Developments Ltd (1187201)<br><br>Pennard Holdings Ltd (51983)<br><br>London Colney Limited (977496)<br><br>Longbourn Estates (977635)<br><br>Intrasales Ltd (1157383)<br><br>Leverstock Green Village Association (1185907)<br><br>Owners of Land South of Burydell Lane (1186128)<br><br>1144419<br><br>973643<br><br>973659<br><br>1153650<br><br>1153651<br><br>1159948 |  |  |  |
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|   | 1186108<br>347648<br>1185714  |          |  |           |
| Plan fails to take into account the impact of proposed housing or contribution to housing targets in neighbouring councils                    | Berkhamsted Residents Action Group (BRAG) (1186012)<br>1153245<br>1186129 | Disagree | There has been and will be ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met.   | No change |
| Intentions of neighbouring authorities have had a big impact on plans for development within the district                                     | 1185955   | Disagree | There has been and will be ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met.   | No change |
| The Decision to include East St Albans Broad Location did not consider Welwyn Hatfield Borough Council Plans for development in the same area | Ellenbrook Area Residents Association Committee (1185802)                 | Disagree | There has been and will be ongoing joint working with neighbouring local authorities including the South West Herts Group and Welwyn & Hatfield. Duty to co-operate is considered to be met. Evidence on development strategy / site selection is available in full. | No change |
| Any expansion to Hemel Hempstead should be led by Dacorum Borough   | Berkhamsted Residents Action Group (BRAG) (1186012)                       | Disagree | There has been and will continue to be ongoing collaboration with Dacorum Borough Council on masterplanning the urban extensions to Hemel Hempstead – cross reference with Policy S6.  | No change |

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| Council with SADC collaboration   |  |          |  |   |
| SADC has met its Duty to Cooperate, but Paragraph 1.5 should include additional wording to support this                   | Trustees of James Henry Frank Sewell Deceased (1185630)                | Disagree | Already covered in the Plan. Will additionally be covered by the Duty to Cooperate Statement of Compliance.  | Already covered in the Plan. Will additionally be covered by the Duty to Cooperate Statement of Compliance. |
| Evidence base/Plan should be updated to show cross-boundary issues being dealt with                                       | Dacorum Borough Council (1186054)<br>Watford Borough Council (1122500) | Disagree | There has been ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met. A Memorandum of Understanding has been agreed with the SWHG and a Statement of Common Ground will follow. | No change   |
| An agreement is needed to agree housing and employment need between Dacorum Borough Council and SADC                      | Dacorum Borough Council (1186054)<br>CWC Group (1153869)               | Noted    | A Memorandum of Understanding has been agreed with the SWHG and a Statement of Common Ground will follow.  | No change   |
| Duty to Cooperate has been met and any DtC issue between Dacorum Borough Council should be addressed as a soundness issue | Dacorum Borough Council (1186054)                                      | Noted    | Support noted  | No change   |
| Duty to Cooperate development need assessments should consider all sources  | Burhill Developments Ltd (977347)                                      | Noted    | There has been ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-   | No change   |

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| of housing land supply  |                                     |          | operate is considered to be met. Evidence on development strategy / site selection is available in full.   |           |
| There is a lack of understanding from Neighbouring Authorities to deal with cross-boundary issues   | Burhill Developments Ltd (977347)   | Disagree | There has been ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met.   | No change |
| Welwyn Hatfield Borough Council is not part of the Joint Strategic Plan for South-West Hertfordshire – Why?   | Aurora Properties Limited (1151817) | Noted    | This decision was determined as a result of the evidence from the SWHG research. Whilst not part of the South West Herts grouping, SADC acknowledges the existing cross-boundary relationship with Welwyn Hatfield Borough Council and will be maintaining this relationship through a wider Duty to Cooperate.  | No change |
| There are sites Welwyn Hatfield Borough Council have assessed but omitted from their plan, which provide 1,826 dwellings. This can be used to provide for unmet need in SADC's plan | Aurora Properties Limited (1151817) | Disagree | There has been ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met. Evidence on development strategy / site selection is available in full. There is no reasonable prospect of Welwyn Hatfield providing for SADC's need. | No change |
| Site allocations are only viable once the Duty to Cooperate has been fulfilled  | St Albans Civic Society (1156974)   | Disagree | There has been ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met.   | No change |

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| Concerns over duty to co-operate; there is a lack of clarity between local authorities and HCC as there are no firm policies or spatial approaches set   | St Albans Civic Society (156974)<br>52064 | Disagree | There has been ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met.                 | No change |
| London Colney Parish Council has little influence to protect existing local infrastructure from overdevelopment coming from outside the District, therefore support discussion taking place to enable Duty to Cooperate to be agreed | London Colney Parish Council (52477)      | Noted    | Support noted  | No change |
| Watford Borough Council supports progress on the Draft Plan and joint working between SADC and Watford Borough Council   | Watford Borough Council (1122500)         | Noted    | Support noted  | No change |
| Clarification needed to show types of strategic and cross boundary issues relevant to SADC   | Watford Borough Council (1122500)         | Disagree | There has been ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met. A Memorandum of | No change |



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| that will be addressed through the Joint Strategic Plan   |   |          | Understanding has been agreed with the SWHG and a Statement of Common Ground will follow.  |           |
| A review of the JSP should take place with SWHG once strategic issues have been identified and progressed   | Watford Borough Council (1122500)       | Disagree | There has been ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met. A Memorandum of Understanding has been agreed with the SWHG and a Statement of Common Ground will follow. | No change |
| WHBC welcome acknowledgement of joint working between SADC & WHBC in Draft Plan, even though not part of South West Housing Market Area and Functional Economic Market Area | Welwyn Hatfield Borough Council (52397) | Noted    | Support noted  | No change |
| WHBC suggest Para 1.5 makes clear that those not part of SWHG are Duty to Cooperate neighbours and that work will commence/be agreed for a Statement of Common              | Welwyn Hatfield Borough Council (52397) | Disagree | Wider Duty to Cooperate relationships addressed in paragraph 1.5.  | No change |

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| Ground/Memorandum of Understanding   |  |       |  |           |
| WHBC have placed a number of holding objections that are hoped to be resolved with a Statement of Common Ground/Memorandum of Understanding once SADC has completed evidence gathering | Welwyn Hatfield Borough Council (52397)            | Noted | SADC will continue to work with WHBC and other DC bodies.      | No change |
| SADC should record all Duty to Cooperate (DtC) discussions and undertakings to demonstrate that DtC has been complied with   | Crest Strategic Projects and Bloor Homes (1158079) | Noted | Records of Duty to Cooperate discussions have been maintained. | No change |

### 1.7 – Plan Preparation

| Representation Point  | Representor Raising Point (see below for list of abbreviations)                        | Outline Reply | Recommended Reply (including notes and references)   | Suggested Actions (including any Changes to Plan) |
|---|--|---------------|--|---|
| St Albans has progressed too far ahead of the neighbouring authorities in the | Redbourn Parish Council (759908)<br><br>Leverstock Green Village Association (1185907) | Disagree      | There has been and will be ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met. | No change   |

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| Joint Strategic Plan (JSP) that prevents cross boundary working for housing allocations  |                                     |          |   |           |
| The Publication Draft of the Local Plan should be the intended Submission Local Plan, not a "Draft".   | Aurora Properties Limited (1151817) | Disagree | The LP to be submitted is the Publication Draft.  | No change |
| A Regulation 19 consultation is for the benefit of the Examination in Public. If the plan gets amended SADC should undertake a further Regulation 19 consultation before submission. | Aurora Properties Limited (1151817) | Disagree | The Local Plan will be carried out in accordance with the requirements of the relevant legislation. | No change |
| SADC should not repeat the same mistake as WHBC by submitting a plan that they know is manifestly flawed and not sound   | Aurora Properties Limited (1151817) | Disagree | Disagree that the Plan is flawed and unsound.   | No change |
| The plan has not been designed with  | 1034653                             | Disagree | SADC has carried out the necessary consultations at both Regulation 18 and Regulation 19 stages.    | No change |

|   |  |          |  |           |
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| the cooperation of local residents  |  |          |  |           |
| There is no evidence to suggest that SADC has engaged with the local community of Leverstock Green  | Leverstock Green Village Association (1185907)   | Disagree | SADC has carried out the necessary consultations at both Regulation 18 and Regulation 19 stages.       | No change |
| The information contained within the SA reports has not influenced policies in the Plan relating to landscape, character, infrastructure, balance of sites in different settlements, broad location selection, environmental dimension of sustainable development | Martin Grant Homes and Kearns Land (975683)<br>ERLP 1 Sarl (1123561)<br>Stackbourne Limited (1153646)<br>Redbourn Parish Council (759908)<br>1185775 | Disagree | The vision of the Local Plan is based on a thriving community which includes long term sustainability. | No change |

## 1.9 – Plan Evidence

| Representation Point   | Representor Raising Point  | Outline Reply | Recommended Reply (including notes and references)   | Suggested Actions (including any Changes to Plan) |
|--|--|---------------|--|---|
| The draft local plan has not been based on up to date evidence                   | <p>Harpenden Green Belt Association (866541)</p> <p>Martin Grant Homes and Kearns Land (975683)</p> <p>The Environment Agency (1147557)</p> <p>Aboyne Residents Association (1181214)</p> <p>51 Pegasus Ltd (1186098)</p> <p>Department of Health &amp; Social Care and Bloor Homes (1156886)</p> <p>334023</p> <p>1185714</p> | Disagree      | Evidence supporting the Local Plan is available in full.   | No change   |
| Absence of evidence of effective joint working from the local plan evidence base | <p>Martin Grant Homes and Kearns Land (975683)</p> <p>Hunston Planning Limited (1185622)</p> <p>Batford Community Action Group (1185696)</p>   | Disagree      | There has been ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met. A Memorandum of Understanding has been agreed with the SWHG and a Statement of Common Ground. | No change   |

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|   | <p>Helioslough Ltd<br/>(1182085)</p> <p>Gladman Developments Ltd (1187201)</p> <p>Owners of Land South of Burydell Lane (1186128)</p> <p>1186131</p> <p>1185714</p>  |          |   |           |
| Concerns that the local plan is not based upon proportionate and justified evidence as the policies are not accompanied by supporting text  | <p>Martin Grant Homes and Kearns Land (975683)</p> <p>347648</p>   | Disagree | Full and detailed justification is provided by evidence documents. It is not necessary to justify the Plan within the Plan document itself. To do so would result unnecessarily in a longer and more complex document.  | No change |
| There is insufficient evidence to support the strategy for meeting the Council's housing requirement predominantly at these Broad Locations | <p>Martin Grant Homes and Kearns Land (975683)</p> <p>Redbourn Parish Council (759908)</p> <p>Leverstock Green Village Association (1185907)</p> <p>Owners of Land South of Burydell Lane (1186128)</p> <p>1186131</p> | Disagree | <p>Development need and site specific analysis in GB work provide exceptional circumstances for GB release. Evidence on development strategy / site selection is available in full.</p> <p>Concentrating development in larger sites that can effectively deliver infrastructure is a key part of the development strategy.</p> | No change |
| Further evidence required on the need for residential care  | Martin Grant Homes and Kearns Land (975683)  | Disagree | Evidence relating to care homes is available in full.   | No change |

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| homes/nursing homes   | Signature Senior Lifestyle (1186910)         |          |   |           |
| SADC does not provide evidence or justification in support of the future supply of sites of 0.5ha or less   | Martin Grant Homes and Kearns Land (975683)  | Disagree | Evidence relating to small sites is available in full.  | No change |
| Use of outdated retail study data as evidence for the retail policy   | Aboyne Residents Association (1181214)       | Disagree | Evidence on retail is available in full.  | No change |
| Propose the inclusion of Brookbanks NW Harpenden Local Plan Transportation Study, Transport Position Statement, Vision Document and L&G/ CEG Regulation 19 response document as part of the Council's evidence base | Legal and General (1051022)<br>CEG (1158030) | Disagree | Such documents would support the Broad Location in the masterplanning process and would not be Local Plan evidence documents.   | No change |
| Difficulty in providing conclusive comments on the soundness of the plan as SADC is still compiling evidence  | CEG (1158030)<br>347648                      | Disagree | Any further evidence is in the form of updates and are not new studies. Comments can be provided on the evidence base to date in conjunction with the draft Local Plan. | No change |

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| Concerns that the policies in the plan rely to some extent on the views of certain long standing members rather than empirical data and evidence | 347648  | Disagree | Evidence supporting the Local Plan is available in full.  | No change |
| Lack of evidence to suggest that the council has examined fully all other reasonable options for meeting their identified housing need.          | 1153268<br>Owners of Land South of Burydell Lane (1186128)<br>1186131 | Disagree | Development need and site specific analysis in GB work provide exceptional circumstances for GB release. Evidence on development strategy / site selection is available in full. Concentrating development in larger sites that can effectively deliver infrastructure is a key part of the development strategy. | No change |
| Lack of consideration has been given to the proposed site as part of the LP's evidence on assessing sites for the release from the Green Belt.   | Mr Pete Hutchison (1153268)   | Disagree | Development need and site specific analysis in GB work provide exceptional circumstances for GB release. Evidence on development strategy / site selection is available in full. Concentrating development in larger sites that can effectively deliver infrastructure is a key part of the development strategy. | No change |
| The evidence base does not establish an up-to-date objective assessment of the need for employment land,   | 51 Pegasus Ltd (1186098)  | Disagree | Existing SADC and SWHG evidence studies set out a clear evidence base that the LP approach is directly based on.  | No change |



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| given the new housing target.  |  |          |   |  |
| Local Plan appendices should be included on the planning policy evidence base webpages   | CP Holdings (1158145)  | Noted    | The Local Plan and its appendices will be added to the Local Plan 2018 /19 Library of Documents.  | The Local Plan and its appendices will be added to the Local Plan 2018 /19 Library of Documents. |
| The local plan fails to demonstrate and evidence an adequate five-year supply of housing | Owners of Land South of Burydell Lane (1186128)<br>1186131                           | Disagree | The NPPF and Plan evidence necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy. There are sufficient deliverable sites for years 1-5. This is confirmed in relevant developer representations. | No change  |
| Section 1.9 does not specify which version of the NPPF the local plan complies with      | Redbourn Parish Council (759908)   | Disagree | The current wording reflects the approach actually taken to the structure of the LP. The new NPPF wording 2018 is generally similar and not contradictory to the approach taken.  | No change  |
| Absence of an updated Infrastructure Delivery Plan                                       | Gladman Developments Ltd (1187201)<br>Leverstock Green Village Association (1185907) | Agree    | IDP will be updated on an ongoing basis.IDP will be updated on an ongoing basis.  | IDP will be updated on an ongoing basis.   |
| Up to date documents for the evidence base are not contained within the document library | CP Holdings (1158145)  | Disagree | Evidence is available in full and where required has been updated. In some cases  | No change  |

### Paragraph 2.1 – Vision

| Representation Point   | Representor Raising Point                                 | Outline Reply | Recommended Reply (including notes and references)   | Suggested Actions (including any Changes to Plan) |
|--|---|---------------|--|---|
| The Plan vision does not promote long term sustainability in relation to the SA / SEA objectives, it prioritises economic development and resource use | Stackbourne Limited (1153646)<br>1153802                  | Disagree      | The vision is based on a thriving community which includes long term sustainability.             | No Change   |
| The Plan vision provides no context and is not specific to the district  | Stackbourne Limited (1153646)<br>Theatres Trust (1179001) | Disagree      | The vision is specific to the District.  | No Change   |
| The Plan vision should address housing affordability   | M Scott Properties Ltd. (1185993)                         | Disagree      | Covered by reference to a great place to live. Cross reference with Paragraph 2.2 and Policy L3. | No Change   |

### Paragraph 2.2 – Strategic Policies

| Representation Point  | Representor Raising Point             | Outline Reply | Recommended Reply (including notes and references)                  | Suggested Actions (including any Changes to Plan) |
|---|---------------------------------------|---------------|---|---|
| The strategic policies should address public health and wellbeing | Hertfordshire County Council (837689) | Disagree      | Strategic policies are based on the draft NPPF and includes health. | No change   |

|  |                           |          |  |           |
|--|---------------------------|----------|--|-----------|
| The plan should make reference to the revised NPPF | Historic England (929489) | Disagree | The current wording reflects the approach actually taken to the structure of the LP. The new NPPF wording 2018 is generally similar and not contradictory to the approach taken. | No change |
|--|---------------------------|----------|--|-----------|

### Paragraph 2.3 – Objectives

| Representation Point  | Representor Raising Point                                | Outline Reply | Recommended Reply (including notes and references)  | Suggested Actions (including any Changes to Plan) |
|---|--|---------------|---|---|
| The objectives are too short and vague. They provide no context/are not specific to the District/fail to guide land allocations/not compatible with SA objectives | Stackbourne Limited (1153646)<br>Theatres Trust (977496) | Disagree      | The objectives provide an appropriate structure for the context and detail set out in the Policies later in the Plan. | No change   |
| Protection of existing cultural and entertainment facilities should be an objective   | Theatres Trust (977496)                                  | Disagree      | Already covered by Objectives 3, 4 and 5  | No change   |
| Support objective on conservation and enhancement of the historic environment.  | Historic England (929489)                                | Noted         | Support noted   | No change   |
| Support inclusion of affordable housing in objectives   | 1185775  | Noted         | Support noted   | No change   |

### Paragraph 2.4 – Local Policies

| Representation Point                              | Representor Raising Point | Outline Reply | Recommended Reply (including notes and references)   | Suggested Actions (including any Changes to Plan) |
|---|---------------------------|---------------|--|---|
| Plan lacks site specific policies for small sites | Historic England (929489) | Disagree      | Cross reference with L23 and L30 – provides design principles that must be applied to all development, including development on small sites. | No change   |

### Paragraph 2.6 – Plan Period

| Representation Point  | Representor Raising Point  | Outline Reply | Recommended Reply (including notes and references)  | Suggested Actions (including any Changes to Plan) |
|---|--|---------------|---|---|
| Plan commencement year lacks justification in relation to historic housing need / under delivery. 2018 should be the start for the Plan, not 2020, otherwise not accounting for two years of need | ERLP 1 Sarl (1123561)<br>M Scott Properties (1185993)<br>Gladman Developments Ltd (1187201)<br>M Scott Properties (1185993)<br>Andersons Group (1146719)<br>Department of Health & Social Care and Bloor Homes (1156886) | Disagree      | 2020 is the earliest realistically possible date of adoption of the Plan and is therefore appropriate in the context of the new draft and final NPPF. | No change   |

|   |  |          |  |           |
|---|--|----------|--|-----------|
| Support the plan period with regards to the plan horizon  | Andersons Group (1146719)                                    | Noted    | Support noted  | No change |
| Plan submission will be after the NPPF transition date of 24 <sup>th</sup> January 2019 and should therefore be prepared in the context of the new NPPF / PPG | Department of Health & Social Care and Bloor Homes (1156886) | Agree    | The new NPPF wording 2018 is generally similar to the 2012 NPPF and not therefore contradictory to the approach taken. | No change |
| Plan evidence is not available in relation to full plan period  | Gladman Developments Ltd (1187201)                           | Disagree | Evidence is available in full and where required has been updated.   | No change |

#### Paragraph 2.7 – Plan Review

| Representation Point  | Representor Raising Point          | Outline Reply | Recommended Reply (including notes and references)              | Suggested Actions (including any Changes to Plan) |
|---|------------------------------------|---------------|---|---|
| Plan review (with clear timetable) should also be undertaken where housing delivery is below the annual requirement or where land supply is significantly below 5 years | Gladman Developments Ltd (1187201) | Disagree      | Review will be in accordance with the requirements of the NPPF. | No change   |

### Paragraph 2.8- Minerals and Waste

| Representation Point   | Representor Raising Point             | Outline Reply | Recommended Reply (including notes and references)  | Suggested Actions (including any Changes to Plan)  |
|--|---------------------------------------|---------------|---|--|
| Mineral Safeguarding Areas should be shown on the Policies Map | Hertfordshire County Council (837689) | Disagree      | HCC's Minerals and Waste Plan forms part of the statutory Development Plan and includes the MSA on the Policies Map | Minor modification – HCC Mineral Safeguarding Areas added to list of 'Other GIS sources' at 1.10 |

### Paragraph 3.1 – Using the Policies

| Representation Point  | Representor Raising Point  | Outline Reply | Recommended Reply (including notes and references)   | Suggested Actions (including any Changes to Plan) |
|---|--|---------------|--|---|
| The plan fails to distinguish between policy and supporting text  | Crown Estate (51946)<br>Historic England (929489)                    | Disagree      | All text under the Policies is Policy. This is clear from the overall plan format.   | No change   |
| The policies are not accompanied by supporting text, meaning the necessary justification (i.e. in terms of planning law, national policy or the planning policy evidence base) of the policies is absent. | Martin Grant Homes and Kearns Land (975683)<br>CP Holdings (1158145) | Disagree      | Full and detailed justification is provided by evidence documents. It is not necessary to justify the Plan within the Plan document itself. To do so would result unnecessarily in a longer and more complex document. | No change   |

|   |                       |          |  |           |
|---|-----------------------|----------|--|-----------|
| No clear differentiation between the policy wording and explanatory links is confusing and may not be correctly interpreted | CP Holdings (1158145) | Disagree | All text under the Policies is Policy. This is clear from overall plan format.<br><br>Full and detailed justification is provided by evidence documents. It is not necessary to justify the Plan within the Plan document itself. To do so would result unnecessarily in a longer and more complex document. | No change |
| Plan should have full paragraph numbering   | Crown Estate (51946)  | Disagree | Policy numbering is sufficient to signpost the Policies section. Paragraph numbering of Policies would confuse rather than clarify presentation.   | No change |

### Paragraph 3.2 – List of Policies

| Representation Point                                | Representor Raising Point | Outline Reply | Recommended Reply (including notes and references)   | Suggested Actions (including any Changes to Plan) |
|---|---------------------------|---------------|--|---|
| Add a Strategic Rail Freight Policy under Chapter 4 | Helioslough Ltd (1182085) | Disagree      | The Broad Location is a greater priority for use of this site. The main site owner has promoted the site as available and deliverable for housing and confirmed policy requirements are deliverable. | No change   |

### S1 Spatial Strategy and Settlement Hierarchy

| Representation Point                    | Representor Raising Point | Outline Reply | Recommended Reply (including notes and references)   | Suggested Actions (including any Changes to Plan) |
|---|---------------------------|---------------|--|---|
| Query meaning of lower category scale 2 | 1144419                   | Noted         | The scale and density of new development will be expected to be lower in the category 2 settlements than the scale and density of new development in the category 1 settlements. | No change   |

|   |  |          |  |           |
|---|--|----------|--|-----------|
| Need for medium sized sites in the category 2 villages  | Martin Grant Homes and Kearns Limited (975683)   | Disagree | Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.  | No change |
| Object to approach to category 3 settlements which limits development   | Canton Ltd (1057961)   | Disagree | Category 3 settlements are located in the Green Belt, the aim of which is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.  | No change |
| Don't burden development through controls on main settlements and towns   | RF Sinclair and Sons (1058251)<br>St Albans School (1187032)<br>52064  | Disagree | The policy positively supports and does not prevent development in these settlements.  | No change |
| SADC should not be putting new housing alongside expansion of Hemel Hempstead-oppose inclusion HH as category 1 settlement. | CPRE Hertfordshire (872572)<br>Berkhamsted Residents Action Group (1186012)<br>Lawes Agricultural Trust (1187615)<br>1158258 | Disagree | Hemel Hempstead has a wide range of services and facilities and is a main urban settlement. It is clearly a category 1 settlement.<br><br>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.<br><br>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy. | No change |



|   |   |          |  |           |
|---|---|----------|--|-----------|
| London Colney is a large village and not a town. There is significant development on the edge London Colney within Hertsmere BC. Use land within existing settlement boundaries before greenfield site adjacent to Shenley Lane.          | CPRE Hertfordshire (872572)<br>London Colney Parish Council (52477)<br>Aurora Properties Limited (1151817)<br>1185583<br>1185821<br>347648                  | 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.<br><br>Housing requirement/targets are based on the standard methodology set out by the government – see S4.<br><br>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.<br><br>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy. | No change |
| Plan should promote more small and medium sized sites in category 1 settlements rather than using green belt  | Hill Residential (1158064)  | Noted    | The policy and other LP policies positively supports and does not prevent development in these settlements.  | No change |
| Park Street Garden Village is not available for housing development and should be excluded from category 2 of the settlement hierarchy. Criteria for judgement (from Green Belt Review) ignored when looking at proposal. Hasn't been put | Butterfly World Project Ltd (1183965)<br>CPRE Hertfordshire (872572)<br>(1185775)<br>St Stephen Parish Council (51804)<br>Hertsmere Borough Council (51934) | Disagree | The main site owner has promoted the site as available and deliverable for housing. Considerations have taken into account the existing planning permission for an alternative use and other relevant factors.   | No change |

|  |   |          |   |           |
|--|---|----------|---|-----------|
| forward with cooperation from London Colney. Very limited infrastructure and services.                                       | Aurora Properties Limited (1151817)<br>M Scott Properties (1185993)   |          |   |           |
| Broad policy approach to density of category 2 large villages should seek to influence and not just reflect existing density | CPRE Hertfordshire (872572)   | Noted    | Policy S1 and other LP policies requires development to make efficient use of land, including by increasing density and height of development. In existing settlements this should not however be to the detriment of the existing character.   | No change |
| Opportunities exist adjacent to Redbourn and Wheathampstead  | J W Pigott and Son (1183246)<br>1185775                               | Disagree | Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.<br><br>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.  | No change |
| East of St Albans site impact on Smallford doesn't count as 'small scale infilling'.   | Ellenbrook Area Residents Association Committee (1185802)             | Agree    | Cross reference to S2 and S6. East of St Albans is a Broad Location for development. Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.<br><br>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy. | No change |
| LP should prioritise bulk of new development towards the first tier of the settlement hierarchy                              | Legal and General (1051022)<br>CEG (1158030)<br>CP Holdings (1158145) | Agree    | The policy approach is for most larger scale development to be in/adjacent to the most accessible locations i.e. category 1 settlements.  | No change |

|   |  |          |   |           |
|---|--|----------|---|-----------|
| Sequential approach is inflexible and unreasonable. Extensions to existing villages and towns is more consistent with NPPF.   | Burhill Developments Ltd (977347)                          | Disagree | The policy does not include a sequential test but provides the broad policy approach that will be taken to the different categories of settlement. NPPF supports this approach.   | No change |
| How Wood and Bricket Wood overlooked and have stations. Contrary to NPPF in that the approach does not actively manage patterns of growth to make the fullest possible use of public transport. | M Scott Properties (1185993)                               | Disagree | They have not been overlooked. Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.<br><br>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.   | No change |
| Evidence behind categorisation of settlements not available and concerns with assessment. Not possible for SADC to promote development in Dacorum.  | Anderson Group (1146719)<br><br>Longbourn Estates (977635) | Disagree | There are clear distinctions between the different categories of settlement in terms of accessibility and services/facilities. The policy notes that Hemel Hempstead is in Dacorum however there is planned expansion into the District. It is therefore necessary to categorise it. There is ongoing joint work with Dacorum in this area. | No change |

|   |   |                 |   |                  |
|---|---|-----------------|---|------------------|
| <p>Park Street Garden Village not well located to facilities and services needed for residential development. No justification to include proposal as a Garden Village</p>  | <p>Anderson Group (1146719)</p> <p>Department of Health &amp; Social Care and Bloor Homes (1156886)</p> <p>D'Arblay Investments (1187404)</p> | <p>Disagree</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> | <p>No change</p> |
| <p>Some locations such as land at Boissy Close are just as sustainable as settlements that have been given category 2 status. Settlement hierarchy influenced by the strategic allocations rather than the settlement hierarchy influencing the site selection process.</p> | <p>Anderson Group (1146719)</p>   | <p>Disagree</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> | <p>No change</p> |

|  |  |          |  |           |
|--|--|----------|--|-----------|
| Sandridge and Smallford should be excluded from Green Belt and long term boundaries established around them consistent with NPPF. Should be classified as category 2 'large villages'. | Glinwell PLC (1187377)<br>Longbourn Estates (977635)<br>D'Arblay Investments (1187404) | Disagree | Sandridge and Smallford are small settlements with a very limited range of services and facilities within the Green Belt and are therefore category 3 settlements. | No change |
| 'Excluded from the green belt' interpreted that any releases on the edge of these settlements would be contrary to strategy (which is the intent of the broad locations)               | Crown Estate (51946)   | Disagree | Cross reference to Policy S2 - sets out development strategy which provides for expansion at all category 1 and one category 2 settlement.                         | No change |
| Unnecessary to describe Redbourn as a large village. Policy is not positively worded to encourage appropriate and sustainable growth and appropriate development sites                 | Pennard Holdings Ltd (51983)   | Disagree | The policy positively supports and does not prevent development in Redbourn and other settlements.   | No change |

|  |   |          |  |           |
|--|---|----------|--|-----------|
| Recommend more land allocated around St Albans as the largest settlement and that Land South of Alban Way is allocated for residential development | London Colney Limited (977496)  | Disagree | <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 |
| 'Broad policy approach' column should state planning of development edge of Hemel Hempstead in SADC will be with full engagement with Dacorum BC   | Dacorum Borough Council (1186054)                                       | Disagree | Cross reference to paragraph 1.5 and Policy S6 – sets out engagement with Dacorum BC.  | No change |
| Consideration of infill pockets of development that have existing infrastructure and facilities has not been considered                            | <p>Mr Antonio Barba (1187384)</p> <p>D'Arblay Investments (1187404)</p> | Disagree | <p>Where not in the Green Belt, infill is positively supported in the Plan, subject to design, context etc. 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 |
| Sites on brownfield register are close to public transport and should be developed before release of greenbelt.                                    | D'Arblay Investments (1187404)  | Noted    | Positively bringing forward brownfield sites, subject to design, context etc. is part of the Plan strategy; but it is not possible to meet all need through this type of development.  | No change |

|  |                                       |          |   |           |
|--|---------------------------------------|----------|---|-----------|
| Council's approach to Green Belt is inconsistent in that it regards an industrial estate (Ventura Park) to be excluded from Green Belt but not entire village (Smallford /Sandridge) | D'Arblay Investments (1187404)        | Disagree | Site is already located outside of the Green Belt   | No change |
| 'Development must make efficient use of land by increasing the density and height of development' should be clarified as development must be appropriate to the site context         | Hertfordshire County Council (837689) | Disagree | Clarified in S1 in the broad policy approach column. Additionally cross reference to Policies L1 and L23.                                 | No change |
| Emphasis should be on reduced travel demand instead of greater accessibility   | Hertfordshire County Council (837689) | Disagree | Cross reference to Policy L18 which addresses sustainable transport infrastructure.   | No change |
| Allocated Broad locations do not conform with Spatial Strategy   | CP Holdings (1158145)                 | Disagree | Cross reference to Policy S2 - sets out development strategy which provides for expansion at all category 1 and one category 2 settlement | No change |

## S2 Development Strategy

| Representation Point   | Representor Raising Point  | Outline Reply | Recommended Reply (including notes and references)   | Suggested Actions (including any Changes to Plan) |
|--|--|---------------|--|---|
| No evidence that harm to the Green Belt has been properly weighed against benefits of meeting the objectively assessed need for housing – housing need is too highly weighted  | Ramblers Association (52420)<br>Redbourn Parish Council (759908)<br>London Colney Limited (977496)<br>Intrasales Ltd (1157383)<br>The British Horse Society (1187597)<br>334023<br>1185775 | Disagree      | Development need, overall Plan context and site specific analysis in GB work provide exceptional circumstances for GB release. | No change   |
| Housing need (and an inability to meet Government figures for housing need) does not constitute exceptional circumstances that necessitate major development in Green Belt (as set out in NPPF para 137). The evidence / | Harpenden Green Belt Association (866541)<br>St Albans & District Footpaths Society (723340)<br>CPRE Hertfordshire (872572)<br>Berkhamsted Residents Action Group (BRAG) (1186012)         | Disagree      | Development need, overall Plan context and site specific analysis in GB work provide exceptional circumstances for GB release. | No change   |



|  |  |          |   |           |
|--|--|----------|---|-----------|
| justification available is inadequate  | Legal and General (1051022)<br>Redbourn Parish Council (759908)<br>CWC Group (1153869)<br>Glinwell PLC (1187377)<br>CEG (1158030)<br>1153802<br>1185523<br>1019306<br>1185714<br>1153651 |          |   |           |
| Hemel Garden Communities should be referred to in the policy   | Dacorum Borough Council (1186054)  | Disagree | HGC is a wider and evolving concept that is better set out and explained outside of the Local Plan.   | No change |
| The development strategy relies too heavily on a limited number of large strategic allocations/is not appropriate as it does not include smaller sites | RF Sinclair and Sons (1058251)<br>Hill Residential (1158064)<br>J W Pigott and Son (1183246)<br>Rice Group (1058426)<br>ERLP 1 Sarl (1123561)  | Disagree | Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy. | No change |

|  |  |  |  |  |
|--|--|--|--|--|
|  | DB Rees (Builders) Ltd<br>(1160056)<br><br>Jarvis Homes 973180,<br><br>Hilton House Properties<br>(1057476)<br><br>Wrenbridge Land Ltd<br>(1187023)<br><br>Trustees of G.A. Simons<br>Family Trust (1187408)<br><br>Taylor Wimpey Strategic<br>Land (1187472)<br><br>Gallagher Estates<br>(1143916)<br><br>M Scott Properties<br>(1185993)<br><br>Trustees of G.A. Simons<br>Family Trust (1187408)<br><br>Intrasales Ltd (1157383)<br><br>Glinwell PLC (1187377)<br><br>London Colney Limited<br>(977496)<br><br>D'Arblay Investments<br>(1187404)<br><br>Shonleigh Nominees<br>(978420)<br><br>CP Holdings (1158145) |  |  |  |
|--|--|--|--|--|

|  |  |          |   |           |
|--|--|----------|---|-----------|
|  | 1153650<br>1159948<br>1187384<br>498103<br>978427<br>52064<br>52552<br>977889  |          |   |           |
| Plan fails to consider sites that can come forward quickly to help maintain a 5 years supply of deliverable housing sites. Requirement of specific deliverable sites for years 1-5 is not met. | ERLP 1 Sarl (1123561)<br>DB Rees (Builders) Ltd (1160056)<br>Jarvis Homes 973180<br>Home Builders Federation Ltd (1156936)<br>Ralph Catton Family Trust (1186119)<br>Sandridge Parish Council (869186)<br>Comer Group (872799)<br>Anderson Group (1146719)<br>Longbourn Estates (977635) | Disagree | The Plan necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy. There are sufficient deliverable sites for years 1-5. This is confirmed in relevant developer representations. | No change |

|   |  |          |   |           |
|---|--|----------|---|-----------|
|   | Taylor Wimpey Strategic Land (1187472)<br><br>SADC Community Services and Green Spaces (1200137)<br><br>1153650<br><br>1153651<br><br>1159948  |          |   |           |
| Trajectory of delivery / development strategy unsatisfactory. Backlog of housing needs require to be addressed earlier in the plan period | ERLP 1 Sarl (1123561)<br><br>DB Rees (Builders) Ltd (1160056)<br><br>Jarvis Homes (973180)<br><br>Home Builders Federation Ltd (1156936)<br><br>Ralph Catton Family Trust (1186119)<br><br>Comer Group (872799)<br><br>Anderson Group (1146719)<br><br>Longbourn Estates (977635)<br><br>Taylor Wimpey Strategic Land (1187472)<br><br>1153650 | Disagree | There is no backlog under Government standard methodology approach as additional provision is already incorporated. | No change |

|  |  |          |   |           |
|--|--|----------|---|-----------|
|  | 1153651<br>1159948   |          |   |           |
| There are small and medium sized sites that would deliver under 500 dwellings which have not been robustly assessed as reasonable alternatives and which constitute 'exceptional circumstances' for Green Belt release | Canton Ltd (1057961)<br>Hill Residential (1158064)<br>Minister Court Frogmore (1185980)<br>London Colney Parish Council (52477)<br>ERLP 1 Sarl (1123561)<br>Trustees of James Henry Frank Sewell Deceased (1185630)<br>Jarvis Homes (973180)<br>Burhill Developments Ltd (977347)<br>Park Street BCh & Bloor Homes Ltd (985300)<br>Home Builders Federation Ltd (1156936)<br>M Scott Properties (1185993)<br>Linden Wates (Bricket Wood) Limited (1186996) | Disagree | Evidence on development strategy / site selection is available in full. | No change |

|  |   |  |  |  |
|--|---|--|--|--|
|  | <p>Thakeham Homes<br/>(1187005)</p> <p>Hilton House Properties<br/>(1057476)</p> <p>Anderson Group<br/>(1146719)</p> <p>CWC Group (1153869)</p> <p>Department of Health &amp;<br/>Social Care and Bloor<br/>Homes (1156886)</p> <p>Wrenbridge Land Ltd<br/>(1187023)</p> <p>Glinwell PLC (1187377)</p> <p>Pennard Holdings Ltd<br/>(51983)</p> <p>London Colney Limited<br/>(977496)</p> <p>Longbourn Estates<br/>(977635)</p> <p>Mr Keith Hadley<br/>(1153539)</p> <p>Intrasales Ltd (1157383)</p> <p>Hallam Land<br/>Management Limited<br/>(1185998)</p> |  |  |  |
|--|---|--|--|--|

|   |  |       |  |           |
|---|--|-------|--|-----------|
|   | Taylor Wimpey Strategic Land (1187472)<br><br>Gallagher Estates (1143916)<br><br>Castleoak Care Communities (1187716)<br><br>Gorhambury Estates Company Limited (375996)<br><br>1153650<br><br>1159948<br><br>52552<br><br>978427<br><br>1186046<br><br>1019306<br><br>1158213<br><br>1153268<br><br>52064 |       |  |           |
| <i>Strategic and small sites put forward</i><br><br>(see separate schedule) | (see separate schedule)  | Noted | Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.<br><br>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy. | No change |

|   |  |                 |  |                  |
|---|--|-----------------|--|------------------|
| <p>The site selection process/ Green Belt assessment/ranking of the broad locations is not justified/flawed</p> | <p>CWC Group (1153869)<br/> Harpenden Green Belt Association (866541)<br/> Helioslough Ltd (1182085)<br/> Burhill Developments Ltd (977347)<br/> Department of Health &amp; Social Care and Bloor Homes (1156886)<br/> Lawes Agricultural Trust (1187615)<br/> Historic England (929489)<br/> Tarmac (1153600)<br/> London Colney Limited (977496)<br/> Taylor Wimpey Strategic Land (1187472)<br/> CPRE Hertfordshire (872572)<br/> Redbourn Parish Council (759908)<br/> Leverstock Green Village Association (1185907)<br/> CP Holdings (1158145)</p> | <p>Disagree</p> | <p>Site selection is firmly based on comprehensive GB work and the key development strategy points that larger settlements are most appropriate as locations and larger sites deliver greater community benefit.</p> | <p>No change</p> |
|---|--|-----------------|--|------------------|



|   |  |          |   |           |
|---|--|----------|---|-----------|
|   | 1185714<br>789007<br>1055738<br>1185092<br>498103<br>1153539   |          |   |           |
| Support approach to site selection  | Crown Estate (51946)<br>Trustees of James Henry Frank Sewell Deceased (1185630)  | Noted    | Support noted   | No change |
| Other Broad Locations for development should be considered and referenced | Hertsmere Borough Council (51934)<br>Redbourn Parish Council (759908)<br>Leverstock Green Village Association (1185907)<br>Tarmac (1153600)<br>Burhill Developments Ltd (977347)<br>Comer Group (872799)<br>Department of Health & Social Care and Bloor Homes (1156886)<br>London Colney Limited (977496) | Disagree | Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. | No change |

|   |  |          |  |           |
|---|--|----------|--|-----------|
|   | Helioslough Ltd<br>(1182085)<br><br>CP Holdings (1158145)  |          |  |           |
| Alternative/additional strategic sites put forward as 'reasonable alternatives'   | Tarmac (1153600)<br><br>Burhill Developments Ltd (977347)<br><br>Comer Group (872799)<br><br>Gallagher Estates (1143916)<br><br>Lawes Agricultural Trust (1187615)<br><br>Department of Health & Social Care and Bloor Homes (1156886)<br><br>London Colney Limited (977496) | Noted    | Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.  | No change |
| A regional approach to development strategy is required as there is a viable alternative development strategy - building a new garden town in North Herts/South Beds. | 1185483  | Disagree | This approach is not something that SADC can deliver. Though such an approach might provide additional development capacity it would not be sufficient to deal with the Government view of housing need at a District level. | No change |
| Should provide for a contingency of   | Tarmac (1153600)   | Disagree | Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.  | No change |

| additional strategic sites   |   |                 |  |                  |
|--|---|-----------------|--|------------------|
| <p>The development strategy needs to be justified by a better / up to date evidence base</p> | <p>Martin Grant Homes and Kearns Land (975683)</p> <p>Minister Court Frogmore (1185980)</p> <p>Watford Borough Council (1122500)</p> <p>CWC Group (1153869)</p> <p>Intrasales Ltd (1157383)</p> <p>Leverstock Green Village Association (1185907)</p> <p>Historic England (929489)</p> <p>Gorhambury Estates Company Limited (375996)</p> <p>CP Holdings (1158145)</p> <p>1153651</p> <p>1185775</p> <p>1153539</p> | <p>Disagree</p> | <p>Evidence on development strategy / site selection is available in full.</p> | <p>No change</p> |

|   |  |              |   |   |
|---|--|--------------|---|---|
| The Plan / policy fails to provide guidance for Neighbourhood Plans that advocate additional housing (such as Redbourn Neighbourhood Plan)  | <p>Martin Grant Homes and Kearns Land (975683)</p> <p>Aldwyck Housing Group (1186030)</p> <p>Hilton House Properties (1057476)</p>   | Partly Agree | The NPPF and draft Local Plan support Neighbourhood planning. The Local Plan deals with the overall need for new housing and is not reliant on NPs. NPs must make their local own justification for additional housing provision (and for other uses); this is their intended role. Given the specific wording used in the final NPPF 2018 (after the Council decision on 11 July 2018 based on the draft NPPF) a minor modification should be made to make clear that if detailed local evidence justifies development at a neighbourhood scale, on land currently designated as Green Belt, it is supported in principle. | <p>Minor modification</p> <p>If detailed local evidence justifies development at a neighbourhood scale, on land currently designated as Green Belt, it is supported in principle.</p> |
| Plan fails to take into account the cumulative impact (environmental, Green Belt and infrastructure) of SADC and neighbouring council's housing allocations/proposals (Hertsmere and Welwyn Hatfield) | <p>London Colney Parish Council (52477)</p> <p>1182733</p> <p>347648</p> <p>1153245</p> <p>1186046</p> <p>1185955</p> <p>1186129</p> | Disagree     | DtC arrangements ensure this is not the case. Development is being coordinated across boundaries under joint working and liaison arrangements. It is however acknowledged that the whole sub region will experience significant additional development to accommodate population / household change and growth (in accordance with Government policy - NPPF)  | No change   |
| Policy should emphasise that Brownfield should be developed first   | <p>CPRE Hertfordshire (872572)</p> <p>D'Arblay Investments (1187404)</p> <p>1158213</p> <p>1185945</p> <p>1121386</p>                | Noted        | This is a significant part of the Plan strategy; but it is not possible to meet all need through this type of development as the opportunities are limited (ref BLR). It is not possible to apply a rigid phasing policy in this respect.   | No change   |

|   |   |          |   |           |
|---|---|----------|---|-----------|
| Greater emphasis should be placed on development around London Colney/Napsbury Estate             | Owners of Land North of Napsbury (1186783)  | Disagree | Evidence on development strategy / site selection is available in full.   | No change |
| Broad Locations should be more evenly distributed across the District                             | Colney Heath Parish Council (51891)<br>London Colney Parish Council (52477)<br>498103   | Disagree | Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. The key development strategy points that larger settlements are most appropriate as locations and larger sites deliver greater community benefit. | No change |
| There is no development strategy for City, towns and wider district                               | Park Street BCh & Bloor Homes Ltd (985300)  | Disagree | Policies S1 and S2 set out a very clear approach  | No change |
| Sustainable patterns of development have not been considered in the proposed development strategy | Park Street BCh & Bloor Homes Ltd (985300)<br>CWC Group (1153869)<br>Pennard Holdings Ltd (51983)<br>Longbourn Estates (977635)<br>Intrasales Ltd (1157383)<br>Hill Residential (1158064) | Disagree | Policies S1 and S2 out a very clear approach based on accessibility of employment and high order facilities and services by modes other than the private car.   | No change |

|   |  |          |   |           |
|---|--|----------|---|-----------|
|   | <p>Owners of Land North of Napsbury (1186783)</p> <p>Leverstock Green Village Association (1185907)</p> <p>867068</p> <p>1153802</p> <p>1153245</p> <p>1186129</p> |          |   |           |
| SA and the Plan are not considered to be consistent with national policy as they don't aim to deliver sustainable development | Helioslough Ltd (1182085)  | Disagree | The approach taken reflects the Plan's vision of providing a thriving community which includes long term sustainability.  | No change |
| Loss of prime agricultural land   | <p>759883</p> <p>498103</p> <p>1185704</p>   | Noted    | <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>Loss of higher quality agricultural land has been considered as a factor amongst others, such as Green Belt, in determining the Plan strategy.</p> | No change |

|   |                                       |          |  |           |
|---|---------------------------------------|----------|--|-----------|
| Should include more employment locations. Disagree with a sole focus on the Enterprise Zone at the expense of other growth areas.   | Goodman (1153774)                     | Disagree | <p>Specific plan provision of land is based on strategic planning factors.</p> <p>Policy S5 supports employment land provision appropriate to the settlements.</p> <p>The EZ has important functions supporting business start-ups and attracting UK and international investment.</p> | No change |
| Look forward to reviewing the strategic transport assessments for the Broad Locations and outcomes of the COMET modelling run to understand the potential cross-boundary transport impacts  | Central Bedfordshire Council (861963) | Noted    | A transport evidence workplan has been agreed with HCC. The next output is expected in early 2019 from the HCC COMET run.  | No change |
| Further work needs to be carried out on transport – lack of understanding for HCC to confirm if sufficient. Would be willing to agree a MoU that sets out the work going forward and how any identified problems will be addressed. | Hertfordshire County Council (837689) | Noted    | A transport evidence workplan has been agreed with HCC. The next output is expected in early 2019 from the HCC COMET run.  | No change |
| Support the Broad Locations identified  | Minister Court Frogmore (1185980)     | Noted    | Support noted  | No change |

|  |  |          |  |           |
|--|--|----------|--|-----------|
|  | Trustees of James Henry<br>Frank Sewell Deceased<br>(1185630)<br><br>1182518<br><br>1184221<br><br>1185695<br><br>1185939<br><br>1186062 |          |  |           |
| 'Broad Locations'<br>should be renamed<br>'Strategic Housing<br>Allocations'                                   | Legal and General<br>(1051022)   | Disagree | Local Plan wording reflects NPPF wording | No change |
| Support allocation of<br>PSGV for housing-<br>led development  | Minister Court Frogmore<br>(1185980)   | Noted    | Support noted                            | No change |
| Support the inclusion<br>of East and North<br>Hemel Hempstead<br>Broad Locations                               | Grand Union<br>Investments Ltd.<br>(977391)  | Noted    | Support noted                            | No change |
| Support inclusion of<br>land at Holtsmere<br>End Road as part of<br>North Hemel<br>Hempstead Broad<br>Location | Mr and Mrs Bill and<br>Valerie Barr (1157883)  | Noted    | Support noted                            | No change |



|   |  |          |   |           |
|---|--|----------|---|-----------|
| Support the inclusion of North St Albans  | Hallam Land Management Limited (1185998)   | Noted    | Support noted   | No change |
| Concerns about loss of Green Belt and green environment as a result of development of North St Albans   | 840795   | Noted    | <p>Development need, overall Plan context and site specific analysis in GB work provide exceptional circumstances for GB release.</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 |
| Support omission of land north-east of Redbourn   | Ver Valley Society (826041)  | Noted    | Support noted   | No change |
| Site at North East Redbourn should be considered/included as a Broad Location                           | <p>Helioslough Ltd (1182085)</p> <p>Lawes Agricultural Trust (1187615)</p> <p>1181750</p> <p>1185092</p> | Disagree | <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 |
| Concerns about loss of / harm to Green Belt as a result of strategic developments proposed at Harpenden | <p>Harpenden Green Belt Association (866541)</p> <p>1055683</p> <p>1185714</p>                           | Noted    | <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 |

|  |  |          |   |           |
|--|--|----------|---|-----------|
| Disagree with inclusion of North East Harpenden, particularly in relation to impact on infrastructure                  | 789007   | Disagree | <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 |
| Disagree with inclusion of East and/or North Hemel Hempstead Broad Locations, including due to proximity to Buncefield | <p>Redbourn Parish Council (759908)</p> <p>Leverstock Green Village Association (1185907)</p> <p>Berkhamsted Residents Action Group (BRAG) (1186012)</p> <p>759883</p> <p>498103</p> <p>334023</p> <p>1184569</p> <p>1158258</p> <p>1185704</p> <p>1034653</p> | Disagree | <p>Development need, overall Plan context and site specific analysis in GB work provide exceptional circumstances for GB release.</p>   |           |
| Plan relies too much on development at Hemel Hempstead   | <p>Berkhamsted Residents Action Group (BRAG) (1186012)</p> <p>1185935</p> <p>1184750</p> <p>977889</p>   | Disagree | <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 |

|   |   |       |  |           |
|---|---|-------|--|-----------|
| Concerns over impact on Redbourn and surrounding area's infrastructure, including roads, health services, train station | Redbourn Parish Council (759908)<br>Leverstock Green Village Association (1185907)<br>Hertfordshire County Council (837689)<br><br>759883<br>1181723<br>867312<br>1144419<br>1034653<br>1184569 | Noted | Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.<br><br>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.   | No change |
| Concerns over proximity to Redbourn and reduction of gap with Hemel Hempstead   | 1153741<br>759883<br>1181723<br>498103  | Noted | Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.<br><br>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.<br><br>There will still be a very substantial green gap between Hemel and Redbourn which will be enhanced and made permanent by the Country Park. | No change |
| Growth at HH would place significant pressure on the main town, through higher use of infrastructure, local             | Redbourn Parish Council (759908)<br><br>Mr Antonio Barba (1187384)<br><br>D'Arblay Investments (1187404)  | Noted | Refer to S6 and L17<br><br>Concentrating development in larger sites that can effectively deliver infrastructure is a key part of the development strategy.  | No change |

|   |   |          |   |           |
|---|---|----------|---|-----------|
| services and facilities   |   |          | <p>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.</p> <p>This matter will be properly detailed and addressed through the masterplanning / planning application / EIA process, with appropriate consultation.</p> |           |
| Limited evidence to support inclusion of East and/or North Hemel Hempstead sites                          | <p>Redbourn Parish Council (759908)</p> <p>Leverstock Green Village Association (1185907)</p> | Disagree | Evidence on development strategy / site selection is available in full.   |           |
| Concerns over viability and deliverability of East and North Hemel Hempstead                              | <p>Redbourn Parish Council (759908)</p> <p>Leverstock Green Village Association (1185907)</p> | Disagree | Evidence on development strategy / site selection is available in full.   |           |
| Concerns over deliverability of East and North Hemel St Albans  | Gorhambury Estates Company Limited (375996)   | Disagree | Evidence on development strategy / site selection is available in full.   |           |
| Disagree with inclusion of West of Chiswell Green   | <p>Owners of Land North of Napsbury (1186783)</p> <p>1187590</p>                              | Disagree | Development need, overall Plan context and site specific analysis in GB work provide exceptional circumstances for GB release.  | No change |
| Concerns about loss of / harm to Green Belt as a result of development proposed at West of Chiswell Green | <p>St Stephen Parish Council (51804)</p> <p>1182697</p> <p>1184271</p> <p>1184839</p>         | Disagree | Development need, overall Plan context and site specific analysis in GB work provide exceptional circumstances for GB release.  | No change |

|   |   |          |   |           |
|---|---|----------|---|-----------|
|   | 1184864<br>1185244<br>1185478<br>1185479<br>1185481<br>1185482<br>1185633<br>1185640<br>863091<br>871923<br>1156288<br>1182480<br>1187008<br>977889 |          |   |           |
| Additional residential development in Chiswell Green is not acceptable. Will change character of Chiswell Green and pressure local road infrastructure and services, impact air pollution. No evidence as to why this designation | St Stephen Parish Council (51804)<br>1187590<br>1182697<br>1158536<br>1184271<br>1184839<br>1184864   | Disagree | Development need, overall Plan context and site specific analysis in GB work provide exceptional circumstances for GB release.<br><br>The BL was identified in the Green Belt Review. | No change |

|  |  |       |  |           |
|--|--|-------|--|-----------|
| included as an exception to the green belt.  | 1185244<br>1185478<br>1185479<br>1185481<br>1185482<br>1185469<br>1185633<br>863091<br>1185775<br>1156288<br>1182480<br>1185640<br>1187008 |       |  |           |
| Concerns with inclusion of West of London Colney, particularly impact on local infrastructure            | London Colney Parish Council (52477)   | Noted | Evidence on development strategy / site selection is available in full.<br><br>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy. | No change |
| Concerns about loss of / harm to Green Belt as a result of development proposed at West of London Colney | Sanders Laing (1183909)  | Noted | Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. Evidence on development strategy / site selection is available in full.  | No change |

|   |  |                 |   |                  |
|---|--|-----------------|---|------------------|
| <p>Park Street Garden Village Broad</p> <p>Location should be removed from the development strategy as there is uncertainty over its availability/delivery for housing as it has consent for a rail freight interchange</p> | <p>RF Sinclair and Sons (1058251)</p> <p>Department of Health &amp; Social Care and Bloor Homes (1156886)</p> <p>Helioslough Ltd (1182085)</p> <p>M Scott Properties (1185993)</p> <p>Butterfly World Project Ltd (1183965)</p> <p>Jarvis Homes (973180)</p> <p>CALA Group Ltd (977724)</p> <p>Albert Bygrave Centre (985070)</p> <p>Eaton Lodge (985289)</p> <p>Glinwell PLC (1187377)</p> <p>Trustees of G.A. Simons Family Trust (1187408)</p> <p>Home Builders Federation Ltd (1156936)</p> <p>Gallagher Estates (1143916)</p> | <p>Disagree</p> | <p>The main site owner has promoted the site as available and deliverable for housing. Considerations have taken into account the existing planning permission for an alternative use and other relevant factors.</p> | <p>No change</p> |
|---|--|-----------------|---|------------------|

|  |  |  |  |  |
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|  | <p>Hallam Land Management Limited (1185998)</p> <p>Park Street Baptist Church &amp; Bloor Homes Ltd (985300)</p> <p>Rice Group (1058426)</p> <p>Beechwood Homes (1123837)</p> <p>Intrasales Ltd (1157383)</p> <p>Linden Homes (1153662)</p> <p>Hertfordshire Land (1159945)</p> <p>Aldwyck Housing Group (1186030)</p> <p>DB Rees Builders Ltd (1160056)</p> <p>Owners of Land East of Common Lane (1186108)</p> <p>Owners of Land South of Burydell Lane (1186128)</p> <p>Land at the Dak (1186131)</p> |  |  |  |
|--|--|--|--|--|



|  |   |          |   |           |
|--|---|----------|---|-----------|
|  | D'Arblay Investments<br>(1187404)<br><br>973643<br><br>1153650<br><br>1153651<br><br>1159948<br><br>52064<br><br>347648<br><br>1181750<br><br>1187384<br><br>1181750<br><br>1185945<br><br>1185744<br><br>52552<br><br>977889 |          |   |           |
| Not clear if cross boundary sites and consequences of SRFI not being delivered have been discussed with neighbouring LAs/lack of evidence of effective joint | Helioslough Ltd<br>(1182085)  | Disagree | There has been ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met. Considerations have taken into account the existing planning permission for an alternative use and other relevant factors. | No change |

|  |  |          |  |           |
|--|--|----------|--|-----------|
| working on cross boundary strategic priorities   |  |          |  |           |
| Park Street Garden Village not an efficient use give the rarity of a suitable site for a SRFI and longstanding national need for SRFIs.  | Helioslough Ltd (1182085)  | Disagree | The main site owner has promoted the site as available and deliverable for housing. Considerations have taken into account the existing planning permission for an alternative use and other relevant factors. | No change |
| The Plan fails to include a replacement SRFI site  | Butterfly World Project Ltd (1183965)  | Disagree | The specific provision of an 'SRFI site' is not a requirement for a Local Plan   | No change |
| No details on what PSGV will deliver to meet garden village aspirations, or how easy accessibility to St Albans will be achieved   | Helioslough Ltd (1182085)  | Disagree | Cross reference with Policy S6 where high level Garden Village aspirations and access improvements (eg to the Abbey Line) are set out.   | No change |
| Park Street Garden Village is identified within an area serving a strategic gap in the Green Belt. This will create a ribbon of built development, release of this land is contrary to the | Hill Residential (1158064)<br>D'Arblay Investments (1187404),<br>Trustees of G.A. Simons Family Trust (1187408)<br>52552 | Disagree | Development need, overall Plan context and site specific analysis in GB work provide exceptional circumstances for GB release.   | No change |

|   |   |          |  |           |
|---|---|----------|--|-----------|
| Council's Green Belt strategy which aims to maintain existing settlement patterns   | 977889  |          |  |           |
| No justification/evidence to support inclusion of PSGV  | <p>Department of Health &amp; Social Care and Bloor Homes (1156886)</p> <p>Gallagher Estates (1143916)</p> <p>Gorhambury Estates Company Limited (375996)</p> | Disagree | Evidence on development strategy / site selection is available in full.  | No change |
| Disadvantages of not providing the SRFI, including loss of new jobs, 334ha Country Park and reduction of greenhouse gases from shifting road to rail. | Helioslough Ltd (1182085)   | Disagree | The main site owner has promoted the site as available and deliverable for housing. Considerations have taken into account the existing planning permission for an alternative use and other relevant factors.   | No change |
| Plan has no consideration of cumulative impact between both current and proposed residential developments and quarrying activity within a small area  | Ellenbrook Area Residents Association Committee (1185802)   | Disagree | DtC arrangements ensure this is not the case. Development is being coordinated across boundaries under joint working and liaison arrangements. It is however acknowledged that the whole sub region will experience significant additional development to accommodate population / household change and growth (in accordance with Government policy - NPPF) | No change |

|  |                       |          |   |           |
|--|-----------------------|----------|---|-----------|
| Lack of evidence to support suitability and availability of Broad Location sites | CP Holdings (1158145) | Disagree | Evidence on development strategy / site selection is available in full.   | No change |
| Meeting the housing target should be prioritised ahead of impact on the GB       | CP Holdings (1158145) | Disagree | Development need, overall Plan context and site specific analysis in GB work provide exceptional circumstances for GB release | No change |

### S3 Metropolitan Green Belt

| Representation Point  | Representor Raising Point  | Outline Reply | Recommended Reply (including notes and references)   | Suggested Actions (including any Changes to Plan) |
|---|--|---------------|--|---|
| General concern at Green Belt loss to development   | St Albans Civic Society (1156974)<br>1055683<br>1158258<br>1184569<br>1121386<br>1144419 | Noted         | Housing requirement/targets are based on the standard methodology set out by the government – see S4.<br><br>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. | No change   |
| It is important that any development within the Green Belt remains subject to the ‘very special circumstances’ test in the NPPF | 1182518  | Noted         | Cross reference to NPPF for very special circumstances for Green Belt development.   | No change   |

|   |   |                 |  |                  |
|---|---|-----------------|--|------------------|
| <p>Educational development in the Green Belt is inappropriate</p> | <p>Ramblers Association (52420)</p> <p>Harpenden Green Belt Association (866541)</p> <p>St Albans &amp; District Footpaths Society (723340)</p> <p>Beechwood Homes (1123837)</p> <p>CPRE Hertfordshire (872572)</p> <p>London Colney Parish Council (52477)</p> <p>Aurora Properties Limited (1151817)</p> <p>Department for Education (1186955)</p> <p>Linden Wates (Bricket Wood) Limited (1186996)</p> <p>St Albans School (1187032)</p> <p>Crown Estate (51946)</p> <p>The British Horse Society (1187597)</p> <p>Hertfordshire County Council (837689)</p> | <p>Disagree</p> | <p>Policy L21 /S3 / S6 set out a clear approach. Schools are a key element of infrastructure and have been successfully provided and maintained in the Green belt in numerous locations over many years.</p> | <p>No change</p> |
|---|---|-----------------|--|------------------|

|  |   |          |   |           |
|--|---|----------|---|-----------|
|  | 334023<br>1185775   |          |   |           |
| Transport related infrastructure development can damage the Green Belt. The statement that transport infrastructure within the Green Belt is not inappropriate development and demonstrates 'very special circumstances' is not justified. | Ramblers Association (52420)<br>St Albans & District Footpaths Society (723340)<br>Legal and General (1051022)<br>Aurora Properties Limited (1151817)<br>The British Horse Society (1187597)<br>CEG (1158030)<br>867587 | Disagree | Transport infrastructure is essential to sustainable development, including at the Broad Locations. Policy S6 sets out the transport infrastructure required.<br><br>Local transport infrastructure which can demonstrate a requirement for Green Belt location are not considered inappropriate development, as set out in para 146 of the NPPF. | No change |
| The inclusion of a Local Green Belt purpose in GBR evidence is not justified.  | Canton Ltd (1057961)  | Disagree | Based on longstanding approach to maintaining character and identity in District and beyond.  | No change |
| Policy should propose absolute % of Green Belt to be built on which cannot be exceeded   | 1153802   | Disagree | Policy S3 and the NPPF protects the large majority of the GB from development.  | No change |

|  |   |          |  |           |
|--|---|----------|--|-----------|
| Greater recognition should be given to Green Belt protection of productive local sustainable farming and forestry  | 1153802                                   | Disagree | GB land is protected by Policy S3 and productive and sustainable farming and forestry is specifically supported. | No change |
| The housing development proposed on Green Belt land does not conserve the natural environment, landscape or infrastructure. This directly contradicts the SA.<br>Developments on Green Belt land should only be carried out on areas of land which already suffer from environmental degradation | 867068                                    | Disagree | Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.          | No change |
| The policy does not reference housing development, the broad locations or the Green Belt Review and is therefore inadequate  | London Colney Limited (977496)<br>1153802 | Disagree | Policy S2 deals with this.   | No change |

|  |  |          |   |           |
|--|--|----------|---|-----------|
| and in conflict with S2  |  |          |   |           |
| Environmental capacity analysis should drive sustainable development in accordance with the NPPF | Intrasales Ltd (1157383)<br>1153802  | Disagree | NPPF supports approach taken, where site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. | No change |
| The Plan should not rely on 2014 Green Belt Review; it should be updated.                        | Hill Residential (1158064)<br>ERLP 1 Sarl (1123561)<br>Stackbourne Limited (1153646)<br>Redbourn Parish Council (759908)<br>Department of Health & Social Care and Bloor Homes (1156886)<br>Intrasales Ltd (1157383)<br>Lawes Agricultural Trust (1187615)<br>Historic England (929489)<br>1185714<br>977889 | Disagree | NPPF supports approach taken, where site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. | No change |



|  |   |          |  |           |
|--|---|----------|--|-----------|
| No need for a Green Belt policy at all as the NPPF already covers the matter extensively   | St Albans School (1187032)<br>52064           | Disagree | Green Belt Policy is consistent with the NPPF but adds local context and detail.   | No change |
| There is a disproportionate amount of development / loss of Green Belt in the south of the District, exacerbated by Hertsmere to the south and Welwyn Hatfield to the east   | Colney Heath Parish Council (51891)<br>347648 | Disagree | NPPF supports approach taken, where site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations. Sites are generally spread across the district. Sites outside the district are not included in the Plan, though acknowledged through DtC work and work on the SWH JSP. | No change |
| The policy refers to a settlement pattern which is not described or explained.   | Aurora Properties Limited (1151817)           | Disagree | The Policy refers to 'existing settlement pattern'.  | No change |
| Paragraph 85 of the NPPF (2012) states that when defining boundaries local planning authorities should 'not include land which it is unnecessary to keep permanently open' i.e. those that make little contribution to the greenbelt | M Scott Properties (1185993)                  | Noted    | Green Belt Policy is consistent with the NPPF.   | No change |

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| There is no safeguarded land for Green Belt releases or indication of need for boundaries to be altered post plan period 2036  | Crown Estate (51946)<br>52552<br>978427  | Noted    | The Plan covers the time period to 2036 and the trajectory at Appendix 2 clearly shows substantial delivery of housing post 2036 on land excluded from the Green Belt.   | No change |
| GBR evidence does not appear to have considered the release of existing settlements like Blackmore End or other small scale sub areas which make limited contribution to the greenbelt | North Hertfordshire District Council (1185674)<br><br>Intrasales Ltd (1157383)<br>977889 | Noted    | Much of Blackmore End is outside the District Boundary. Overall development strategy has considered these issues. Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.<br><br>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy. | No change |
| Green Belt should be released to meet the health care infrastructure needs necessary to an increasing population (potentially for a new hospital site)                                 | West Hertfordshire Hospitals NHS Trust (1183618)   | Noted    | No substantive evidence provided to support such an approach. Cross reference L22  | No Change |
| Remove the area of Rothamsted Park designated as Town Centre from Green Belt   | 52064  | Disagree | Green Belt Policy and approach for this area is consistent with the NPPF.  | No change |

#### S4 Housing Strategy and Housing Requirement/Target

| Representation Point  | Representor Raising Point   | Outline Reply | Recommended Reply (including notes and references)   | Suggested Actions (including any Changes to Plan) |
|---|---|---------------|--|---|
| Revised 2016-based household projections were published in September 2018 and indicate lower rates of household growth over the plan period which need to be taken into account | <p>Jarvis Homes (973180)</p> <p>Comer Group (872799)</p> <p>DB Rees Builders Ltd (1160056)</p> <p>Anderson Group (1146719)</p> <p>Glinwell PLC (1187377)</p> <p>Intrasales Ltd (1157383)</p> <p>Simons Family Trust (1187408)</p> <p>Lawes Agricultural Trust (1187615)</p> <p>Jarvis Homes (973180)</p> <p>CALA Group Ltd (977724)</p> <p>Albert Bygrave Centre (985070)</p> <p>Eaton Lodge (985289)</p> <p>Rice Group 1058426)</p> <p>Beechwood Homes (1123837)</p> | Noted         | The Plan is intended to address need as defined by Government through the 'standard methodology' | No change   |

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|  | <p>Linden Homes<br/>(1153662)</p> <p>Hertfordshire Land<br/>(1159945)</p> <p>Aldwyck Housing Group<br/>(1186030)</p> <p>CPRE Hertfordshire<br/>(872572)</p> <p>DB Rees (Builders) Ltd<br/>(1160056)</p> <p>Owners of Land East of<br/>Common Lane<br/>(1186108)</p> <p>Owners of Land South of<br/>Burydell Lane (1186128)</p> <p>Land at The Dak<br/>(1186131)</p> <p>London Colney Parish<br/>Council (52477)</p> <p>Trustees of James Henry<br/>Frank Sewell Deceased<br/>(1185630)</p> <p>Colney Heath Parish<br/>Council (51891)</p> <p>Hertsmere Borough<br/>Council (51934)</p> |  |  |  |
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|  | <p>Burhill Developments Ltd<br/>(977347)</p> <p>M Scott Properties<br/>(1185993)</p> <p>Department of Health &amp;<br/>Social Care and Bloor<br/>Homes (1156886)</p> <p>North Hertfordshire<br/>District Council<br/>(1185674)</p> <p>Wrenbridge Land Ltd<br/>(1187023)</p> <p>Dacorum Borough<br/>Council (1186054)</p> <p>Welwyn Hatfield Borough<br/>Council (52397)</p> <p>CEG (1158030)</p> <p>Gallagher Estates<br/>(1143916)</p> <p>Castleoak Care<br/>Communities (1187716)</p> <p>973643</p> <p>1153651</p> <p>1159948</p> <p>978420</p> <p>978427</p> |  |  |  |
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|   | 977889<br>1187384<br>1187404<br>973643<br>347648<br>1185971<br>1019306<br>1153650<br>1153651<br>1159948   |          |   |           |
| Housing targets are out of proportion with the expected rise in population over the plan period and ought to be lower | CPRE Hertfordshire (872572)<br>London Colney Parish Council (52477)<br>Trustees of James Henry Frank Sewell Deceased (1185630)<br>Colney Heath Parish Council (51891)<br>Department of Health & Social Care and Bloor Homes (1156886)<br>867068<br>867587 | Disagree | Housing targets are based on the standard methodology set out by the government.<br><br>Providing a higher amount of housing aims to accord with the Government's ambition to address the long term housing demand whilst taking into account the future demographic changes at a district level. | No change |

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|  | 1184784<br>1153802<br>1019306<br>1185956<br>1055683<br>1185971<br>347648  |          |  |           |
| Housing target should however be a “minimum” with the aim to achieve above these targets as per the Government’s aspirations as set out in the NPPF (2018) | Intrasales Ltd (1157383)<br>Pennard Holdings Ltd (51983)<br>Longbourn Estates (977635)<br>Grand Union Investments Ltd (977391)  | Disagree | Housing targets are based on the standard methodology set out by the government.   | No change |
| Local Plan base date should align with the start of the plan preparation period and demonstrate 5 year supply of housing                                   | Martin Grant Homes and Kearns Land (975683)<br>Canton Ltd (1057961)<br>Jarvis Homes (973180)<br>CALA Group Ltd (977724)<br>Albert Bygrave Centre (985070)<br>Eaton Lodge (985289) | Disagree | 2020 is the earliest realistically possible date of adoption of the Plan and is therefore appropriate in the context of the new draft and final NPPF.<br><br>The Plan necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy. There are sufficient deliverable sites for years 1-5. This is confirmed in relevant developer representations. | No change |

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|  | <p>Park Street BCh &amp; Bloor Homes Ltd (985300)</p> <p>Rice Group (1058426)</p> <p>Beechwood Homes (1123837)</p> <p>Linden Homes (1153662)</p> <p>Hill Residential (1158064)</p> <p>Hertfordshire Land (1159945)</p> <p>Minister Court Frogmore (1185980)</p> <p>Aldwyck Housing Group (186030)</p> <p>DB Rees (Builders) Ltd (1160056)</p> <p>Owners of Land East of Common Lane (1186108)</p> <p>Owners of Land South of Burydell Lane (1186128)</p> <p>Land at The Dak (1186131)</p> <p>ERLP 1 Sarl (1123561)</p> |  |  |  |
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|  | Stackbourne Limited<br>(1153646)<br><br>Burhill Developments Ltd<br>(977347)<br><br>Aurora Properties<br>Limited (1151817)<br><br>Anderson Group<br>(1146719)<br><br>CWC Group (1153869)<br><br>Department of Health &<br>Social Care and Bloor<br>Homes (1156886)<br><br>Wrenbridge Land Ltd<br>(1187023)<br><br>Pennard Holdings Ltd<br>(51983)<br><br>London Colney Limited<br>(977496)<br><br>Longbourn Estates<br>(977635)<br><br>Home Builders<br>Federation Ltd<br>(1156936)<br><br>Dacorum Borough<br>Council (1186054)<br><br>Lawes Agricultural Trust<br>(1187615) |  |  |  |
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|  | <p>Hallam Land Management Limited (1185998)</p> <p>Gorhambury Estates Company Limited (375996)</p> <p>Gallagher Estates (1143916)</p> <p>CP Holdings (1158145)</p> <p>1153650</p> <p>1153651</p> <p>973643</p> <p>1159948</p>                                    |          |  |           |
| Concerns with using a stepped trajectory which has ambitious delivery levels in later years, does not address housing need within years 1-5 of the plan, and is not balanced with an affordability buffer to enable the prospect of achieving a rolling supply of homes. | <p>Martin Grant Homes and Kearns Land (975683)</p> <p>Canton Ltd (1057961)</p> <p>RF Sinclair and Sons (1058251)</p> <p>Hunston Planning Limited (1185622)</p> <p>Jarvis Homes (973180)</p> <p>CALA Group Ltd (977724)</p> <p>Albert Bygrave Centre (985070)</p> | Disagree | The Plan necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy. There are sufficient deliverable sites for years 1-5. This is confirmed in relevant developer representations. Housing trajectory includes the 20% buffer required by NPPF. | No change |

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|  | <p>Eaton Lodge (985289)</p> <p>Park Street BCh &amp; Bloor<br/>Homes Ltd (985300)</p> <p>Rice Group (1058426)</p> <p>Beechwood Homes<br/>(1123837)</p> <p>Linden Homes<br/>(1153662)</p> <p>Hill Residential<br/>(1158064)</p> <p>Hertfordshire Land<br/>(1159945)</p> <p>Minister Court Frogmore<br/>(1185980)</p> <p>Aldwyck Housing Group<br/>(1186030)</p> <p>CPRE Hertfordshire<br/>(872572)</p> <p>DB Rees (Builders) Ltd<br/>(1160056)</p> <p>Owners of Land East of<br/>Common Lane<br/>(1186108)</p> <p>Owners of Land South of<br/>Burydell Lane (1186128)</p> |  |  |  |
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|  | <p>Land at The Dak<br/>(1186131)</p> <p>Legal and General<br/>(1051022)</p> <p>Stackbourne Limited<br/>(1153646)</p> <p>Trustees of James Henry<br/>Frank Sewell Deceased<br/>(1185630)</p> <p>Burhill Developments Ltd<br/>(977347)</p> <p>Aurora Properties<br/>Limited (1151817)</p> <p>M Scott Properties<br/>(1185993)</p> <p>Sandridge Parish<br/>Council (869186)</p> <p>Comer Group (872799)</p> <p>Anderson Group<br/>(1146719)</p> <p>Intrasales Ltd (1157383)</p> <p>Wrenbridge Land Ltd<br/>(1187023)</p> <p>Owner Pound Farm &amp;<br/>East of Sandridge<br/>(1187227)</p> |  |  |  |
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|  | <p>Pennard Holdings Ltd<br/>(51983)</p> <p>London Colney Limited<br/>(977496)</p> <p>Longbourn Estates<br/>(977635)</p> <p>Adrian Irving and Alban<br/>Developments Ltd<br/>(1156368)</p> <p>Home Builders<br/>Federation Ltd<br/>(1156936)</p> <p>Taylor Wimpey Strategic<br/>Land (1187472)</p> <p>Lawes Agricultural Trust<br/>(1187615)</p> <p>CEG (1158030)</p> <p>Crest Strategic Projects<br/>and Bloor Homes<br/>(1158079)</p> <p>Gorhambury Estates<br/>Company Limited<br/>(375996)</p> <p>Gallagher Estates<br/>(1143916)</p> <p>CP Holdings (1158145)</p> |  |  |  |
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|   | <p>Mr and Mrs Bill and Valerie Barr (1157883)</p> <p>52064</p> <p>973643</p> <p>1153650</p> <p>1153651</p> <p>1159948</p> <p>1157883</p> <p>1153268</p>    |          |  |           |
| Suggest that “exceptional circumstances” are not expected to continue and no more than 0.5% greenbelt to be built on per 15 years   | 1153802  | Disagree | Development need, overall Plan context and site specific analysis in GB work provide exceptional circumstances for GB release.   | No change |
| Other small sites should be included as those identified will not address any percentage of the housing requirement because they will be built out before the start of the Plan | <p>Hunston Planning Limited (1185622)</p> <p>Fairview New Homes Ltd (1185602)</p> <p>St Stephen Parish Council (51804)</p> <p>Anderson Group (1146719)</p> | Disagree | <p>The Plan necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy.</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 |

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|  | Taylor Wimpey Strategic Land (1187472)<br><br>Gallagher Estates (1143916)<br><br>52064   |          |  |           |
| The last SHLAA update to include any detailed site assessment was the 2016 update, although this was only a partial update and for many sites the assessment had not been revisited since the 2009 update, | Jarvis Homes (973180)<br><br>1153268   | Disagree | Evidence on development strategy / site selection is available in full.  | No change |
| The paragraph beginning "Small sites of half a hectare or less" is ambiguous and needs to be clarified to ensure that it will not provide grounds for piecemeal erosion of Green Belt boundaries           | Ramblers Association (52420)<br><br>St Albans & District Footpaths Society (723340)<br><br>The British Horse Society (1187597) | Disagree | Development on small sites will have to satisfy relevant Local Plan policies and the NPPF, including demonstrating very special circumstances in the Green Belt if required. | No change |
| Para 68(a) of the NPPF requires 10% of housing requirements to be  | Jarvis Homes (973180)<br><br>CALA Group Ltd (977724)   | Disagree | Housing coming forward on sites of 1 hectare has formed a large part of historic supply and will continue to form at least   | No change |

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| met on sites of 1 hectare or less and therefore there is no sound evidence to support the position that only sites of 500 homes or more should be identified in the Local Plan | <p>Albert Bygrave Centre (985070)</p> <p>Eaton Lodge (985289)</p> <p>Park Street BCh &amp; Bloor Homes Ltd (985300)</p> <p>Rice Group (1058426)</p> <p>Beechwood Homes (1123837)</p> <p>Linden Homes (1153662)</p> <p>Hertfordshire Land (1159945)</p> <p>Aldwyck Housing Group (1186030)</p> <p>DB Rees (Builders) Ltd (1160056)</p> <p>Fairview New Homes Ltd (1185602)</p> <p>Owners of Land East of Common Lane (1186108)</p> <p>Owners of Land South of Burydell Lane (1186128)</p> <p>Land at The Dak (1186131)</p> |  | 10% of the housing requirement during the Plan period. This includes those sites set out at Appendix 5. |  |
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|  | Hertsmere Borough Council (51934)<br>Hilton House Properties (1057476)<br>Anderson Group (1146719)<br>Intrasales Ltd (1157383)<br>Owner Pound Farm & East of Sandridge (1187227)<br>1187590<br>973643<br>1153650<br>1153651<br>1159948<br>1153268 |          |   |           |
| Windfall allowance is not justified by the NPPF or analysis of past trends in either the SHLAA or AMR to explain or evidence the 105 dwellings per annum | Jarvis Homes (973180)<br>CALA Group Ltd (977724)<br>Albert Bygrave Centre (985070)<br>Eaton Lodge (985289)<br>Park Street BCh & Bloor Homes Ltd (985300)  | Disagree | Paragraph 68 of the NPPF states the <i>“local planning authorities should support the development of windfall sites through their policies and decisions- giving great weight to the benefits of using suitable sites within existing settlements for homes.”</i> There is no conflict with NPPF. | No change |

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|  | <p>Hunston Planning Limited (1185622)</p> <p>Rice Group (1058426)</p> <p>Beechwood Homes (1123837)</p> <p>Linden Homes (1153662)</p> <p>Hertfordshire Land (1159945)</p> <p>Minister Court Frogmore (1185980)</p> <p>Aldwyck Housing Group (1186030)</p> <p>CPRE Hertfordshire (872572)</p> <p>DB Rees (Builders) Ltd (1160056)</p> <p>Owners of Land South of Burydell Lane (1186128)</p> <p>Land at The Dak (1186131)</p> <p>Anderson Group (1146719)</p> <p>North Hertfordshire District Council (1185674)</p> |  |  |  |
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|  | <p>London Colney Limited (977496)</p> <p>Home Builders Federation Ltd (1156936)</p> <p>Lawes Agricultural Trust (1187615)</p> <p>Castleoak Care Communities (1187716)</p> <p>Owners of Land South of Burydell Lane (1186128)</p> <p>973643</p> <p>1153650</p> <p>1153651</p> <p>1159948</p> <p>1186131</p> |          |   |           |
| There is no evidence of council owned sites that would deliver housing | <p>Jarvis Homes (973180)</p> <p>CALA Group Ltd (977724)</p> <p>Albert Bygrave Centre (985070)</p> <p>Eaton Lodge (985289)</p> <p>Park Street BCh &amp; Bloor Homes Ltd (985300)</p> <p>Rice Group (1058426)</p>  | Disagree | Ongoing Council programme has recently delivered and will continue to deliver housing | No change |

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|  | Linden Homes<br>(1153662)<br><br>Hertfordshire Land<br>(1159945)<br><br>Hunston Planning<br>Limited (1185622)<br><br>Aldwyck Housing Group<br>(1186030)<br><br>DB Rees (Builders) Ltd<br>(1160056)<br><br>Owners of Land East of<br>Common Lane<br>(1186108)<br><br>Owners of Land South of<br>Burydell Lane (1186128)<br><br>Owners of Land South of<br>Burydell Lane (1186128)<br><br>Land at The Dak<br>(1186131)<br><br>973643<br><br>1153651<br><br>1159948<br><br>1186131 |          |   |           |
| There is no evidence of sites that could be converted from | Jarvis Homes (973180)<br><br>CALA Group Ltd<br>(977724)   | Disagree | Conversion of offices to residential using permitted development and applications have been a significant source of housing in recent years. This will however reduce as many | No change |

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| employment use to housing | <p>Albert Bygrave Centre (985070)</p> <p>Eaton Lodge (985289)</p> <p>Park Street BCh &amp; Bloor Homes Ltd (985300)</p> <p>Rice Group (1058426)</p> <p>Beechwood Homes (1123837)</p> <p>Linden Homes (1153662)</p> <p>Hertfordshire Land (1159945)</p> <p>Aldwyck Housing Group (1186030)</p> <p>DB Rees (Builders) Ltd (1160056)</p> <p>Owners of Land East of Common Lane (1186108)</p> <p>Owners of Land South of Burydell Lane (1186128)</p> <p>Land at The Dak (1186131)</p> <p>186131</p> <p>1153650</p> <p>1153651</p> |  | of the conversions have now taken place. An appropriate approach has been taken. |  |
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|   | 1159948  |          |   |           |
| The target for residential care homes and flexi-care homes is too low, should not be included within the housing target and there is no indication of when they would be delivered. | Retirement Housing Group (1185738)<br>Aurora Properties Limited (1151817)<br>Dacorum Borough Council (1186054)<br>Hallam Land Management Limited (1185998)<br>Castleoak Care Communities (1187716) | Disagree | NPPF supports both appropriate provision of care homes and flexi-care and that such provision is included in housing targets. Evidence is available in full.  | No change |
| The delivery of infrastructure does not reflect the growth of housing and there is no viability evidence demonstrating that it can be supported                                     | M Scott Properties - 1185993)<br>Anderson Group (1146719)<br>1152471<br>789007   | Disagree | Evidence is available and landowner/developer teams have confirmed deliverability of Broad Location related infrastructure.   | No change |
| It should be clarified whether the housing targets have considered unmet development needs from neighbouring authorities such as Dacorum or if the Council sought assistance from   | CWC Group (1153869)<br>Wrenbridge Land Ltd (1187023)<br>Dacorum Borough Council (1186054)<br>Lawes Agricultural Trust (1187615)  | Noted    | There has been and continues to be ongoing joint working with neighbouring local authorities including the South West Herts Group. Duty to co-operate is considered to be met. This has included consideration of potential unmet development needs from neighbouring authorities and their potential to provide for St Albans. | No change |

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| adjoining councils to meet housing need.                                    | Welwyn Hatfield Borough Council - 52397)<br><br>Gorhambury Estates Company Limited (375996)<br><br>Central Bedfordshire Council (861963)<br><br>1185583 |       |               |           |
| Support the inclusion of Residential Care Homes/ Nursing homes in policy S4 | St Stephen Parish Council (51804)   | Noted | Support noted | No change |
| Support standard methodology of 913 dwellings per annum                     | CP Holdings (1158145)   | Noted | Support noted | No change |

### **S5 Economic Development Strategy and Employment Land Provision**

| <b>Representation Point</b>   | <b>Representor Raising Point</b> | <b>Outline Reply</b> | <b>Recommended Reply (including notes and references)</b>  | <b>Suggested Actions (including any Changes to Plan)</b> |
|---|----------------------------------|----------------------|--|--|
| Employment welcomed but job opportunities needed elsewhere in the south of the District and Hertsmere for new and existing villages | 1182733                          | Disagree             | Specific plan provision of land is based on strategic planning factors.<br><br>Policy S5 supports employment land provision appropriate to the settlements, which include London Colney in the south of the District. Policy L16 supports a mixed use opportunity area within Colney Fields Retail Centre/Ridgeview for retail/services and offices. | No change  |

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| Support employment/provision of jobs  | Grand Union Investments Ltd (977391)<br><br>51 Pegasus Ltd (1186098)<br><br>1185037 | Noted    | Support noted  | No change |
| Economic approach should be more 'diverse' – more detail required on type of job and salary.  | Colney Heath Parish Council (51891)<br><br>1055738                                  | Disagree | <p>The Plan's main role is to provide sufficient land and property opportunities. It is more difficult to influence the type of job that is provided as this is determined by overall economic conditions / economic development.</p> <p>However the multi-site Hertfordshire Enviro-Tech Enterprise Zone is a significant opportunity in respect of the point raised. The EZ has important functions supporting business start-ups and attracting UK and international investment. Green technology is a business sector with strong growth potential to create jobs over the plan period in emerging industries. The proposed development at EHH (Central) will be required to develop enviro-tech business, and provide for a range of uses including offices, research and development, light industrial and logistics and new business park of B1 uses.</p> | No change |
| The precise boundaries of the Hertfordshire enviro-tech enterprise zone should be clarified and safeguarded to inhibit residential development. | 1055738   | Noted    | The EZ is clearly delineated on the Policies Map. It does not affect existing residential uses. The site at EHH (Central) will be subject to masterplanning under Policy S6 ii) to establish the precise locations of the individual areas.  | No change |



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| A clear timescale should be set for achievement of new jobs   | 1055738   | Disagree | <p>The Plan's main role is to provide sufficient land and property opportunities. It is more difficult to influence the timescale on which jobs are provided, as this is determined by overall economic conditions / economic development.</p> <p>The proposed employment growth will be over the timeframe of the LP namely 2020-2036.</p>   | No change |
| Details of organisations using the Enterprise Zone required   | 1055738   | Disagree | Not within planning remit   | No change |
| Improve poor quality and safety of Maylands employment area, Hemel Hempstead before building on agricultural land for further employment development. | 1185704   | Disagree | <p>Additional employment land is needed long term.</p> <p>Dacorum Borough Council are working to improve the existing, important employment area.</p>   | No change |
| Roehyde should be an employment broad location (with University links).   | <p>Goodman (1153774)</p> <p>1185775</p> <p>347648</p> | Disagree | <p>An additional Green Belt employment location is not required. This site is not suitable for such development and is in part an existing waste site.</p> <p>BRE and Rothamsted Research are established areas of employment within the Green Belt and areas designated as part of the multi-site Hertfordshire Enviro-Tech Enterprise Zone supported by the Government. They have important functions supporting business start-ups and attracting UK and international investment. Whilst it is acknowledged the importance of teaching and research undertaken by the University of Hertfordshire, it is not incorporated within the Herts Enterprise Zone.</p> | No change |

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| Query deliverability of East Hemel Hempstead employment land allocation, (demand for and accessibility from St Albans & Colney Heath & London Colney). | London Colney Parish Council (52477)<br>Goodman (1153774)<br>1185775<br>347648  | Disagree | The location is highly accessible to the strategic road network and is likely to be attractive to development; particularly as an EZ.  | No change |
| Plan economic evidence base not up-to-date   | The Owners of Breakspears (973659)<br>51 Pegasus Ltd (1186098)<br>Hertsmere Borough Council (51934)<br>Watford Borough Council (1122500)<br>Luton Borough Council (861967)<br>Crown Estate (51946)<br>Aurora Properties Limited (1151817)<br>St Albans Civic Society (1156974)<br>498103<br>1019306 | Disagree | The plan approach to employment is well evidenced.<br><br>St Albans SW Hertfordshire Economic Study update published February 2019. Takes into account recent economic forecasts, the changes to the commercial property stock including that lost through PD, revisit growth scenarios and assesses demand and supply.<br><br>Planned jobs to meet the needs of the estimated population over period 2020-2036 and serves a strategic role for the whole of SW Herts. | No change |

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|   | 1185704   |          |  |           |
| Plan should support future prosperity of Rothamsted Research by removing Townsend Lane from the Green Belt for residential development  | Hill Residential (1158064)  | Disagree | <p>Economic ambitions/needs of Rothamsted Research alone cannot determine Plan development strategy.</p> <p>Land at Townsend Lane does not fall within one of the Broad Locations for development within the LP 2018. There are two planned Broad Locations for development within Harpenden to the NE and NW of the town lying approx. 1.5-2 miles from Rothamsted Institute in proximity and accessible via a range of active transport.</p> | No change |
| Concern about shortage in supply of offices, impacting rent. Lack of allocations in Plan. Land adjacent Copsewood should be allocated for employment and removed from the green belt. | 51 Pegasus Ltd (1186098)  | Noted    | <p>The plan makes substantial new land provision for office development.</p> <p>Policy S6 ii East Hemel requires delivery of a 17ha business park for Class B1 office uses. There are two strategic office locations designated on policies map at St Albans City Station and St Albans Abbey Station both subject to Article 4 direction.</p>   | No change |
| All employment sites are remote from the city centre. There is a need for a new St Albans digital business park.  | <p>51 Pegasus Ltd (1186098)</p> <p>St Albans Labour Party Group (1183933)</p> | Disagree | <p>There are two strategic office locations designated on policies map at St Albans City Station and St Albans Abbey Station. Policy L17 supports high speed broadband and next generation telecommunications. Policies L11 and BL at EHH (Central) seek improvements to active travel links and public transport.</p>   | No change |

|   |   |          |   |           |
|---|---|----------|---|-----------|
| Major employment allocation at East Hemel Hempstead is contrary to Green Belt policy—there are no exceptional circumstances             | CPRE Hertfordshire (872572)   | Disagree | The employment provision of 55ha forms part of the EHH (Central) broad location designation. Development need, overall Plan context and site specific analysis in GB work provide exceptional circumstances for GB release.   | No change |
| More small and medium employment sites should be allocated within Broad Locations   | 347648  | Disagree | Policy S5 supports employment opportunities within category one settlements of St Albans and Harpenden where there are four broad locations designated and provision for a large employment development in EHH. Policy L16 supports a mixed use opportunity area within Colney Fields Retail Centre/Ridgeview for retail/services and office in proximity to BL S6ix west of London Colney. There will be local centre employment opportunities with the Broad Locations    | No change |
| Target of 55ha does not align with Enterprise Zone targets. Target for all 7 Zones is 8000 jobs whilst proposed EHH is for 10,000 jobs. | Hertfordshire Local Enterprise Partnership (1186903)<br><br>Dacorum Borough Council (1186054) | Noted    | The 10,000 jobs estimate for the Plan is justified in detailed evidence. This is not a rigid target.<br><br>The more modest LEP target was prepared for a different purpose and covers a different time period. The Hertfordshire LEP Strategy covers the period from 2017-2030 whilst the LP covers the period up to 2036.<br><br>EHH (Central) site will also be required to provide a business park of primarily B1 offices and new logistics and mixed industrial area. | No change |
| Plan has insufficient sites for digital employment  | London Colney Parish Council (52477)  | Disagree | Policy L17 supports high speed broadband and next generation telecommunications which will ensure that employment sites are desirable and attractive to those industries requiring faster broadband speeds and greater digital connectivity. The Connected Counties programme of which Hertfordshire is a partner, focuses on providing   | No change |

|  |                                |          |  |  |
|--|--------------------------------|----------|--|--|
|  |                                |          | superfast broadband infrastructure and extensions of fibre broadband coverage by 2019.   |  |
| Concern on impact take-up, delivery and viability of Luton strategic employment sites. | Luton Borough Council (861967) | Noted    | <p>Both areas need to make provision for employment growth. The EZ approach in Hertfordshire is designed to target different aspects of employment growth to that in Luton. It serves the whole of SW Herts.</p> <p>The importance of the Luton/Dunstable conurbation and its economic role is acknowledged. Luton has a significant sub-regional role including due to the strategic importance of the airport and the aspirations for expansion.</p> <p>Commuting – it is acknowledged that the M1/M25 growth area extends through Luton into Bedfordshire. Whilst commuting patterns are increasingly diffused Luton has higher self-containment rate of workers than SADC and is not top destination for out-commuting from St Albans<br/> <a href="https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Local%20Plan/Growing%20Lutons%20economy/ECON%20013.pdf">https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Local%20Plan/Growing%20Lutons%20economy/ECON%20013.pdf</a></p> | No change                                  |
| Reducing need to travel not been considered (growth of home working).                  | Luton Borough Council (861967) | Disagree | <p>L18 (Transport Strategy) promotes sustainable modes and transport infrastructure. Travel Plans are required for all major developments which should set out measures to encourage people to use alternative modes of travel to car. Policy S5 supports a mix of employment uses and S6ii EHH site lies adjacent to BL for housing development. Evidence takes account of the trend to no location specific working by planning for a more limited level of land for employment use. The SW Herts Employment Study update 2019 further factors in home working effects into floorspace requirements. The success of Hertfordshire Connected Counties Programme may further influence transport systems and working at home.</p>  | Publish SW Herts Economic study on website |

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| Some jobs in EHH BL should count towards Dacorum's job growth target.  | Dacorum Borough Council (1186054)  | Disagree | <p>This is a matter for joint working within SWH structures and JSP preparation. Employment land provision follows the lead set by the SEP LEP and is strategic in nature, serving SW Herts as a whole.</p> <p>The Local Plan deliberately does not set a SADC area job growth target as it takes an opportunities based approach. If a specific quantitative jobs target is seen as needed / useful it should be related to the whole SWH FEMA through work on the JSP.</p>  | No change |
| Large scale office development not currently viable at East Hemel Hempstead. Maylands as existing is a different market and should be prioritised.                         | Dacorum Borough Council (1186054)  | Disagree | <p>Office uses are that the core of long term need for employment premises (as evidenced in SADC and SW Herts studies). The allocation of (a part only) of the land at this location for offices is a crucial part of the SWH approach to economic development, as there are limits on alternative locations available (alternative housing land use pressures).</p> <p>St Albans SW Hertfordshire Economic Study update published February 2019 confirms likely viability in medium term. Important role of EZ and SWH work in supporting viability.</p> | No change |
| Amount of land required at Rothamsted reducing and some should be released for housing development to support the research activity financially – with associated economic | Lawes Agricultural Trust (1187615) | Disagree | <p>Rothamsted Research is an established area of employment designated as part of the multi-site Hertfordshire Enviro-Tech Enterprise Zone supported by the Government. They have important functions supporting business start-ups and attracting UK and international investment. Green technology is a business sector with strong growth potential to create jobs over the plan period. The LP supports its future growth, but this does not justify a separate approach to housing development in the Green Belt.</p>                                | No change |

|   |   |          |  |           |
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| development benefits  |   |          |  |           |
| WHBC Economy study (2015) indicates some of SADC lies within the Welwyn Hatfield functional economic area (FEMA) due to economic linkages and significant commuting flows | Welwyn Hatfield Borough Council (52397) | Disagree | There is no single approach or definitive answer to the definition of a FEMA. SADC has taken a view, supported by evidence, that a practical FEMA definition is SW Herts. All five SW Herts LPAS and HCC agree. Some cross-boundary relationships with Welwyn & Hatfield clearly exist and are acknowledged. | No change |

### **S6 - Broad Locations for Development**

| <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> |
|---|--|----------------------|--|--|
| Reference to joint working with neighbouring authorities required   | Hertsmere Borough Council (51934)                                      | Disagree             | Cross reference to paragraph 1.5. No need to repeat here. There has been ongoing joint working with neighbouring local authorities including the South West Herts Group. | No change  |
| Policy needs to ensure masterplanning does not delay delivery taking place as soon as possible and developer led masterplanning | Legal and General (1051022)<br>Home Builders Federation Ltd (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  |
| Requirement for masterplans may cause delays, particularly  | M Scott Properties (1185993)   | Disagree             | Masterplans are required for sites of this scale to secure high quality development.   | No change  |

|   |  |          |  |           |
|---|--|----------|--|-----------|
| where there is multiple ownership   | Home Builders Federation Ltd (1156936) |          | There are sufficient deliverable sites for years 1-5. This is confirmed in relevant developer representations.   |           |
| Preamble should be more flexible to allow for changes arising through public consultation/ Planning application process   | Crown Estate (51946)                   | Disagree | Policy S6 sets out a clear approach. This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.  | No change |
| Support community involvement in masterplanning   | 1185950                                | Noted    | Support noted  | No change |
| Stakeholders should include those providing infrastructure, including schools, public transport and health professionals  | 1185950                                | Noted    | Masterplanning will indeed involve a range of stakeholders, including these and more   | No change |
| Strategic maps of the sites, identifying key elements, would aid interpretation of the allocations. These could also be used to demonstrate the conceptual approach to development. | Watford Borough Council (1122500)      | Noted    | This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.   | No change |
| Important to consider how the proposed development areas will be reinforced and enhanced as part of Local Plan reviews  | Watford Borough Council (1122500)      | Noted    | Refer to paragraph 2.1 which outlines the overall vision of the Local Plan. This is also applicable to the Broad Location sites.<br><br>This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation. | No change |



|  |                                       |          |  |           |
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| Could include a greater explanation of the long-term vision of the role of the Broad Locations | Watford Borough Council (1122500)     | Disagree | Each S6 sub-policy (i), (ii) etc. sets out an overall objective.   | No change |
| Support principles of policy   | Crown Estate (51946)                  | Noted    | Support noted  | No change |
| Policy is inflexible – should refer to ‘should reflect’, not ‘must meet’                       | Crown Estate (51946)                  | Disagree | The policies provide a clear requirement which reflects the NPPF. The wording used aims to ensure that the requirements are met. | No change |
| Health Impact Assessment should be carried out at EIA scoping opinion stage                    | Hertfordshire County Council (837689) | Noted    | This matter will be properly detailed through the EIA process, with appropriate consultation                                     | No change |

#### **Policy S6 i) East Hemel Hempstead (North) Broad Location**

| <b>Representation Point</b>   | <b>Representor Raising Point</b> | <b>Outline Reply</b> | <b>Recommended Reply (including notes and references)</b>   | <b>Suggested Actions (including any Changes to Plan)</b> |
|---|----------------------------------|----------------------|---|--|
| Strongly support the policy   | Crown Estate (51946)             | Noted                | Support noted   | No change  |
| Built development boundary should be amended to be in line with SLR plan L2 | Crown Estate (51946)             | Disagree             | The Plan boundaries are appropriate and reflect site constraints and the general findings of the GBR. | No change  |

|  |                                   |          |  |           |
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| Although it is inevitable that the development of Broad Location S6 (i) will lead to additional vehicular crossings of the Nickey Line which will cause some detriment, these will be mitigated as far as possible   | Crown Estate (51946)              | Noted    | The Nickey Line footpath / cycleway is an important landscape, commuting and recreational route feature. As it will need to be crossed there will inevitably be some localised adverse impacts. There will also be considerable opportunities for enhancement. Masterplanning will consider damage mitigation, integration and maximising opportunities within and beyond the development. | No change |
| Point 1 should refer to development being materially in accordance with the masterplan   | Crown Estate (51946)              | Disagree | Already set out in overall S6.   | No change |
| No justification for 3% self-build figure  | Crown Estate (51946)              | Disagree | Justification based on evidence including the Self Build Register. SADC are required to have regard to this as part of Self Build and Custom Housebuilding Act 2015.   | No change |
| Should have an overarching Hemel Garden Communities Broad Location policy including reference to the charter, overall development scale, masterplanning approach, affordable housing, density, housing mix, key infrastructure, infrastructure standards and joint approach, and Strategic Sites Design Guidance | Dacorum Borough Council (1186054) | Disagree | HGC is a wider and evolving concept, much of it beyond SADC boundaries, that is better set out and explained outside of the Local Plan.  | No change |

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| Nickey Line mitigation measures indicated by the Crown Estate must be provided.   | Friends of the Nickey Line (1184312)                                       | Agree    | The Nickey Line footpath / cycleway is an important landscape, commuting and recreational route feature. As it will need to be crossed there will inevitably be some localised adverse impacts. There will also be considerable opportunities for enhancement. Masterplanning will consider damage mitigation, integration and maximising opportunities within and beyond the development.  | No change |
| Concerns over proximity to Buncefield - policies should include reference to the health and safety Development Proximity Zone Consultation Zones at Buncefield Oil Storage Depot. | Redbourn Parish Council (759908)<br>759883<br>498103<br>1144419<br>1185704 | Disagree | The importance of this issue is acknowledged.<br><br>The Plan development proposals already take account of the health and safety issues associated with the Depot. The Health and Safety Executive will be consulted as part of any planning application in proximity to the Buncefield DPZ.<br><br>This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation. | No change |
| Concerns with road access, particularly from / to the M1.   | 1153741<br>498103<br>1184750   | Disagree | Cross reference with Policies L 17 / 18.<br><br>Infrastructure evidence (ref IDP / IDS) confirms that road access can be provided and the M1 junction improvement proposals are appropriate solutions.<br><br>This matter can be properly detailed through the Masterplanning/ planning application process, with appropriate consultation.   | No change |
| Improvements to the M1 Junction 8 insufficient, an additional junction should be considered   | 1153741  | Disagree | Cross reference Policies L 17 / 18.<br><br>Infrastructure evidence (ref IDP / IDS) confirms that road access can be provided and the M1 junction improvement proposals are appropriate solutions.   | No change |
| Concerns development would provide  | 1184750  | Disagree | Infrastructure evidence (ref IDP / IDS) confirms that road access can be provided and the M1 junction improvement proposals are appropriate solutions.  | No change |

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|--|--|----------|---|-----------|
| opportunity for a Junction 8A  |  |          |   |           |
| Internal road/local roads would become a 'rat-run'   | Redbourn Parish Council (759908)<br>498103 | Disagree | The internal road is planned as a main distributor road, so it cannot reasonably be described as a rat run.   | No change |
| Lower housing figure should be applied to allow for more green spaces and community facilities   | 498103                                     | Disagree | Housing targets are based on evidence on local housing need and standard methodology set out by the government.   | No change |
| Density will need to be higher than 40dph to provide the 1,650 dwellings as some land in private ownership, which would not be appropriate | Redbourn Parish Council (759908)<br>498103 | Disagree | Some sub-areas will achieve higher density. Overall the land can accommodate the dwelling numbers in the Plan (reference Annex 1)   | No change |
| Lack of green spaces in plans for EHH  | 498103                                     | Disagree | Cross reference Policy L22 and L26 – 28.<br><br>Substantial green space provision is planned.<br><br>This matter can be properly detailed through the Masterplanning process / planning application / EIA processes, with statutory consultation. | No change |
| Lack of off-street parking provision in plans for EHH  | 498103                                     | Disagree | Cross reference Policy L20 and appendix 1.<br><br>There are clear standards in Plan policy.   | No change |
| Lack of community facilities in plans for EHH  | 498103                                     | Disagree | Cross reference Policy L22 and L26 – 28.<br><br>Substantial community facility provision is planned.  | No change |

|  |   |          |   |           |
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|  |   |          | This matter can be properly detailed through the Masterplanning process / planning application / EIA processes, with statutory consultation.  |           |
| Further work needs to be carried out on infrastructure, including highways, parking, water, sewerage   | Hertfordshire County Council (837689)<br>498103<br>867312 | Noted    | These points are generally recognised. These matters can be properly detailed through the Masterplanning process / planning application / EIA processes, with statutory consultation.   | No change |
| Health and safety aspects of building close to M1, pylons, oil pipeline, Buncefield Oil Depot and under Luton Airport flightpath need to be considered | 498103<br>1144419<br>1185704                              | Noted    | These points are generally recognised. This matter can be properly detailed through the Masterplanning process / planning application / EIA processes, with statutory consultation.   | No change |
| There should be a joint Area Action Plan for EHH with DBC  | 498103<br>1185704   | Disagree | This was an option considered. It has been replaced with a collaborative joint Masterplanning process which can address the issues more quickly in the context of the clear development requirements in the Plan and the requirements of the NPPF.  | No change |
| Not explicitly clear what sports facilities to be provided   | Sport England (824971)                                    | Disagree | Cross reference Policy L22 and L26 – 28.<br><br>The policy refers to strategic and local open space and recreation space and community facilities. Any specific reference to the type of specific sports facilities would be overly prescriptive and inflexible at this stage. This matter can be properly detailed through the Masterplanning process / planning application / EIA processes, with statutory consultation. | No change |

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| No evidence base to inform need for sports provision  | Sport England (824971) | Disagree | <p>Cross reference Policy L22 and L26 – 28.</p> <p>Baseline and further work since Regulation 19 has been undertaken to inform specific development proposals. Playing Pitch Strategy update 2019 provides baseline data.</p>  | No change |
| Need for additional facilities at this location where facilities already at capacity          | Sport England (824971) | Agree    | <p>Cross reference Policy L22 and L26 – 28.</p> <p>The policy concurs stating that development will be required to deliver strategic and local open space and recreation space and community facilities</p> <p>This matter can be properly detailed through the Masterplanning process / planning application / EIA processes, with statutory consultation</p>   | No change |
| Should include sports facility provision in proposal points                                   | Sport England (824971) | Disagree | <p>Cross reference Policy L22 and L26 – 28.</p> <p>The policy states that development will be required to deliver strategic and local open space and recreation space and community facilities</p> <p>This matter can be properly detailed through the Masterplanning process / planning application / EIA processes, with statutory consultation</p>  | No change |
| Unclear if public open space or recreation space refers to indoor or outdoor sports provision | Sport England (824971) | Disagree | <p>Cross reference Policy L22 and L26 – 28.</p> <p>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 nature. The policy also refers to recreation space and community facilities which would capture indoor sports facilities.</p> | No change |

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|   |  |       | This matter can be properly detailed through the Masterplanning process.   |           |
| Further consideration of strategic community sports facility provision is required across all EHH BLs | Sport England (824971)   | Agree | <p>Cross reference Policy L22 and L26 – 28.</p> <p>The proposed Hemel BL's S6 i-iv (apart from S6ii as a major new Enviro-Tech business / employment land focused location) all require delivery of strategic and local public open space. The precise location and nature of the open spaces and community sport provision will be informed by ongoing joint work with Dacorum Borough Council. 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 |
| Both strategic and local public space must be provided  | <p>Ramblers Association (52420)</p> <p>St Albans &amp; District Footpaths Society (723340)</p> <p>Hertfordshire County Council (837689)</p> <p>1184750</p> | Agree | This is set out in the policy and will be taken forward as part of the Masterplanning process  | No change |
| Countryside access links must be provided   | <p>Ramblers Association (52420)</p> <p>St Albans &amp; District Footpaths Society (723340), 1157340</p>  | Agree | This is set out in the policy and will be taken forward as part of the Masterplanning process  | No change |

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| Must provide / support the country park  | Ramblers Association (52420)<br><br>St Albans & District Footpaths Society (723340)<br><br>1184750<br><br>1185037<br><br>Hertfordshire County Council (837689) | Agree    | This is set out in the policy and will be taken forward as part of the Masterplanning process  | No change |
| Areas of the Country Park will be inaccessible to the public and has unclear management plans. Country Park is really an area for balancing ponds. | 498103   | Disagree | Provision of an accessible well managed public country park is a development requirement.<br><br>This matter can be properly detailed through the masterplanning / planning application process, with appropriate consultation.  | No change |
| Heritage environment /assets have not been considered at EHH and lack of criteria to protect assets  | 334023<br><br>Redbourn Parish Council (759908)<br><br>Historic England (929489)<br><br>Leverstock Green Village Association (1185907)                          | Disagree | Cross reference Policy L30<br><br>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.<br><br>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. | No change |
| Heritage Impact Assessment required  | Historic England (929489)  | Disagree | Cross reference Policy L30   | No change |



|   |  |          |   |           |
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| and policy wording should reflect its findings                                |  |          | This is part of the masterplanning process  |           |
| Development, including landscaping, should be of a high standard of design    | 1184750  | Agree    | Cross reference Policy L29<br>This is part of the masterplanning process  | No change |
| Further landscape and EIA work should be carried out                          | 1184750  | Noted    | Cross reference Policy L29<br>This is part of the masterplanning and planning application process; including statutory consultation   | No change |
| Sports/health/educational facilities must not encroach into country park land | 1184750  | Disagree | Cross reference Policy 26 - 28<br>Open space provision is very sizeable. The detailed masterplanning of the open space can allow for accommodation of all these uses and for appropriate country park / habitat creation. | No change |
| 40dph too high  | 1184750  | 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 |
| Alternatives to the overhead power lines should be considered                 | 1184750  | Noted    | Undergrounding or diversion is unlikely to be practical or viable. However the development will be Masterplanned to avoid undesirable environmental and visual issues in the design of the new development.               | No change |
| Important trees must be preserved   | 1184750<br>Hertfordshire<br>County Council<br>(837689) | Noted    | Cross reference Policy L29<br>Retention of important trees is a requirement of the policy.  | No change |
| Clarity needed on whether specific deliverables such as                       | St Albans & District<br>Footpaths Society<br>(723340)  | Noted    | Cross reference Policy L21 and Policies Map. Primary school within the area excluded from the green belt, secondary school within the Green Belt.   | No change |

|   |                                      |          |   |           |
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| school buildings will be accommodated in the Broad Location or Green Belt                                     | The British Horse Society (1187597)  |          |   |           |
| Proposed secondary school will risk Redbourn children's access to Roundwood Park                              | 1185037                              | Noted    | School place catchment and allocations policies are not a planning matter.  | No change |
| Support setting minimum housing number targets  | Grand Union Investments Ltd (977391) | Noted    | Support noted   | No change |
| DBC and SADC are not collaborating, particularly with regard to number of houses allocated to SADC and DBC    | 1144419<br>1185704                   | Disagree | Cross reference Policy S2 / S4<br><br>SADC and DBC are clearly working together through ongoing Duty To Cooperate, including the SWH JSP process.   | No change |
| Concerns that the development may not end up providing the required 40% affordable housing                    | 1144419                              | Disagree | This is a specific policy requirement in the Plan. All requirements set out in the Broad Location policies, including a minimum 40% affordable housing, have been agreed as deliverable by the landowners/developers.<br><br>Cross reference with L3. | No change |
| Support inclusion of Eaton Lodge in Broad Location  | 985289                               | Noted    | This existing Eaton Lodge is included.  | No change |
| Further clarity on some detailed aspects of the development can be provided as part of masterplanning process | 985289                               | Noted    | This is the approach being taken.   | No change |

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| The development should be required to deliver walking and cycling facility improvements and public transport links to promote car free access | 1048449<br>Hertfordshire County Council (837689) | Agree    | Cross reference Policy L18<br><br>This approach is integral to the policy.  | No change |
| Dacorum should take control of planning for EHH   | 1185704  | Disagree | Only SADC (as LPA) can plan for land within SADC's area, unless it agrees otherwise. SADC is committed to working jointly with DBC on planning for land at Hemel.   | No change |
| HSE must be consulted on buffer zones/mitigations for Buncefield Oil Depot and pipelines  | Environment Agency (1147557)                     | Noted    | This is an important constraint that is noted in the S6 ii policy and will be taken into account in Masterplanning. The level of development / land available allow for the depot and pipelines constraints to be accommodated. | No change |
| Buffer zones / mitigation for Buncefield Oil Depot and pipelines might limit amount of development  | Environment Agency (1147557)                     | Noted    | This is an important constraint that is noted in the S6 ii policy and will be taken into account in Masterplanning. The level of development / land available allow for the depot and pipelines constraints to be accommodated. | 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 |
| Clarify jargon e.g. community food zone   | St Albans Civic Society (1156974)                | Disagree | Term allows for allotments or other forms of growing space – urban farming or community gardens – to be agreed in detail through Masterplanning and planning applications   | No change |
| No strategy for delivering 3% self-build homes  | St Albans Civic Society (1156974)                | Disagree | This is included as a specific policy requirement   | No change |
| Strongly support allocation and safeguarding of land for schools  | Department for Education (1186955)               | Noted    | Support noted   | No change |

|   |  |          |  |  |
|---|--|----------|--|--|
| School building areas should be removed from green belt   | Department for Education (1186955)<br><br>Hertfordshire County Council (837689)        | Noted    | Primary school site is in the land to be taken out of GB. Secondary school to be retained in the GB. Cross reference L21 and Policies Map.   | 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. |
| Overhead electricity transmission line is not a defensible boundary for the Green Belt.   | Redbourn Parish Council (759908)<br><br>Linden Wates (Bricket Wood) Limited (1186996)  | Disagree | The large, longstanding long distance powerlines creates a clear physical line marking the edge of the Green Belt, as identified by consultants in the GBR.  | No change                                |
| Residential development/sports pitches/education uses will extend beyond area recommended in the GBR for development  | Redbourn Parish Council (759908)<br><br>Leverstock Green Village Association (1185907) | Noted    | Residential development site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.<br><br>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.                                 | No change                                |
| Support principles of major development at East and North Hemel Hempstead however these areas are being planned through a comprehensive masterplan and should therefore be one location. Amended text | DBC (1186054)  | Disagree | The sites are split in the Plan to allow for explanation of development requirements and to indicate potential stages / phases of development and housing trajectory implications, which differ between BLs. Masterplanning and planning applications for all will clearly be considered in the context of each other. | No change                                |

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|---|---------------------------------------|----------|--|---|
| for an overarching policy suggested.  |                                       |          |  |   |
| School provision should take emerging Hemel Garden Communities masterplan and emerging education guidance for Garden Communities by MHCLG guidance into account | DBC (1186054)                         | Noted    | Cross reference L17<br><br>Work on the education infrastructure evidence base has been ongoing and has informed the policy requirement.  | No change   |
| Institutional residential (C2) units should have a separate housing target and be excluded from dwelling trajectory figures                                     | DBC (1186054)                         | Disagree | NPPF / PPG / Housing Delivery Test acknowledge that C2 institutional residential units contribute to housing provision.  | No change   |
| Secondary school should be 10FE – can be built as 8FE with flexibility to expand  | Hertfordshire County Council (837689) | Noted    | Work on the education infrastructure evidence base has been ongoing and has informed the policy requirement.   | Minor modification – to acknowledge required flexibility to be able to expand to 10 FE. |
| Amend policy wording to include land size requirement for flexi-care home   | Hertfordshire County Council (837689) | Disagree | Requirement as set out in Policy L2.<br><br>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)        | Disagree | This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.   | No change   |
| Policy should consider social and pastoral needs of future  | 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   |

|   |   |          |  |           |
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| occupants and include requirements for a community facility e.g. a community hall     |   |          |  |           |
| What masterplanning collaboration has there been?                                     | St Stephen Parish Council (51804)   | Noted    | There has been ongoing joint working with Dacorum Borough Council, local communities and other stakeholders.   | No change |
| Collaboration with neighbouring Councils needed                                       | 1181750<br>1182733  | Noted    | There has been ongoing joint working with neighbouring local authorities including Dacorum and the South West Herts Group. DtC considered to be met.                     | 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 |
| 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)<br><br>London Colney Parish Council (52477) | Noted    | New infrastructure will be provided in association with new development. Further details can be found in IDP updates/ Masterplanning work / planning application process | No change |
| Be more specific with renewable energy/energy efficiency requirement                  | 1181723   | Disagree | Cross reference with Policy L25 which sets out the energy and environmental performance requirements of new developments. This addresses renewable energy.               | No change |

### Policy S6 ii) East Hemel Hempstead (Central) Broad Location

| Representation Point  | Representor Raising Point   | Outline Reply | Recommended Reply (including notes and references)  | Suggested Actions (including any Changes to Plan) |
|---|---|---------------|---|---|
| Support allocation of EHH (Central) to include industrial and logistics uses, given proximity to motorway network | Greater London Authority (1157729)                                      | Noted         | Support noted   | No change   |
| Support principle of employment allocation  | Crown Estate (51946)<br><br>Gorhambury Estates Company Limited (375996) | Noted         | Support noted   | No change   |
| Support inclusion of Breakspears in the allocation  | Owners of Breakspears (973659)  | Noted         | Support noted   | No change   |
| Should create a business park with well-designed open spaces  | 1184750<br><br>1184750  | Noted         | This approach is integral to the policy.  | No change   |
| Dacorum should take control of planning for EHH   | 1185704   | Disagree      | Only SADC (as LPA) can plan for land within SADC's area, unless it agrees otherwise. SADC is committed to working jointly with DBC on planning for land at Hemel.   | No change   |
| HSE must be consulted on buffer zones/mitigations for Buncefield Oil Depot and pipelines                          | Environment Agency (1147557)  | Noted         | This is an important constraint that is noted in the S6 ii policy and will be taken into account in Masterplanning. The level of development / land available allow for the depot and pipelines constraints to be accommodated. | No change   |

|   |   |          |  |           |
|---|---|----------|--|-----------|
| Buffer zones / mitigation for Buncefield Oil Depot and pipelines might limit amount of development  | Environment Agency (1147557)  | Noted    | This is an important constraint that is noted in the S6 ii policy and will be taken into account in Masterplanning. The level of development / land available allow for the depot and pipelines constraints to be accommodated.  | 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 |
| 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)<br>Hertfordshire County Council (837689)<br>1048449 | Agree    | Cross reference with Policy L18 and Appendix 4 which set out the Key infrastructure requirements for broad locations including East Hemel Hempstead central.<br><br>This approach is integral to the policy.   | No change |
| Development needs to be required to deliver transport network (including walking, cycling and equestrian links) and public transport services upgrades/improvements | The British Horse Society (1187597)<br><br>Ramblers Association (52420)               | Agree    | Refer to Appendix 4 which sets out the Key infrastructure requirements for broad locations including East Hemel Hempstead central.<br><br>This approach is integral to the policy.   | No change |
| Need for a traffic-free multi-use right of way for walkers, cyclists, horse-riders and carriage drivers linking EHH (North) and EHH (South)                         | The British Horse Society (1187597)   | Noted    | Cross reference with Policy L18 and Appendix 4 which set out the Key infrastructure requirements for broad locations including East Hemel Hempstead.<br><br>These matters can be properly detailed through the masterplanning process / planning application / EIA processes, with statutory consultation. | No change |



|   |  |          |   |           |
|---|--|----------|---|-----------|
| Further work needs to be carried out on infrastructure, including highways  | Hertfordshire County Council (837689)<br>1055738   | 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 |
| Internal road/local roads would become a 'rat-run'  | Redbourn Parish Council (759908)<br><br>Leverstock Green Village Association (1185907)<br><br>498103 | Disagree | The internal road is planned as a main distributor road, so it cannot reasonably be described as a rat run.   | No change |
| An additional Jct 8a would lead to additional traffic movements on local roads, impacting on Redbourn and the surrounding area.   | Redbourn Parish Council (759908)<br><br>Leverstock Green Village Association (1185907)               | Disagree | Cross reference Policies L 17 / 18.<br><br>Infrastructure evidence (ref IDP / IDS) confirms that road access can be provided and the M1 junction improvement proposals are appropriate solutions. | No change |
| Are Jct 8 improvements actually required?   | 1184750  | Disagree | Cross reference Policies L 17 / 18.<br><br>Infrastructure evidence (ref IDP / IDS) confirms that road access can be provided and the M1 junction improvement proposals are appropriate solutions. | No change |
| Difficulty in integrating a gypsy and traveller site with the wider proposed development. Vulnerable to noise and disturbance from the adjacent commercial development. | Owners of Breakspears (973659)   | Disagree | Sites have been allocated in the most appropriate locations, based on evidence, as set out in L7.   | No change |

|   |                                    |          |   |           |
|---|------------------------------------|----------|---|-----------|
| Additional gypsy and traveller pitches in EHH Broad Location would result in an over-concentration in the area, exacerbating existing problems. Traveller sites should be more evenly distributed across the District   | DBC (1186054)<br>1181723<br>498103 | Disagree | Sites have been allocated in the most appropriate locations, based on evidence, as set out in L7. There is considerable flexibility within these large Broad Locations to locate sites sensitively. | No change |
| Requirement 1 should refer to development being materially in accordance with the masterplan.   | Crown Estate (51946)               | Noted    | Already set out in overall S6.  |           |
| Point 2 should include that development should take into consideration the aims and status of the EZ, which accepts that some occupiers will not meet the EZ criteria. Modify policy to clarify that compliance with the criteria is not an absolute requirement, to provide flexibility. | Crown Estate (51946)               | Noted    | Approach taken appropriately acknowledges importance and role of EZ.  | No change |
| Enviro-Tech should be defined in a glossary for clarity   | Crown Estate (51946)               | Noted    | Defined as part of Hertfordshire Enviro-Tech enterprise zone by Herts LEP.  | No change |

|  |                      |          |  |           |
|--|----------------------|----------|--|-----------|
| Range of uses in point 3 should include 'ancillary and supporting' uses  | Crown Estate (51946) | Disagree | This matter can be properly detailed through the master planning process/ planning application process   | No change |
| Split between primarily B1 and mixed industrial uses is too prescriptive/inflexible. Flexibility is needed over the plan period  | Crown Estate (51946) | Disagree | Policy S6 ii) sets out a clear approach.   | No change |
| Support provision of a variety jobs, but figure of 10,000 jobs should be deleted as is only speculative at this stage with no evidential basis apparent                        | Crown Estate (51946) | Noted    | Support noted. Full and detailed justification is provided by evidence documents. It is not necessary to justify the Plan within the Plan document itself. To do so would result unnecessarily in a longer and more complex document.  | No change |
| Due to extensive ground remodelling required policy should be amended to retain important trees and landscape features 'where possible and appropriate'                        | Crown Estate (51946) | Disagree | Policy S6 ii) sets out a clear approach. This matter can be properly detailed through the masterplanning process / planning application process  | No change |
| Point 9 should clarify that the link road is needed as part of the wider transport package to support development in SADC and DBC Local Plans, and not just for EHH (central). | Crown Estate (51946) | Noted    | Cross reference with Policy L18 and Appendix 4 which set out the Key infrastructure requirements for broad locations including East Hemel Hempstead.<br><br>These matters can be properly detailed through the masterplanning process / planning application / EIA processes, with statutory consultation. | No change |

|  |                      |          |  |           |
|--|----------------------|----------|--|-----------|
| Point 9 should include reference to upgrading the A414/Green Lane junction, or add additional point  | Crown Estate (51946) | Noted    | <p>Cross reference with Policy L18 and Appendix 4 which set out the Key infrastructure requirements for broad locations including East Hemel Hempstead.</p> <p>These matters can be properly detailed through the masterplanning process / planning application / EIA processes, with statutory consultation.</p>  | No change |
| Point 10 should be amended to note MMTI provision will be subject to its function and viability being demonstrated   | Crown Estate (51946) | Noted    | <p>Cross reference with Policy L18 and Appendix 4 which set out the Key infrastructure requirements for broad locations including East Hemel Hempstead.</p> <p>MMTI is required, while acknowledging function will evolve over time.</p> <p>These matters can be properly detailed through the masterplanning process / planning application / EIA processes, with statutory consultation.</p> | No change |
| Support use of exceptional environmental opportunities within the employment area however it is unsound to specify particular solution such as CHP and large scale solar power as the best option may change over time | Crown Estate (51946) | Noted    | <p>Refer to policy L25 which sets out the energy and environmental performance requirements for new developments. This addresses energy efficiency that BL must comply with. Appropriate alternatives that deliver similar objectives may be possible, if fully justified.</p>   | No change |
| Mitigation for noise/air pollution not critical for a major employment location  | Crown Estate (51946) | Disagree | <p>Cross reference to Policy L18 which requires major developments to provide proposals for limiting and mitigating air quality impacts.</p>   | No change |
| Support principles of major development at   | DBC (1186054)        | Disagree | <p>The sites are split in the Plan to allow for explanation of development requirements and to indicate potential stages /</p>   | No change |

|   |  |          |   |           |
|---|--|----------|---|-----------|
| East and North Hemel Hempstead however these areas are being planned through a comprehensive masterplan and should therefore be one location. Amended text for an overarching policy suggested.                                 |  |          | phases of development and housing trajectory implications, which differ between BLs. Masterplanning and planning applications for all will clearly be considered in the context of each other.  |           |
| Should include a household waste recycling centre   | DBC (1186054)<br>Hertfordshire County Council (837689) | Disagree | Cross reference with Policy L18 and Appendix 4 which set out the Key infrastructure requirements for broad locations including East Hemel Hempstead.<br><br>These matters can be properly detailed through the master planning process / planning application / EIA processes, with statutory consultation. | No change |
| No fundamental ecological constraints and support retentions of important trees and landscape features  | Hertfordshire County Council (837689)                  | Noted    | Support noted   | No change |
| Concerns relating to impact on traffic volume on minor routes to north/east Hemel Hempstead possibly on cycle routes, on B487 Redbourn Road, on M1 Jct 8 and on roads within Maylands. MMTI not sufficient to mitigate impacts. | Hertfordshire County Council (837689)                  | 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 |

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|--|--|----------|---|-----------|
| Although a business area, provision of a certain amount of other uses e.g. small retail may be appropriate in order to reduce the need to travel | Hertfordshire County Council (837689)  | Noted    | These are supported already in the overall policy approach. These matters can be properly detailed through the master planning process / planning application / EIA processes, with statutory consultation.       | No change |
| Consultation/liaison with HCC and relevant bus/coach operators needed on MMTI  | Hertfordshire County Council (837689)  | Noted    | That process is supported and ongoing. These matters can be properly detailed through the master planning process / planning application / EIA processes, with statutory consultation.                            | No change |
| Heritage environment /assets have not been considered at EHH and lack of criteria to protect assets  | Gorhambury Estates Company Limited (375996)<br>Historic England (929489)<br>Leverstock Green Village Association (1185907)<br>Redbourn Parish Council (759908)<br>334023 | Disagree | Cross reference Policy L30<br><br>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 Impact Assessment required and policy wording amended to reflect its findings   | Historic England (929489)  | Disagree | Cross reference Policy L30<br><br>This is part of the masterplanning process  | No change |

|  |   |          |   |           |
|--|---|----------|---|-----------|
| Impact on setting of Gorhambury Estate should be mitigated by way of a landscape buffer, building height limits, light shields | Gorhambury Estates Company Limited (375996)                                     | 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    | There has been ongoing joint working with Dacorum Borough Council, local communities and other stakeholders.  | 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 |
| Collaboration with neighbouring Councils needed  | 1181750<br>1182733  | Agree    | There has been ongoing joint working with neighbouring local authorities including the South West Herts Group. DtC considered to be met.                                  | No change |
| Major infrastructure must be provided up front   | Colney Heath Parish Council (51891)<br><br>London Colney Parish Council (52477) | Noted    | New infrastructure will be provided in association with new development. Further details can be found in IDP updates / Masterplanning work / planning application process | No change |
| Be more specific with renewable energy/energy efficiency requirement   | 1181723   | Disagree | Cross reference to policy L25 which sets out the energy and environmental performance requirements of new developments. This addresses renewable energy.                  | No change |

### Policy S6 iii) East Hemel Hempstead (South) Broad Location

| Representation Point   | Representor Raising Point | Outline Reply | Recommended Reply (including notes and references)   | Suggested Actions (including any Changes to Plan) |
|--|---------------------------|---------------|--|---|
| Not explicitly clear what sports facilities to be provided                           | Sport England (824971)    | Noted         | <p>Cross reference Policy L22 and L26 – 28.</p> <p>The policy refers to strategic and local open space and recreation space and community facilities. Any specific reference to the type of specific sports facilities would be overly prescriptive and inflexible at this stage. This matter can be properly detailed through the Masterplanning process / planning application / EIA processes, with statutory consultation.</p> | No change   |
| No evidence base to inform need for sports provision                                 | Sport England (824971)    | Disagree      | <p>Cross reference Policy L22 and L26 – 28.</p> <p>Baseline and further work since Regulation 19 has been undertaken to inform specific development proposals. Playing Pitch Strategy update 2019 provides baseline data.</p>  | No change   |
| Need for additional facilities at this location where facilities already at capacity | Sport England (824971)    | Agree         | <p>Cross reference Policy L22 and L26 – 28.</p> <p>The policy concurs stating that development will be required to deliver strategic and local open space and recreation space and community facilities</p> <p>This matter can be properly detailed through the Masterplanning process / planning application / EIA processes, with statutory consultation</p>   | No change   |



|   |                        |          |  |           |
|---|------------------------|----------|--|-----------|
| Should include sports facility provision in proposal points                                   | Sport England (824971) | Disagree | <p>Cross reference Policy L22 and L26 – 28.</p> <p>The policy states that development will be required to deliver strategic and local open space and recreation space and community facilities</p> <p>This matter can be properly detailed through the Masterplanning process / planning application / EIA processes, with statutory consultation</p>  | No change |
| Unclear if public open space or recreation space refers to indoor or outdoor sports provision | Sport England (824971) | Disagree | <p>Cross reference Policy L22 and L26 – 28.</p> <p>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 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 |
| Consideration of extending/enhancing sports facilities in proposed secondary school           | Sport England (824971) | Agree    | <p>Cross reference Policy L22 and L26 – 28.</p> <p>The proposed Hemel BL's S6 i-iv (apart from S6ii as a major new Enviro-Tech business / employment land focused location) all require delivery of strategic and local public open space. The precise location and nature of the open spaces and community sport provision will be informed by ongoing joint work with</p>  | No change |

|   |   |          |   |           |
|---|---|----------|---|-----------|
|   |   |          | <p>Dacorum Borough Council. 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> |           |
| Development, including landscaping, should be of high standard design | 1184750   | Agree    | <p>Cross reference Policy L29</p> <p>This is part of the masterplanning process</p>   | No change |
| Concerns with road access, particularly from/to the M1.               | <p>1153741</p> <p>498103</p> <p>1184750</p>                 | Disagree | <p>Cross reference Policies L 17 / 18.</p> <p>Infrastructure evidence (ref IDP / IDS) confirms that road access can be provided and the M1 junction improvement proposals are appropriate solutions.</p>  | No change |
| Further landscape and EIA work should be carried out                  | 1184750   | Noted    | <p>Cross reference Policy L29</p> <p>This is part of the masterplanning and planning application process; including statutory consultation</p>  | No change |
| Important trees must be preserved                                     | <p>Hertfordshire County Council (837689)</p> <p>1184750</p> | Noted    | <p>Cross reference Policy L29</p> <p>Retention of important trees is a requirement of the policy.</p>   | No change |
| Support setting minimum housing targets                               | Grand Union Investments Ltd (977391)                        | Noted    | Support noted   | No change |
| Lower housing figure should be applied to allow                       | 498103  | Disagree | Housing requirement/targets are based on the standard methodology set out by the government – see S4.   | No change |

|   |                                       |          |   |           |
|---|---------------------------------------|----------|---|-----------|
| for more green spaces and community facilities  |                                       |          | <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> |           |
| DBC and SADC are not collaborating, particularly with regard to number of housing allocated to SADC and DBC | 1144419<br>1185704                    | Disagree | <p>Cross reference Policy S2 / S4</p> <p>There has been ongoing joint working with neighbouring local authorities including the South West Herts Group. DtC considered to be met.</p>   | No change |
| Collaboration with neighbouring Councils needed   | 1181750<br>1182733                    | Noted    | <p>There has been ongoing joint working with neighbouring local authorities including the South West Herts Group. DtC considered to be met.</p>   | No change |
| What masterplanning collaboration has there been?   | St Stephen Parish Council (51804)     | Noted    | <p>There has been ongoing joint working with Dacorum Borough Council, local communities and other stakeholders.</p>   | No change |
| Dacorum should take control of planning for EHH   | 1185704                               | Disagree | <p>Only SADC (as LPA) can plan for land within SADC's area, unless it agrees otherwise. SADC is committed to working jointly with DBC on planning for land at Hemel.</p>  | No change |
| Is there a need for the amount of flexi-care provision required?  | St Stephen Parish Council (51804)     | Noted    | <p>Evidence available in full, including in HCC documents and representations. Policy L2 sets out an appropriate approach.</p>  | No change |
| Policy should include a land size requirement for flexi-care home   | Hertfordshire County Council (837689) | Disagree | <p>Requirement as set out in Policy L2.</p> <p>Size requirements can be properly detailed through the Masterplanning / planning</p>   | No change |

|  |   |          |   |           |
|--|---|----------|---|-----------|
|  |   |          | application / EIA process, with appropriate consultation.   |           |
| 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)<br><br>London Colney Parish Council (52477) | Noted    | New infrastructure will be provided in association with new development. Further details can be found in IDP updates / Masterplanning work / planning application process | No change |
| Strongly support the policy  | Crown Estate (51946)  | Noted    | Support noted   | No change |
| GB boundary to southern corner of site should be moved to<br><br>1) allow flexibility in terms of future development<br><br>2) questionable what strategic GB function the triangle of land would continue to play<br><br>3) not a strong GB boundary – should be moved out to Hemel Hempstead Road/M1, and to also include Centurion Golf Club which would be justified by economic | Centurion Golf Club (1160058)   | Disagree | Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.   | No Change |

|  |  |          |  |           |
|--|--|----------|--|-----------|
| benefits from expansion of its facilities  |  |          |  |           |
| Amend point 1 to refer to development being materially in accordance with the masterplan   | Crown Estate (51946)                           | Disagree | Already set out in overall S6.   | No change |
| Concerns the boundary defined on the Policies Map is not large enough for 2,400 homes plus associated infrastructure at 40dph. Additional land at southern tip should be included. | Crown Estate (51946)                           | Disagree | Some sub-areas will achieve higher density. Overall the land can accommodate the dwelling numbers in the Plan (reference Annex 1)  | No change |
| Density will need to be much higher than 40dph to provide the 2,400 dwellings which would not be appropriate   | Leverstock Green Village Association (1185907) | Disagree | Some areas will achieve higher density. Overall the land can accommodate the dwelling numbers in the Plan (reference Annex 1)  | No change |
| 40dph too high   | 1184750  | 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 |
| No justification for 3% self-build figure, amended policy wording suggested  | Crown Estate (51946)                           | Disagree | Justification based on evidence including the Self Build Register. SADC are required to have regard to this as part of Self Build and Custom Housebuilding Act 2015.                         | No change |

|  |                                     |          |   |           |
|--|-------------------------------------|----------|---|-----------|
| Concerns development may not end up providing the required 40% affordable housing                                | 1144419                             | Disagree | This is a specific policy requirement in the Plan. Evidence available suggests the level of provision is viable.  | No change |
| Unlikely the development will be built out in plan period due to infrastructure require and scale of development | 1185704                             | Disagree | <p>The Plan necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy. There are sufficient deliverable sites for years 1-5.</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> | No change |
| Lack of community facilities in plans for EHH  | 498103                              | Disagree | <p>Cross reference Policy L22 and L26 – 28.</p> <p>Substantial community facility provision is planned.</p> <p>This matter can be properly detailed through the Masterplanning process / planning application / EIA processes, with statutory 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 |
| Strongly support allocation and safeguarding of land for schools   | Department for Education (1186955)  | Noted    | Support noted   | No change |

|   |  |       |  |           |
|---|--|-------|--|-----------|
| School building areas should be removed from Green Belt   | Department for Education (1186955)<br><br>Hertfordshire County Council (837689)            | Noted | Primary school site is in the land to be taken out of GB. Cross reference L21 and Policies Map.  | No change |
| Education uses will extend beyond area recommended in the GBR for development   | Leverstock Green Village Association (1185907)   | Noted | Residential development site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.<br><br>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy. | No change |
| School site locations should be identified  | Hertfordshire County Council (837689)  | Noted | Primary school site is in the land to be taken out of GB. Cross reference L21 and Policies Map.<br><br>This matter can be properly detailed through the master planning process/ planning application/ EIA processes, with statutory consultation.                                     | 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)<br><br>The British Horse Society (1187597) | Noted | Primary school site is in the land to be taken out of GB. Cross reference L21 and Policies Map.<br><br>This matter can be properly detailed through the master planning process/ planning application/ EIA processes, with statutory consultation.                                     | No change |
| Support transport network improvements  | St Albans & District Footpaths   | Noted | Support noted  | No change |

|  |  |          |   |           |
|--|--|----------|---|-----------|
|  | <p>Society<br/>(723340)</p> <p>The British<br/>Horse Society<br/>(1187597)</p> <p>Ramblers<br/>Association<br/>(52420)</p>   |          |   |           |
| Lack of green spaces in plans for EHH  | 498103   | Disagree | <p>Cross reference Policy L22 and L26 – 28.</p> <p>Substantial provision is planned.</p> <p>This matter can be properly detailed through the master planning process / planning application / EIA processes, with statutory consultation.</p> | No change |
| Support sufficient assets to provide sustainable management of community facilities, open spaces and parklands | <p>St Albans &amp; District<br/>Footpaths<br/>Society<br/>(723340)</p> <p>The British<br/>Horse Society<br/>(1187597)</p> <p>Ramblers<br/>Association<br/>(52420)</p> <p>Hertfordshire<br/>County Council<br/>(837689)</p> | Noted    | Support noted   | No change |



|  |  |       |  |           |
|--|--|-------|--|-----------|
| Both strategic and local public space must be provided | Ramblers Association (52420)<br><br>St Albans & District Footpaths Society (723340)<br><br>The British Horse Society (1187597)<br><br>Hertfordshire County Council (837689)<br><br>1184750 | Agree | This is part of the masterplanning process | No change |
| Countryside access links must be provided              | Ramblers Association (52420)<br><br>St Albans & District Footpaths Society (723340)<br><br>The British Horse Society (1187597)<br><br>St Albans Cycle Campaign (346623)                    | Agree | This is part of the masterplanning process | No change |

|   |  |          |   |           |
|---|--|----------|---|-----------|
|   | 1157340  |          |   |           |
| Sports/health/educational facilities must not encroach into country park land | 1184750  | Disagree | <p>Cross reference Policy L26 - 28</p> <p>Open space provision is very sizable. The detailed master planning of the open space can allow for accommodation of all these uses and for appropriate country park / habitat creation.</p> | No change |
| Must provide/support the country park/green buffer to the south east          | <p>Ramblers Association (52420)</p> <p>St Albans &amp; District Footpaths Society (723340)</p> <p>Hertfordshire County Council (837689)</p> <p>1184750</p> <p>1185037</p> <p>The British Horse Society (1187597)</p> | Agree    | This is a development requirement.  | No change |
| Boundary of site should comply with Green Belt Review                         | Leverstock Green Village Association (1185907)   | Disagree | <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>           | No change |

|  |   |          |  |           |
|--|---|----------|--|-----------|
|  |   |          | Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.  |           |
| The development should be required to deliver walking and cycling facility improvements and public transport links to promote car free access, which should be adequately maintained | Hertfordshire County Council (837689)<br><br>St Albans Cycle Campaign (346623)<br><br>1048449     | Agree    | Cross reference Policy L18<br><br>This approach is integral to the policy.   | No change |
| Development must respond to the 'village character' of Leverstock Green  | Leverstock Green Village Association (1185907)  | Noted    | This matter can be properly detailed through the master planning process / planning application / EIA processes, with statutory consultation.<br><br>Also cross reference Policy L1 and L23.   | No Change |
| Less dwellings should be proposed so that the scale of the development complements Leverstock Green  | Leverstock Green Village Association (1185907)  | Disagree | This is an appropriate minimum density / number of dwellings 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.<br><br>Cross reference Policy S1, S2, L1 and L23. | No change |
| Heritage environment /assets have not been considered at EHH and lack of criteria to protect assets. Impact on nearby listed buildings including                                     | Historic England (929489)<br><br>Redbourn Parish Council (759908)<br><br>Leverstock Green Village | Disagree | Cross reference Policy L30<br><br>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 |

|   |   |          |   |           |
|---|---|----------|---|-----------|
| Westwick Row and buildings at Gorhambury  | Association (1185907)<br>Gorhambury Estates Company Limited (375996)<br>334023<br>1184969 |          |   |           |
| Heritage Impact Assessment required and policy wording should reflect its findings  | Historic England (929489)   | Disagree | Cross reference Policy L30<br>This is part of the masterplanning process.   | No change |
| Impact on setting of Gorhambury Estate should be mitigated by way of a landscape buffer, building height limits, light shields  | Gorhambury Estates Company Limited (375996)   | Noted    | Importance of historic Gorhambury Estate acknowledged. This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.         | No change |
| Additional gypsy and traveller pitches in EHH Broad Location would result in an over-concentration in the area, exacerbating existing problems. Gypsy and Traveller sites should be more evenly distributed across the District | DBC (1186054)<br>1181723<br>498103  | Disagree | Sites have been allocated in the most appropriate locations, based on evidence, as set out in L7. There is considerable flexibility within these large Broad Locations to locate sites sensitively. | No change |
| Should be more 1-2 bed dwellings  | 1034653   | Disagree | Cross reference L1 and Appendix 6   | No change |

|  |   |          |  |           |
|--|---|----------|--|-----------|
| Lack of off-street parking provision in plans for EHH  | 498103  | Disagree | Cross reference Policy L20<br>There are clear standards in Plan policy.  | No change |
| Further work needs to be carried out on infrastructure, including highways, parking, water, sewerage   | Hertfordshire County Council (837689)<br>498103<br>867312 | 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 |
| There should be a joint Area Action Plan for EHH with DBC  | 498103<br>1185704   | Disagree | This was an option considered. It has been replaced with a collaborative joint Masterplanning process which can address the issues more quickly in the context of the clear development requirements in the Plan and the requirements of the NPPF. | 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 |
| Policy should include requirement for provision of a new hospital  | West Hertfordshire Hospitals NHS Trust (1183618)          | Disagree | No substantive evidence provided to support such an approach. Cross reference L22.   | No change |
| Civic Society Design Advisory Group should be consulted as part of any pre-planning consultation   | St Albans Civic Society (1156974)                         | Disagree | This matter 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) | Disagree | This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.   | No change |
| Support principles of major development at East and North Hemel Hempstead however these areas are being planned through a comprehensive masterplan and should therefore be one location. Amended text for an overarching policy suggested. | DBC (1186054)                  | Disagree | The sites are split in the Plan to allow for explanation of development requirements and to indicate potential stages / phases of development and housing trajectory implications, which differ between BLs. Masterplanning and planning applications for all will clearly be considered in the context of each other. | No change |
| School provision should take emerging Hemel Garden Communities masterplan and emerging education guidance for Garden Communities by MHCLG guidance into account  | DBC (1186054)                  | Noted    | Cross reference L17<br><br>Work on the education infrastructure evidence base has been ongoing and has informed the policy requirement.  | No change |
| Institutional residential (C2) units should have a separate housing target and be excluded from dwelling trajectory figures  | DBC (1186054)                  | Disagree | NPPF / PPG / Housing Delivery Test acknowledge that C2 institutional residential units contribute to housing provision.  | No change |
| Be more specific with renewable energy/energy efficiency requirement   | 1181723                        | Disagree | Cross reference with Policy L25 which sets out the energy and environmental performance requirements of new developments. This addresses renewable energy.   | No change |

### Policy S6 iv) North Hemel Hempstead Broad Location

| Representation Point   | Representor Raising Point | Outline Reply | Recommended Reply (including notes and references)   | Suggested Actions (including any Changes to Plan) |
|--|---------------------------|---------------|--|---|
| Not explicitly clear what sports facilities to be provided                           | Sport England (824971)    | Disagree      | <p>Cross reference Policy L22 and L26 – 28.</p> <p>The policy refers to strategic and local open space and recreation space and community facilities. Any specific reference to the type of specific sports facilities would be overly prescriptive and inflexible at this stage. This matter can be properly detailed through the Masterplanning process / planning application / EIA processes, with statutory consultation.</p> | No change   |
| No evidence base to inform need for sports provision                                 | Sport England (824971)    | Noted         | <p>Cross reference Policy L22 and L26 – 28.</p> <p>Baseline and further work since Regulation 19 has been undertaken to inform specific development proposals. Playing Pitch Strategy update 2019 provides baseline data.</p>  | Publish updated evidence                          |
| Need for additional facilities at this location where facilities already at capacity | Sport England (824971)    | Agree         | <p>Cross reference Policy L22 and L26 – 28.</p> <p>The policy concurs stating that development will be required to deliver strategic and local open space and recreation space and community facilities</p> <p>This matter can be properly detailed through the Masterplanning process / planning application / EIA processes, with statutory consultation</p>   | No change   |

|   |                        |          |  |           |
|---|------------------------|----------|--|-----------|
| Should include sports facility provision in proposal points                                   | Sport England (824971) | Disagree | <p>Cross reference Policy L22 and L26 – 28.</p> <p>The policy states that development will be required to deliver strategic and local open space and recreation space and community facilities</p> <p>This matter can be properly detailed through the Masterplanning process / planning application / EIA processes, with statutory consultation</p>  | No change |
| Unclear if public open space or recreation space refers to indoor or outdoor sports provision | Sport England (824971) | Disagree | <p>Cross reference Policy L22 and L26 – 28.</p> <p>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 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 |
| Consideration of extending/enhancing sports facilities in proposed secondary school           | Sport England (824971) | Agree    | <p>Cross reference Policy L22 and L26 – 28.</p> <p>The proposed Hemel BL's S6 i-iv (apart from S6ii as a major new Enviro-Tech business / employment land focused location) all require delivery of strategic and local public open space. The precise location and nature of the open spaces and community sport provision will be informed by ongoing joint work with</p>  | No change |



|   |                                      |          |   |           |
|---|--------------------------------------|----------|---|-----------|
|   |                                      |          | <p>Dacorum Borough Council. 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> |           |
| Development, including landscaping, should be of a high standard of design                                  | 1184750                              | Agree    | <p>Cross reference Policy L29</p> <p>This is part of the masterplanning process</p>   | No change |
| Welcome requirement for new managed woodland and encourage provision of street trees                        | The Woodland Trust (1185811)         | Noted    | Support noted   | 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 |
| Support setting minimum housing targets   | Grand Union Investments Ltd (977391) | Noted    | Support noted   | No change |
| DBC and SADC are not collaborating, particularly with regard to number of housing allocated to SADC and DBC | 1144419<br>1185704                   | Disagree | <p>Cross reference Policy S2 / S4</p> <p>SADC and DBC are clearly working together through ongoing Duty To Cooperate, including the SWH JSP process.</p>  | No change |
| What masterplanning collaboration has there been?   | St Stephen Parish Council (51804)    | Noted    | There has been ongoing joint working with Dacorum Borough Council, local communities and other stakeholders.  | No change |

|  |   |          |   |           |
|--|---|----------|---|-----------|
| Collaboration with neighbouring Councils needed  | 1181750<br>1182733  | Noted    | There has been ongoing joint working with neighbouring local authorities including Dacorum and the South West Herts Group. DtC considered to be met.  | No change |
| Concerns development may not end up providing the required 40% affordable housing                                | 1144419   | Disagree | This is a specific policy requirement in the Plan. Evidence available suggests the level of provision is viable.  | No change |
| Unlikely the development will be built out in plan period due to infrastructure require and scale of development | 1185704   | Disagree | The Plan necessitates a significant change in approach from previous scales of development. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy. There are sufficient deliverable sites for years 1-5.<br><br>New infrastructure will be provided in association with new development. Further details can be found in IDP updates / master planning work / planning application process | No change |
| Further work needs to be carried out on infrastructure, including highways, parking, water, sewerage             | Hertfordshire County Council (837689)<br>498103<br>867312 | 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 |
| Support transport network improvements   | St Albans & District Footpaths Society (723340)           | Noted    | Support noted   | No change |

|   |  |          |  |           |
|---|--|----------|--|-----------|
|   | <p>The British Horse Society (1187597)</p> <p>Ramblers Association (52420)</p>         |          |  |           |
| Concerns with road access, particularly from/to the M1  | <p>1153741</p> <p>498103</p> <p>1184750</p>  | Disagree | <p>Cross reference with Policies L 17 / 18.</p> <p>Infrastructure evidence (ref IDP / IDS) confirms that road access can be provided and the M1 junction improvement proposals are appropriate solutions.</p> <p>This matter can be properly detailed through the Masterplanning/ planning application process, with appropriate consultation.</p> | No change |
| Infrastructure requirements and their deliverability not been fully considered by SADC or DBC | Redbourn Parish Council (759908)   | 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   | 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  | <p>Colney Heath Parish Council (51891)</p> <p>London Colney Parish Council (52477)</p> | Noted    | New infrastructure will be provided in association with new development. Further details can be found in IDP updates / Masterplanning work / planning application process  | No change |

|  |                                       |          |  |           |
|--|---------------------------------------|----------|--|-----------|
| Health and safety aspects of building close to M1, pylons, oil pipeline, Buncefield Oil Depot and under Luton Airport flightpath need to be considered | 498103<br>1144419<br>1185704          | Noted    | These points are generally recognised. This matter can be properly detailed through the Masterplanning process / planning application / EIA processes, with statutory consultation.  | No change |
| Lower housing figure should be applied to allow for more green spaces and community facilities   | 498103                                | Disagree | Housing targets are based on evidence on local housing need and standard methodology set out by the government.  | No change |
| There should be a joint Area Action Plan with DBC  | 498103<br>1185704                     | Disagree | This was an option considered. It has been replaced with a collaborative joint Masterplanning process which can address the issues more quickly in the context of the clear development requirements in the Plan and the requirements of the NPPF. | No change |
| Dacorum should take control of planning for EHH  | 1185704                               | Disagree | Only SADC (as LPA) can plan for land within SADC's area, unless it agrees otherwise. SADC is committed to working jointly with DBC on planning for land at Hemel.  | 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 |
| 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) | Noted    | Primary school site is in the land to be taken out of GB. Cross reference L21 and Policies Map.  | No change |

|  |   |          |  |  |
|--|---|----------|--|--|
|  |   |          | This matter can be properly detailed through the master planning process / planning application / EIA processes, with statutory consultation.  |  |
| School building areas should be removed from green belt                          | Department for Education (1186955)<br><br>Hertfordshire County Council (837689) | Noted    | Primary school sites in the land to be taken out of GB. Cross reference L21 and Policies Map.  | 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. |
| Proposed secondary school will risk Redbourn children's access to Roundwood Park | 1185037   | Noted    | School place catchment and allocations policies are not a planning matter.   | 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 wording should include land size requirement for flexi-care home          | Hertfordshire County Council (837689)   | Disagree | Requirement as set out in Policy L2.<br><br>Size requirements can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation. | No change                                |
| Scale of growth unclear as reference to 1,000 and 1,500 dwellings                | Redbourn Parish Council (759908)  | Noted    | BL will have a minimum capacity for 1,500 dwellings, with delivery of 1,000 beyond 2036.   | No change                                |

|  |   |          |   |           |
|--|---|----------|---|-----------|
| Cumulative growth at East and North Hemel Hempstead sites would be challenging to deliver                      | Redbourn Parish Council (759908)  | Disagree | The Plan involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy. | No change |
| Support sufficient assets to provide sustainable management of community facilities, open spaces and parklands | St Albans & District Footpaths Society (723340)<br><br>The British Horse Society (1187597)<br><br>Ramblers Association (52420)<br><br>Hertfordshire County Council (837689) | Noted    | Support noted   | No change |
| Both strategic and local public space must be provided   | Ramblers Association (52420)<br><br>St Albans & District Footpaths Society (723340)<br><br>The British Horse Society (1187597)  | Agree    | This is part of the masterplanning process  | No change |

|   |  |       |   |           |
|---|--|-------|---|-----------|
|   | Hertfordshire<br>County Council<br>(837689)<br><br>1184750   |       |   |           |
| Countryside access links<br>must be provided  | Ramblers<br>Association<br>(52420)<br><br>St Albans &<br>District<br>Footpaths<br>Society<br>(723340)<br><br>The British<br>Horse Society<br>(1187597)<br><br>St Albans Cycle<br>Campaign<br>(346623)<br><br>1157340 | Agree | This is part of the masterplanning process  | No change |
| Clarity needed on whether<br>specific deliverables such<br>as school buildings will be<br>accommodated in the Broad<br>Location or Green Belt | St Albans &<br>District<br>Footpaths<br>Society<br>(723340)<br><br>The British<br>Horse Society<br>(1187597)   | Noted | School sites are in the land to be taken out of<br>GB. Requirement is in policy text. Cross<br>reference L21.<br><br>This matter can be properly detailed through<br>the master planning process / planning<br>application / EIA processes, with statutory<br>consultation. | No change |

|   |   |       |   |           |
|---|---|-------|---|-----------|
| Should be required to deliver walking and cycling facility improvements and public transport links to promote car free access, which should be adequately maintained. | St Albans Cycle Campaign (346623)<br>Hertfordshire County Council (837689)<br>1048449   | Agree | Cross reference Policy L18<br>This approach is integral to the policy.                        | No change |
| Must provide/support the country park   | Ramblers Association (52420)<br>St Albans & District Footpaths Society (723340)<br>Hertfordshire County Council (837689)<br>The British Horse Society (1187597)<br>1184750<br>1185037 | Agree | This is set out in the policy and will be taken forward as part of the Masterplanning process | No change |
| Important trees must be preserved   | Hertfordshire County Council (837689)<br>1184750  | Noted | Cross reference Policy L29<br>Retention of important trees is a requirement of the policy.    | No change |



|  |   |          |  |           |
|--|---|----------|--|-----------|
| Heritage environment /assets have not been considered and lack of criteria to protect assets, including nearby Grade II Listed buildings and Aubrey Camp scheduled monument              | Historic England (929489)<br><br>Redbourn Parish Council (759908)<br><br>Leverstock Green Village Association (1185907)<br><br>334023 | Disagree | Cross reference Policy L30<br><br>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.<br><br>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. | No change |
| Heritage Impact Assessment required and policy wording amended to reflect its findings   | Historic England (929489)   | Disagree | Cross reference Policy L30<br><br>This is part of the masterplanning process   | No change |
| Support principles of major development at East and North Hemel Hempstead however these areas are being planned through a comprehensive masterplan and should therefore be one location. | Dacorum Borough Council (1186054)   | Disagree | The sites are split in the Plan to allow for explanation of development requirements and to indicate potential stages / phases of development and housing trajectory implications, which differ between BLs. Masterplanning and planning applications for all will clearly be considered in the context of each other.   | No change |
| School provision should take emerging Hemel Garden Communities masterplan and emerging education guidance for Garden Communities by MHCLG guidance into account                          | Dacorum Borough Council (1186054)   | Noted    | Cross reference L17<br><br>Work on the education infrastructure evidence base has been ongoing and has informed the policy requirement.  | No change |

|   |  |          |   |           |
|---|--|----------|---|-----------|
| Institutional residential (C2) units should have a separate housing target and be excluded from dwelling trajectory figures   | Dacorum Borough Council (1186054)  | Disagree | NPPF / PPG / Housing Delivery Test acknowledge that C2 institutional residential units contribute to housing provision.   | No change |
| Should include requirement relating to mitigating adverse impacts from motorway noise and air pollution   | 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 |
| 40dph too high  | 1184750  | 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 |
| 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 |
| Concerns over proximity to Buncefield - policies should include reference to the health and safety Development Proximity Zone Consultation Zones at Buncefield Oil Storage Depot. | Redbourn Parish Council (759908)<br>759883<br>498103<br>1144419<br>1185704 | Disagree | The importance of this issue is acknowledged.<br><br>The Plan development proposals already take account of the health and safety issues associated with the Depot. The Health and Safety Executive will be consulted as part of any planning application in proximity to the Buncefield DPZ.<br><br>This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation. | No change |

|  |  |          |  |           |
|--|--|----------|--|-----------|
| Be more specific with renewable energy/energy efficiency requirement                             | 1181723                                    | Disagree | Cross reference with Policy L25 which sets out the energy and environmental performance requirements of new developments. This addresses renewable energy.           | No change |
| Civic Society Design Advisory Group should be consulted as part of any pre-planning consultation | St Albans Civic Society (1156974)          | Disagree | This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.                                 | No change |
| Strongly support the policy  | Crown Estate (51946)                       | Noted    | Support noted  | No change |
| Point 1 should refer to development being materially in accordance with the masterplan           | Crown Estate (51946)                       | Disagree | Already set out in overall S6.   | No change |
| No justification for 3% self-build figure, amended policy wording suggested                      | Crown Estate (51946)                       | Disagree | Justification based on evidence including the Self Build Register. SADC are required to have regard to this as part of Self Build and Custom Housebuilding Act 2015. | No change |
| Support inclusion of land east of Holtsmere End Road   | Mr and Mrs Bill and Valerie Barr (1157883) | Noted    | Support noted  | No change |

#### **Policy S6 v) East St Albans Broad Location**

| <b>Representation Point</b>                             | <b>Representor Raising Point</b>   | <b>Outline Reply</b> | <b>Recommended Reply (including notes and references)</b>   | <b>Suggested Actions (including any Changes to Plan)</b> |
|---|------------------------------------|----------------------|---|--|
| School building areas should be removed from green belt | Department for Education (1186955) | Noted                | Primary school site in the land to be taken out of GB. Secondary school to be retained in the GB. Cross reference L21 and Policies Map. | No change  |

|   |  |          |   |  |
|---|--|----------|---|--|
|   | Hertfordshire<br>County Council<br>(837689)  |          |   |  |
| Primary school should be increased to 3FE   | Hertfordshire<br>County Council<br>(837689)  | Agree    | Minor modification – clarification “A site for and appropriate contributions towards a 3 FE”  | Minor modification – “A site for and appropriate contributions towards a 3 FE” |
| Clarity needed on whether specific deliverables such as school buildings will be accommodated in the Broad Location or Green Belt | St Albans &<br>District<br>Footpaths<br>Society<br>(723340)<br><br>The British<br>Horse Society<br>(1187597) | Noted    | Both schools within the Broad Location.<br>Primary school site in the land to be taken out of GB. Secondary school to be retained in the GB. Cross reference L21 and Policies Map.<br><br>This matter can be properly detailed through the master planning process / planning application / EIA processes, with statutory consultation. | No change  |
| Strongly support allocation and safeguarding of land for schools  | Department for<br>Education<br>(1186955)   | Noted    | Support noted   | No change  |
| Policy should include indication of school site size required   | Department for<br>Education<br>(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.                                       |
| Broad Location Land should be retained for future school expansion  | 1153245<br><br>1186129   | Disagree | Housing need is a greater priority for use of this site. The main site owner has promoted the site as available and deliverable for housing.  | No change  |
| Not a sustainable location for a secondary school, and instead existing schools should be expanded                                | 1185775  | Disagree | Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy. Both expanded and new schools are part of the strategy.   | 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>  | Agree | This is part of the masterplanning process. | 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>The British Horse Society (1187597)</p> <p>Ramblers Association (52420)</p> <p>1185460</p> | Noted | Support noted   | 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>The British Horse Society (1187597)</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)  | Agree | <p>Cross reference Policy L18</p> <p>This approach is integral to the policy.</p> | No change |

|  |   |       |  |           |
|--|---|-------|--|-----------|
|  | Hertfordshire<br>County Council<br>(837689)<br><br>867587<br><br>1048449<br><br>1185460   |       |  |           |
| Further work needs to be carried out on infrastructure, including highways, parking, water, sewerage | Hertfordshire<br>County Council<br>(837689)<br><br>Ellenbrook Area<br>Residents<br>Association<br>Committee<br>(1185802)<br><br>498103<br><br>867312<br><br>867587<br><br>1184378<br><br>1185460<br><br>1185775 | 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  | St Albans<br>Deanery Synod<br>(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 |

|  |   |          |  |           |
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| community facility e.g. a community hall   |   |          |  |           |
| 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.<br><br>Size requirements can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation. | 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)<br><br>London Colney Parish Council (52477) | Noted    | New infrastructure will be provided in association with new development. Further details can be found in IDP updates / Masterplanning work / planning application process              | No change |
| 'Other community provisions, including health provisions' is insufficient. Request amendment to 'including new GP, clinic and other healthcare facilities' | 1185035   | 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.            | 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 |
| 40dph too high  | 1184750                           | 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 |
| Minimum capacity of 1,250 dwellings to be should be changed to 902 dwellings, as 348 already being built.   | Oaklands College (1185294)        | Disagree | Policy states 1,250 dwellings includes area with extant permission of 348 dwellings.   | No change |
| Wording of S6 v) 16 and 17 to be amended to include 'subject to discussions regarding local needs and optimal location  | Oaklands College (1185294)        | Disagree | The development requirements are clear and the masterplan process will confirm specific proposals  | No change |
| Wording of S6 v) 10 to be amended to include location of which to be agreed through discussions between District Council, County Council and Oaklands College | Oaklands College (1185294)        | Disagree | This will in practice be the case, but there is no need to set it out explicitly in the policy.  | No change |
| 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. There are particular opportunities at East St Albans because of the role and nature of Oaklands. | No change |

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| Heritage environment /assets have not been considered and lack of criteria to protect assets             | Historic England (929489)<br>1153245<br>1186129   | Disagree | Cross reference Policy L30<br><br>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.<br><br>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. | No change |
| Should include requirement to design to mitigate adverse air quality impacts, as in S6 i), ii) and iii). | Hertfordshire County Council (837689)<br><br>Ellenbrook Area Residents Association Committee (1185802)<br>1153245 | Disagree | Cross reference to Policy L18 which requires major developments to provide proposals for limiting and mitigating air quality impacts.  | No change |
| Proposed development will encroach upon the Green Belt   | 1153245<br>1186129  | Noted    | Housing requirement/targets are based on the standard methodology set out by the government – see S4.<br><br>Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.<br><br>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.  | No change |

|  |   |          |  |           |
|--|---|----------|--|-----------|
| The Broad Location does not take into account Watling Chase Community Guide  | 1153245   | Disagree | Watling Chase has been identified under L29. Development will be considered against the Watling Chase Supplementary Planning Guidance.   | No change |
| Request Beaumont Schools playing field is removed from Broad Location or; amendment made to for playing fields to be retained or replaced with equivalent or better. | Sports England (824971)   | Disagree | Playing fields is part of Broad Location as it is part of the area that will be excluded from the Green Belt to create a new, defensible long term boundary.   | No change |
| No plan for wildlife protection / preservation of green space areas for the whole Broad Location area  | 1186129   | Disagree | Requirement as set out in Policy L29. This is included in evidence documents.<br><br>Localised detailed matters can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation. | No change |
| Part of the site under HCC ownership is physically detached from the majority of the broad location site, and should not be included in the master plan.             | Hertfordshire County Council (1185913)  | Disagree | Whole area needs to be considered holistically rather than on a piecemeal basis. This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.                    | No change |
| Has not taken into account submitted Local Plan for Welwyn Hatfield  | Ellenbrook Area Residents Association Committee (1185802)<br><br>1153245<br>1186129 | Disagree | There has been ongoing joint working with neighbouring local authorities including the South West Herts Group. DtC considered to be met.   | No change |

|  |   |          |   |           |
|--|---|----------|---|-----------|
| No information provided on strategy or delivery, just a wishlist | Aurora Properties Limited<br>(1151817)<br><br>867587  | Disagree | The development requirements are clear and the Masterplan process will provide more specific proposals in due course.             | No change |
| What masterplanning collaboration has there been?                | St Stephen Parish Council<br>(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                  | Ellenbrook Area Residents Association Committee<br>(1185802)<br><br>1181750<br><br>1182733<br><br>867587<br><br>1153245 | Agree    | There has been ongoing joint working with neighbouring local authorities including the South West Herts Group.                    | No change |
| No Sequential test based on the Latest SFRA.                     | Environmental Agency<br>(1147557)   | Noted    | Cross reference to Policy L29 and NPPF/NPPG.<br><br>Updated Flood Risk Assessment has been prepared and added to the website.     | No change |

### Policy S6 vi) North St Albans Broad Location

| Representation Point                      | Representor Raising Point   | Outline Reply | Recommended Reply (including notes and references) | Suggested Actions (including any Changes to Plan) |
|---|---|---------------|--|---|
| 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>The British Horse Society (1187597)</p> <p>Ramblers Association (52420)</p>   | Noted         | Support noted                                      | No change   |

|   |  |          |   |           |
|---|--|----------|---|-----------|
| Insufficient infrastructure to cope with additional traffic   | 840795<br>867587   | Disagree | Traffic modelling shows no 'showstoppers' regarding traffic. New infrastructure will be provided in association with new development. Further details can be found in IDP updates / Masterplanning work / planning application process            | No change |
| Improvements to public transport, footpaths and cycling routes need to be specifically identified                                 | 867587<br>1048449<br>1153802   | Disagree | Cross reference to Policy L18<br><br>This matter can be properly detailed through the masterplanning/ planning application/ EIA process, with appropriate consultation.   | 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)<br><br>The British Horse Society (1187597) | Noted    | Primary school site in the land to be taken out of GB. Cross reference L21 and Policies Map.<br><br>This matter can be properly detailed through the master planning process / planning application / EIA processes, with statutory consultation. | No change |
| School building areas should be removed from green belt   | Department for Education (1186955)<br><br>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 |
| The development should be required to deliver walking and cycling facility improvements and                                       | St Albans Cycle Campaign (346623)<br><br>Hertfordshire County Council (837689)             | Agree    | Cross reference Policy L18<br><br>This approach is integral to the policy.  | No change |

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|--|--|-------|--|--|
| public transport links to promote car free access which should be adequately maintained  | 1153802<br>1048449   |       |  |  |
| Further work needs to be carried out on infrastructure, including highways, parking, water, sewerage   | Hertfordshire County Council (837689)<br>498103<br>867312<br>1185775 | 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)                                  | 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. |

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|   | London Colney Parish Council (52477) |          |  |            |
| Should include plans for new St Albans North station  | 1153802                              | Disagree | No evidence of need identified and would be contrary to Network Rail strategy for stations.  | No change  |
| Explicitly drop Ariston Site for retail, and confirm with HCC that the two new primary schools will be located in the North St Albans Broad Location, and not the Ariston Site. | Friends of Bernards Heath (118795)   | Disagree | Ariston is not identified for retail. Policy S6 vi) sets out requirement for one new primary school.   | No change. |
| Another primary school is not required in North St Albans, when instead an additional secondary school is required.   | 1184862<br>1184966<br>840795         | Disagree | North St Albans Broad Location will generate additional need, as well as other growth. Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy. | No change  |
| Will the new primary school be located within the Green Belt?   | 840795                               | Noted.   | Primary school site in the land to be taken out of GB. Cross reference L21 and Policies Map.   | No change  |



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| 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)  | Disagree | Primary school site in the land to be taken out of GB. Cross reference L21 and Policies Map.   | No change                                |
| North St Albans BL can be developed to meet open space standards   | Hallam Land Management Limited (1185998)   | Noted    | Requirement set out in policy text. This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation. | No change                                |
| Suggest inclusion of 'Urban Wilderness' project, as an approach for new open space creation in this Broad Location | Hallam Land Management Limited (1185998)   | Noted    | 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), 1184750<br>St Albans & District Footpaths Society (723340) | Agree    | This is part of the masterplanning process.  | No change                                |

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|   | The British Horse Society (1187597)  |          |   |           |
| Welcome requirement for new managed woodland and encourage provision of street trees  | The Woodland Trust (1185811)   | Noted    | Support noted   | No change |
| Woodland 'Long Springs' bordering the site should be protected by uncultivated strip for public access                            | 1185956  | Noted    | Importance of Long Springs acknowledged. This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.   | 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)<br>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 |
| Unclear from policies map if St Albans Schools Woollam Playing Fields playing fields form part of the broad location.             | Sport England (824971)<br>1185956  | Disagree | The policies map is based on ordnance survey. The base is periodically updated, but the latest available has been used.<br><br>In order to create a long-term defensible Green Belt boundary, a very small part of the existing Woollams playing fields are included in the Broad Location. There will be | No change |

|   |                        |          |   |           |
|---|------------------------|----------|---|-----------|
| Should be removed from Broad Location.  |                        |          | considerable new provision in and associated with the Broad Location.   |           |
| No evidence base to inform need for sports provision  | Sport England (824971) | Disagree | Cross reference Policy L22 and L26 – 28.<br><br>Baseline and further work since Regulation 19 has been undertaken to inform specific development proposals. Playing Pitch Strategy update 2019 provides baseline data.  | No change |
| Should include sports facility provision in proposal points                                   | Sport England (824971) | Disagree | Cross reference Policy L22 and L26 – 28.<br><br>The policy states that development will be required to deliver strategic and local open space and recreation space and community facilities<br><br>This matter can be properly detailed through the Masterplanning process / planning application / EIA processes, with statutory consultation  | No change |
| Unclear if public open space or recreation space refers to indoor or outdoor sports provision | Sport England (824971) | Disagree | Cross reference Policy L22 and L26 – 28.<br><br>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 nature. The policy also refers to recreation space and community facilities which would capture indoor sports facilities.<br><br>This matter can be properly detailed through the Masterplanning process. | No change |
| Need for additional facilities at this location where   | Sport England (824971) | Agree    | Cross reference Policy L22 and L26 – 28.  | No change |

|  |                        |       |  |           |
|--|------------------------|-------|--|-----------|
| facilities already at capacity   |                        |       | <p>The policy concurs stating that development will be required to deliver strategic and local open space and recreation space and community facilities</p> <p>This matter can be properly detailed through the Masterplanning process / planning application / EIA processes, with statutory consultation</p> |           |
| Consideration of extending/enhancing sports facilities in proposed school  | Sport 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 |
| Reference should be made to linking key ecological corridors including Heartwood, Batchwood and Beech Bottom Dyke                          | 1153802                | Noted | Policy 29 sets out requirements for development. This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.  | No change |
| In support of policy in respect of housing mix, size, type and density, infrastructure. Clearly meets requirements for Green Belt release. | 763827                 | Noted | Support noted  | No change |

|   |                                       |          |   |           |
|---|---------------------------------------|----------|---|-----------|
| 1-2 bedroom homes is not a sensible mix for this site and should be slanted towards larger family homes | 1183126                               | Disagree | Cross reference to Policy L1 and Appendix 6<br><br>Evidence points to most need being for small – medium sized family homes, which will be the priority. 1 bedrooms will only be a small proportion of the total. | No change |
| Development will be built out too quickly and will not create a sustainable community                   | 1183126                               | Disagree | Housing trajectory at appendix 2 shows indicative delivery rates. This will allow creation of a sustainable community.  | No change |
| 40dph too high  | 1184750                               | 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 |
| 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.<br><br>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)        | Disagree | This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.  | No change |

|   |                                       |          |   |           |
|---|---------------------------------------|----------|---|-----------|
| With additional traffic there will be a reduction in Air Quality  | 840795                                | Noted    | Cross reference to Policy L18 which requires major developments to provide proposals for limiting and mitigating air quality impacts.   | 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 |
| 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 |
| Location of planned 2FE school should be located adjacent to Townsend School rather than within the strategic location, to create better support between primary and secondary, | Townsend School (1186028)             | Disagree | Concentrating development in larger sites that can create new communities and deliver infrastructure – including schools - is a key part of the development strategy. Cross reference L21.  | No change |

|   |                                       |          |   |           |
|---|---------------------------------------|----------|---|-----------|
| and reduce traffic on New Greens Estate.  |                                       |          |   |           |
| Energy efficiency should include a separate policy, and should be the highest standard as per Policy L25              | 1153802                               | Disagree | Refer to policy L25 which sets out the energy and environmental performance requirements for new developments.          | 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 |
| 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 |
| 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 |

|   |                                   |       |   |           |
|---|-----------------------------------|-------|---|-----------|
| 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<br>1182733                | Noted | There has been ongoing joint working with neighbouring local authorities including the South West Herts Group.                    | No change |

### **L1- Housing Size, Type, Mix and Density**

| <b>Representation Point</b>   | <b>Representor Raising Point</b>      | <b>Outline Reply</b> | <b>Recommended Reply (including notes and references)</b>  | <b>Suggested Actions (including any Changes to Plan)</b> |
|---|---------------------------------------|----------------------|--|--|
| There are already many privately owned new housing developments in St Albans which the council agreed to, which are only partially occupied | 1182314                               | Disagree             | The LPA does not have control over how private housing is bought/sold/occupied.                        | No change  |
| Support the draft plan  | Oaklands College (1185294)<br>1184221 | Noted                | Support noted  | No change  |
| The council is not doing enough to provide affordable housing and needs to reset its targets  | 1184399                               | Disagree             | Cross reference to policy L3/4 which provide guidance on approach taken to provide affordable housing. | No change  |



|  |         |          |  |           |
|--|---------|----------|--|-----------|
| to restore historical supply side failure  |         |          |  |           |
| Excellence in design does not go hand in hand with high density housing  | 1034653 | 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. Policy L23 sets out the main design principles for new developments. This includes promoting sustainable and high quality designs. | No change |
| Building massed concentrations of affordable units at the proposed mix of sizes, and on the scale proposed, will unbalance the structures necessary for thriving innovative- and balanced- communities | 867312  | Disagree | The NPPF prioritises achieving optimal housing densities and appropriate mix of sizes / types.<br>This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.                                   | No change |
| The largest requirement (57%) is for 3 bed houses, however credible analysts recognise that larger family and 'executive' homes are essential to attracting investment and                             | 867312  | Noted    | Evidential basis for specific mix is summarised in Appendix 6 and more detail supporting the Local Plan is available in full.  | No change |

|   |   |          |  |           |
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| entrepreneurs into an area.   |   |          |  |           |
| Concerns over developer and resident disputes over the varying standards of space and housing density between Dacorum (30-35dph) and SADC (40dph). SADC needs to recognize this explicitly and devise clear justifications and mitigations of likely consequences | 867312                                      | Noted    | <p>DtC arrangements will ensure development is coordinated across boundaries under joint working and liaison arrangements.</p> <p>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.</p> | No change |
| Concerns that the minimum average housing density of 40dph is too high. “The average and best new developments are about 25-30 houses per hectare   | 1184750<br>1185704                          | 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 |
| Requests a total block on all future new builds   | 1184784                                     | Disagree | Housing targets are based on evidence on local housing need and standard methodology set out by the government.  | No change |
| Highlight the importance of   | Martin Grant Homes and Kearns Land (975683) | Disagree | Full and detailed justification is provided by evidence documents. It is not necessary to justify the Plan within the  | No change |

|   |   |          |  |           |
|---|---|----------|--|-----------|
| providing a housing development that is based upon proportionate and up-to- date evidence. The policy should also indicate where this evidence can be found.  |   |          | <p>Plan document itself. To do so would result unnecessarily in a longer and more complex document.</p> <p>There has been and will be ongoing joint working with neighbouring local authorities including the South West Herts Group. 2016 evidence is still highly relevant. Forthcoming draft SW Herts study will update 2016 evidence, but will not fundamentally alter the underlying evidence supporting the mix set out.</p> |           |
| Object to the proposed requirement for affordable housing size, type and mix to reflect that being provided for the market element of all development. Whatever the market, it is very unlikely that it will be so closely aligned to the social rented sector. | Martin Grant Homes and Kearns Land (975683) | Disagree | Evidential basis for specific mix is summarised in Appendix 6 and more detail supporting the Local Plan is available in full.  | No change |
| Flats should not be more than 2 storeys high in category 2 areas. That should form part of the policy   | Hill Residential (1158064)<br>1144419       | Disagree | Cross reference to policy L23 where height must be appropriate in the street scene and not negatively impact the existing urban characteristics.   | No change |

|   |         |          |   |           |
|---|---------|----------|---|-----------|
| Setting the housing density to 40 dwellings per hectare is likely to result in a highly urbanised environment. This contradicts the statement that "All new housing will be developed at a density that is consistent with achieving high quality, sustainable design that does not compromise the distinctive character of the area in which it is situated" | 1185704 | Disagree | <p>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.</p> <p>Policy L23 sets out the main design principles for new developments. This includes promoting sustainable and high quality designs.</p> | No change |
| The developments should not be considered urban extensions (as they are not) and density should be defined as a maximum of 30 dph in these areas. More Green Belt should be released if necessary to cover the shortfall.   | 1185704 | Disagree | <p>Site selection is firmly based on comprehensive GB work and the most appropriate locations have already been selected.</p> <p>40dph 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.</p>            | No change |

|   |                             |          |  |           |
|---|-----------------------------|----------|--|-----------|
| Generally support L1 draft  | Hill Residential (1158064)  | Noted    | Support noted  | No change |
| Disagree with the policy statement that higher density development will be encouraged in accessible urban locations with good access to services as it is inadequate in the context of new NPPF policies. The council should maximise opportunities for regeneration and reuse of previously developed land before removing land from the Green belt for brownfield sites and underutilised land. | CPRE Hertfordshire (872572) | Disagree | Development need, overall Plan context and site specific analysis in GB work provide exceptional circumstances for GB release. Evidence on development strategy / site selection is available in full. Cross reference with policy S2.   | No change |
| The policy should include a requirement for new sites and regeneration, redevelopment and change of use schemes to meet   | CPRE Hertfordshire (872572) | Disagree | <p>Cross reference with Policy L23 and S2. Policy L1 states new housing will be developed at a density that is consistent with achieving high quality, sustainable design that does not compromise the distinctive character of the area.</p> <p>Cross reference with S1 in respect of Settlement Hierarchy for new development, and L18 in respect of Transport Strategy.</p> | No change |

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| specified density standards, with suitable area for higher density development accessible by public transport shown on the policies map  |                             |          |  |           |
| The Policy should therefore include minimum density requirements in the Policy that reflect their location and character. In any Broad Locations that are retained in the Plan there should be a minimum housing density of 60 units per hectare in accordance with policy advice for newly planned large land areas, and 100 per hectare for apartments/flats in accessible urban locations near public transport interchanges. | CPRE Hertfordshire (872572) | Disagree | <p>40dph 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.</p> <p>Policy L1 states new housing will be developed at a density that is consistent with achieving high quality, sustainable design that does not compromise the distinctive character of the area. Policy S6 states which density is required for each BL.</p> | No change |

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| It is unclear which parts of the policy relate to Broad Locations and which relate to other development   | Jarvis Homes (973180)                  | Disagree | L1 states which criterion refers to all housing developments and broad locations. Cross reference to Policy S6 which sets out the criterion for each broad locations, along with Appendix 6.   | No change  |
| The policy encourages higher density development but does not state what density would be appropriate and where, this is required by paragraph 123 of the NPPF 2018 and should be included within the policy. | Jarvis Homes (973180)                  | Disagree | Policy L1 states new housing will be developed at a density that is consistent with achieving high quality, sustainable design that does not compromise the distinctive character of the area. Policy S6 states which density is required for each BL. | No change. |
| The strategic local plan needs to address the strong unsubsidised market in larger properties   | Aboyne Residents Association (1181214) |          | Evidential basis is summarised in Appendix 6 and more detail supporting the Local Plan is available in full  | No change  |
| Would like to see the plan encourage creative implementations of higher rise flat based accommodation in  | 1185971                                | Disagree | Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.<br><br>40dph is an appropriate minimum density to make best use of land and to avoid further pressure on loss of greenfield land/              | No change  |

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| order to minimise the consumption of green belt land.  |  |          | Green Belt. The NPPF supports optimisation of residential density.  |           |
| Disagree with the prioritisation of integrating the look and feel of buildings with any adjacent existing buildings over the consumption of the Green Belt | 1185971  | Disagree | Good design is a requirement set out by the NPPF Paragraph 127 and L23                                      | No change |
| Support the housing mix proposed   | 347648   | Noted    | Support noted   | No change |
| Local factors must be taken into account in tailoring an appropriate housing mix for each individual site (refers to Broad Locations)                      | Legal and General (1051022)<br>CEG (1158030)<br>Hallam Land Management Limited (1185998) | Noted    | Evidential basis is summarised in Appendix 6 and more detail supporting the Local Plan is available in full | No change |
| Agrees that the mix should be based on robust evidence and should be informed by the District-wide assessment of housing need                              | Legal and General (1051022)  | Noted    | Support noted   | No change |



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| Clarification is sought on whether the precise housing mix required should vary between the strategic housing allocations to reflect local patterns of demand           | Legal and General (1051022)<br><br>CEG (1158030)   | Noted    | Evidential basis is summarised in Appendix 6 and more detail supporting the Local Plan is available in full.   | No change |
| Support the strategy taken to extrapolate from the evidence taken from the Housing vision study which focused on the particular circumstances of the St Albans District | Trustees of James Henry Frank Sewell Deceased (1185630)  | Noted    | Support noted  | No change |
| Support L1  | Trustees of James Henry Frank Sewell Deceased (1185630)<br><br>Wheathampstead Parish Council (51941) | Noted    | Support noted  | No change |
| Policy wording is not clear and disturbing " <i>higher density development, including buildings</i> "   | St Stephen Parish Council (51804)  | Disagree | The NPPF prioritises achieving optimal housing densities and appropriate mix of sizes / types. This will apply to any urban development / expansion. This is a reasonable approach and other policies such as L23 and the specific context will determine what an appropriate height in individual circumstances is. | No change |

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| <i>of greater height than existing, will be encouraged.'</i>  |                                     |          |   |           |
| Encouraging buildings of greater height than existing will significantly impact the local character of areas such as Chiswell Green and Park Street Garden Village, falling outside the acceptable standard | St Stephen Parish Council (51804)   | Disagree | Refer to policy S1 which indicates that higher density and height will be encouraged, particularly in most accessible parts of urban settlements. No reason in principle that higher is not 'acceptable', depending on context. | No change |
| Support the proposal to build small/medium family homes to allow both trading up and down freeing up properties for more suitable occupation  | Colney Heath Parish Council (51891) | Noted    | Support noted   | No change |
| Renewable energy targets for developments should be increased and enforced ,with more specific aims   | Colney Heath Parish Council (51891) | Agree    | Cross reference to Policy L25 which sets out the energy standards for new developments. Larger Broad locations will be expected to deliver renewable/ low- carbon energy supply.  | No change |

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| for creating carbon neutral areas  |                                     |          |  |           |
| The plan should encourage energy efficient buildings and the incorporation of energy efficient solutions such as solar and wind power at an early planning stage and working with the BRE as appropriate | Colney Heath Parish Council (51891) | Noted    | <p>Cross reference to Policy L25 which sets out the energy standards for new developments.</p> <p>This matter can be properly detailed through the masterplanning/ planning application/ EIA process, with appropriate consultation.</p> | No change |
| Policy L1 is too vague and contains no strategy (with the exception of a requirement for housing in the broad locations to achieve a minimum net average density of 40dph)                               | Aurora Properties Limited (1151817) | Disagree | L1 directly addresses requirements.  | No change |

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| Concerned with the statement<br>“developed at a density that is consistent with achieving high quality sustainable design” and its future impact on local character for areas  | St Albans Civic Society (1156974)     | Noted    | <p>The NPPF prioritises achieving optimal housing densities and appropriate mix of sizes / types.</p> <p>Cross reference with Policy L23 and S2. Policy L1 states new housing will be developed at a density that is consistent with achieving high quality, sustainable design that does not compromise the distinctive character of the area.</p> | No change |
| Suggest further consideration for downsizing, mix of dwelling, first time purchasers, or those of lower means  | Wheathampstead Parish Council (51941) | Disagree | <p>L1 already sets out support for opportunities for downsizers. Cross reference to policy L3/4 which provide guidance on our approach taken to provide affordable housing.</p> <p>Appendix 6 also provides more information on housing mix with regards to affordable and subsidised home ownership.</p>   | No change |
| The key to a thriving local housing market is to build small / medium family homes. Building this type of property will enable people who currently live in flats to trade up to the next stage of family accommodation, freeing up smaller properties for | London Colney Parish Council (52477)  | Noted    | Small / medium sized family homes is a key focus of the policy.   | No change |

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| several of the other groups on the list.   |                                   |                    |  |           |
| The policy could provide clearer guidance about the approach to housing mix and type to demonstrate flexibility. For example, will the housing mix policy be applied uniformly or will this be flexible reflecting the location of a proposal? | Watford Borough Council (1122500) | Disagree           | Evidential basis is summarised in Appendix 6 and more detail supporting the Local Plan is available in full. L1 sets out taking into account evidence of local need, existing pattern of development in the area and site-specific factors.  | No change |
| The policy is unclear as it does not provide specific guidance on the mix of housing to be provided in developments  | Anderson Group (1146719)          | Noted/<br>Disagree | <p>Evidential basis is summarised in Appendix 6 and more detail supporting the Local Plan is available in full. L1 sets out taking into account evidence of local need, existing pattern of development in the area and site-specific factors.</p> <p>The fine details of this matter can be properly detailed through the Masterplanning/ planning application/ EIA process, with appropriate consultation.</p> | No change |

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| Just under 30% of all housing identified within the plan is to be an urban extension of Hemel Hempstead, limiting the choice for St Albans residents to find housing in the district. | Anderson Group (1146719)   | Disagree | Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.<br><br>Cross reference with S6 i), ii) and iii)   | No change |
| Concerns that the policy could be used to refuse developments on an ad hoc basis without reference to evidence of housing need  | Gladman Developments Ltd (1187201)   | Disagree | Evidential basis is summarised in Appendix 6 and more detail supporting the Local Plan is available in full.<br><br>Cross reference to Policies S6, L3 and L23 which provide guidance on the requirements for new developments. | No change |
| The policy provides a significant degree of uncertainty in terms of how it is applied in the decision making  | Gladman Developments Ltd (1187201)<br><br>Home Builders Federation Ltd (1156936) | Disagree | Cross reference to Policies S6, L3 and L23 which provide guidance on the requirements for new developments.   | No change |
| The policy should be amended to refer to the latest SHMA to ensure consistent and responsive decision making  | Gladman Developments Ltd (1187201)   | Noted    | Evidential basis is summarised in Appendix 6 and more detail supporting the Local Plan is available in full. L1 is clear in setting requirements.   | No change |

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| with a fair degree of predictability   |  |          |   |           |
| Support L1's aim of achieving a mix of housing types in new developments which reflects evidence of local need   | Crown Estate (51946)<br>Adrian Irving and Alban Developments Ltd (1156368) | Noted    | Support noted   | No change |
| Contesting the evidential basis for the policy objective of having the same mix of dwelling sizes for all tenures  | Crown Estate (51946)   | Disagree | Evidential basis is summarised in Appendix 6 and more detail supporting the Local Plan is available in full.  | No change |
| Figures in Appendix 6 are based on the SADC 2013 SHMA which is both out of date and assumed that St Albans is a self-contained Housing Market Area. This is due to be superseded by a new joint South West Herts SHMA in late 2018 | Crown Estate (51946)   | Disagree | There has been and will be ongoing joint working with neighbouring local authorities including the South West Herts Group. 2016 evidence is still highly relevant. Forthcoming draft SW Herts study will update 2016 evidence, but will not fundamentally alter the underlying evidence supporting the mix set out. | No change |

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| The policy should not include the 5 <sup>th</sup> paragraph which refers to a single housing mix for all tenures. Additionally, Appendix 6 should reflect the tenure specific mix contained in the Savills Report (attached by TCE) | Crown Estate (51946)   | Disagree | There has been and will be ongoing joint working with neighbouring local authorities including the South West Herts Group. 2016 evidence is still highly relevant. Forthcoming draft SW Herts study will update 2016 evidence, but will not fundamentally alter the underlying evidence supporting the mix set out. | No change |
| Welcome the flexibility element of the policy   | Adrian Irving and Alban Developments Ltd (1156368)<br><br>Gladman Developments Ltd (1187201)<br><br>Home Builders Federation Ltd (1156936)<br><br>Crest Strategic Projects and Bloor Homes (1158079) | Noted    | Support noted   | No change |
| Policy L1 is too vague  | Aurora Properties Limited (1151817)<br><br>1144419   | Disagree | Policy L1 sets out a clear approach. Detailed matters can be properly detailed through the Masterplanning/ planning application/ EIA process, with appropriate consultation.  | No change |
| The policy and Appendix 6 should refer to 2016 SHMA forms the   | Adrian Irving and Alban Developments Ltd (1156368)   | Disagree | Appendix 6 refers to the existing SHMA evidence, both SADC and SWH.   | No change |



|  |   |          |   |           |
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| most recent evidence on housing mix  | Crest Strategic Projects and Bloor Homes (1158079)  |          |   |           |
| The policy must provide an indication on the general property size mix they are seeking to achieve (based on number of bedrooms) and how this will be assessed. This general mix should inform, not dictate, the type of development that is delivered | Home Builders Federation Ltd (1156936)<br><br>Dacorum Borough Council (1186054)<br><br>Hallam Land Management Limited (1185998) | Noted    | This is set out in Appendix 6.  | No change |
| Supports paragraph 6 which encourages the provision of higher density development in accessible urban locations with good access to services as it can encourage the use of sustainable modes of transport   | Hertfordshire County Council (837689)   | Noted    | Support noted   | No change |
| In addition, the formatting and  | CEG (1158030)   | Disagree | Full and detailed justification is provided by evidence documents. It is not necessary to justify the Plan within the | No change |

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| wording should be amended to distinguish between the formal policy and the reasoned justification for the policy.  |  |       | Plan document itself. To do so would result unnecessarily in a longer and more complex document. |           |
| Support the objective of policy L1 as it proposes all new housing developments to contribute to a mix of different housing types                           | Crest Strategic Projects and Bloor Homes (1158079) | Noted | Support noted  | No change |
| Welcome the aspect of encouraging the provision of first time buyers (1-2 bed) flats, first family homes (2-3 bed houses) and opportunities for downsizers | Crest Strategic Projects and Bloor Homes (1158079) | Noted | Support noted  | No change |
| The evidence of housing mix could be different at the end of the plan period compared to that which exists from 2015 and                                   | Hallam Land Management Limited (1185998)           | Note  | Explicitly acknowledged in Appendix 6.   | No change |

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| underpins the policy. The policy must allow for consideration of changes in circumstances   |  |          |  |           |
| Concerns that no account will have been taken of changes to the stock profile on account of houses built between 2011 and 2020  | Hallam Land Management Limited (1185998) | Disagree | Full and detailed justification is provided by evidence documents. It is not necessary to justify the Plan within the Plan document itself. To do so would result unnecessarily in a longer and more complex document. | No change |
| Each planning permission granted on Broad Location sites will need to incorporate measures that allows a flexible approach to determining what is the appropriate housing mix at different points in that build programme | Hallam Land Management Limited (1185998) | Noted    | L1 and Appendix 6 are clear as to what is required. Detailed matters can be properly detailed through the Masterplanning / planning application/ EIA process, with appropriate consultation.                           | No change |
| The density of any individual proposal must reflect the principles of achieving high  | Hallam Land Management Limited (1185998) | Agree    | This is an appropriate approach to minimum density to make best use of land and to avoid further pressure on loss of greenfield land/ Green Belt. Policy L23 sets out the main   | No change |

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| quality development, sustainable design and respect an area's character |  |  | design principles for new developments. This includes promoting sustainable and high quality designs. |  |
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## **L2 – Provision of Older Persons Housing and Special Needs Housing**

| <b>Representation Point</b>   | <b>Representor Raising Point</b>  | <b>Outline Reply</b> | <b>Recommended Reply (including notes and references)</b>                               | <b>Suggested Actions (including any Changes to Plan)</b> |
|---|---|----------------------|---|--|
| There is a lack of evidence to justify the requirements set for bedspaces within the older persons and special needs housing sector | Martin Grant Homes and Kearns Land Limited (975683)<br><br>Hallam Land Management Limited (1185998) | Disagree             | Evidence available in full, including in HCC documents and representations.             | No change  |
| Uncertain where the remainder of the bedspace accommodation for older people is expected to be located                              | Martin Grant Homes and Kearns Land Limited (975683)   | Noted                | Policy S6, L2 and L8 addresses this matter.   | No change  |
| There is no definition of 'flexi-care' besides it being within class C3   | Retirement Housing Group (1185738)  | Noted                | This is included in evidence documents, including in HCC documents and representations. | No change  |

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|---|--|----------|---|--|
| Flexi-care should not be classified as C3. Certain forms of specialist housing for older people such as Extra Care/ Assisted Living may by virtue of care provided fall within Class C2 | Retirement Housing Group (1185738)<br><br>McCarthy & Stone Retirement Lifestyles Ltd (1186072) | Disagree | Policy L2, L3, L4 and S6 sets out an appropriate approach, including provision of C2.                                   | No change  |
| There is a confusion within the definition of flexi-care as policy S4 denotes that flexi-care homes and similar use class C2 can fall under one category                                | Retirement Housing Group (1185738)   | Agree    | Flexi Care homes fall under use class C3, therefore, this will be amended in policy S4 (typo)                           | Minor modification<br><br>Swap 'C2' and 'C3' in paragraph 2 of policy S4 |
| Target for the delivery of specialist accommodation for older people should be recalculated using the Housing for Later Life multiplier   | Retirement Housing Group (1185738)   | Disagree | Evidence available in full, including in HCC documents and representations. Policy L2 sets out an appropriate approach. | No change  |

|  |  |          |  |           |
|--|--|----------|--|-----------|
| Council has not considered the economic viability of development to inform the targets set out within the Local Plan   | McCarthy & Stone Retirement Lifestyles Ltd (1186072) | Disagree | Evidence available in full, including in HCC documents and representations. Policy L2 sets out an appropriate approach. Updated evidence regarding economic viability of development has been made available on the council website. | No change |
| The policy is based on outdated evidence (Three Dragon's viability research). Contravenes criteria in NPPF.  | McCarthy & Stone Retirement Lifestyles Ltd (1186072) | Disagree | Updated evidence regarding economic viability of development has been made available on the council website.   | No change |
| Needs to be a better distinction between C2 and C3 Extra Care accommodation to allow each scheme to be considered on its own circumstances. Alternatively, the policy commentary or guidance must provide sufficient flexibility to all for consideration of the specific circumstances for each scheme. | McCarthy & Stone Retirement Lifestyles Ltd (1186072) | Disagree | Policy L2 and L3 sets out a clear approach. Each scheme will be considered on its own merits.  | No change |

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| Should be a presumption in favour of sustainable housing, in particular specialist housing which is being proposed on suitable sites  | McCarthy & Stone Retirement Lifestyles Ltd (1186072)    | Agree    | Refer to policy L23 and L25 which sets out energy, environmental performance, design and layout standards for new developments. This will also be applicable for specialist housing on sites. | No change |
| The plan currently relies on its strategic developments to deliver a proportion of care or flexi-care accommodation   | Stackbourne Limited (1153646)                           | Noted    | Policy S6, L2 and L3 sets out a clear approach.   | No change |
| A risk of older persons and special needs housing being made an after-thought as the economic benefits attached to them are much lower. 'Smallford Works' site put forward to meet this need. | Stackbourne Limited (1153646)                           | Disagree | Policy S6, L2, L3 and L8 set out a clear approach for older persons and special needs housing. The requirements are expected to be met by developers.   | No change |
| Supports policy   | Trustees of James Henry Frank Sewell Deceased (1185630) | Noted    | Support noted   | No change |

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|  | Harpenden Town Council (51870)<br>St Albans Civic Society (1156974)<br>Gladman Developments Ltd (1187201)<br>Crest Strategic Projects and Bloor Homes (1158079) |          |   |           |
| C2, C3 and special needs housing numbers are too generic                                     | Aurora Properties Limited (1151817)   | Disagree | Policy L2 sets out a clear approach. Evidence available in full, including in HCC documents and representations.                                  | No change |
| A lack of strategy for how L2 housing provision will be achieved with regards to allocations | Aurora Properties Limited (1151817)<br>Castleoak Care Communities (1187716)   | Disagree | Policy S6, L2 and L8 set out a clear approach for older persons and special needs housing. The requirements are expected to be met by developers. | No change |
| No evidence to support or explain the approach to the provision of care accommodation        | Signature Senior Lifestyle (1186910)  | Disagree | Policy L2 sets out a clear approach. Evidence available in full, including in HCC documents and representations.                                  | No change |
| Provided detailed information relating to bedspace numbers                                   | Hertfordshire Country Council (837689)  | Noted    | SADC acknowledges the information provided  | No change |



|   |  |          |   |           |
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| Local Plan should include a criteria which enables exemptions to be made to the provision of affordable home ownership where specialist accommodation is secured. | Crest Strategic Projects and Bloor Homes (1158079) | Disagree | Policy L2 and L3 sets out an appropriate approach.  | No change |
| C2 component of the policy should be additional to the Plan's housing requirement   | Hallam Land Management Limited (1185998)           | Disagree | The plan sets out an appropriate approach. This has been reinforced by the government's approach in the updated NPPF and PPG. | No change |
| Plan should clarify that the affordable housing provision required for older persons accommodation is part of the 40% requirement and not in addition             | Hallam Land Management Limited (1185998)           | Disagree | L2 and L3 sets out a clear approach.  | No change |
| Supports the inclusion of a minimum requirement for C2 care accommodation   | Castleoak Care Communities (1187716)               | Noted    | Support noted   | No change |

|   |                                       |          |   |           |
|---|---------------------------------------|----------|---|-----------|
| Concerned with the approach taken in ensuring that sufficient specialist housing and accommodation for older persons can be delivered | Castleoak Care Communities (1187716)  | Disagree | Policy S6, L2, L3 and L8 set out a clear approach for older persons and special needs housing. The requirements are expected to be met by developers.   | No change |
| The minimum bedspace requirements for both C2 and C3 is inadequate as it doesn't reflect the 2016 SHMA requirements                   | Castleoak Care Communities (1187716)  | Disagree | Policy S6, L2 and L8 set out a clear approach for older persons and special needs housing. Evidence available in full, including in HCC documents and representations.  | No change |
| Emphasis on mental / physical capacity important to aims of being a dementia friendly community                                       | Wheathampstead Parish Council (51941) | Noted    | Policy S6, L2 and L8 set out a clear approach for older persons and special needs housing. Refer to policy L23 and L25 which sets out design and layout standards for new developments. This will also be applicable for specialist housing on sites. | No change |

### **L3 – Provision of and Financial Contributions towards Affordable Housing**

| <b>Representation Point</b>   | <b>Representor Raising Point</b> | <b>Outline Reply</b> | <b>Recommended Reply (including notes and references)</b>                       | <b>Suggested Changes (including any Changes to Plan)</b> |
|---|----------------------------------|----------------------|---|--|
| There is already existing privately owned housing which is partially occupied and can be used to meet | 1182314                          | Disagree             | The LPA does not have control over how private housing is bought/sold/occupied. | No change  |

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| affordable housing targets for local people  |   |          |  |           |
| The policy fails to provide significant short-term improvements in affordable housing  | 1184399                                     | Disagree | Policy L3 sets out an appropriate approach. There are sufficient deliverable sites for years 1-5. This is confirmed in relevant developer representations.   | No change |
| Social housing numbers are too low   | St Albans Labour Party (1183933)<br>1184399 | Disagree | Evidential basis for specific mix is summarised in Appendix 6 and more detail supporting the Local Plan is available in full.<br><br>It is not necessary to justify the Plan within the Plan document itself. To do so would result unnecessarily in a longer and more complex document. | No change |
| The Council must make a use of the lifting of the borrowing cap to ensure enough social housing would be built   | 1184399                                     | Noted    | Not within planning remit  | No change |
| Development not consistent with national policy as only 36% of houses will be 1-2 bedroom in an area which has a high proportion of 3-4 bedroom houses | 1034653                                     | Disagree | Evidential basis for specific mix is summarised in Appendix 6 and more detail supporting the Local Plan is available in full.  | No change |

|  |                                  |          |   |           |
|--|----------------------------------|----------|---|-----------|
| Term 'affordable housing' a misused term for 'subsidised housing'  | 867068                           | Disagree | The terminology used reflects NPPF wording and is consistent with national policy.  | No change |
| Plan should concentrate on smaller affordable dwellings to buy   | 867068                           | Disagree | Housing Mix is set out in Policy L1 and Appendix 6. Evidential basis for specific mix is summarised in Appendix 6 and more detail supporting the Local Plan is available in full. | No change |
| Percentage of Affordable Housing type 3) (Subsidised Home ownership types) should be raised from 40% to preferably more than 50% | 867068                           | Disagree | Cross reference Appendix 6 which sets out justification for the requirement.  | No change |
| Concerns over loss of affordable housing from the 40% target due to properties being set above the market rent                   | 867587                           | Disagree | Policy L3 sets out an appropriate approach. Affordable housing can be secured through Planning Obligations at application stage.  | No change |
| Mix of affordable housing types does not reflect the evidence base and must be adjusted to do so                                 | St Albans Labour Party (1183933) | Disagree | Evidential basis for specific mix is summarised in Appendix 6 and more detail supporting the Local Plan is available in full.   | No change |

|  |   |          |  |           |
|--|---|----------|--|-----------|
| Minimum target should be raised to 75% affordable homes on sites of 10 dwellings or more to reflect the demands  | St Albans Labour Party (1183933)            | Disagree | This mix not appropriate due to viability, deliverability and community balance / cohesion   | No change |
| 80% social and affordable housing is far too high  | 1184750                                     | Disagree | The plans does not seek 80% affordable rent in BLs. Policy S6 and L3 sets out a clear approach.  | No change |
| Policy should be reworded to make clear affordable housing should be secured via an affordable housing scheme to be agreed with the Council, as part of a reserved matters or full application | Martin Grant Homes and Kearns Land (975683) | Disagree | Policy L3 sets out a clear approach. This matter can be properly detailed through the Masterplanning / planning application process.   | No change |
| Lack of evidence to justify 40% affordable housing requirement   | Martin Grant Homes and Kearns Land (975683) | Disagree | Evidential basis for specific mix is summarised in Appendix 6 and more detail supporting the Local Plan is available in full.<br><br>It is not necessary to justify the Plan within the Plan document itself. To do so would result unnecessarily in a longer and more complex document. | No change |
| The 40% minimum requirement should be secured from major schemes   | Martin Grant Homes and Kearns Land -975683  | Noted    | Required by Policy L3.   | No change |

|   |   |          |   |           |
|---|---|----------|---|-----------|
| The term 'socially desirable geographic spread' is too ambiguous for applicants and decision makers   | Martin Grant Homes and Kearns Land (975683)<br>Jarvis Homes (973180)  | Disagree | Refers to schemes of 100 dwellings or more. Will be agreed with the identified provider as part of Masterplanning / planning application / obligation stages. | No change |
| Concerns over shared ownership schemes and the risk of increasing maintenance charges and rent for owners. Highlight the need for the council to address this and find ways to manage/prevent this. | 1144419   | Disagree | Not within planning remit   | No change |
| Support 40% requirement for affordable housing  | Hill Residential (1158064)<br>Trustees of James Henry Frank Sewell Deceased (1185630)<br>Colney Heath Parish Council (51891)<br>St Albans Civic Society (1156974)<br>Settle (1187516) | Noted    | Support noted   | No change |

|  |  |          |  |           |
|--|--|----------|--|-----------|
|  | Crest Strategic Projects<br>and Bloor Homes<br>(1158079)<br><br>347648   |          |  |           |
| There is a need for<br>an up to date<br>whole plan viability<br>assessment   | Hill Residential<br>(1158064)<br><br>M Scott Properties<br>(1185993)<br><br>Home Builders<br>Federation Ltd<br>(1156936) | Noted    | Updated evidence regarding economic viability of<br>development has been made available on the council<br>website. | No change |
| Policy is not clear<br>about when<br>affordable housing<br>will be sought and<br>what the relevant<br>thresholds are     | Jarvis Homes (973180)  | Disagree | Policy L3 sets out a clear approach.   | No change |
| The approach to<br>vacant buildings<br>credit is not in line<br>with NPPF  | Jarvis Homes (973180)  | Disagree | Policy L3 sets out a clear approach. Para 63 of the NPPF is<br>defined in footnote.                                | No change |
| More information<br>should be provided<br>on how the<br>affordable housing<br>sum may vary or<br>should be<br>calculated | Jarvis Homes (973180)  | Disagree | Policy L3 sets out a clear approach  | No change |

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| Suggested mix of affordable housing type is not conducive to addressing the fundamental affordability problems within the district.                                    | CEG (1158030)<br>1185775  | Disagree | Evidential basis for specific mix is summarised in Appendix 6 and more detail supporting the Local Plan is available in full.   | No change |
| A significantly higher proportion of properties should be social rented than 30%   | 1185775   | Disagree | Policy L3 sets out appropriate affordable housing requirements. Evidential basis for specific mix is summarised in Appendix 6 and more detail supporting the Local Plan is available in full.       | No change |
| The policies relating to Older Persons Housing should also include promotion of housing suitable for downsizing, which may well be able to be provided at market value | 1185775   | Noted    | Policy L1 which supports opportunities for downsizing.  | No change |
| Uncertain how the affordable housing will be distributed across individual sites in Broad Locations  | Colney Heath Parish Council (51891)<br>London Colney Parish Council (52477)<br>347648 | Noted    | All Broad Locations must meet a minimum of 40% affordable housing. The distribution will be agreed through the process of Masterplanning with local communities, landowners and other stakeholders. | No change |
| The minimum 40% affordable housing   | Colney Heath Parish Council (51891)   | Noted    | All Broad Locations must meet a minimum of 40% affordable housing. The distribution will be agreed through  | No change |



|  |  |          |  |           |
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| contribution should be evenly distributed throughout individual sites and Broad Locations  | 347648   |          | the process of Masterplanning with local communities, landowners and other stakeholders.   |           |
| Developers must deliver the affordable housing proportion and not be able to avoid this responsibility   | Colney Heath Parish Council (51891)<br>347648  | Agree    | All requirements set out in the Broad Location policies, including a minimum 40% affordable housing, have been agreed as deliverable by the landowners/developers. | No change |
| Must be a range of unit types and sizes similar to private tenure for social and affordable rented housing   | London Colney Parish Council (52477)<br><br>Colney Heath Parish Council (51891)<br>347648  | Noted    | Policy L3 sets out a clear approach  | No change |
| Generally support policy   | Legal and General (1051022)  | Noted    | Support noted  | No change |
| Inconsistency between Local Plan and NPPF. There is no requirement for financial contributions for schemes of 9 or fewer homes. This should be removed or corrected. | Legal and General (1051022)<br><br>Trustees of James Henry Frank Sewell Deceased- (1185630)<br><br>RF Sinclair and Sons (1058251)<br><br>Aurora Properties Limited (1151817) | Disagree | Policy L3 sets out appropriate approach based on local evidence  | No change |

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|   | Gladman Developments Ltd (1187201)<br><br>Home Builders Federation Ltd (1156936)<br><br>52064 |          |  |           |
| Complex policy wording used relating to default mechanism   | Legal and General (1051022)   | Disagree | Policy L3 sets out a clear approach  | No change |
| Council's full evidence base relating to viability should be published prior to the submission of the emerging plan | Legal and General (1051022)   | Noted    | Updated evidence regarding economic viability of development has been made available on the council website.                               | No change |
| Support affordable housing split of 60% to 40%  | Trustees of James Henry Frank Sewell Deceased (1185630)                                       | Noted    | Support noted  | No change |
| Would like to know percentage cost for schemes with 9 or fewer homes  | St Stephen Parish Council (51804)   | Noted    | Policy L3 provides details on the overall affordable housing percentage requirements. 'Cost' will depend on individual site circumstances. | No change |
| Affordable homes should be 20% below market rents   | Aurora Properties Limited (1151817)   | Noted    | Required by Policy L3 for affordable rent  | No change |
| Discounted market sales should be   | Aurora Properties Limited (1151817)   | Disagree | Policy L3 sets out appropriate affordable housing requirements responding to government definitions in NPPF                                | No change |

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| 20% below local market value  |  |          |   |           |
| Insufficient specific provision for Starter Homes which have the greatest demand in SADC          | Aurora Properties Limited (1151817)<br><br>Gladman Developments Ltd (1187201)  | Disagree | Starter homes supported by Policy L3  | No change |
| Policy wording is not clear on the approach to be taken on sites for between 10-50 dwellings      | M Scott Properties (1185993)   | Disagree | Refer to policy L3 'Affordable Housing Provisions' and 'financial contributions' section.   | No change |
| Absence of a detailed viability study for each Broad Location                                     | M Scott Properties (1185993)   | Noted    | Updated evidence regarding economic viability of development has been made available on the council website. Further evidence may be made available in due course. Viability/deliverability have been agreed for all Broad Locations by the landowners/developers | No change |
| No evidence to justify or explain 40% requirement for care accommodation. Should not refer to C2. | Signature Senior Lifestyle (1186910)<br><br>CastleOak Care Communities (1187716)<br><br>McCarthy & Stone Retirement Lifestyles Ltd (1186072) | Disagree | The NPPF para 62 states that where a need for affordable housing is identified planning policies should specify the level and type required. Evidence available in full, including in HCC documents and representations.  | No change |
| Affordable housing contributions should be increased  | London Colney Parish Council (52477)   | Disagree | Evidential basis for specific mix is summarised in Appendix 6 and more detail supporting the Local Plan is available in full.   | No change |

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|  |   |          | This mix not appropriate due to viability, deliverability and community balance / cohesion.                                   |           |
| A 75% affordable and 25% market split has no reasonable prospect of being delivered                                  | London Colney Parish Council (52477)  | Agree    | 75% 25% split not proposed in Policy  | No change |
| The policy should be worded as an aspiration to meet local needs in full   | London Colney Parish Council (52477)  | Disagree | Evidential basis for specific mix is summarised in Appendix 6 and more detail supporting the Local Plan is available in full. | No change |
| No justification for requiring schemes at fewer than 10 (net) to make a financial contribution to off-site provision | Mr Dean Ivory (52552)<br>Shonleigh Nominees (978420)<br>Trustees GA Simons Family Trust (1187408)<br>Kenneth Ivory (978427)<br>Mr Richard Blair (977889)<br>Mr Antonio Barba (1187384)<br>D'Arblay Investments (1187404)<br>Watford Borough Council (1122500) | Disagree | Policy L3 sets out appropriate approach based on local evidence   | No change |

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| No justification that the landowner should receive nothing for land for affordable housing  | Mr Dean Ivory (52552)<br>Shonleigh Nominees (978420)<br>Kenneth Ivory (978427)<br><br>Mr Richard Blair (977889)<br><br>Mr Antonio Barba (1187384)<br><br>D'Arblay Investments (1187404) | Disagree | Affordable housing will be sought by way of Planning Obligation. Landowners can receive receipts for affordable housing by means of those obligations. | No change |
| The requirement that a building has not been in economical beneficial use for at least 3 years, and has been marketed for the same, period is not justified | Kenneth Ivory (978427)<br>Mr Richard Blair (977889)<br>Mr Antonio Barba (1187384)<br>D'Arblay Investments (1187404)<br>Mr Dean Ivory (52552)<br>Shonleigh Nominees (978420)             | Disagree | Policy L3 sets out a clear approach and is justified in the context of the District and the LP approach overall.                                       | No change |
| Review process would need to consider not only return values but costs as well  | Mr Dean Ivory (52552)<br>Shonleigh Nominees (978420)<br>Mr Richard Blair (977889)   | Noted    | Review process will take both values and costs into account.   | No change |

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|  | Mr Antonio Barba<br>(1187384)<br><br>D'Arblay Investments<br>(1187404) |          |  |           |
| The provision of affordable housing is considered to be inadequate, as recent experience in the District has been that developers fail to deliver the agreed percentage of affordable housing often citing viability as a reason | Sandridge Parish Council (869186)                                      | Disagree | Policy L3 provides an overall set of requirements. Policy S6 sets out a minimum requirement for affordable housing and other policy requirements in Broad Locations. Viability/deliverability have been agreed for all Broad Locations by the landowners/developers  | No change |
| Concerns that future development would be on Green Belt sites in preference to Brownfield and that developers would not provide the targeted percentage of affordable housing  | Sandridge Parish Council (869186)                                      | Disagree | Cross refer development strategy in S1 and S2. Policy L3 provides an overall set of requirements. Policy S6 sets out a minimum requirement for affordable housing and other policy requirements in Broad Locations. Viability/deliverability have been agreed for all Broad Locations by the landowners/developers | No change |
| No evidence base to demonstrate whether the policy   | Anderson Group (1146719)   | Noted    | Updated evidence regarding economic viability of development has been made available on the council website. Further evidence may be made available in due course.   | No change |

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| position has been tested for viability   |  |          |  |           |
| Viability matters must be tested through the plan preparation and not negotiated on a site by site level (other than exceptional circumstances)  | Anderson Group (1146719)   | Noted    | Updated evidence regarding economic viability of development has been made available on the council website. Further evidence may be made available in due course. | No change |
| Support updated definition of Affordable Housing which recognises Starter Homes and Discounted Market Sales homes as types of affordable housing | Gladman Developments Ltd (1187201)   | Noted    | Support Noted  | No change |
| Concerns over the potential limitations imposed on site promoters as affordable housing is restricted to a given type (social rent)              | Mr Marcello Cannatella (1187377)<br>Mr Dean Ivory (52552)<br>Shonleigh Nominees (978420)<br>Kenneth Ivory (978427) | Disagree | Policy L3 and Appendix 6 sets out a clear approach.  | No change |
| Concerns over the homogenous housing mix   | Crown Estate (51946)   | Disagree | Evidential basis for specific mix is summarised in Appendix 6 and more detail supporting the Local Plan is available in full.                                      | No change |

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| proposed for all tenures                                      |   |          |   |           |
| Need for two separate mixes for affordable and market housing | Crown Estate (51946)  | Disagree | Evidential basis for specific mix is summarised in Appendix 6 and more detail supporting the Local Plan is available in full. | No change |
| Remove the default mechanism for non-provision                | Home Builders Federation Ltd (1156936)  | Disagree | L3 sets out a clear approach given likely varying conditions and context over the Plan period.                                | No change |
| The percentage requirement of 40% is excessive                | Mr Dean Ivory (52552)<br>Kenneth Ivory (978427)<br>Shonleigh Nominees (978420)<br>Aurora Properties Limited (1151817)<br>D'Arblay Investments (1187404)<br>Mr Richard Blair (977889)<br>Mr Antonio Barba (1187384)<br>Trustees GA Simons Family Trust (1187408) | Disagree | Evidential basis for specific mix is summarised in Appendix 6 and more detail supporting the Local Plan is available in full. | No change |
| Support the range of affordable housing options               | Settle (1187516)  | Noted    | Support noted   | No change |



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| Note the acknowledged need for specialist accommodation within the broader onward supply of affordable homes   | Settle (1187516)                                   | Note     | Support noted   | No change                |
| Encourage a clearer definition to the terms included in describing 'Social Rent' levels                        | Settle (1187516)                                   | Disagree | The terminology used reflects NPPF wording and is consistent with national policy.  | No change                |
| Affordable housing mix should be based on robust evidence and up-to-date evidence                              | CEG (1158030)                                      | Noted    | Evidential basis for specific mix is summarised in Appendix 6 and more detail supporting the Local Plan is available in full. | Publish updated evidence |
| Identifying land for affordable housing in planning permissions and obligations is not an appropriate practice | Crest Strategic Projects and Bloor Homes (1158079) | Disagree | Policy L3 sets out an appropriate approach  | No change                |
| Policy should reflect normal market practices and avoid an onerous situation that may impede delivery.         | Crest Strategic Projects and Bloor Homes (1158079) | Disagree | Policy L3 sets out an appropriate approach that will not impede delivery  | No change                |

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| Allow alternatives to provision, in kind, on site.  | Crest Strategic Projects and Bloor Homes (1158079)  | Disagree | Policy L3 sets out a clear approach   | No change |
| Specific policy wording suggested in relation to default provision in case of non-provision.  | Crest Strategic Projects and Bloor Homes (1158079)  | Disagree | Policy L3 sets out a clear approach. Will be agreed with the identified provider as part of Masterplanning / planning application / obligation stage. | No change |
| Policy fails to provide a degree of flexibility with regards to the methods of securing affordable housing provision in respective planning obligations | Hallam Land Management Limited (11859998)   | Disagree | Policy L3 sets out a clear approach   | No change |
| Policy percentage for affordable housing is too high  | Mr Dean Ivory (52552)<br>Kenneth Ivory (978427)<br>Shonleigh Nominees (978420)<br>D'Arblay Investments (1187404)<br>1184750 | Disagree | Evidential basis for specific mix is summarised in Appendix 6 and more detail supporting the Local Plan is available in full.                         | No change |

#### L4- Affordable housing development in the Green Belt (rural exceptions sites)

| Representation Point   | Representor Raising Point                   | Outline Reply | Recommended Reply (including notes and references)   | Suggested Actions (including any Changes to Plan) |
|--|---|---------------|--|---|
| If a site is already designated in a made Neighbourhood Plan, it would already not be subject to the policies in this Plan.  | RF Sinclair and Sons (1058251)<br><br>52064 | Disagree      | Proposals, even on allocated sites in a Neighbourhood Plan, will still need to comply with policies in the Local Plan.   | No change   |
| The policy seeks only to allow for social rented housing on exception sites rather than <i>“one or more types of affordable housing”</i> as set out in paragraph 71 of the NPPF. Therefore L4 is not considered to be consistent with national policy. | 973180                                      | Disagree      | NPPF paragraph 71 refers to “one or more” types of affordable housing. Therefore one type – social rented housing, is in accordance with the NPPF.                                   | No change   |
| This policy is likely to reduce the number of affordable houses  | Hunston Planning Limited (1185622)          | Disagree      | This is an additional route for housing development, subject to the details set out in the policy. Other routes in the LP or through national policy in the NPPF are also available. | No change   |

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| delivered in the Green Belt rather than increase it  | Trustees of James Henry Frank Sewell Deceased (1185630)<br><br>Shonleigh Nominees (978420) |          |  |           |
| Does not seek to meet the area's objectively assessed needs as it excludes the provision of some forms of affordable housing                                 | Hunston Planning Limited (1185622)   | Disagree | <p>Overall, 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> <p>This is an additional route for development to meet some localised needs, subject to the details of the policy.</p> | No change |
| Criterion (iii) may unintentionally make 'limited affordable housing' inappropriate in the District, rather than appropriate development allowed by the NPPF | Hunston Planning Limited (1185622)   | Disagree | NPPF allows for the principle of limited affordable housing, subject to Local Plan policies – which this is detailing.   | No change |
| The policy seeks to set a maximum number of affordable homes per site at just two-thirds of the amount the Council   | Hunston Planning Limited (1185622)   | Noted    | The planning application was determined under the currently adopted Local Plan (1994), and full justification can be found in the officer's report. Policy L4 defines 'limited' as required by paragraph 145 of the NPPF 2018.   | No change |

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| recently approved for itself in the Green Belt  |  |          |  |           |
| The NPPF states that <i>“limited affordable housing for local community needs under policies set out in the development plan”</i> is considered appropriate development in the Green Belt and as such does not have to demonstrate <i>“very special circumstances”</i> . This should not be used to justify development where it would not otherwise meet the test of <i>“very special circumstances”</i> | Colney Heath Parish Council (51891)<br><br>Hunston Planning Limited (1185622)<br><br>Trustees of James Henry Frank Sewell Deceased (1185630)<br><br>347648 | Noted    | Policy L4 does not state a requirement to demonstrate ‘very special circumstances’. Policy L4 defines ‘limited’ as required by paragraph 145 of the NPPF 2019. This requirement is also reflective with paragraphs 77-79 of the NPPF 2019, supporting development that meets local need whilst avoiding homes in isolated areas. | No change |
| The text should be rewritten to reflect a more positive approach to appropriate development in the Green Belt which will boost the  | Trustees of James Henry Frank Sewell Deceased (1185630)<br><br>M Scott Properties (1185993)  | Disagree | The current wording reflects the approach actually taken to the strategic approach of the LP. The new NPPF wording 2019 is generally similar and not contradictory to the approach taken.  | No change |

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| supply of housing rather than make it more difficult to achieve   |                                     |           |  |           |
| Highlight the need for Neighbourhood Plan consideration   | St Stephen Parish council (51804)   | Noted     | Policy L4 states any site designated solely for affordable housing in made Neighbourhood Plan will be supported.   | No change |
| Criterion (iv) is unnecessary. If the area is “ <i>dominated by buildings</i> ” it is unlikely to be performing any Green Belt purpose and the Council should consider the release of that area from the Green Belt | Aurora Properties Limited (1151817) | Disagree. | This requirement is reflective with paragraphs 77-79 of the NPPF 2019, supporting development that meets local need whilst avoiding homes in isolated areas. Not all settlements are excluded from the Greenbelt, as set out in Policy S2.   | No change |
| This policy could allow ‘carte blanche’ building across the Green Belt if the housing is designated as affordable   | St Albans Civic Society (1156974)   | Disagree  | The NPPF sets out that limited affordable housing for local community needs can be appropriate in the Green Belt. These requirements are also reflective with paragraphs 77-79 of the NPPF 2019, supporting development that meets local need whilst avoiding homes in isolated areas. | No change |
| The policy suggests that a developer could put their entire affordable housing quota for a scheme on the Green Belt, leaving any urban  | St Albans Civic Society (1156974)   | Disagree  | Para 145 of the NPPF sets out that limited affordable housing for local community needs can be appropriate in the Green Belt.  | No change |

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| brown field site to be developed exclusively for private housing. The policy must guard against such possibility  |                              |          |  |           |
| As currently permitted, the policy only allows for development that is no larger than 10 dwellings on a maximum site area of 0.5 Ha. The definition of a rural exception site in the NPPF (2012) advises that rural exception sites are 'small sites' but it does not define the number of dwellings. Given the acute need for affordable housing in the District they consider that this threshold should be increased | M Scott Properties (1185993) | Disagree | Para 145 of the NPPF sets out that limited affordable housing for local community needs can be appropriate in the Green Belt, in accordance with Local Plan policies. L4 defines what is considered limited. | No change |
| Encourage the revision of the wording for policy requirement (ii) to be more reflective   | M Scott Properties (1185993) | Disagree | NPPF paragraph 71 refers to "one or more" types of affordable housing. Therefore one type – social rented housing, is in accordance with the NPPF.   | No change |

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| of the new definition of affordable housing set out in the NPPF (2018)  |                             |          |   |           |
| The requirement that affordable housing is in some way restricted to Social Rent will effectively mean that viable sites will not come forward given Government funding   | Shonleigh Nominees (978420) | Disagree | NPPF paragraph 71 refers to “one or more” types of affordable housing. Therefore one type – social rented housing, is in accordance with the NPPF.  | No change |
| The policy fails to recognise the close relationship some Green Belt settlements have with the major settlements of the District. Therefore, distinguishing between the priority need for housing for local community and that of major settlements will be hard to evidence. This approach overlooks a significant contribution medium scale sites | Anderson Group (1146719)    | Disagree | Para 145 of the NPPF sets out that limited affordable housing for local community needs can be appropriate in the Green Belt, in accordance with Local Plan policies. L4 defines what is considered limited. Housing not identified as local community needs is not considered to fall within this exception in the NPPF. | No change |



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| on the edge of non-Green Belt areas could provide to meeting both market and affordable needs in the District.   |                                       |       |  |           |
| Account should be taken of LTP4's Policy 5: Development Management, part G, which states:<br><i>"Resist development that would either severely affect the rural or residential character of a road or other right of way, or which would severely affect safety on rural roads, local roads and rights of way especially for vulnerable road users. This should include other routes which are important for sustainable transport or leisure"</i> | Hertfordshire County Council (837689) | Noted | <p>This requirement is reflective with paragraphs 77-79 of the NPPF 2019, supporting development that meets local need whilst avoiding homes in isolated areas. Greenbelt settlements are defined under S2.</p> <p>Development will be required to comply with Policy L18 and L19.</p> | No change |

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|--|-----------------------------|----------|--|-----------|
| Supports the principles of policy L4   | CPRE Hertfordshire (872572) | Noted    | Support noted  | No change |
| Suggests an amendment of the site size criterion to encourage the optimal use of sites, particularly for smaller dwellings, through either reducing the qualifying site size to 0.75 hectares, or increasing the number of dwellings to 15 | CPRE Hertfordshire (872572) | Disagree | Policy states size of sites must be below this, at 0.5 hectares, and defines 'limited' as required by paragraph 145 of the NPPF 2019.  | No change |
| The policy should require the impact on the Green Belt to be 'minimal', rather than 'limited'. There should be a requirement that this is also demonstrated in a Planning Statement accompanying the planning application                  | CPRE Hertfordshire (872572) | Disagree | Policy defines 'limited' as required by paragraph 145 of the NPPF 2019. The policy also identifies what type of housing constitutes 'Local Community Need', and evidence of this, and legal agreement, will be sought at planning application stage. | No change |
| Recommend the addition of a criterion to read  | Historic England (929489)   | Disagree | Cross reference with Policy LP30.  | No change |

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| <i>'the development will conserve and where appropriate enhance the historic environment'</i> |  |  |  |  |
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#### **L5- Small Scale Development in Green Belt Settlements**

| <b>Representation Point</b>   | <b>Representor Raising Point</b>   | <b>Outline Reply</b> | <b>Recommended Reply (including notes and references)</b>   | <b>Suggested Actions (including any Changes to Plan)</b> |
|---|--|----------------------|---|--|
| Current policy wording fails to give the local community, in the form of the Neighbourhood plan, the specific opportunity to review and modify the Green Belt Settlement boundary | St Stephen Parish Council (51804)<br><br>867587  | Partly Agree         | Cross refer to S2 - The NPPF and draft Local Plan support Neighbourhood planning. The Local Plan deals with the overall need for new housing and is not reliant on NPs. NPs must make their local own justification for additional housing provision (and for other uses); this is their intended role. Given the specific wording used in the final NPPF 2018 (after the Council decision on 11 July 2018 based on the draft NPPF) a minor modification should be made to make clear that if detailed local evidence justifies development at a neighbourhood scale, on land currently designated as Green Belt, it is supported in principle. | No Change (to L5 – minor modification to S2)             |
| Policy L5 differs from national policy as it effectively precludes certain types of development that the NPPF specifically provides for   | Jarvis Homes (973180)<br><br>Belgrave Land (Northern) No 2 Limited (1185928)<br><br>DB Rees (Builders) Ltd (1160056)<br><br>Hunston Planning Limited (1185622) | Disagree             | The proposed policy does not preclude development which is already acceptable under para 145 of the NPPF.   | No change  |

|   |   |          |   |           |
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|   | Trustees of James Henry Frank Sewell Deceased (1185630)   |          |   |           |
| There is a lack of clarity with the policy. The reader must assume that all four criteria set out must be satisfied   | Jarvis Homes (973180)<br>DB Rees (Builders) Ltd (1160056) | Disagree | Policy sets out all four criteria are relevant.   | No change |
| Given all criteria in L5 must be met, it would indicate that only previously developed sites are included. This conflicts with paragraph 145 of NPPF which permits infill development on greenfield and brownfield land | Jarvis Homes (973180)<br>DB Rees (Builders) Ltd (1160056) | Disagree | The proposed policy does not preclude development which is already acceptable under para 145 of the NPPF.               | No change |
| The description of previously developed land that includes " <i>part of a previously developed property area</i> " is unclear.  | Jarvis Homes (973180)<br>DB Rees (Builders) Ltd (1160056) | Disagree | Definition of Previously Developed Land set out in Glossary of NPPF.  | No change |
| The restriction of development to 10  | Jarvis Homes (973180)                                     | Disagree | NPPF refers to Infilling, whilst LP provides clarity as to what constitutes Infilling in this context in this District. | No change |

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| <p>dwellings does not accord with the NPPF which places no size restriction on sites, providing it does not have a greater impact on openness</p>   | <p>DB Rees (Builders) Ltd (1160056)</p> <p>Hunston Planning Limited (1185622)</p> |          |   |           |
| <p>The definition of infill development being restricted to a gap is considered inappropriate. There are many potential infill sites that are not gaps in frontages but are nevertheless infill development in terms of being within a settlement and part of the built form.</p> | <p>Jarvis Homes (973180)</p> <p>DB Rees (Builders) Ltd (1160056)</p>              | Disagree | <p>NPPF refers to Infilling, whilst LP provides clarity as to what constitutes Infilling in this context in this District.</p>  | No change |
| <p>Policy L5 should be deleted as the content of paragraph 145 NPPF adds plenty of meaningfulness to the policy coverage.</p>   | <p>DB Rees (Builders) Ltd (1160056)</p> <p>Jarvis Homes (973180)</p> <p>52064</p> | Disagree | <p>Policy L5 refers to small scale development in Green Belt Settlements. The proposed policy does not preclude development which is already acceptable under para 145 of the NPPF.</p> | No change |

|  |  |          |   |           |
|--|--|----------|---|-----------|
| No justification has been provided for excluding part of Sleafshyde village from the boundary of the Green Belt Settlement   | Jarvis Homes (973180)<br>52064   | Disagree | The excluded area is considered separate to the main area, and is not considered part of the Green Belt Settlement.     | No change |
| There is no definition of “infilling” or “limited filling” in the NPPF. This can result in difficulty for sites to come forward as the decision-maker is left to form a view on an application | Belgrave Land (Northern) No 2 Limited (1185928)  | Disagree | NPPF refers to Infilling, whilst LP provides clarity as to what constitutes Infilling in this context in this District. | No change |
| The definition of an infill site is overly prescriptive and has no basis for introduction into the policy as a key test. The wording is therefore a barrier to sustainable development         | Belgrave Land (Northern) No 2 Limited (1185928)<br><br>Minister Court Frogmore (1185980) | Disagree | NPPF refers to Infilling, whilst LP provides clarity as to what constitutes Infilling in this context in this District. | No change |

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| Request for the criterion 3 of Policy L5 to be deleted to ensure consistency with national policy in the Framework and to ensure the policy can effectively deliver sustainable development | Belgrave Land (Northern) No 2 Limited (1185928)                             | Disagree | Policy L5 refers to small scale development in Green Belt Settlements. The proposed policy does not preclude development which is already acceptable under para 145 of the NPPF. | No change |
| Support L5  | CPRE Hertfordshire (872572)<br>St Albans Civic Society (1156974)<br>1185945 | Noted    | Support noted  | No change |
| Disagree with the Smallford village hatched area, denoting allowable small scale development, and request for it to be corrected  | 1185945   | Noted    | Boundaries of Green Belt Settlements based on evidence. Cross reference to Policies Map.   | No change |
| A separate limb to policy L5 should be included to reflect the development exceptions set out in the Framework.   | Minister Court Frogmore (1185980)   | Disagree | The proposed policy does not preclude development which is already acceptable under para 145 of the NPPF.  | No change |

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| The boundaries of many of the “Green Belt Settlements” are arbitrarily drawn, with cases where substantial areas of the settlement are shown excluded from the definition  | 52064                       | Disagree | Boundaries of Green Belt Settlements based on evidence. Cross reference to Policies Map.   | No change |
| The draft plan’s criteria within this proposed policy lack clarity and will not provide the predictability that developers need. The third bullet point of this draft policy is too subjective and open to varied interpretation | 52064                       | Disagree | Approach is consistent with national policy.   | No change |
| Policy wording needs to refer to a maximum site size, and not a maximum of 10 dwellings. This can lead to a large, very low density, development which would be inconsistent with  | CPRE Hertfordshire (872572) | Disagree | Proposed developments will also be required to comply with the other criterion set out in L5 and other LP and NPPF policies on making best use of land, appropriate density etc. | No change |



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| the objectives of the Plan and National Planning Policy  |   |          |   |           |
| Suggest that a maximum site size of 0.75 hectares should be specified by the Policy  | CPRE Hertfordshire (872572)                               | Disagree | Proposed developments will also be required to comply with the other criterion set out in L5.   | No change |
| No justification has been provided for excluding part of Radlett Road ( Frogmore) village (including the report site) from the boundary of the Green Belt Settlement   | DB Rees (Builders) Ltd (1160056)                          | Disagree | The excluded area is considered separate to the main area, and is not considered part of the Green Belt Settlement.   | No change |
| The definition of Green Belt settlement envelope is not necessarily determinative of whether a proposal could be considered limited infilling in terms of the NPPF. Case law has established that a judgement will | DB Rees (Builders) Ltd (1160056)<br>Jarvis Homes (973180) | Noted    | Approach is consistent with national policy. Policy L5 refers to small scale development in Green Belt Settlements. The proposed policy does not preclude development which is already acceptable under para 145 of the NPPF. | No Change |

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| need to be made “on ground”, based on relevant factors, rather than simply relying on a Local Plan designation   |   |          |   |           |
| The policy should allow limited infilling in villages on non- previously developed land and allow the redevelopment of previously develop land even if its outside a village   | Hunston Planning Limited (1185622)  | Disagree | Approach is consistent with national policy. Policy L5 refers to small scale development in Green Belt Settlements. The proposed policy does not preclude development which is already acceptable under para 145 of the NPPF. | No Change |
| The policy has conflated two separate forms of appropriate development to the detriment of both (“Limited infilling in villages” and “limited infilling and the partial or complete redevelopment of previously developed land”). This will increase the difficulty in delivering them | Hunston Planning Limited (1185622)<br>Trustees of James Henry Frank Sewell Deceased (1185630) | Disagree | Approach is consistent with national policy. Policy L5 refers to small scale development in Green Belt Settlements. The proposed policy does not preclude development which is already acceptable under para 145 of the NPPF. | No Change |

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| The wording of the policy needs to be clearer  | Colney Heath Parish Council (51891)<br>London Colney Parish Council (52477)<br>347648 | Disagree | The current wording reflects the approach actually taken to the structure of the LP. The new NPPF wording 2019 is generally similar and not contradictory to the approach taken.  | No change |
| Limited development of previously undeveloped land should be considered on a case by case basis judging the specific proposal for any individual site and ensuring the openness to the settlement is not lost over time and ultimately being taken out of the Green Belt 'washover' entirely | Colney Heath Parish Council (51891)<br>347648   | Noted    | Approach is consistent with national policy.  | No change |
| The policy should be split in two sections to reflect the exceptions as set out in the NPPF  | Trustees of James Henry Frank Sewell Deceased (1185630)                               | Disagree | Approach is consistent with national policy. Policy L5 refers to small scale development in Green Belt Settlements. The proposed policy does not preclude development which is already acceptable under para 145 of the NPPF. | No change |

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| The policy seems to allow infilling only in those parts of a villages where there is no room for infilling   | Trustees of James Henry Frank Sewell Deceased (1185630)<br>347648 | Disagree | Approach is consistent with national policy. The proposed policy does not preclude development which is already acceptable under para 145 of the NPPF.  | No change |
| Recommend for the text regarding the policies and extent of the village envelopes to be reviewed to promote appropriate development in the Green Belt rather than frustrate it | Trustees of James Henry Frank Sewell Deceased (1185630)           | Disagree | Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.<br><br>Approach is consistent with national policy. The proposed policy does not preclude development which is already acceptable under para 145 of the NPPF. | No change |
| L5 paragraph 1 should be deleted. The NPPF paragraph 145 (e) does not require limited infilling in the Green Belt to be previously developed land                              | Aurora Properties Limited (1151817)                               | Disagree | Approach is consistent with national policy. Policy L5 refers to small scale development in Green Belt Settlements. The proposed policy does not preclude development which is already acceptable under para 145 of the NPPF.   | No change |
| L5 relaxes planning rules for the re designated 'Green Belt Settlements' of Folly Fields, Lea Valley and Gustard   | Wheathampstead Parish Council (51941)                             | Support  | Support Noted   | No change |

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| Wood. By more readily permitting small scale development within the localities the need for additional housing and facilities may be addressed without eroding the Green Belt   |                                      |          |   |           |
| Notes that the plan seeks to spread future development around existing towns via the identified broad locations /circumstances and not in others  | London Colney Parish Council (52477) | Noted    | Approach is consistent with national policy.  | No change |
| Suggest a clarification on what constitutes a gap in such situations (i.e. if a lone building is considered sufficient to define a gap suitable for infill or if a gap requires stronger definition of its boundaries and | Watford Borough Council (1122500)    | Disagree | The policy refers to small scale development in Green Belt settlements, as defined in S2 and the proposals map. A gap is defined under point 3 of the policy. The proposed policy does not preclude development which is already acceptable under para 145 of the NPPF. | No change |

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| relationship to the existing settlement)   |   |          |  |           |
| The assessment of extensions is based on its relationship to the existing building and any potentially adverse impact on the surrounding area. If these are the critical factors it is unclear why the size thresholds would be required rather than assessing a scheme on its design merits | Watford Borough Council (1122500)                 | Disagree | Proposed developments will also be required to comply with the other criterion set out in L5. This includes point 3 (infill) and point 4 (character).  | No change |
| Sandridge green belt settlement boundary constraints potential growth  | Owner of Pound Farm & East of Sandridge (1187227) | Disagree | The excluded area is not considered to be within the Green Belt Settlement envelope. The proposed policy does not preclude development which is already acceptable under para 145 of the NPPF. | No change |
| Policy L5 allocation should be extended to allow small scale development such as 'Notcutts Garden Centre'  | Notcutts (1160112)                                | Disagree | The excluded area is not considered to be within the Green Belt Settlement envelope. The proposed policy does not preclude development which is already acceptable under para 145 of the NPPF. | No change |

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| SADC should consider modifying L5 to include an additional criterion, which would allow for the open character of the settlement which contributes to the openness of the Green Belt to be protected. This is particularly important where the settlement lies in a fragile gap between towns | Welwyn Hatfield Borough Council (52397) | Disagree | Proposed developments will also be required to comply with the other criterion set out in L5. This includes point 3 (infill) and point 4 (character).  | No change |
| In addition to the requirement set out in this policy, account should be taken of LTP4's Policy 5: Development Management, part g, which states: "Resist development that would either severely affect the rural or residential character of a road or other right of way, or which           | Hertfordshire County Council (837689)   | Disagree | L5 refers to Green Belt requirement is reflective with paragraphs 77-79 of the NPPF 2019, avoiding homes in isolated areas. Greenbelt settlements are defined under S2.<br><br>Development will be required to comply with Policy L18 and L19. | No change |

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| would severely affect safety on rural roads, local roads and rights of way especially for vulnerable road users. This should include other routes which are important for sustainable transport or leisure.” |                           |          |   |           |
| Recommend the addition of a criterion to read ‘the development will conserve and where appropriate enhance the historic environment’   | Historic England (929489) | Disagree | Cross reference to Policy L30 which addresses this. | No change |



### Policy L6 - Extension or Replacement of Dwellings in the Green Belt

| Representation Point  | Representor Raising Point (see below for list of abbreviations)     | Outline Reply | Recommended Reply (including notes and references)  | Suggested Actions (including any Changes to Plan) |
|---|---|---------------|---|---|
| Policy is unnecessary as many of the works referred to would be permitted development                               | RF Sinclair and Sons (1058251)<br>52064                             | Disagree      | Policy applies to development that is not permitted development and planning permission is required. Permitted development rights are a separate process. | No change   |
| Policy should refer to replacement of 'buildings' not 'dwellings'   | RF Sinclair and Sons (1058251)<br>52064                             | Disagree      | Policy L6 applies to specifically to dwellings. The principle of replacement buildings in the Green Belt are addressed in the NPPF.                       | No change   |
| Policy too detailed/restrictive/complex   | Jarvis Homes (973180)<br>Aurora Properties Ltd (1151817)<br>1185956 | Disagree      | The Policy establishes important principles for Green Belt development  | No change   |
| Part i) conflicts with NPPF which only requires extensions to not be disproportionate to size of original dwellings | Jarvis Homes (973180)   | Disagree      | Policy provides further detail as to what would be disproportionate additions. There is no conflict with the NPPF   | No change   |

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| 'Replacement Dwellings' section conflicts with NPPF which doesn't require assessment on location or character/size | Jarvis Homes (973180)                        | Disagree | Policy provides further detail to assess replacement dwellings which are not inappropriate in the Green Belt in principle. There is no conflict with the NPPF | No change |
| Support policy - acceptable  | St Albans Civic Society (1156974)<br>1185630 | Noted    | Support noted   | No change |

#### **Policy L7 Gypsies, Travellers and Travelling Show People**

| <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> |
|---|--|----------------------|---|--|
| Sites should be more evenly distributed across the District | St Stephen Parish Council (51804)<br>Colney Heath Parish Council (51891)<br>DBC (1186054)<br>1144419<br>1185704<br>1185821<br>1186046<br>1181723<br>347648 | Disagree             | Sites have been allocated in the most appropriate locations, based on evidence, as set out in L7. | No change  |

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|   | 498103                                      |          |   |           |
| Additional pitches in EHH Broad Location would result in an over-concentration in the area, exacerbating existing problems. | DBC (1186054)                               | Disagree | Sites have been allocated in the most appropriate locations, based on evidence, as set out in L7. There is considerable flexibility within these large Broad Locations to locate sites sensitively.   | No change |
| EHH (Central) Broad Location is a proposed employment site and not therefore an appropriate location for a travellers site  | DBC (1186054)                               | Disagree | Cross reference to Policy S6.<br><br>Sites have been allocated in the most appropriate locations, based on evidence, as set out in L7. There is considerable flexibility within these large Broad Locations to locate sites sensitively.  | No change |
| SADC should not allocate sites in an extension of a town in another district  | Berkhamsted Residents Action Group (186012) | Disagree | Sites have been allocated in the most appropriate locations, based on evidence, as set out in L7. There is considerable flexibility within these large Broad Locations to locate sites sensitively.<br><br>SADC is the responsible LPA and is committed to working jointly with DBC on planning in these areas. | No change |
| Policy needs amending to include a target following updated GTANA   | DBC (1186054)<br>WHBC (52397)               | Disagree | Updated draft GTANA work 2019 has been published. No need to amend Policy or approach.  | No change |

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| Question robustness of evidence base and level of need  | Herts GATE (1151880)                         | Disagree | Updated draft GTANA work 2019 has been published. No need to amend Policy or approach.   | No change |
| Sites do not reflect traveller need and will have a long lead-in time   | Herts GATE (1151880)                         | Disagree | Updated draft GTANA work 2019 has been published. No need to amend Policy or approach.   | No change |
| Management arrangement for proposed new sites is unclear  | Herts GATE (1151880)                         | Disagree | Will be agreed as part of Masterplanning / planning application/obligation stage.  | No change |
| Land adjacent existing Barley Mow site should be considered   | Herts GATE (1151880)                         | Disagree | Sites have been allocated in the most appropriate locations, based on evidence, as set out in L7. Policy L7 already sets out that the potential and suitability of extending existing sites will be considered.                  | No change |
| Policy supported as sound/acceptable  | St Albans Civic Society (1156974)<br>1185630 | Noted    | Support noted  | No change |
| Should be collaborative masterplanning work with HBC to consider site provision that have the potential to affect Hertsmere | HBC 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 |

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| Evidence base should take account of need from Hertsmere's transit site | WHBC (52397) | Disagree | Updated draft GTANA work 2019 has been published. No need to amend Policy or approach. | No change |
|---|--------------|----------|--|-----------|

### Policy L8 - Primarily Residential Areas

| Representation Point   | Representor Raising Point (see below for list of abbreviations) | Outline Reply | Recommended Reply (including notes and references)  | Suggested Actions (including any Changes to Plan) |
|--|---|---------------|---|---|
| Converted units need to be of a reasonable size                              | 1144419   | Noted         | Cross reference to policy L24 which sets out the development amenity standards. These are applicable to all forms and scales of development and must be followed in principle.  | No change   |
| Policy should discourage rather than refuse conversion of flats to dwellings | 1185956   | Disagree      | Policy L8 sets out a very clear approach. Housing targets are based on evidence on local housing need and standard methodology set out by the government. Development which results in a loss of housing units will be detrimental to these aims.   | No change   |
| Multiple occupation properties must be provided with sufficient parking      | 1144419   | Noted         | Appendix 1 table sets out parking requirements for houses in multiple occupation.<br><br>As set out in policy L20, parking provision for changes of use or extensions shall reflect the number of spaces required for the new use of the extension. | No change   |
| Policy will not effectively protect residential amenity                      | Thames Water (931213)   | Noted         | Cross reference with Policy L24, which sets out a clear approach to Development Amenity Standards.  | No change   |

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| Support policy – approach acceptable.  | St Albans Civic Society (1156974)<br>Gladman Developments Ltd.(1187201) | Noted    | Support noted  | No change |
| Residential area boundaries should be amended to include 'Kingston Smith' site and Aboyne Lodge School (given that no zoning category for schools near the City Centre will be made) | 867312  | Disagree | Evidence based boundaries chosen based primarily on usage on the ground and local character. Cross refer L12 | No change |

### L9 - Primarily Business Use Areas

| Representation Point  | Representor Raising Point (see below for list of abbreviations) | Outline Reply | Recommended Reply (including notes and references)  | Suggested Actions (including any Changes to Plan) |
|---|---|---------------|---|---|
| Policy ineffective as has been overtaken by the change of use freedoms under GPDO | 1058251   | Disagree      | It is one of the strategic objectives of the plan to provide appropriate commercial development. The policy aims to support business uses in principle from the loss of premises in Class B arising from permitted development rights of the GPDO through Article 4 directions. | No change   |
| More flexibility for mixed uses, including housing                                | HCC (837689)<br>Watford BC (1122500)                            | Disagree      | It is acknowledged that Para 81 (d) NPPF states that policies should be flexible enough to accommodate needs not expected in the plan, allow for new flexible working practises such as live-work accommodation and to enable   | No change   |

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| required in designated areas.  | 52552<br>978427<br>872572         |          | response to changes in economic circumstances. However this is a very selective policy for a small number of key employment areas.  |           |
| Define business use areas on policies map  | 872572                            | Agree    | The Policies Map already refers to L9 business use areas.   | No change |
| Include high speed broadband and next level telecommunications in all new business / commercial developments                                       | St Stephen Parish Council(51804)  | Agree    | Cross reference to Policy 17. Plan policy encourages high speed broadband and next generation telecommunications provision in new development.  | No change |
| Concerns relating to decentralised retail uses (in business use areas) that could undermine central area shopping                                  | St Albans Civic Society (1156974) | Disagree | The LP aims to enhance and protect the vitality and viability of centres through a presumption against retail outside centres.<br><br>L9 concurs stating that additional retail uses will not be permitted (in primarily business use areas) unless strictly related to a primarily Class B activity.   | No change |
| Allocate development site at Roehyde for 25ha mixed industrial and research facilities (as employment land or special employment location in Green | Goodman (1153774)                 | Disagree | Cross reference to Policy S2, L10 and 11.<br><br>An additional Green Belt employment location is not required. This site is not suitable for such development and is in part an existing waste site.<br><br>BRE and Rothamsted Research are established areas of employment within the Green Belt and areas designated as part of the multi-site Hertfordshire Enviro-Tech Enterprise Zone supported by the Government. They have important functions supporting business start-ups and attracting UK | No change |

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| Belt) – to support University of Hertfordshire |  |  | and international investment. Whilst it is acknowledged the importance of teaching and research undertaken by the University of Hertfordshire, it is not incorporated within the Herts Enterprise Zone. |  |
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### L10 Strategic Office Locations

| Representation Point  | Representor Raising Point                                | Outline Reply | Recommended Reply (including notes and references)   | Suggested Actions (including any Changes to Plan) |
|---|--|---------------|--|---|
| Plan policy should allow flexibility for alternative uses within Strategic Office Locations | Eskmuir Properties Ltd. (1156728)<br>Waford BC (1122500) | Disagree      | The policy does not rule out mixed use; it only prioritises office use and development and protects existing office use.   | No change   |
| Shortage of supply of office space/ additional space required                               | Pegasus (1186098)  | Disagree      | Policy S6 ii) East Hemel requires delivery of a circa 17ha business park for primarily Class B1 office uses. Also part of the multi-site Hertfordshire Enviro-Tech Enterprise Zone. The allocation of Article 4 directions within the strategic office locations will protect much of the remaining stock. | No change   |
| Employment need evidence (2016) is out of date  | Pegasus (1186098)  | Disagree      | 2016 evidence is still highly relevant. St Albans SW Hertfordshire Economic Study update published February 2019. Takes into account recent economic forecasts, the changes to the commercial property stock including that lost through PD, revisit growth scenarios and assesses demand and supply.      | No change   |
| Special employment locations and new provision at East Hemel Hempstead                      | Pegasus (1186098)  | Disagree      | There is scope for further development in strategic office locations. BRE and Rothamsted Research are established areas of employment and will support sectors with strong growth potential. A new business park of circa 17ha for primarily office development at East Hemel Hempstead will               | No change   |



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| Broad Location are remote from St Albans City Centre.  |                   |          | meet all quantitative need and is well located for central services and facilities.   |           |
| Special employment locations only cater for limited/ specialist sectors of the economy   | Pegasus (1186098) | Agree    | <p>BRE and Rothamsted Research are established areas of employment within the Green Belt and areas designated as part of the multi-site Hertfordshire Enviro-Tech Enterprise Zone supported by the Government. They have important functions supporting business start-ups and attracting UK and international investment. Green technology is a business sector with strong growth potential to create jobs over the plan period.</p> <p>A new business park of circa 17ha for primarily office development at East Hemel Hempstead will meet all quantitative need and is well located for central services and facilities.</p> | No change |
| Site at Copsewood, St Albans should be allocated for commercial use (offices)  | Pegasus (1186098) | Disagree | There is no need for additional land (cross reference policies S 2/5/6). The proposed site is a Green Belt location. There are no exceptional circumstances for allocation of further employment land.  | No change |
| Allocate development site at Roehyde for 25ha mixed industrial and research facilities (as employment land or special employment location in Green | 1153774           | Disagree | <p>Cross reference Policy S2, L9 and 11.</p> <p>BRE and Rothamsted Research are established areas of employment within the Green Belt and areas designated as part of the multi-site Hertfordshire Enviro-Tech Enterprise Zone supported by the Government. They have important functions supporting business start-ups and attracting UK and international investment.</p> <p>Whilst it is acknowledged the importance of teaching and research undertaken by the University of Hertfordshire, it is</p>   | No change |

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| Belt) – to support University of Hertfordshire |  |  | not incorporated within the Herts Enterprise Zone and there is need for related employment land provision. The proposed site is a Green Belt location. There are no exceptional circumstances for allocation of further employment land. |  |
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### **L11 - Special Employment Locations in the Green Belt**

| <b>Representation Point</b>  | <b>Representor Raising Point</b>  | <b>Outline Reply</b> | <b>Recommended Reply (including notes and references)</b>  | <b>Suggested Actions (including any Changes to Plan)</b> |
|--|---|----------------------|--|--|
| Redevelopment, intensification and extension of built development at these sites is unacceptable. Additional development is only acceptable within existing built 'footprint', possibly including redevelopment of underused or redundant temporary/ ancillary buildings such as glasshouses | Ramblers Association (52420)<br>CPRE (872572)<br>Harpenden Society (51870)<br>St Albans & District Footpaths Society (723340) | Disagree             | BRE and Rothamsted Research are established areas of development / employment within the Green Belt and are designated as part of the multi-site Hertfordshire Enviro-Tech Enterprise Zone. They have important functions supporting business start-ups and attracting UK and international investment.<br><br>Future growth will be carefully planned and controlled in relation to Green Belt openness; through masterplanning and agreements, as set out in the Policy. | No change  |

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| Policy should differentiate between development supported in principle and that which demonstrates very special circumstances   | British Horse Society (1187597)  | Disagree | BRE and Rothamsted Research are established areas of employment within the Green Belt and areas designated as part of the multi-site Hertfordshire Enviro-Tech Enterprise Zone. They have important functions supporting business start-ups and attracting UK and international investment. Policy indicates that for these sites, Green Belt very special circumstances are important and may apply in relation to the proposed masterplan / agreements.                                | No change |
| Policy should include provisions for off-shoot businesses. Residential schemes within the Green Belt that relate to these businesses should include some provision for staffing | 975683   | Disagree | Policy L11 sets out a very clear approach, including reference to business carrying out complementary knowledge-based research and development activities.<br><br>General housing development is not supported. Some accommodation may be required as ancillary to and supporting research activity and essential staffing   | No change |
| Need for active travel/travel plans and multi-user routes for leisure   | Ramblers Association (52420)<br><br>St Albans & District Footpaths Society (723340)<br><br>Hertfordshire County Council (837689) | Disagree | Cross reference Policy 18 which generally promotes sustainable modes and transport infrastructure. Policy L11 concurs with the representation in that criteria (3) seeks improved pedestrian and cycle links to Bricket Wood Station (which lies North of the Common, BRE and adjacent housing). Rothamsted is well located for central area transport access. Depending on the nature of any redevelopment/expansion in the future, travel plans may be required – cross reference L18. | No change |

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| Release of land at Townsend Lane for (affordable) housing would support Rothamsted Research as employer   | Hill Residential (1158064)<br>Lawes Agricultural Trust (1187615) | Disagree | <p>Cross reference to representations re Policy S2.</p> <p>Land at Townsend Lane does not fall within one of the Broad Locations for development within the LP 2018.</p> <p>There are two planned Broad Locations for development within Harpenden to the NE and NW of the town lying approx. 1.5-2 miles from Rothamsted Institute in proximity and accessible via a range of active transport.</p> <p>Policy L3 facilitates a minimum of 40% affordable homes as a proportion of the overall dwelling numbers on site to include 'social rent', 'affordable rent' and 'subsidised home ownership types'.</p> <p>Ambitions/needs of Rothamsted Research alone cannot determine Plan development strategy.</p> | No change |
| BRE & Rothamsted cater for specific sectors of economy  | 1186098  | Agree    | <p>BRE and Rothamsted Research are established areas of employment within the Green Belt and areas designated as part of the multi-site Hertfordshire Enviro-Tech Enterprise Zone supported by the Government. They have important functions supporting business start-ups and attracting UK and international investment. Green technology is a business sector with strong growth potential to create jobs over the plan period.</p>   | No change |
| The BRE section should include criteria to afford protection to the Mohne Dam monument and in Rothamsted to conserve the Harpenden Conservation | Historic England (929489)  | Disagree | <p>Cross reference Policy L30 which supports conservation of heritage assets as appropriate to their significance. This issue will also be addressed in proposed Masterplanning and agreements</p>   | No change |

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| Area and Rothamsted Manor   |                        |          |   |           |
| Policy could be used to support inappropriate housing development at these locations  | St Stephens PC (51804) | Disagree | General housing development is not supported. Some accommodation may be required as ancillary to and supporting research activity and essential staffing.   | No change |
| Allocate development site at Roehyde for 25ha mixed industrial and research facilities (as employment land or special employment location in Green Belt) - to support University of Hertfordshire | 1153774                | Disagree | <p>Cross reference Policy L9.</p> <p>BRE and Rothamsted Research are established areas of employment within the Green Belt and areas designated as part of the multi-site Hertfordshire Enviro-Tech Enterprise Zone supported by the Government. They have important functions supporting business start-ups and attracting UK and international investment.</p> <p>Whilst it is acknowledged the importance of teaching and research undertaken by the University of Hertfordshire, it is not incorporated within the Herts Enterprise Zone and there is need for related employment land provision.</p> | No change |

### **L12 - Centre for Retail, Services and Leisure**

| <b>Representation Point</b>                                       | <b>Representor Raising Point</b>                 | <b>Outline Reply</b> | <b>Recommended Reply (including notes and references)</b>  | <b>Suggested Actions (including any Changes to Plan)</b> |
|---|--|----------------------|--|--|
| Lack of evidence/ policy on changing retail market; suggestion to | Aboyne Residents Association (1181214)<br>867312 | Disagree             | Evidence can be found online in the South West Hertfordshire retail and leisure study and its draft update 2019. | No change  |

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| include a strategy for dealing with parking and traffic as barriers to retail growth in City Centre |   |          |  |           |
| Increase development of service and leisure in 'Key Shopping Areas'                                 | 1185717   | Noted    | The policy supports the creation of new services that contribute positively to the vitality and viability of the area.   | No change |
| Remove protection on retail in defined frontages  | St Albans Civic Society (1156974)<br>52064  | Disagree | NPPF supports positive policies such as this to support town centres and these limited numbers of retail frontages. Supported also by retail evidence studies.             | No change |
| Remove restriction on Hot Food Takeaways. Policy revision suggested.                                | Kentucky Fried Chicken (Great Britain) Limited (1050716)<br>McDonalds Restaurants (1187475) | Disagree | The policy sets out an appropriate and balanced approach which provides for consumer choice and also aims to promote healthier lifestyles and protect residential amenity. | No change |
| Introduce public art to attract footfall  | St Albans Civic Society (1156974)   | Agree    | Refer to policy L23 which supports the provision of public art in public realm.  | No change |
| Support Local Centre Designation for Wheathampstead   | Wheathampstead Parish Council (51941)   | Noted    | Support noted  | No change |
| Out of centre retail development  | London Colney Parish Council (52477)  | Noted    | The LP aims to enhance and protect the vitality and viability of centres through a presumption against retail outside centres.   | No change |

|  |  |       |   |   |
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| should not be at the expense of St Albans centre, and must ensure the unique character of the medieval city is preserved | Colney Heath Parish Council (51891)                |       | Please refer to policy L30 for guidance on the approaches taken to preserve the historic environment.   |   |
| Clarification needed on how retail variation and changes of use will be considered in primary and secondary retail areas | Watford Borough Council (1122500)                  | Noted | Policy L12 sets out an overarching approach for retail centres. Consideration for changes of use will be considered on an individual basis and depending on the individual nature of the application. | No change   |
| Support additional retail, services and leisure provisions in Broad Location Sites                                       | Crest Strategic Projects and Bloor Homes (1158079) | Noted | Existing LP approach supported  | No change   |
| Marshalswick Lane food store, not just petrol forecourt canopy, should be included in District Centre boundary           | Sainsbury's Supermarkets Ltd (376338)              | Agree | Proposal for minor adjustment noted   | Minor modification – Policies Map minor amendment to district centre boundary |

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| Town centre and key shopping area boundaries should be amended to not include Aboyne Lodge School, residential gardens, Kingston Smith site and Coupers Garage | 867312  | Disagree | Evidence based boundaries chosen based primarily on usage on the ground and local character. Cross refer L8  | No change |
| Policy does not comply with tests set out in the NPPF  | Legal & General Investment Management (1185943) | Disagree | The LP aims to enhance and protect the vitality and viability of centres through a presumption against retail outside centres.<br><br>NPPF supports positive policies such as this to support town centres. Supported also by retail evidence studies. | No change |

### **L13 - Attractive and Vibrant Cultural and Civic Areas**

| <b>Representation Point</b>                                 | <b>Representor Raising Point</b>           | <b>Outline Reply</b> | <b>Recommended Reply (including notes and references)</b>   | <b>Suggested Actions (including any Changes to Plan)</b> |
|---|--|----------------------|---|--|
| The Plan does not refer to tourism development              | Hunston Planning Ltd. (1185622)<br>1181750 | Disagree             | Policy L13 refers to entertainment and visitor facilities.  | No change  |
| Policy does not protect against loss of existing facilities | Theatres Trust (1179001)                   | Disagree             | Policy L13 supports the retention of existing cultural and entertainment facilities. Policy L22 supports the retention of leisure and other community buildings | No change  |



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| Additional hotel provision should be identified in or close to Harpenden                                    | Hunston Planning Ltd. (1185622)   | Disagree | Delivery of additional and improved hotel provision is supported by Policy L13.   | No change |
| There are no site-specific policies which support the improvement of cultural and entertainment facilities  | Abbey Theatre (1186123)   | Disagree | Policy L13 gives site specific proposals, amongst others are St Albans City Centre, Cathedral Quarter, Harpenden leisure redevelopments etc.  | No change |
| Environmental enhancements should include reference to schemes to encourage sustainable forms of transport. | St Albans Cycle Campaign (346623)<br><br>Growth & Infrastructure Unit Hertfordshire County Council (837689) | Disagree | Sustainable transport is addressed in Policy L18  | No change |
| Enhancements should be sought specifically for the proposed Park Street Garden Village                      | St Stephen Parish Council (51804)   | Disagree | Requirements for Park Street Garden Village addressed in Policy S6 xi)  | No change |
| Proposals to enhance these facilities need to be accessible / inclusive                                     | Harpenden Town Council (51870)  | Noted    | L13 requires enhancement and management of area to encourage activities that are a focus on community activity and pride. Detailed design of improvements/enhancements/additional facilities will be addressed at the planning application stage. | No change |

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| Proposals to enhance these facilities need to be provided with sufficient parking                              | Harpenden Town Council (51870) | Agree | Parking requirements addressed at L20 and Appendix 1.                                   | No change |
| Support hotel provision, but hotel proposals in Harpenden should only be developed near Town and Local Centres | Harpenden Town Council (51870) | Noted | Policy L14 requires a sequential approach to non-residential uses in residential areas. | No change |
| Support reference to culture and history but should reference conserving/enhancing historic environment        | Historic England (929489)      | Noted | Addressed in Policy L30   | No change |

#### **L14 Location of Non Residential Uses Serving Residential Areas**

| <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> |
|---|--|----------------------|--|--|
| No strategy / lack of detail in providing for the social and pastoral needs for the Broad | St Albans Deanery Synod (1185929)                                      | Disagree             | Cross reference Policy S6, L12 and L22 which require community facilities and opportunities for new provision of places of worship as part of development of new Local Centres in Broad Locations, including in joint use community buildings. | No change  |

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| Location developments  |  |          |   |   |
| Support additional retail units where viable outside urban locations   | 347648                                 | Noted    | Support noted   | No change   |
| Support provision of small scale community development   | St Stephen Parish Council (51804)      | Noted    | Support noted   | No change   |
| Facilities that serve communities in Broad Locations should be 'green'/landscaped                                | St Albans Civic Society (1156974)      | Noted    | Cross reference Policies 6, 23 and 29 which include requirements for green infrastructure, public open space and retention of important landscape features. | No change   |
| Community services should say 'support and contribute towards' sustainable communities rather than deliver them. | Watford Borough Council (1122500)      | Agree    | A minor clarification setting out that these services 'support and contribute towards' sustainable communities rather than deliver them is suggested.       | Suggested minor modification<br><br>'support and contribute towards' instead of 'deliver' |
| Policy on sequential approach should not refer to need   | Sainsbury's Supermarkets Ltd. (376338) | Disagree | The approach taken is consistent with national policy. Need should be considered as part of the assessment.   | No change   |

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| Policy should include health impact and sustainable transport references | Hertfordshire County Council (837689) | Disagree | Cross reference Policy L18 which references sustainable transport and air quality. Policies are based on the draft NPPF which includes sustainable transport and health. | No change |
|--|---------------------------------------|----------|--|-----------|

### L15 Leisure Uses

| Representation Point   | Representor Raising Point  | Outline Reply | Recommended Reply (including notes and references)   | Suggested Actions (including any Changes to Plan)                        |
|--|--|---------------|--|--|
| Approach to provision is too negative.   | Sport England (824971)   | Disagree      | The NPPF para. 92 states that planning policies should plan positively for community facilities such as recreational facilities. Policy L15 states that high intensity uses and medium intensity type A uses will <i>only</i> be permitted within towns and villages. This positively directs these uses to these areas. | No change  |
| Medium intensity uses are acceptable in Green belt – Policy should not be conditional. | Sport England (824971)   | Disagree      | The NPPF para. 92 states that planning policies should plan positively for community facilities such as open space. Policy L15 states that medium intensity uses type B will <i>normally</i> be permitted in the Green Belt. This positively supports these uses in these areas, but with appropriate caveats.           | No change  |
| Support policy with amendment to recognise horse riding/carriage driving.              | Ramblers Association (52420)<br><br>The British Horse Society (1187597)<br><br>1157340 | Agree         | Proposal for minor adjustment noted  | Minor modification - to include mention of horse riding/carriage driving |

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|---|---------------------------------------|----------|--|-----------|
| Policy for High Intensity Uses is incorrect as not all non-residential activities can be provided through a sequential approach or without use of Green Belt / open land. | St Albans School (1187032)<br>52064   | Disagree | The NPPF requires an approach to these issues. Policy L15 states that high intensity uses and medium intensity type A uses will <i>only</i> be permitted within towns and villages. This positively directs these uses to these areas. | No change |
| Park Street Garden Village development should comply with policy on Medium Intensity uses Type A and B and also be considered for High intensity uses                     | St Stephen Parish Council (51804)     | Agree    | Cross reference Policies L12 and L13 which references provision of retail and service developments.  | No change |
| Leisure uses in Broad Locations should be 'green' / landscaped  | St Albans Civic Society (1156974)     | Noted    | Cross reference Policies L12, L13 and L14 which require environmental enhancements to take place for preserving and enhancing the local setting.   | No change |
| Support policy subject to reference to travel planning requirement.   | Hertfordshire County Council (837689) | Noted    | Cross reference to Policy L18 which addresses transport strategy.<br><br>Support noted   | No change |

## L16 Mixed Use Opportunity Areas

| Representation Point  | Representor Raising Point      | Outline Reply | Recommended Reply (including notes and references)  | Suggested Actions (including any Changes to Plan) |
|---|--------------------------------|---------------|---|---|
| Mixed use, including high density residential, needed for Colney Fields Retail Centre and Griffiths Way | 1055738                        | Agree         | Policy L16 specifically encourages mixed use, including residential in these areas. Cross reference with L1 which relates to density.   | No change   |
| Griffiths Way retail development – should not adversely affect town centre viability/ vitality          | Albans Civic Society (1156974) | Agree         | Policy L16 specifically states retail and services should not adversely affect town centre vitality and viability. Cross reference with L12 which relates to the vitality and viability of town centre locations. | No change   |
| Development at Griffiths Way has the ability to impact surrounding Listed Buildings.                    | Historic England (929489)      | Noted         | Noted - Cross reference to policy L30   | No change   |

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| Colney Fields/Ridgeview should be a preferred location for retail/service use, and mixed use should not constrain this purpose. Retail planning consent on Ridgeview Lodge should be recognised. | Legal & General Investment Management (1185943)<br><br>Sainsbury's Supermarkets Ltd. (376338) | Disagree | Retail/service uses are positively supported in the policy.  | No change |
| Promote Policy L16 (ref Colney Fields Retail Centre) through joint working   | Hertsmere Borough Council (51934)   | Noted    | There has been and will be ongoing joint working with neighbouring local authorities including Hertsmere and the South West Herts Group.   | No change |
| Colney Fields Retail Centre – no further expansion of retail space should be permitted / should not adversely affect town centre   | St Albans Civic Society (1156974)<br><br>1055738  | Noted    | Policy L16 states retail and services should not adversely affect town centre vitality and viability. Cross reference with L12 which relates to the vitality and viability of town centre locations. | No change |
| Ridgeview, London Colney / Colney Fields Retail Centre –   | 1055738   | Disagree | Mixed use, including residential, encouraged in L16.   | No change |

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| continue residential usage                                       |                                   |       |  |           |
| Support the development at CCOS.                                 | St Albans Civic Society (1156974) | Noted | Support noted  | No change |
| CCOS development has the ability to impact on Conservation Area. | Historic England (929489)         | Noted | Cross reference to Policy L30 which sets requirements for new developments in conservation areas, which must respond to the character, appearance and local distinctiveness of the area. | No change |

#### **L17 Infrastructure**

| <b>Representation Point</b>   | <b>Representor Raising Point</b>                                    | <b>Outline Reply</b> | <b>Recommended Reply (including notes and references)</b>             | <b>Suggested Actions (including any Changes to Plan)</b> |
|---|---|----------------------|---|--|
| Reference to utilities infrastructure and broadband are supported   | Harpenden Town Council (51870)<br>St Stephen Parish Council (51804) | Noted                | Support noted   | No change  |
| High speed broadband is essential for new development   | St Stephen Parish Council (51804)                                   | Noted                | Support noted   | No change  |
| Providers will not commit resources to confirm high speed connections until outline planning permission is obtained. Should | Legal and General (1051022)<br>CEG (1158030)                        | Disagree             | This matter can be properly detailed through the masterplanning work. | No change  |



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| be considered rather than addressed.   |  |          |   |           |
| <p>There is inadequate infrastructure to support new development in the district and in particular at Broad Locations &amp; locality. There is an existing infrastructure deficit / existing infrastructure is already under strain or overstretched such as roads, traffic, parking, cycle network, schools, NHS etc</p> <p>Specific locations include:</p> <ul style="list-style-type: none"> <li>• District</li> <li>• Broad Locations and locality</li> <li>• Hemel Hempstead</li> </ul> | <p>St Albans Civic Society (1156974)</p> <p>Verulam Residents Association (1185823)</p> <p>Bricket Wood Residents Association (1186066)</p> <p>STACC (346623)</p> <p>789007</p> <p>759883</p> <p>863632</p> <p>867587</p> <p>871923</p> <p>1187590</p> <p>1185714</p> <p>1048449</p> <p>1056580</p> <p>1152471</p> <p>1158536</p> <p>1182733</p> | 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. | No change |

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| <ul style="list-style-type: none"> <li>Other locations</li> </ul>  | 1182793<br>1183112<br>1184271<br>1184378<br>1184569<br>1184784<br>1185483<br>1185583<br>1185821<br>1185935<br>1186129  |          |  |  |
| There is limited evidence to support identification of broad locations. Robustness of strategy is under question.                          | Redbourn Parish Council (759908)   | Disagree | Evidence on development strategy / site selection is available in full.<br><br>Evidence is available and landowner/developer teams have confirmed deliverability of Broad Location related infrastructure. | No change                                |
| IDP / infrastructure planning is inadequate / contrary to NPPF / not up to date. It is based on lower housing allocation / does not relate | Redbourn Parish Council (759908)<br>Hertfordshire County Council (837689)<br>Harpenden Green Belt Association (866541) | Disagree | Work on the infrastructure evidence base has been ongoing and IDP updates will be made as required to reflect the latest position.   | IDP will be updated on an ongoing basis. |

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| to the scale of development being proposed. More evidence required / Update required.  | Aboyne Residents Association (1181214)<br>Leverstock Green Village Association (1185907)<br>334023<br>759883<br>1185704 |              |   |  |
| Need for update to demonstrate deliverability / viability of the LP. Unclear whether BL & planning policy are viable. NPPF para 67 & NPPG requirement. | Gladman (1187201)   | Partly agree | Evidence is available and landowner/developer teams have confirmed deliverability of Broad Location related infrastructure.<br><br>Updated viability report has been prepared and will be added to the website. | Updated viability report to be added to evidence on website. |
| Add ref to LTP4 & GTPs in IDP.   | Hertfordshire County Council (837689)   | Agree        | IDP update to include ref to LTP4 & GTPs  | IDP will be updated on an ongoing basis.                     |
| Some transport mitigation may be carried out as S278 works, add ref in IDP.  | Hertfordshire County Council (837689)   | Agree        | IDP update to include ref to s278 works   | IDP will be updated on an ongoing basis.                     |
| Robust evidence of capacity within the existing utilities network is required.   | Harpenden Town Council (51870)  | Noted        | IDP includes reference to utilities network. Further details can be found in IDP updates / master planning work / planning application process  | No change  |
| An independent report on the impact of building  | 759883  | Disagree     | HSE safety guidance is available and HSE have been consulted by landowners. This matter can be properly   | No change  |

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| within the shadow of the Buncefield oil depot is required.   |                                     |          | detailed through the masterplanning work/ planning application process   |           |
| GB Review should be updated to demonstrate it is appropriate to consider development at NHH  | Redbourn Parish Council (759908)    | Disagree | Evidence on development strategy / site selection is available in full.  | No change |
| New garden village in Hertsmere is under consideration by Hertsmere. Potential infrastructure needs for Hertsmere garden village                                 | Hertsmere Borough Council (1182733) | Noted    | It is one of a number of different options under consideration by Hertsmere. SADC has raised concerns about potential impacts. Ongoing consideration under Duty To Cooperate and joint working arrangements. | No change |
| A more radical and ambitious overarching transport strategy should be developed to prevent 'the residual cumulative impacts on the road network becoming severe' | 1185460                             | Disagree | LP policy together with HCC's LTP4 provides an appropriate overarching strategy for transport.   | No change |

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| IDS does not plan for growth outside BLs.   | Harpenden Green Belt Association (866541)   | Disagree | IDS includes a column for 'other non-BL development'   | No change |
| IDS is missing from list of supporting documents.   | St Albans Cycle Campaign (346623)   | Disagree | The IDS is included at appendix 4 of the LP.   | No change |
| IDS does not have a detailed list of all infrastructure schemes.  | Hertfordshire County Council (837689)<br>Legal and General (1051022)<br>CEG (1158030) | Agree    | The IDS is designed to provide a one page summary overview. Master planning and IDP updates should provide more details. | No change |
| Masterplanning will inform the IDS  | Hallam Land Management (1185998)  | Noted    | IDS explanatory notes deals with this.   | No change |
| The most significant infrastructure issues for BLs relate to transport and schools  | Aboyne Residents Association (1181214)  | Noted    | Work on the infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.              | No change |
| For BL at NW Harpenden, onsite health facility is shown on IDS if NHS do not have existing GP capacity nearby; but it is not listed at S6viii. Requirement should be tested | Legal and General (1051022)<br>CEG (1158030)  | Noted    | This matter can be properly detailed through the masterplanning work / planning application                              | No change |

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| against capacity as part of master planning.  |  |          |   |           |
| For BL at Chiswell Green, IDS should be reviewed to remove ref to healthcare floorspace. It is too small and not necessary in view of existing healthcare capacity in the area.   | Adrian Irving (Trustee) and Alban Developments Limited (1156368) | Disagree | This matter can be properly detailed through the masterplanning work/ planning application  | No change |
| At EHHS option for one new hospital of c7ha to serve population of West Herts. On completion of the new facility in 2024/26, closure of St Albans Hospital and HH hospital would release land for other uses, although site disposals may occur before this date. | West Hertfordshire Hospitals NHS Trust (1183618)                 | Disagree | <p>In Press Release Oct 2018 WHHT indicated that “The proposal to develop planned care on the St Albans and Hemel Hempstead hospital sites as set out in the original SOC currently remains our preferred way forward.”</p> <p>St Albans hospital site is considered in principle to be the best location to serve the SADC population. It is also centrally located within the West Herts area.</p> <p>No substantive evidence has been submitted to justify a deliverable alternative in a sequentially preferable location to serve SADC population.</p> | No change |

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| The latest position regarding WHHT hospital has not been taken into account and evidence needs to be updated.   | Leverstock Green Village Association (1185907)                | Disagree | There has been and continues to be ongoing engagement with WHHT.  | No change                                |
| Hospital provision should be addressed  | Wheathampstead Parish Council (51941)                         | 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. |
| HVCCG provided detailed comments about capacity of GPs to absorb some of the proposed development and where there is a shortfall of space. New development expected to make a proportionate contribution towards additional facilities. | Herts Valleys Clinical Commissioning Group (1177790, 1183617) | 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. |
| There are possible plans for a community hub in St Albans and ongoing work to look at redeveloping Harpenden  | Herts Valleys Clinical Commissioning Group (1177790, 1183617) | 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. |

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| Memorial Hospital into a fit for purpose community site. HVCCG formula is set out to calculate the cost per dwelling of mitigating the impact that additional growth brings. |                              |          |   |  |
| Should include reference to environmental infrastructure to help to meet NPPF paragraph 149  | Environment Agency (1147557) | Disagree | Already covered by 'green' infrastructure   | No change                                |
| IDP should include an updated Flood Risk Assessment  | Environment Agency (1147557) | Noted    | The updated SFRA report has been added to the website.  | No change                                |
| IDP should refer to Thames Basin Management Plan 2015 under strategic green infrastructure - river corridors.  | Environment Agency (1147557) | 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. |
| Policy should include additional references to waste water and   | Thames Water (931213)        | Disagree | Policies L23 and L29 address drainage and flood risk. Suggested text would be appropriate as planning conditions or informatives, rather than policy. | No change                                |



|   |   |          |  |           |
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| planning conditions.  |   |          |  |           |
| Infrastructure must be supported by S106 & CIL  | St Stephen Parish Council (51804)   | Noted    | Approach is consistent with national policy.   | No change |
| Policy should reference planning obligations and be consistent with NPPF  | Crown Estate (51946)<br>Hill Residential (1158064)<br>Crest Strategic Projects, Bloor Homes, and Mr Scott (1158079)<br>Hallam Land Management (1185998) | Disagree | Approach is consistent with national policy.   | No change |
| It is not lawful to remedy existing infrastructure deficits / Clarification required for contributions sought which go beyond mitigating the impact of development. | Hill Residential (1158064)<br>Hallam Land Management (1185998)  | Disagree | Approach is consistent with national policy. This matter can be properly detailed through the masterplanning work and planning applications. | No change |
| Need to introduce a proportional approach to infrastructure improvements over and above   | Crown Estate (51946)  | Disagree | Approach is consistent with national policy. This matter can be properly detailed through the masterplanning work.                           | No change |

|   |   |              |   |           |
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| those required to make development acceptable   |   |              |   |           |
| Support policy / support delivery of infrastructure   | Hertfordshire County Council (837689)<br>Environment Agency (1147557)<br>Crest Strategic Projects and Bloor Homes (1158079)<br>Hunston Planning Limited (1185630)<br>Hallam Land Management (1185998)<br>Department for Education (1186955) | Noted        | Support noted   | No change |
| Vehicle charging points are essential for new development                                   | St Stephen Parish Council (51804)   | Partly Agree | Policies L18 and L20 require consideration of technology and infrastructure for sustainable travel. | No change |
| For Wheathampstead village transport connections are important. Good bus services required. | Wheathampstead Parish Council (51941)   | Noted        | Policy L18 requires consideration of bus related measures.  | No change |
| The delivery of social infrastructure, e.g. community                                       | St Albans School (1187032)<br>52064   | Disagree     | Appropriate infrastructure should be provided where required in association with new development.   | No change |

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| leisure & education, should not be burdened by infrastructure contributions.  |  |          |  |  |
| Concern that policy relates to infrastructure and not community facilities.   | Aurora Properties Limited (1151817)            | Disagree | Policy L17 relates to a wide range of infrastructure and related facilities. This includes community facilities.   | No change                                |
| St Albans District is within new London Plan strategic infrastructure priority ' Midland and west coast mainline..' policy SD3 & fig 2.15 | Greater London Authority (1157729)             | Noted    | Policy L17 recognises need for strategic infrastructure.   | No change                                |
| Lack of clarity in the Dacorum IDP in relation to increased quantum of growth, joint area action plan & cross boundary working.           | Leverstock Green Village Association (1185907) | Noted    | Work on SADC infrastructure evidence base has been ongoing and IDP updates will reflect the latest position. Dacorum are at an earlier stage in Plan making. Appropriate liaison is ongoing. | IDP will be updated on an ongoing basis. |
| Underground ducting must be accessible without disturbance to road surfaces   | St Stephen PC (51804)                          | Noted    | Policy L17 deals with this.  | No change                                |

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| New infrastructure must be provided before or at the same time as development e.g. new schools, healthcare facilities          | 347648  | Disagree | New infrastructure must be provided within an appropriate timescale.<br>Work on SADC infrastructure evidence base has been ongoing and IDP updates and Masterplanning will reflect the latest position. | IDP will be updated on an ongoing basis. |
| Concern that the increase in traffic from development will provide the opportunity for government to introduce J8A at Redbourn | 1184750 | Disagree | Work on SADC infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.  | IDP will be updated on an ongoing basis. |

### **L18 Transport Strategy**

| <b>Representation Point</b>   | <b>Representor Raising Point</b>  | <b>Outline Reply</b> | <b>Recommended Reply (including notes and references)</b>  | <b>Suggested Actions (including any Changes to Plan)</b> |
|---|---|----------------------|--|--|
| Support policy or general thrust of policy  | Legal and General (1051022)<br><br>Crest Strategic Projects and Bloor Homes (1158079) | Noted                | Support noted  | No change  |
| The Overall Approach outlined in Policy L18 supports the aims of LTP4. However, HCC as Highways Authority would like to see | Hertfordshire County Council (837689)   | Noted                | This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation. | No change  |

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| strong links to the application of the transport user hierarchy in the development of transport mitigations.  |   |          |   |           |
| Plan should reduce car dependency and car use. Benefits will be improved public health through active travel increase and air pollution decrease and reduced congestion | 1185967   | Noted    | Policy L18 seeks to support this approach.  | No change |
| Modal shift should be encouraged by making sustainable travel more accessible not by making driving less accessible   | Harpenden Town Council (51870)                                  | Noted    | Policy L18 seeks a balanced approach to supporting sustainable travel, while acknowledging the reality of high levels of car ownership. Aspects of this matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation. | No change |
| Expectation is unrealistic for modal change to buses and bicycles   | 867312  | Disagree | Approach is consistent with national policy.  | No change |
| There is a lack of evidence to support claim that selection of BLs are based on opportunities for sustainable travel.   | Harpenden Green Belt Association (866541)<br>1185775<br>1185704 | Disagree | Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.<br><br>Opportunities for sustainable travel formed part of that site selection work and is available online.  | No change |

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| NPPF para 138 requires first consideration to sites well served by public transport.  | Aurora Properties Limited (1151817)          | Noted    | Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.<br><br>Opportunities for sustainable travel formed part of that site selection work and is available online. | No change                                |
| Better transport through district is required for road / cycle / footway  | Wheathampstead Parish Council (51941)        | Agreed   | Supported by approach taken in L18. Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.  | IDP will be updated on an ongoing basis. |
| Bullet 4 - Add ref to "Residential development will provide a reasonable level of parking for residents, in order to protect amenity for existing residents." | Legal and General (1051022)                  | Disagree | Policy L20 and appendix 1 deals with parking.  | No change                                |
| Bullet 4 add 'at non-residential development'   | Legal and General (1051022)<br>CEG (1158030) | Disagree | Policy L20 and appendix 1 deals with parking.  | No change                                |
| Bullet 6 - employers should be encouraged to produce travel plans which encourage sustainable modes of transport  | Hertfordshire County Council (837689)        | Noted    | Policy L18 already deals appropriately with travel plans.  | No change                                |
| Bullet 8 - add "secure" to "cycle parking in new developments..."   | STACC (346623)                               | Noted    | Minor modification for clarification   | Minor modification to add "secure"       |

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| Bullet 12 - should refer to all roads and not just major roads.   | Hertfordshire County Council (837689) | Disagree | There are clear standards in Plan policy which relates to all roads.   | No change  |
| Add new bullet - access by cycle<br>“provision of appropriate amenities and community facilities easily accessible on foot to major new development sites”                                | STACC (346623)                        | Noted    | Minor modification for clarification   | Minor modification - access by cycle<br>“provision of appropriate amenities and community facilities easily accessible on foot to major new development sites” |
| A more radical and ambitious overarching transport strategy should be developed to prevent the residual cumulative impacts on the road network  | 1185460                               | Disagree | Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.<br><br>A transport evidence workplan has been agreed with HCC. | No change  |
| Main Transport Schemes (MTS)<br><br>Sentence 1 - add ref to 'the funding of the main transport schemes will be agreed through the planning application process and accord with CIL regs.' | Crown Estate (51946)                  | Disagree | This matter can be properly detailed through the Masterplanning / planning application/ EIA process, with appropriate consultation.  | No change  |
| Support policy / support overall approach   | British Horse Society (1187597)       | Noted    | Support Noted  | No change  |

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|  | Hill Residential<br>(1158064)   |          |  |   |
| Para 1 - delete ref to 'utility and leisure' before 'trips'  | Hertfordshire County Council (837689)   | Noted    | Minor modification for clarification   | Minor modification - delete ref to 'utility and leisure' before 'trips' |
| Para 1, replace 'alongside primary roads' with 'alongside roads likely to have high traffic volumes'.  | British Horse Society (1187597)<br><br>Footpaths Secretary<br>Ramblers Association (52420)<br><br>1157340 | Disagree | There are clear standards in Plan policy. Approach is consistent with national policy. | No change   |
| Para 2 - Replace existing wording with new. "(2) a new route between the intersection of the B487 (Hemel Hempstead Road / Redbourn Road) and the Nickey Line, running south along the East Hemel Hempstead site spine road to the A4147 in the south. This will be funded by Broad Locations S6(i), (ii) and (iii). There may also be potential to extend this route further afield to St Albans | Crown Estate (51946)  | Disagree | There are clear proposals in Plan policy. Approach is consistent with national policy. | No change   |



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| and Redbourn, subject to detailed assessment”.   |                                       |          |  |  |
| Extension of green ring required to provide cycle route for London Colney children to secondary school | London Colney Parish Council (52477)  | Noted    | Policy L29 deals with this.  | No change                                |
| Extension to green ring in villages welcomed   | Wheathampstead Parish Council (51941) | Noted    | Support noted – also Policy L29 deals with this.   | No change                                |
| RoWIP is welcomed and links to health & wellbeing.   | Wheathampstead Parish Council (51941) | Noted    | Support Noted  | No change                                |
| Improvement to inter-urban cycling routes should be identified in the IDP                              | Hertfordshire County Council (837689) | Noted    | Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.                            | IDP will be updated on an ongoing basis. |
| Add ref to secure cycle parking.   | 1048449                               | Noted    | Policy L18 deals with this. See also minor modification above.   | No change                                |
| Priority should be given to urban cycling routes, rather than inter-urban routes.                      | 1048449                               | Noted    | Both are supported in L18. Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position. | No change                                |
| A commitment to maintaining cycle paths is required.   | STACC (346623)<br>1048449             | Noted    | Approach is consistent with national policy and regulations.   | No change                                |
| Lack of coherent cycle network in the District should be acknowledged.                                 | 1048449                               | Disagree | Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.                            | No change                                |

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| Better defined cycle routes required  | St Stephens Parish Council (51804)  | Disagree | Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.   | No change                                |
| Cycle routes should contribute to free flow of traffic rather than have a negative impact                     | Harpenden Town Council (51870)  | Noted    | Both cycling and free flow of traffic are supported in L18. Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.     | IDP will be updated on an ongoing basis. |
| Add ref to horse carriage drivers.  | Footpaths Coordinator St Albans & District Footpaths Society (723340)       | Disagree | Not necessary here. Approach is consistent with national policy.  | No change                                |
| Preferable for horse riders to be treated separate to cycling & walking.                                      | Hertfordshire County Council (837689)                                       | Disagree | There are clear proposals in Plan policy. Approach is consistent with national policy.  | No change                                |
| Preparation and implementation of Local Cycling and Walking Infrastructure Plans (LCWIPs) should be included. | 1048449   | Disagree | Overall support for cycling and walking in L18. LCWIPs not within Plan remit.   | No change                                |
| Additional bus routes in all BLs will be essential and must be included in travel plans.                      | Hertfordshire County Council (837689)                                       | Noted    | Overall support for bus provision in L18 and S6. This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation. | No change                                |
| Improved roads will result in more reliable bus services & help mode shift                                    | Colney Heath Parish Council (51891)<br>London Colney Parish Council (52477) | Noted    | Overall support for bus provision in L18  | No change                                |

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| More buses required / Improved bus service welcomed. For eg to connect villages & urban centres.      | St Albans Labour Group (1183933)<br><br>Wheathampstead Parish Council (51941)<br><br>St Stephens Parish Council (51804)<br><br>1056580           | Noted | Overall support for bus provision in L18  | No change |
| Consider bus hubs which allows villagers to cycle or drive to a local site for access to bus services | Colney Heath Parish Council (51891)  | Noted | Overall support for bus provision in L18.   | No change |
| Reliance on buses is not credible for e.g funding cutbacks in recent years.                           | Aboyne Residents Association (1181214)<br><br>1152471  | Noted | Overall support for bus provision in L18. National approach to bus funding not within planning remit. | No change |
| Welcome improvement to Abbey Line. More detail needed.  | Abbey Flyer Users Group (1156861)<br><br>St Albans Labour Group (1183933)<br><br>St Stephens Parish Council (51804)<br><br>1185775<br><br>867068 | Noted | Support Noted   | No change |

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| Agreement is required from other parties to make improvements.   | 867068                            | Noted    | Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.  | No change |
| Abfly have commissioned a detailed feasibility study from independent expert railway consultants. Part one of the study indicates that the capital costs of a passing loop will be considerably less than previous estimates and that there is a sound business case for investment in upgrading the Abbey Line. | Abbey Flyer Users Group (1156861) | Noted    | Requirement for improved Abbey Line service in S6.   | No change |
| London Northwestern have plans to upgrade the Abbey Line which are different to policy.  | 1181750                           | Noted    | Requirement for improved Abbey Line service in S6. Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position. | No change |
| All mention of rail links to be explored- abbey line or midland mainline should be excluded.   | 1055738                           | Disagree | Requirement for improved Abbey Line service in S6. Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position. | No change |

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| By reinstating the link to the Abbey line freight trains would have additional access to the west coast main line and midland main line.   | 1186081  | Noted    | Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.  | No change |
| This is not a committed rail industry scheme and delivery would be subject to a feasibility study and funding, together with all necessary consents. In addition we cannot support any increase in frequency along the Abbey line unless the level crossing at Cotton Mill Lane is closed. | Network Rail (1184616)                                 | Noted    | Noted requirements for feasibility. 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 |
| Decked car park at Harpenden Station – Delete reference / Priority should be given to improving accessibility by sustainable modes.  | Hertfordshire County Council (837689)<br>STACC(346623) | Disagree | Policy L18 seeks a balanced approach to supporting sustainable travel, while acknowledging the reality of high levels of car ownership.  | No change |
| Improved accessibility to Harpenden station by public transport is welcomed  | St Albans Labour Group (1183933)                       | Noted    | Support noted  | No change |

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| Better cycle access and storage is required for Harpenden Railway Station.   | 1185775                                     | Noted | Supported by approach in L18.  | No change |
| Query if Thameslink trains will be unable to cope with extra commuters from new development plus impact of railfreight scheme.                 | St Albans Labour Group (1183933)<br>1185714 | Noted | Additional planned rail capacity has been noted. Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position. | No change |
| A new London Colney station would be an aspirational and realistic improvement and meet sustainability needs                                   | 1183210                                     | Noted | Sustainable rail transport improvements sought under S6 xi.  | No change |
| Detailed traffic mitigation measures for Broad Locations should be included in the Transport Assessment accompanying any planning application. | Hertfordshire County Council (837689)       | Noted | Required by L18  | No change |
| Due to the lack of Modelling work it is unclear at the current time what highway improvements will   | Hertfordshire County Council (837689)       | Noted | A transport evidence workplan has been agreed with HCC.  | No change |

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| be required for the Local Plan.   |  |          |  |           |
| Extra highway capacity is not supported unless required to enable new development.  | Hertfordshire County Council (837689)  | Noted    | Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.<br><br>A transport evidence workplan has been agreed with HCC. | No change |
| Improvement to road infrastructure is required in advance of new development  | Colney Heath Parish Council (51891)  | Noted    | Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.  | No change |
| Junction improvement required. Junction re-design should explore improvement for safety of cyclists and pedestrians and increased bus priority. | Hertfordshire County Council (837689)<br><br>STACC (346623)<br><br>St Albans Labour Group (1183933)<br><br>1183210 | Noted    | Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.<br><br>A transport evidence workplan has been agreed with HCC. | No change |
| Junction Improvement will increase traffic  | Redbourn Parish Council (759908)   | Noted    | This matter can be properly detailed through the Masterplanning/ planning application / EIA process, with appropriate consultation.  | No change |
| Para 4 - add ref to new residential and non-residential developments  | Hertfordshire County Council (837689)  | Disagree | Policy L20 deals with this   | No change |
| Provision of recharge points in St Albans needs further investigation to deliver extra provision.   | St Albans Civic Society (1156974)  | Disagree | Policy L18 & L20 deals with this   | No change |

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| A ring road for the city with infrastructure improvements at bottlenecks is wanted. It would traffic calm the entire city at a budget cost.  | 1181750        | Disagree | Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.<br><br>A transport evidence workplan has been agreed with HCC. | No change |
| A414 upgrade needs to be completed as a matter of urgency. The proposed 'hamburger' style roundabout at London Colney North needs to be an up and over as does Park Street roundabout. | 1186081        | Disagree | Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.<br><br>A transport evidence workplan has been agreed with HCC. | No change |
| A414 proposals will impact on the other routes crossing the A414 in St Albans area in London Colney and Colney Heath   | 1186046        | Noted    | Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.<br><br>A transport evidence workplan has been agreed with HCC. | No change |
| Welcome policy   | STACC (346623) | Noted    | Support Noted  | No change |
| Add text "Residential development will provide a reasonable level of parking for residents, in order to  | CEG (1158030)  | Disagree | Policy L20 & appendix 1 provides clear standards.  | No change |



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| protect amenity for existing residents.”   |   |          |   |           |
| It is considered that support for car-share/shared mobility options could be mentioned.  | Hertfordshire County Council (837689)   | Disagree | Policy L20 & appendix 1 deals with this.  | No change |
| More park and ride is required   | Colney Heath Parish Council (51891)   | Disagree | Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.                   | No change |
| Parking impact assessment for town centre and transport hubs required  | 867312  | Disagree | Policy L20 & appendix 1 provides clear standards.   | No change |
| Increased parking is needed for eg at Harpenden, St Albans, local roads.   | Aboyne Residents Association (1181214)<br>Harpenden Town Council (51870)<br>Verulam Residents Association (1185823) | Disagree | Policy L20 & appendix 1 provides clear standards.   | No change |
| Policies on car parking provision and management can have a direct impact on the uptake of sustainable modes and need to be considered in a comprehensive manner, looking at | Hertfordshire County Council (837689)   | Noted    | Policy L18 seeks a balanced approach to supporting sustainable travel, while acknowledging the reality of high levels of car ownership. | No change |

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| both on and off street facilities, pricing and availability.  |  |          |  |           |
| HCC would prefer that Travel Plans are sought through the Section 106 process which enables the county council to seek a monitoring fee.                            | Hertfordshire County Council (837689)              | Noted    | This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation. | No change |
| it is unduly excessive to expect travel plans and air quality statements from all development of 10 + dwellings   | RF Sinclair & Sons (1058251)<br>52064              | Disagree | Policy L18 sets out a clear approach, supported by the NPPF  | No change |
| To comply with NPPF para 111 amend policy to say "All developments that will generate significant amounts of movement should be required to provide a Travel Plan". | Crest Strategic Projects and Bloor Homes (1158079) | Disagree | Policy L18 sets out a clear approach which is consistent with national policy.   | No change |
| Travel plan requirements should be in line with the latest HCC guidance.  | Hertfordshire County Council (837689)              | Noted    | This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation. | No change |
| School travel plans should apply to all   | 1181750  | Disagree | Policy L18 sets out a clear approach   | No change |

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| schools, new and existing; public and private.   |  |       |  |               |
| <p>There is no adequate, up to date evidence about traffic movement and traffic congestion. Current evidence relates to a lower level of growth than in the LP. IDP is out of date / COMET does not cover all relevant roads. More evidence required for specific locations such as:</p> <ul style="list-style-type: none"> <li>• Broad Locations &amp; locality</li> <li>• St Albans central area</li> <li>• A414 corridor</li> <li>• Roads close to Luton eg M1, A1081, B653, A5183/B4540</li> <li>• Other eg district wide</li> </ul> | <p>Redbourn Parish Council (759908)</p> <p>Aboyne Residents Association (1181214)</p> <p>Leverstock Green Village Association(1185907)</p> <p>North Herts District Council (1185674)</p> <p>Luton Borough Council (861967)</p> <p>Welwyn Hatfield Borough Council (52397)</p> <p>867312</p> <p>Central Bedfordshire Council (861963)</p> <p>North Herts District Council (1185674)</p> <p>Bricket Wood Residents Association (1186066)</p> | Noted | <p>Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.</p> <p>A transport evidence workplan has been agreed with HCC.</p> <p>Some matters can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.</p> | Update to IDP |

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|  | Harpenden Green Belt Association (866541)<br><br>334023<br><br>1185714<br><br>1144419                                     |       |  |           |
| Assurance required prior to submission that transport modelling will not flag up significant issues.                       | London Colney Parish Council (52477)  | Noted | No 'showstoppers' identified. Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.<br><br>A transport evidence workplan has been agreed with HCC. | No change |
| Some nearby councils would like a better understanding of potential cross-boundary issues. Eg Central Beds, N Herts, Luton | Luton Borough Council (861967)<br><br>Central Bedfordshire Council (861963)<br><br>North Herts District Council (1185674) | Noted | Addressed on an ongoing basis through DC arrangements.   | No change |

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| Transport evidence for some BLs shows that there are no highway constraints preventing development.  | <p>Crest Strategic Projects and Bloor Homes (1158079)</p> <p>Legal and General (1051022)</p> <p>Adrian Irving and Alban Development Ltd (1156368)</p>  | Noted    | <p>Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.</p> <p>A transport evidence workplan has been agreed with HCC.</p> <p>Some matters can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.</p> | No change |
| <p>There is inadequate transport infrastructure to support new development in the district and in particular at Broad Locations &amp; locality. There is an existing infrastructure deficit / existing infrastructure is already under strain or overstretched; such as roads; parking; bus; rail; cycle network.</p> <p>Specific locations include:</p> | <p>Redbourn Parish Council (759908)</p> <p>Ellenbrook Area Residents Association Committee (1185802)</p> <p>Colney Heath Parish Council (51891)</p> <p>Wheathampstead Parish Council (51941)</p> <p>St Albans Labour Group (1183933)</p> <p>1184750</p> <p>1185460</p> <p>1185704</p> <p>1183210</p> | Disagree | <p>Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.</p> <p>A transport evidence workplan has been agreed with HCC.</p> <p>Some matters can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.</p> | No change |

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| <ul style="list-style-type: none"> <li>• Broad Locations and locality</li> <li>• Colney Heath</li> <li>• Southern part of St Albans, in particular around King Harry roundabout and King Harry Lane</li> <li>• Proposed new school at London Road</li> <li>• Other eg district wide</li> </ul> | 1185744 |  |  |  |
|  | 1184864 |  |  |  |
|  | 1187008 |  |  |  |
|  | 1184839 |  |  |  |
|  | 1158536 |  |  |  |
|  | 863091  |  |  |  |
|  | 1184271 |  |  |  |
|  | 1182480 |  |  |  |
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|  | 871923  |  |  |  |
|  | 1182697 |  |  |  |
|  | 1185469 |  |  |  |
|  | 1184378 |  |  |  |
|  | 347648  |  |  |  |
|  | 867587  |  |  |  |

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|  | 1184567<br>1183112<br>1055683<br>840795<br>1184569<br>1153741<br>1187590<br>1185714<br>1182793<br>1182518<br>1185971<br>760045<br>1185821<br>1185728 |       |  |           |
| Housing at PSGV will frustrate delivery of an important part of the national SFRI network, contrary to government policy objectives. | DB Cargo (1184888)<br>Freight on Rail (1187503)<br>Network Rail (1184616)  | Noted | Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.<br><br>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.<br><br>The main site owner has promoted the site as available and deliverable for housing. Considerations have taken into account the existing planning permission for an alternative use and other relevant factors. | No change |

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| Radlett is v important to help improve access to rail services in London and the wider Southeast. Radlett location is exceptionally good for rail freight. It is able to serve a large proportion of customers in the region. If Radlett is not delivered it will be a major setback to the industry. | Freight on Rail (1187503)<br><br>GB Railfreight (1187613)                           | Noted | <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>The main site owner has promoted the site as available and deliverable for housing. Considerations have taken into account the existing planning permission for an alternative use and other relevant factors.</p> | No change |
| Opportunities to develop SRFI in southern England are very few.   | DB Cargo (1184888)<br><br>GB Railfreight (1187613)                                  | Noted | <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>The main site owner has promoted the site as available and deliverable for housing. Considerations have taken into account the existing planning permission for an alternative use and other relevant factors.</p> | No change |
| SRFI is important to secure modal shift for freight to be transported by rail rather than road. Modal shift cannot  | DB Cargo (1184888)<br><br>Freight on Rail (1187503)<br><br>GB Railfreight (1187613) | Noted | <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 |



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| be achieved without SRFIs.<br>The likely saving in road miles is immense. A daily service would avoid 18 million truck miles. |  |          | The main site owner has promoted the site as available and deliverable for housing. Considerations have taken into account the existing planning permission for an alternative use and other relevant factors.  |           |
| SRFI is supported.  | DB Cargo (1184888)<br><br>Freight on Rail (1187503)<br><br>GB Railfreight (1187613)<br><br>Network Rail (1184616)                                    | Noted    | Support Noted. Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.<br><br>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.<br><br>The main site owner has promoted the site as available and deliverable for housing. Considerations have taken into account the existing planning permission for an alternative use and other relevant factors. | No change |
| 1. Support policy /policy sound   | Harpenden Town Council (51870)<br><br>Hunston (1185630)<br><br>St Stephens Parish Council (51804)<br><br>STACC (346623)<br><br>Central Beds (861963) | Noted    | Support Noted   | No change |
| Policy is not clearly written. Formatting and wording should  | CEG (1158030)<br><br>LRM Planning Limited obo Hallam Land  | Disagree | Policy L18 sets out a clear approach  | No change |

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| be amended to distinguish between the formal policy and the reasoned justification.  | Management (1185998)                    |          |  |  |
| Policy is difficult to understand in relation to BLs.  | Hallam Land Management Limited(1185998) | Disagree | Policy L18 sets out a clear approach   | No change                                |
| For Nickey Line, action is required to improve safety at crossing. Eg regular maintenance of verge; speed limits on approaching roads; crossing upgrade; reposition of crossing at roundabout. | Friends of Nickey Line (1184312)        | Noted    | <p>The Nickey Line footpath / cycleway is an important landscape, commuting and recreational route feature. As it will need to be crossed there will inevitably be some localised adverse impacts. There will also be considerable opportunities for enhancement. Masterplanning will consider damage mitigation, integration and maximising opportunities within and beyond the development.</p> <p>Some matters can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.</p> <p>Some elements are not within planning remit.</p> | IDP will be updated on an ongoing basis. |
| Greater housing density should be provided near railway stations and bus routes.   | 1158258                                 | Disagree | <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                                |
| Napsbury park has access to great network of major roads & is 10 mins drive from mainline stations.  | Countrywide Planning (1186783)          | Noted    | <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                                |

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| Planner should read RAC report BBC News - Young couples 'trapped in car dependency'          | 1187504                               | Noted | Issue acknowledged. Policy L18 seeks a balanced approach to supporting sustainable travel, while acknowledging the reality of high levels of car ownership.   | No change |
| We would like to see more car clubs.   | STACC (346623)                        | Noted | Policy L18 sets out a clear approach  | No change |
| Lower Luton Road is unsafe for journey route to school                                       | Wheathampstead Parish Council (51941) | Noted | Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.<br><br>A transport evidence workplan has been agreed with HCC.<br><br>Some matters can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation. | No change |
| Transport connections are important to villages eg Wheathampstead                            | Wheathampstead Parish Council (51941) | Noted | Policy L18 sets out a clear approach  | No change |
| Roads and Infrastructure should be delivered before or at the same time as new developments. | 1185945                               | Noted | Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.<br><br>A transport evidence workplan has been agreed with HCC.<br><br>Some matters can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation. | No change |
| Enforcement should be used if HGV's stray from primary roads.                                | 1185945                               | Noted | Not within planning remit   | No change |

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| At EHH, rise in air pollution will impact people who would potentially be living and working next to a motorway.         | 1144419 | Noted    | Issue and approach identified in S6  | No change |
| Before deciding on quantity and timescales for development - all transport issues should be addressed.                   | 1185704 | Noted    | <p>LP required to be based on proportionate evidence. Not all detailed issues will reasonably be fully worked through at this stage. Work on the transport infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.</p> <p>A transport evidence workplan has been agreed with HCC.</p> <p>Some matters can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation.</p> | No change |
| Opportunities have been missed to promote sustainable travel. Suggested additions to policy are listed in full response. | 1153802 | Disagree | Policy L18 sets out a clear approach   | No change |
| There are no traffic considerations and No parking improvements  | 863632  | Disagree | Policy L18, L19, L20, Appendix 1 and IDP set out a clear approach  | No change |

## L19 - Highways / Access Considerations for New Development

| Representation Point   | Representor Raising Point   | Outline Reply | Recommended Reply (including notes and references)   | Suggested Actions (including any Changes to Plan) |
|--|---|---------------|--|---|
| Plan is not based on up to date & relevant evidence about transport movement and traffic congestion.   | Redbourn Parish Council (759908)<br>Harpenden Society (1156761)<br>Aboyne Residents Association (1181214)<br>Leverstock Green Village Association (1185907) | Disagree      | Work on the infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.<br><br>A transport evidence workplan has been agreed with HCC. | IDP will be updated on an ongoing basis.          |
| Scale of growth and distribution of development must be properly assessed and considered in transport terms.   | Leverstock Green Village Association (1185907)  | Noted         | Work on the infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.<br><br>A transport evidence workplan has been agreed with HCC. | IDP will be updated on an ongoing basis.          |
| Provision for setting down/picking up in a safe and acceptable manner can be a challenge. Eg St Albans School. Aspects of policy needs to be reworked. | St Albans School (1187032)  | Disagree      | Policies L19 sets out a clear approach   | No change   |

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| More clarity required including implementation and enforcement. Eg school coaches in George St & Fishpool Street   | St Albans Civic Society (1156974)  | Disagree | Policies L19 sets out a clear approach   | No change |
| For education facilities and day nursery/creches, setting down/picking up should be minimum of 300m from entrance. Illegal parking in the vicinity of these uses must be enforced. | STACC (346623)   | Disagree | Policies L19 sets out a clear approach   | No change |
| Support policy   | Footpaths Secretary Ramblers Association (52420)   | Noted    | Support noted  | No change |
| Criteria (i) add ref to 'carriage drivers'   | British Horse Society (1187597)  | Disagree | Policies L19 sets out a clear approach, including "horse-riders and other non-motorised users" | No change |
| For para 3, add ref to horse rider and carriage drivers. / Add more refs to horse rider and carriage drivers.  | Footpaths Secretary Ramblers Association (52420)<br><br>British Horse Society (1187597)<br><br>1157340 | Disagree | Policies L19 sets out a clear approach   | No change |

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| For non-motorised users, improve crossings where existing routes cross busy roads.   | British Horse Society (1187597)              | Disagree     | Policies L19 sets out a clear approach   | No change   |
| Local RoW & local foot/cycle paths require connection to local amenities such as shops and schools.  | STACC (346623)                               | Agree        | Minor modification would be a useful clarification   | Minor modification – “including to local amenities such as shops and schools” to L19 para 4 |
| In (ii) it should not require assessment of 'all alternatives and their cost'. It should relate to reasonable alternatives where appropriate.                            | CEG (1158030)<br>Legal and General (1051022) | Partly Agree | Minor modification to add word “reasonable” would be a useful clarification  | Minor modification – add “reasonable”   |
| Direct routes from EHH to St Albans via Bluehouse Hill /Verulam Road / Folly Lane to city station. This route is virtually gridlocked with long tailbacks in the morning | Aboyne Residents Association (1181214)       | Noted        | <p>Work on the infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.</p> <p>A transport evidence workplan has been agreed with HCC.</p> <p>Additional work may be detailed through the Masterplanning / planning application / EIA process, with appropriate consultation.</p> | IDP will be updated on an ongoing basis.  |

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| Hemel Hempstead crossing - problem with speed and traffic volumes. Suggested measures for speed limits and crossing upgrade.                        | Friends of the Nickey Line (1184312)   | Noted | As above | IDP will be updated on an ongoing basis. |
| A5183 Redbourn Bypass / B487 Redbourn Lane Roundabout Crossings - detailed measures suggested for speed limit, crossing upgrade & verge management. | Friends of the Nickey Line (1184312)   | Noted | As above | IDP will be updated on an ongoing basis. |
| A1081, Ambrose Lane & Lower Luton Road are a concern as they will be affected by new development in a severely adverse way.                         | Harpenden Society (1156761)<br>Wheathampstead Parish Council (51941)               | Noted | As above | IDP will be updated on an ongoing basis. |
| East and North Hemel Hempstead Broad Locations - traffic impact on  | Leverstock Green Village Association (1185907)<br>Redbourn Parish Council (759908) | Noted | As above | IDP will be updated on an ongoing basis. |



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| B487 Redbourn Road  |  |       |          |  |
| Must plan for traffic impediments to retail in the city centre  | Aboyne Residents Association (1181214)<br>867312 | Noted | As above | IDP will be updated on an ongoing basis. |
| N St Albans & E St Albans broad locations -<br>Tinkering with junctions will not enable the network cope with the current traffic levels let alone the increased traffic generated by 2,500 new homes | 867587   | Noted | As above | IDP will be updated on an ongoing basis. |
| N St Albans BL - Increased road widths are required. Roads are gridlocked.  | 840795   | Noted | As above | IDP will be updated on an ongoing basis. |
| BL Chiswell Green - inadequate narrow local roads were not designed for this level of vehicle increase and they are unsuitable to   | 1158536<br>1184271                               | Noted | As above | IDP will be updated on an ongoing basis. |

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| accommodate any proposed development.  |                                      |       |          |  |
| East and North Hemel Hempstead Broad Locations - New developments will have a disproportionate and unsustainable impact on access from/to the M1 from/through/to Redbourn and Harpenden. | 1153741                              | Noted | As above | IDP will be updated on an ongoing basis. |
| Concern regarding introduction of new J8A at Redbourn.   | 1184750                              | Noted | As above | IDP will be updated on an ongoing basis. |
| BL East Hemel /Nickey Line - developers have indicated a number of improvements to the Nickey Line including crossings & all weather surfacing.  | Friends of the Nickey Line (1184312) | Noted | As above | IDP will be updated on an ongoing basis. |

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| BL - Park Street Garden Village requires a significantly improved road network and traffic management schemes. Consideration should be given to a Park & Ride Scheme.   | 1185744   | Noted | As above | IDP will be updated on an ongoing basis. |
| BL S6v E St Albans - Primary Network Route (PNR) (The A1057) is failing to cope as it is, the additional vehicles coming from these developments will choke this route to a standstill. The increased traffic will also increase the noise pollution and air pollution. | Ellenbrook Area Residents Association Committee (1185802) | Noted | As above | IDP will be updated on an ongoing basis. |
| BL EHH - Not enough work seems to have been done on defining the  | 1185704   | Noted | As above | IDP will be updated on an ongoing basis. |

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| required changes to the road network to cope with the extra cars (+ buses and lorries presumably. Before deciding on quantity and timescales for development - all transport issues should be addressed |   |          |   |           |
| Redbourn Lane Car Park - detailed measures suggested for maintenance, improvement to entrance and larger size.  | Friends of the Nickey Line (1184312)  | Noted    | Not within planning remit.  | No change |
| Policy support/ various policy aspects welcomed   | Barton Wilmore obo Bloor Homes (1158079)<br>British Horse Society (1187597) | Noted    | Support noted   | No change |
| Reliance on buses is not credible.  | Aboyne Residents Association (1181214)                                      | Disagree | Policy L18 deals with this. Buses are not 'relied on' but are an important part of the sustainable transport approach | No change |
| Parking implications for city centre must be dealt with   | Aboyne Residents Association (1181214)<br>867312                            | Noted    | Policy L18, L20 & Appendix 1 deals with this.   | No change |

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| For key considerations in assessing new development, NPPF paras 108-111 are relevant.   | Hunston (1185630)                              | Noted    | Approach is consistent with national policy.   | No change                                |
| LTP4 / GTP outline potential schemes for EHH relate to lower growth assumptions. They will have some disbenefits.                             | Leverstock Green Village Association (1185907) | Noted    | Work on the infrastructure evidence base has been ongoing and IDP updates will reflect the latest position on LTP4 & GTPs. | IDP will be updated on an ongoing basis. |
| The formatting and wording should distinguish between policy and 'reasoned justification'.  | CEG (1158030)                                  | Disagree | Policy L19 sets out a clear approach   | No change                                |
| Criterion (iii) gives weight to advisory documents. It should be recognised that material considerations may justify an alternative approach. | Hallam Land Management Limited (1185998)       | Noted    | Policy L19 sets out an appropriate approach  | No change                                |
| Policy says new roadside services will be refused in GB. This is too negative and   | RF Sinclair & Sons (1058251)<br>52064          | Disagree | Policy L19 sets out a clear approach.  | No change                                |

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| needs to be reworked.  |                                       |          |  |  |
| In BLs, residential roads should have 20mph limit.   | STACC (346623)<br>1048449             | Noted    | This matter can be properly detailed through the Masterplanning / planning application / EIA process, with appropriate consultation. | No change  |
| For Wheathampstead village, transport connections are paramount. Better transport required throughout district with connectivity by road/cycle/footpath between settlements. | Wheathampstead Parish Council (51941) | Noted    | Policy 18 deals with this.   | No change  |
| Add ref to railway level crossing. Detailed wording suggested.   | Network Rail (1184616)                | Disagree | No evidence supplied to justify the approach suggested.  | No change  |
| Amend para 2 to reflect the NPPF 2018 to ' <u>A Travel and Traffic Transport Assessment and an Air Quality Assessment</u> will be required for major developments.'          | Hertfordshire County Council (837689) | Noted    | Minor modification will provide helpful clarification.   | Minor modification to reflect minor updated wording in NPPF - ' <u>A Travel and Traffic Transport Assessment and an Air Quality Assessment</u> will be required for major developments'. |

## L20 – New Development Parking Guidance and Standards

| Representation Point  | Representor Raising Point             | Outline Reply | Recommended Reply (including notes and references)  | Suggested Actions (including any Changes to Plan) |
|---|---------------------------------------|---------------|---|---|
| Protection of existing parking spaces is contrary to switch to sustainable travel. Existing parking spaces could provide local amenity space or cycle parking instead.  | St Albans Cycle Campaign (346623)     | Disagree      | A realistic approach supporting sustainable travel whilst acknowledging the ongoing role of the car has been taken. | No change   |
| NPPF & NPPG support reduced levels of parking   | Hertfordshire County Council (837689) | Noted         | Policy L20 & appendix 1 sets out a clear approach   | No change   |
| Low car / no car parking provision is supported in highly accessible areas and where additional car trips would lead to adverse impact on highway network e.g. congested areas / junctions at capacity nearby. Car share supported. | Hertfordshire County Council (837689) | Noted         | Policy L20 & appendix 1 sets out a clear approach   | No change   |

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| Provision needs to be made for the disabled persons parking spaces   | Hertfordshire County Council (837689)     | Noted    | Policy L20 & appendix 1 sets out a clear approach  | No change |
| Clarify the parking standards for visitors and unallocated parking in policy and appendix 1  | Legal and General (1051022)               | Disagree | Policy L20 & appendix 1 sets out a clear approach  | No change |
| Appendix 1 standards will lead to an over-provision of parking spaces outside of city centres but in highly accessible locations e.g. How Wood | Hilton House Properties Limited (1057476) | Disagree | A realistic approach supporting sustainable travel whilst acknowledging the ongoing role of the car has been taken. Policy L20 & appendix 1 sets out an appropriate approach | No change |
| Broad Location at Chiswell Green will worsen parking issues  | 1187590                                   | Disagree | A realistic approach supporting sustainable travel whilst acknowledging the ongoing role of the car has been taken. Policy L20 & appendix 1 sets out a clear approach        | No change |
| Policy opposes the loss of garage courts, even though the Council's is delivering affordable housing through                                   | 52064                                     | Disagree | This matter is appropriately addressed by the overall LP policy framework  | No change |



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| making better use of such sites.  |  |          |   |  |
| The whole issue of the older residents and their need always to use a car to shop has been ignored  | 760045   | Disagree | A realistic approach supporting sustainable travel whilst acknowledging the ongoing role of the car has been taken. Policy L20 & appendix 1 sets out a clear approach | No change                                |
| Government requires 1.5 spaces per unit.  | 760045   | Disagree | Misstatement of Government policy. Policy L20 & appendix 1 sets out an appropriate approach   | No change                                |
| The plan is derelict in its approach to parking. This is the number one problem of the district / Sufficient parking is required.         | 863632<br>1144419                                  | Disagree | A realistic approach supporting sustainable travel whilst acknowledging the ongoing role of the car has been taken. Policy L20 & appendix 1 sets out a clear approach | No change                                |
| Need to demonstrate that parking in town centres and transport hubs, e.g. train stations, can cope with the needs of a higher population. | 867312   | 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. |
| Proposed residential parking standards are onerous.   | Adrian Irving and Alban Developments Ltd (1156368) | Disagree | A realistic approach supporting sustainable travel whilst acknowledging the ongoing role of the car has been taken. Policy L20 & appendix 1 sets out a clear approach | No change                                |

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| Cambridge City Council Local Plan appendix D & Cycle Parking Guide are considered to be best practice. SADC proposed standards at appendix 1 falls short of this requirement. Bring it fully into line with Cambridge guidance. Numerous changes suggested to LP appendix 1. | St Albans Cycle Campaign (346623) 1048449                  | Disagree | Policy L20 & appendix 1 sets out a clear approach. Cambridge Cycle Parking Guide is already directly referenced in L20. However Cambridge has an exceptionally large student and young person population that means some aspects relating to cycling are not directly comparable. | No change |
| Clarify the cycle parking standards  | Legal and General (1051022)                                | Disagree | Policy L20 & appendix 1 sets out a clear approach   | No change |
| Reference to other authority for cycle standards does not respond to local circumstances   | Hilton House Properties Limited, (1057476)                 | Disagree | Cambridge is an acknowledged leader with regard to supporting cycling. Policy L20 & appendix 1 sets out an appropriate approach   | No change |
| Plan is very weak on cycle parking   | 1185967  | Disagree | Policy L20 & appendix 1 sets out a clear approach   | No change |
| Specific policy wording suggested  | Crown Estate (51946) Hertfordshire County Council (837689) | Disagree | Policy L20 & appendix 1 sets out a clear approach   | No change |

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| Size of parking bays should take account of the fact that cars have got larger.           | St Albans Civic Society (1156974)                    | Disagree | Policy L20 & appendix 1 sets out a clear approach        | No change |
| East Hemel Hempstead (Central) should be in parking zone 3.                               | Crown Estate (51946)                                 | Disagree | Policy L20 & appendix 1 sets out an appropriate approach | No change |
| 2002 parking policy should be revised to reflect new best practice                        | St Albans Cycle Campaign (346623)                    | Disagree | Policy L20 & appendix 1 sets out a clear approach        | No change |
| Elements of the policy are unclear  | Legal and General (1051022)                          | Disagree | Policy L20 & appendix 1 sets out a clear approach        | No change |
| Requirement for vehicle charging points is not very aspirational and should be increased. | Hilton House Properties Limited (1057476)<br>1185525 | Disagree | Policy L18, L20 & appendix 1 sets out a clear approach   | No change |
| Car share parking is not going to work.   | 1144419  | Disagree | Policy L20 & appendix 1 sets out a clear approach        | No change |

## L21 – Education

| Representation Point   | Representor Raising Point                          | Outline Reply | Recommended Reply (including notes and references)    | Suggested Actions (including any Changes to Plan) |
|--|--|---------------|---|---|
| Policy should allow the possibility of delivery of school by developers  | Crest Strategic Projects and Bloor Homes (1158079) | Noted         | Policy L21 /IDP sets out an appropriate approach.     | No change   |
| Where school capacity is higher than BL population requires, transfer site at nil cost should be for a proportion of the school only | Crown Estate (51946)                               | Noted         | Policy L21 /S6 / IDP sets out an appropriate approach | No change   |
| 'Transferred to education authority at nil cost' may prevent flexibility to deliver bespoke educational facilities                   | Hunston Planning Limited (1185622)                 | Disagree      | Policy L21 /IDP sets out an appropriate approach      | No change   |
| Sites to be transferred to Local Education Authority will benefit HCC in respect of land values. May                                 | 1185775  | Disagree      | Policy L21 /IDP sets out an appropriate approach      | No change   |

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| conflict with government policy re free schools   |   |          |  |  |
| New schools must be provided in a timely manner, before or at the same time as development.   | Colney Heath Parish Council (51891)<br>London Colney Parish Council (52477)   | Noted    | Policy L21 /IDP sets out an appropriate approach. Timing of school provision will be decided during Masterplanning/planning application processes.       | No change                                |
| A full business case to show that the "appropriate contribution" from the developers will be both sufficient in its own right and supported by other funding. | 1153742   | Noted    | Policy L21 /IDP sets out an appropriate approach. Exact nature of school provision will be decided during Masterplanning/planning application processes. | No change                                |
| Support policy / support delivery of new schools  | London Colney Parish Council (52477)<br><br>St Stephen Parish Council (51804) | Agree    | Support noted  | No change                                |
| Add ref to each new school  | CEG(1158030)  | Noted    | Add reference in IDP   | IDP will be updated on an ongoing basis. |
| Site requirement should accord with BB103 or BB104  | Department for Education (1186955)  | Noted    | Add reference in IDP   | IDP will be updated on an ongoing basis. |
| Do not refer to state funded education  | Crown Estate (51946)  | Disagree | Policy L21 / IDP sets out a clear approach   | No change                                |

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| Broad Locations:<br>At BL - North St Albans new school playing fields will serve a community joint use function but not designated Local Green Space.<br>Covenants would restrict use of land. | Hallam Land Management Limited (1185998)   | Disagree | Policy L21 sets out a clear approach – when not in the Green Belt, new school playing fields will be designated as Local Green Space. | No change |
| Policy seeks to prevent future sell off of school playing fields by confirming community value   | Hunston Planning Limited(1185622)  | Noted    | Support for Policy L21 which addresses this already is noted.   | No change |
| School development in GB is contrary to NPPF   | Harpenden Green Belt Association (866541)<br>Historic England (929489)<br>Leverstock Green Village Association (1185907)<br>St Albans Civic Society (1156974)<br>1185714 | Disagree | Policy L21 /S3 / S6 sets out an appropriate approach  | No change |
| Remove school site &/or school built zone from GB. Show school   | Department for Education (1186955)   | Disagree | Policy L21 /S3 / S6 sets out an appropriate approach  | No change |

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| boundary on map.  | Hertfordshire County Council (837689)<br>Crown Estate (51946) |          |  |           |
| No difference between building a new primary school at BL and building one on the Townsend site.  | Chair of Governors Townsend School (1186028)                  | Disagree | Concentrating development in larger sites that can create new communities and deliver infrastructure – including schools - is a key part of the development strategy. Cross reference S6 vi. | No change |
| Blocks of GB adjacent to BLs at NW Harpenden, E St Albans, EHHN & London Colney is erroneous. They should be included within broad locations and designated as local green space. | 1055738   | Disagree | Policy L21 /S3 / S6 sets out an appropriate approach   | No change |
| Add ref to the historic environment   | Historic England (929489)                                     | Disagree | Policy L30 deals with this   | No change |
| Object to new school in GB due to lack of exceptional circumstances / very special circumstances  | CPRE (872572)<br>Ramblers Association (52420)                 | Disagree | Policy L21 /S3 / S6 set out a clear approach   | No change |

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| Land off London Road (LOLR) unsuitable and unjustified. Landowners do not support therefore it is not deliverable.   | Beechwood Homes (1123837)<br>Gorhambury Estates Company Ltd (375996)<br>Verulam Golf Club (1185810)<br>1185565<br>1186015<br>1185761 | Disagree         | School site allocations based on evidence and work with HCC. Work on the education infrastructure evidence base has been ongoing and IDP updates will reflect the latest position. | No change |
| Support housing at land off London Road site.  | Verulam Golf Club (1185810)<br>1186015   | Disagree         | Policy S4 deals with housing requirement   | No change |
| Add ref to protect the historic environment  | Historic England (929489)  | Disagree         | Policy L30 deals with this   | No change |
| Support policy   | St Albans Labour Group (1183933)   | Noted            | Support noted  | No change |
| London Road is congested & the junction of London Road/Verulam Industrial Estate, particularly with the railway bridge being so close and would become very dangerous. Infrastructure to support cycling | 1185728  | Noted / Disagree | Policy L18/L19 deals with this. Site selection in part because of proximity to areas where primary school pupils live/will live and will be able to access by walking.             | No change |



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| and walking is difficult, the lives of school children at risk if this proposal goes ahead. There are few primary age children within walking distance of the land which means any pupil will travel by car. |  |                  |   |           |
| HCC request an additional school allocation is required at Ariston site for state funded primary education.  | Hertfordshire County Council (837689)  | Noted / Disagree | School site allocations based on evidence and work with HCC. Work on the education infrastructure evidence base has been ongoing and IDP updates will reflect the latest position. HCC still working on evidence base regarding intended location for school and approach to provision. | No change |
| Do not support school at Ariston Site  | FOBH (1181795)   | Noted            | School site allocations based on evidence and work with HCC. Work on the education infrastructure evidence base has been ongoing and IDP updates will reflect the latest position. HCC still working on evidence base regarding intended location for school and approach to provision. | No change |
| Add ref to appropriate local infrastructure to encourage cycling and walking to school.  | Footpaths Coordinator St Albans & District Footpaths Society (723340)<br>British Horse Society (1187597) | Disagree         | Policy L18 deals with this  | No change |

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|   | London Colney Parish Council (52477)<br>STACC (346623)<br>Ramblers Association (52420) |          |   |           |
| Add ref to travel plan  | British Horse Society (1187597)<br>Ramblers Association (52420)                        | Disagree | Policy L18 deals with this.   | No change |
| Lack of evidence base for education / IDP update required   | Department for Education (1186955)<br>Redbourn Parish Council (759908)<br>1185583      | Noted    | Work on the education infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.   | No change |
| Policy L21 is not justified or consistent with national policy.   | Harpenden Green Belt Association (866541)  | Disagree | Approach is consistent with national policy.  | No change |
| Include ref to special education need.  | St Albans Labour Group (1183933)   | Disagree | Included in overall approach to school provision  | No change |
| Existing schools are already oversubscribed / strain on existing schools by new development, especially at Broad Locations. | 1185469<br>1185714<br>1184569<br>1184784<br>1153741                                    | Noted    | Concentrating development in larger sites that can create new communities and deliver infrastructure – including schools - is a key part of the development strategy. | No change |

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| More primary school places are required at Chiswell Green / Park Street  | St Stephen Parish Council (51804)      | Noted    | Work on the education infrastructure evidence base has been ongoing and IDP updates will reflect the latest position.   | IDP will be updated on an ongoing basis. |
| Secondary school required at PSGV  | St Stephen Parish Council (51804)      | Noted    | Policy S6 xi provides for this.   | No change                                |
| Concern about lack of new secondary places for St Albans   | St Albans Labour Group (1183933)       | Disagree | Concentrating development in larger sites that can create new communities and deliver infrastructure – including schools - is a key part of the development strategy. | No change                                |
| Secondary places for Kimpton are required  | North Herts District Council (1185674) | Disagree | Concentrating development in larger sites that can create new communities and deliver infrastructure – including schools - is a key part of the development strategy. | No change                                |
| BL North St Albans - object to primary school. Margaret Wix, an excellent primary school, is substantially under used. / Additional secondary places are required. | 1184862<br>840795<br>1184966           | Disagree | Concentrating development in larger sites that can create new communities and deliver infrastructure – including schools - is a key part of the development strategy. | No change                                |
| The whole of the East Hemel area proposals should be totally reconsidered.   | 334023                                 | Disagree | Concentrating development in larger sites that can create new communities and deliver infrastructure – including schools - is a key part of the development strategy. | No change                                |

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| For Verulam area, the proposed plan does nothing to remedy the inadequacy of infrastructure in this area - particularly schools | Verulam Residents Association (1185823)      | Disagree | Concentrating development in larger sites that can create new communities and deliver infrastructure – including schools - is a key part of the development strategy.  | No change |
| BL at NE Harpenden - HCC have no plans for improvement except those related to new school.                                      | 1183112                                      | Disagree | HCC support approach here and in S6 vii. Concentrating development in larger sites that can create new communities and deliver infrastructure – including schools - is a key part of the development strategy. | No change |
| Lack of ref to Extended Learning facilities   | St Albans Labour Group (1183933)             | Disagree | Included in overall approach to school provision.  | No change |
| More clarity required due to policy overlap in categories: new school; broad locations; GB education sites.                     | Legal and General (1051022)<br>CEG (1158030) | Disagree | Policy L21 sets out a clear approach, in conjunction with other policies.  | No change |
| Policy does not make provision for schools in the independent sector.   | St Albans School (1187032)                   | Disagree | There is no evidence of additional need in the independent sector that needs to be separately addressed in the LP. This matter can be appropriately addressed by the overall LP policy framework               | No change |
| Policy is vague   | Aurora Properties Limited (1151817)          | Disagree | Policy L21 sets out a clear approach   | No change |

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| Proposals at EHH for a new secondary school will affect access to Roundwood School for Redbourn children. | 1185037 | Noted | Not within planning remit.                                | No change |
| Unclear whether NE Harp and NW Harp will deliver a single 2FE school or two 2FE schools.                  | 1153741 | Noted | Policy S6 deals with this. They are two separate schools. | No change |

## **L22 - Community Leisure and Sports Facilities**

| <b>Representation Point</b>   | <b>Representor Raising Point</b>   | <b>Outline Reply</b> | <b>Recommended Reply (including notes and references)</b> | <b>Suggested Actions (including any Changes to Plan)</b> |
|---|--|----------------------|---|--|
| Policy requirement for community, leisure, sports facilities and local centre at Broad Locations is supported | Harpenden Town Council (51870)<br>Crest Strategic Projects and Bloor Homes (1158079) | Noted                | Support noted   | No change  |
| Policy supports the early allocation of BLs from which the majority of funding for such                       | Hunston Planning Limited (1185630)   | Noted                | Policy L22 sets out a clear approach.                     | No change  |

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| facilities will come.   |                                     |          |  |           |
| 'Suitably re-provided elsewhere' is very subjective. Loss of existing community infrastructure may be needed to fund improvement elsewhere but with an overall net loss. (e.g. Museum of St Albans, Harpenden Public Halls). Delete policy. | St Albans School (1187032)<br>52064 | Disagree | Examples given show suitable re-provision along lines set out in policy L22. | No change |
| Joint use facilities at educational development are not always feasible and should be deleted.  | St Albans School (1187032)          | Disagree | Policy L22 sets out an appropriate approach                                  | No change |
| The policy should be reworded to say that replacement provision of equivalent or better provision in terms of quantity  | Sport England (824971)              | Disagree | Policy L22 sets out a clear approach   | No change |

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| and quality in a suitable location will need to be provided.   |                                   |       |   |           |
| There is a need for new purpose built mosque.  | 1185960                           | Noted | Policy L22 acknowledges that there is a deficit of worship space and sets out an appropriate approach to provision. | No change |
| Not enough thought has gone into providing for the social and pastoral needs of the people who will live in the proposed developments. The provision of a Community Hall or Multi-Faith Centre should also be included in any development. | St Albans Deanery Synod (1185929) | Noted | Policy L22 acknowledges that there is a deficit of worship space and sets out an appropriate approach to provision  | No change |
| Marketing should be undertaken to demonstrate demand for existing use if any.  | Watford Borough Council (1122500) | Noted | Policy L22 deals with this.   | No change |
| Support policy to protect public houses  | St Albans Civic Society (1156974) | Noted | Support noted   | No change |

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|   | St Albans Labour Party<br>(1183933) |          |  |           |
| Text on public houses lacks sufficient guidance and justification   | Theatres Trust<br>(1179001)         | Disagree | Has been considered in depth at PPC. Policy L22 sets out a clear approach.   | No change |
| The land proposed for cemetery extension is not available from landowner and should be deleted from the map. Landowner wishes to work with the council to identify alternative land next to the existing cemetery, which can be provided alongside new residential development. | Gallagher Estates<br>(1143916)      | Disagree | The need for additional cemetery provision and the identification of an extension to London Road cemetery as the most appropriate location is clear. | No change |
| Criteria for very special circumstances is insufficient.  | CPRE (872572)<br>1019306            | Disagree | Policy L22 sets out a clear approach.  | No change |
| In relation to St Albans City   | CPRE (872572)                       | Disagree | Has been considered in depth at PPC. Policy L22 sets out a clear approach  | No change |



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| Football Club - need reference to suitable alternative locations beyond the district boundary in criteria 1. Criteria 2 should recognise that new development would have a severe impact. Criteria 3 scale of development should be minimised. Public scrutiny of viability assessment is required. Primary public access to stadium to be by sustainable transport modes guaranteed through legal agreement. |                                   |       |   |           |
| The enabling development must conform to NPPF it must not be a Trojan horse   | St Albans Civic Society (1156974) | Noted | Has been considered in depth at PPC. Policy L22 sets out a clear approach | No change |

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| for large housing estates   |   |          |   |           |
| Existing football club site must be returned to the park for public enjoyment.  | St Albans Civic Society (1156974)       | Noted    | The LP sets out an appropriate policy framework for future decision making.<br><br>This matter can be properly detailed through the masterplanning/ planning application/ EIA process, with appropriate consultation. | No change |
| Support policy in principle   | St Albans Labour Party (1183933)        | Noted    | Support noted   | No change |
| The Council has not demonstrated that it is the public interest to support a private commercial facility in the Green Belt.   | Ramblers Association (52420)            | Disagree | Has been considered in depth at PPC. Policy L22 sets out an appropriate approach  | No change |
| Enabling development must be restricted to that which is essential to ensure the deliverability and viability of the stadium. | Ramblers Association (52420)            | Noted    | Has been considered in depth at PPC. Policy L22 sets out an appropriate approach  | No change |
| Add ref to significant community benefits (beyond benefits to St Albans City FC)  | CPRE (872572)<br>Sport England (824971) | Noted    | Policy L22 sets out an appropriate approach.  | No change |

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| can be demonstrated / including how the development would help meet identified community, sports and leisure facility needs.                               |  |       |   |  |
| Travel to multiple hospital locations is unacceptable eg Watford & Stevenage. Travel is difficult, especially by public transport and should be addressed. | Colney Heath Parish Council (51891)<br>Wheathampstead Parish Council (51941)   | Noted | Not directly within LP remit  | No change                                |
| Health and well-being policy needs to be expanded  | St Albans Labour Party (1183933)<br>Wheathampstead Parish Council (51941)  | Noted | Health and well-being is appropriately addressed by LP policy framework overall – including transport, green spaces, provision of special needs accommodation, community facilities etc.          | No change                                |
| Hospital provision should be addressed / adequate provision needed.  | Colney Heath Parish Council (51891)<br>London Colney Parish Council (52477)<br>Wheathampstead Parish Council (51941) | Noted | There has been and continues to be ongoing liaison with the West Herts Hospital Trust. Work on the infrastructure evidence base has been ongoing and IDP update will reflect the latest position. | IDP will be updated on an ongoing basis. |
| GP and other healthcare facilities are   | London Colney Parish Council (52477)   | Noted | Work on the infrastructure evidence base has been ongoing and IDP update will reflect the latest position.  | IDP will be updated on an ongoing basis. |

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| important.<br>Adequate<br>provision<br>required.   |  |          |   |  |
| A&E is required  | St Albans Labour Party<br>(1183933)                              | Disagree | There has been and continues to be ongoing liaison with the West Herts Hospital Trust. Work on the infrastructure evidence base has been ongoing and IDP update will reflect the latest position. | IDP will be updated on an ongoing basis. |
| Where health facilities are no longer required there should be a presumption for housing use on NHS land.<br>Policies aimed to prevent loss of NHS facilities can harm delivery of services for the community.<br>Disposal of unneeded NHS facilities can be delayed or prevented. | NHS Property (911547)  | Disagree | Policy L22 sets out a clear approach. Where NHS facilities are genuinely no longer required then uses such as residential can be supported.   | No change                                |
| CCG detailed comments about capacity of GPs to absorb some of the proposed development and   | Herts Valleys Clinical Commissioning Group<br>(1177790, 1183617) | Noted    | Work on the infrastructure evidence base has been ongoing and IDP update will reflect the latest position.  | No change                                |

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| where there is a shortfall of space.  |   |       |  |  |
| New development is expected to make a proportionate contribution towards additional facilities. Herts Valleys Clinical Commissioning Group formula is set out to calculate the cost per dwelling of mitigating the impact of additional growth. | Herts Valleys Clinical Commissioning Group (1177790, 1183617) | Noted | Work on the infrastructure evidence base has been ongoing and IDP update will reflect the latest position. | IDP will be updated on an ongoing basis. |
| CCG's strategy of 'Your Care, Your Future' focuses on moving care out of large acute sites into more community focused delivery points. There are possible plans for a community hub in St Albans and ongoing work to look at redeveloping      | Herts Valleys Clinical Commissioning Group (1177790, 1183617) | Noted | Work on the infrastructure evidence base has been ongoing and IDP update will reflect the latest position. | IDP will be updated on an ongoing basis. |

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| Harpenden Memorial Hospital into a fit for purpose community site.   |   |       |   |  |
| The local acute provider is working through options for reconfiguring their current sites. St Albans City Hospital is part of that.            | Herts Valleys Clinical Commissioning Group (1177790, 1183617) | Noted | There has been and continues to be ongoing liaison with the West Herts Hospital Trust. Work on the infrastructure evidence base has been ongoing and IDP update will reflect the latest position. | IDP will be updated on an ongoing basis. |
| Current infrastructure is insufficient at Batford. Infrastructure must be improved including restoration of local centre and resources.        | 789007  | Noted | A local centre is identified at Batford – see also L12. This matter can be properly detailed through the masterplanning / planning application/ EIA process, with appropriate consultation.       | No change                                |
| For North East Harpenden Broad Location, football pitches is assumed, but it is traditionally male. Sports provision should be gender neutral. | 789007  | Noted | This matter can be properly detailed through the masterplanning/ planning application/ EIA process, with appropriate consultation.  | No change                                |

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| Retention of existing community leisure and sports is consistent with NPPF & Sport England. Part of the Broad Location site at North St Albans is currently used for playing fields for Old Albanians Sports Club. In preparing master plan consideration will need to be given as to how these are accommodated. | Hallam Land Management Limited (1185998) | Noted | This matter can be properly detailed through the masterplanning/ planning application/ EIA process, with appropriate consultation.  | No change |
| Policy should give consideration to extending or enhancing existing sports facilities that adjoin the Broad Location such as the Verulam School, Beaumont School and Oaklands College sites   | Sport England (824971)                   | Noted | Policies S6 & L22 set out a clear approach - This matter can be properly detailed through the masterplanning / planning application / EIA process, with appropriate consultation. | No change |

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| New community facilities should be transferred to the town council  | Harpenden Town Council (51870)        | Noted    | Ownership of community facilities can be properly detailed through the masterplanning/ planning application/ EIA process, with appropriate consultation.     | No change                                |
| Additional manned police station(s) required.   | St Albans Labour Party (1183933)      | Disagree | The police have not identified such requirements. Work on the infrastructure evidence base has been ongoing and IDP update will reflect the latest position. | IDP will be updated on an ongoing basis. |
| Improved changing rooms for sports facilities is required.  | St Albans Labour Party (1183933)      | Noted    | Not directly within Local Plan remit – cross reference S3 and support for sport and recreation facilities.   | No change                                |
| A local road circuit with a Cyclo Cross element on top is top priority for the cycling club.                        | Verulam Cycling Club (1187616)        | Noted    | This matter is appropriately addressed by LP policy framework  | No change                                |
| HCC early childhood services identify that 4 children's centre areas may not have sufficient places.                | Hertfordshire County Council (837689) | Noted    | Work on the infrastructure evidence base has been ongoing and IDP update will reflect the latest position.   | IDP will be updated on an ongoing basis. |
| HCC library services: Redbourn & Wheathampstead to be co-located with fire stations, construction to commence 2018. | Hertfordshire County Council (837689) | Noted    | Work on the infrastructure evidence base has been ongoing and IDP update will reflect the latest position.   | IDP will be updated on an ongoing basis. |



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| <p>No additional libraries are planned for St Albans, so additional demand will need to be met by increasing capacity at existing locations nearest to proposed development. Appropriate contributions are required. Drive for efficiencies means that floorspace of existing libraries may change.</p> |  |              |   |   |
| <p>HCC Community Protection: No change required to Hertfordshire Fire and Rescue Services facilities. An integrated risk management plan is being produced which considers relocation of stations. Hertfordshire Fire and Rescue</p>  | <p>Hertfordshire County Council (837689)</p> | <p>Noted</p> | <p>Work on the infrastructure evidence base has been ongoing and IDP update will reflect the latest position.</p> | <p>IDP will be updated on an ongoing basis.</p> |

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| Services wished to be consulted on water supply. Sprinkler systems in all new buildings and development is recommended.  |                        |       |  |           |
| Up-to-date sports facility strategy (indoor and outdoor sports) required   | Sport England (824971) | Noted | New evidence base for Playing Pitch Strategy has been published. | No change |
| Should address the principle of alternative sports and recreation provision (where the benefits clearly outweigh the loss) being acceptable on open space, sports and recreation land/buildings. | Sport England (824971) | Noted | Policy L22 sets out an appropriate approach.                     | No change |
| Existing settlements also need much better access to community facilities. There should be plans to upgrade  | 1181750                | Noted | Policy L22 sets out an appropriate approach.                     | No change |

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| existing housing areas with poor community facilities e.g. Verulam, Batchwood. |  |  |  |  |
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### L23 Urban Design and Layout of New Development

| Representation Point   | Representor Raising Point   | Outline Reply | Recommended Reply (including notes and references)  | Suggested Actions (including any Changes to Plan) |
|--|---|---------------|---|---|
| <p>Plan should do more to promote health and wellbeing in new developments including designing attractive and safe access and facilities for sustainable modes</p> <p>Reference 'Hertfordshire's Health and Wellbeing Planning Guidance, May 2017<br/> <a href="https://www.hertfordshire.gov.uk/hertfordshires-">https://www.hertfordshire.gov.uk/hertfordshires-</a></p> | <p>Sport England (824971)</p> <p>Hertfordshire County Council ( 837689)</p> | Disagree      | <p>The principles included in the Guidance are already embedded in various Plan policies. Cross reference Policies S2 /L18 / L24 / L26-29.</p> <p>A reference to the guidance can be added.</p> | Minor modification - (reference to HCC Guidance)  |

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| <a href="#">health-and-wellbeing-planning-guidance</a>   |   |          |  |  |
| No evidence underpinning the need for M4 (2) dwellings (accessible and adaptable)  | Martin Grant Homes and Kearns Land (975683)<br><br>Thakeham Homes (1187005)<br><br>Home Builders Federation (1156936) | Disagree | SHMA evidence (and forthcoming SW Herts update) indicates changing demographics and increasing numbers of older persons aged 85 and over. New homes should be designed in a flexible way to ensure that housing is accessible and adaptable, maximising ability to remain in homes and/or provide for people with a disability. This presents a clear case for all housing to meet an accessible standard. This policy would positively impact on equality of opportunity. | No change                              |
| Mandatory amount of green roofing should be stipulated. Clarification of meaning of term requested.                            | St Albans Civic Society (1156974)<br><br>1153802  | Disagree | To stipulate a threshold for the minimum amount of green space provision (green roofing) is overly prescriptive.<br><br>Definition of green roofing can be included in online glossary.  | Addition to associated online glossary |
| Lighting references in Policy are inadequate / lack detail. They should refer to all developments not just major developments. | Hertfordshire County Council (837689)<br><br>1153802<br><br>52064   | Disagree | Policy acknowledges the adverse impact on the environment from light pollution and seeks to mitigate. The guidance notes referred to are relevant to all cases and provide sufficient detail. This is only possible where the LPA has planning control. Planning control is not possible on small scale installations.   | No change                              |

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| Section J<br>'Lighting' should be removed as modern lighting systems can be added to facilities without harm to residential amenity / ecology                             | St Albans School<br>(1187031)                        | Disagree | Policy is required to adverse impact on the environment from light pollution and seeks to mitigate. The guidance notes referred to are relevant to all cases and provide sufficient detail.   | No change |
| Landscape impact assessment and EIA is required at feasibility stage to ensure no loss of ecology. Additional criteria are required within design principles and details. | Hertfordshire County Council (837689)<br><br>1184750 | Agree    | Cross reference to Policy L24 / 29<br><br>Policy L23 concurs, stating that development should take account of its landscape context. Policy L29 seeks landscape impact assessments for all major development and those which may have significant effect on the local landscape. 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. | No change |
| All buildings should be maintained by a management company to prevent individuals modifying the fronts of houses  | 1184750  | Noted    | Not within planning remit   | No change |

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| Policy will result in housing densities that are too high. This does not allow for good design.               | 1184750<br>840795   | Disagree | Cross reference to Policies S6 and L1.<br><br>High(er) density does not result in poor quality design. The NPPF para 123 (a) states that plans should contain policies to optimise the use of land in their area to include the use of minimum density standards that should seek a significant uplift in the average density of residential development. Work on density assumptions are based on HCA research recommending residential densities of 30-50dph in suburban locations (the BLs for development). | No change |
| Policy too detailed / prescriptive - Plan should rely on NPPF.  | RF Sinclair and Sons (1058251)<br><br>Crest Strategic Projects and Bloor Homes (1158079)<br><br>Hallam Land Management Limited (1185998)<br><br>St Albans School (1187031)<br><br>52064 | Disagree | This is essential design policy. The NPPF (Section 12) supports local design policy and guidance.   | No change |
| Requirement for surface water drainage information for non-major development not in line with national policy | Jarvis Homes (973180)   | Disagree | NPPF (Section 14) supports appropriate approaches to flooding risk.   | No change |

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| Specific policy wording suggested relating to SUDS – remove word ‘urban’  | Hertfordshire County Council (837689)               | Agree    | Minor modification to reflect more recent usage of SUDS to refer to ‘Sustainable Drainage Systems’ rather than older usage as ‘Sustainable Urban Drainage Systems’ acknowledged minor clarification   | Minor modification – remove word ‘urban’ |
| Supporting text should be included encouraging early consultation with Thames Water / recommendations to prevent sewer blockages  | Thames Water (931213)                               | Disagree | Matter can be dealt with as planning application stage  | No change                                |
| Point (D) requires the scale and massing to be subservient-unclear what is meant by subservient and unjustified as to why new buildings should be so. The location of the development and size of the site do not require this generic approach, scale and massing should | Hill Residential (1158064)<br>Jarvis Homes (973180) | Disagree | The NPPF para 9 states that the required development must ‘take local circumstances into account, to reflect the character, needs and opportunities of each area’. Para 122 criteria d states ‘desirability of maintaining an areas prevailing character and setting’.<br><br>The policy does not unduly constrain potential development locations. | No change                                |

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| be appropriate to existing context.  |  |          |  |           |
| New development should be compatible with the pattern and character of the existing development in all cases not just in verdant and mature suburban areas | Hill Residential (1158064)<br><br>Jarvis Homes (973180)                              | Disagree | The NPPF para 9 states that the required development must 'take local circumstances into account, to reflect the character, needs and opportunities of each area'. The Plan approach takes specific account of the nature of the mature and verdant suburbs with their particular characteristics such as large plots. Not all the district has that particular character. Due regard to relationships with existing development in all cases is acknowledged already. | No change |
| Design Advice Leaflets No 1 & 2 are outdated   | Jarvis Homes (973180)<br><br>Trustees of James Henry Frank Sewell Deceased (1185630) | Disagree | Design Advice Leaflet 1 is still highly relevant to smaller scale development within existing urban areas. The policy also refers to Herts Building Futures (design guidance) and does not unduly constrain design for potential developments.   | No change |
| Plan design policies do not acknowledge the role that urban design and development layouts play in reducing the impacts of climate change                  | Environment Agency (1147557)   | Disagree | Cross reference policies L25/26.<br><br>Criteria xi deals directly with this issue. Herts building futures provides more guidance.   | No change |
| Potential for adjusted / relaxed specific design standards within  | Legal & General (1051022)<br><br>CEG (1158030)                                       | Noted    | Cross reference to L24<br><br>Sufficient clarity provided in policy.   | No change |



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| BL requires clarification.  | Historic England (929489)   |          |   |           |
| Design review policy should include reference to 'Building More Building Beautiful'.  | St Albans Civic Society, (1156974)<br>Hallam Land (1185998)<br>1185950<br>1184967 | Disagree | Whilst the content of the policy exchange document is acknowledged as general background evidence and context - with reference in particular to affordable housing delivery - it is 'London centric' and does not wholly reflect the context of SADC and has no official status.<br><a href="https://policyexchange.org.uk/wp-content/uploads/2018/06/Building-More-Building-Beautiful.pdf">https://policyexchange.org.uk/wp-content/uploads/2018/06/Building-More-Building-Beautiful.pdf</a> | No change |
| Independent design review opinion should be sought from residents and Civic Society   | St Albans Civic Society, (1156974)<br>1184967<br>1185950                          | Agree    | This is the intent of the policy  | No change |
| Pre-application expert design review should not be a requirement for the Broad Locations. Not clear what the difference is between a pre-application expert design review and a subsequent and additional independent design review | Hallam Land (1185998)   | Disagree | The importance of design quality is acknowledged in the NPPF and this is an appropriate way to secure it.   | No change |

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| Clarification required on definition of good urban design and welcoming contemporary design.                            | St Albans Civic Society (1156974)<br>Hallam Land Management Limited (1185998)<br>1185950 | Noted    | The NPPF focuses on high quality buildings and good design standards and reference character and sense of place rather than a particular design typology.  | No change |
| Street design should allow for social interaction for health, safety, social cohesion, the environment and citizenship. | 1184967  | Agree    | The policy seeks to achieve a high standard of detailed design and layout through design and layout principles. The NPPF states the need to support communities' health, social and cultural wellbeing and para 91 (a) states the aim to promote social interaction to achieve healthy and inclusive places. | No change |
| Clarification required on the distinction between 'should' and 'must' in Policy   | St Albans Civic Society (1156974)  | Disagree | Must is a deliberately used stronger word. Should is more flexible and possibly less restrictive. The policy uses both words. The NPPF uses the wording 'should' more frequently and 'must' when referring to policies reflecting international obligations and statutory requirements (for example).        | No change |
| Building height control area should be shown on policies map  | Historic England (929489)  | Disagree | Cross reference Para 1.10.<br><br>Elements of the policies map will be in the form of online information.  | No change |
| Policy should refer to need to conserve and enhance, particularly in relation to re-instatement of                      | Historic England (929489)  | Disagree | Cross reference Policy 30<br><br>The policy states that these aspects must be sensitively considered in relation to the host building and streetscene. Reference to conserve and enhance where location within conservation area best placed within policy L30.  | No change |

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| historic shopfront designs. |  |  |  |  |
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## L24 Development Amenity Standards

| Representation Point   | Representor Raising Point                        | Outline Reply | Recommended Reply (including notes and references)   | Suggested Actions (including any Changes to Plan) |
|--|--|---------------|--|---|
| Support good urban design (residential & industrial) through this policy   | 1184750  | Noted         | Support noted  | No change   |
| Landscape impact assessment and EIA is required at feasibility stage to ensure no loss of ecology. Additional criteria are required within design principles and details | Hertfordshire County Council (837689)<br>1184750 | Agree         | Cross reference to Policy L23 / L29<br><br>Policy L23 concurs, stating that development should take account of its landscape context. Policy L29 seeks landscape impact assessments for all major development and those which may have significant effect on the local landscape. 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. | No change   |
| Policy will result in housing densities that are too high. This does not allow for good design.  | 1184750<br>840795                                | Disagree      | Cross reference to Policies S6 policies and L1 / L24<br><br>High(er) density does not result in poor quality design. The NPPF para 123 (a) states that plans should contain policies to optimise the use of land in their area to include the use of minimum density standards that should seek a significant uplift in the average density of residential development. The minimum density set out in the BL policies is 40dph. Work on density assumptions are based on HCA research                                 | No change   |

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|  |  |          | recommending residential densities of 30-50dph in suburban locations (the BLs for development).  |  |
| Strict controls of amenity space compromise viability and delivery of urban optimisation | Jarvis Homes (973180)<br>Home Builders Federation Ltd (1156936)<br>1058251<br>52064  | Disagree | The Policy establishes important design principles.<br><br>Policy allows for a reduction in the standards of amenity provision to reflect the less constrained design opportunity provided by the BL's and any coherent design approach.   | Update of design guidance planned following Plan adoption. |
| Unclear 'internal space' minimum requirement.  | Jarvis Homes (973180)<br>St Albans Civic Society (1156974)<br>Home Builders Federation Ltd (1156936)<br>Crest Strategic Projects and Bloor Homes (1158079)<br>CEG (1158030)<br>Hertfordshire County Council (837689)<br>1185704<br>1185630 | Disagree | Plan policies deliberately do not specify internal (national technical standards) space standards to allow flexibility to design for varied and changing lifestyles.<br><br>The policy properly requires suitable provision of external space (where internal space is limited). | No change  |

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| Clarification of definition of 'room' would be helpful to clarify what amenity space is required for studios. | <p>Jarvis Homes (973180)</p> <p>St Albans Civic Society (1156974)</p> <p>Home Builders Federation Ltd (1156936)</p> <p>Crest Strategic Projects and Bloor Homes (1158079)</p> <p>CEG (1158030)</p> <p>Hertfordshire County Council (837689)</p> <p>1185704</p> <p>1185630</p> <p>1185630</p> | Disagree | A studio is by definition a single room. 'Room' as related to studios are multi-purpose. | No change |
| Landscape planting should be recognised in its contribution to amenity.                                       | <p>Jarvis Homes (973180)</p> <p>St Albans Civic Society (1156974)</p> <p>Home Builders Federation Ltd (1156936)</p> <p>Crest Strategic Projects and Bloor Homes (1158079)</p> <p>CEG (1158030)</p>   | Agree    | Cross reference to Policy L29  | No change |

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|  | Herts County Council<br>(837689)<br><br>1185704<br><br>1185630 |  |  |  |
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## L25 Energy and environmental performance of new development

| Representation Point  | Representor Raising Point | Outline Reply | Recommended Reply (including notes and references)  | Suggested Actions (including any Changes to Plan) |
|---|---------------------------|---------------|---|---|
| Reducing need to build in the Green Belt would be more environmentally friendly through less carbon emissions                   | 1182314<br>1153802        | Noted         | The NPPF puts a high priority on meeting housing need. This requires some use of green field/ Green belt land. Policy states that the larger broad locations will be expected to deliver renewable/low carbon energy supply.  | No change   |
| Policy should give greater consideration to the needs of the end user (building occupier) to assist them in living sustainably. | 1153802                   | Noted         | It is acknowledged that the environment in which we live, work and socialise plays a significant role in the health of individuals and communities. The policy by its title of 'energy and environmental performance of new development' seeks to reduce carbon dioxide and other emissions that has impacts on air quality and public health and gives those opportunities. The policy does ref to energy conservation in use. | No change   |
| Policy should reference the issue of construction waste, the 'circular economy'   | 1153802                   | Noted         | L25 supports minimising construction waste generation and reuse/recycling materials and the principles of the waste hierarchy.<br><br>Hertfordshire County Council is the waste planning authority for Hertfordshire. Waste is managed through the Hertfordshire Waste Development Framework 2011-2026. A   | No change   |

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| and design for disassembly.   |   |          | key objective is to find alternatives to allow the movement away from landfill by embracing alternative technologies. Proposals for waste management should be in accordance with this framework.  |           |
| Policy does not recognise the energy hierarchy (Lean, Clean, Green).  | 1153802   | Noted    | The energy hierarchy would inform the design, construction and operation of new buildings. The priority is to reduce energy demand, supply energy efficiently and incorporate new renewable technologies. This is the purpose of the policy and does not require a specific hierarchy namecheck. | No change |
| Renewable energy policy / proposals should relate to all developments, not just those over 50 units, classed as major developments or those broad locations stated. | London Colney Parish Council (52477)<br>1153802 | Disagree | Under current NPPF this focuses on effective and proportionate implementation of policy and it is more difficult and less proportionate to apply this aspect of policy to smaller scale development.   | No change |
| Requirement for environmental performance and sustainability statement at pre-application stage is onerous  | Martin Grant Homes and Kearns Land (975683)     | Disagree | Embedding sustainable principles from the earliest stage possible can ensure appropriate measures are built into design. Pre-application stage provides greater opportunities for maximising the benefits.   | No change |
| Parking should be surfaced with permeable materials   | Ver Valley Society (826041)                     | Noted    | Policy concurs stating that sustainable construction should be an integral part of all planning applications. Policy L20 states 'parking surfaces should be permeable'.  | No change |

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| Plan should make reference to remediation of contaminated land   | Environment Agency (1147557)   | Disagree | <p>This is a matter dealt with generally in the NPPF.</p> <p>The Council may impose planning obligations/conditions to ensure remediation of specific sites.</p> <p>High risk development proposals such as petrol stations and cemeteries should be avoided within vulnerable groundwater areas</p>  | No change |
| Plan should include targets and standards for carbon emissions and energy efficiency. Referring to performance targets in conditions and agreements is insufficient. Need for clear policy guidance how development will demonstrate compliance. | <p>Hill Residential (1158064)</p> <p>Environment Agency (1147557)</p> <p>Thames Water (931213)</p> <p>St Stephen Parish Council (51804)</p> <p>St Albans Labour Party Group (1183933)</p> <p>1153802</p> | Noted    | <p>Para 149 of the NPPF states that local councils should take proactive approach to mitigating and adapting to climate change taking into account the long term implications for water supply. BREEAM BRE HQM considered best method for setting performance standards.</p>  | No change |
| Set targets for non-domestic water consumption and requirement to implement water recycling for non-potable uses.  | <p>Environment Agency (1147557)</p> <p>London Colney Parish Council (52477)</p> <p>1153802</p>   | Noted    | <p>Policy applies optional water consumption technical standard.</p> <p>Para 149 of the NPPF states that local councils should take proactive approach to mitigating and adapting to climate change taking into account the long term implications for water supply.</p> <p>Land use activities can indirectly/directly impact upon surface and groundwater quality. May be of benefit to state</p> | No change |



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| Protect groundwater.  |  |          | certain uses must submit and assessment of the potential impact of the use on groundwater such as petrol stations, cemeteries, waste treatment facilities and non-landfill waste management activities, storage of slurry etc<br><br>Policy L23 states that SUDS principles will be applied as a drainage management tool to manage surface water runoff. |           |
| Recommend modification to refer to Part L of Building Regulations | Adrian Irving and Alban Developments Ltd (1156368) | Disagree | This is addressed by relevant building control legislation  | No change |

### **L26 Local Green Space**

| <b>Representation Point</b>   | <b>Representor Raising Point</b>    | <b>Outline Reply</b> | <b>Recommended Reply (including notes and references)</b>   | <b>Suggested Actions (including any Changes to Plan)</b> |
|---|-------------------------------------|----------------------|---|--|
| Ariston site should be designated as Local Green Space                          | Friends of Bernards Heath (1181795) | Disagree             | The Policies map designates the recreation ground at Bernards Heath adjacent to Sandridge Road as local green space, in accordance with the Green Space technical evidence. Ariston Playing Fields are not a public open space. | No change  |
| Green Belt, greenspaces, parks and woodland are being sacrificed to development | 840795                              | Noted                | Policies S1 and S2 provide a clear development strategy. Development need, overall Plan context and site specific analysis in GB work provide exceptional circumstances for GB release.   | No change  |

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| Local green spaces that are publically accessible should be provided by village green designation and new public rights of way | Ramblers Association (52420)<br>St Albans & District Footpaths Society (723340)<br>The British Horse Society (1187597) | Noted    | Policy L29 prioritises enhanced public access improvements to the Green Infrastructure Network. Opportunities are detailed in the Green Infrastructure Plans that support access to recreation and open space such as the St Albans Radial Greenway. The County Council are responsible for a 'Rights of way improvement plan' which is incorporated into policy L18 regarding the transport strategy. | No change |
| The designation criterion 'demonstrably special' is unclear.   | St Albans School (1187032)<br>52064  | Disagree | The NPPF para 99 states that local green spaces should be designated when a plan is prepared. The designation of the local green spaces correlates with the criteria in NPPF para 100 as they are within settlement limits in proximity to local communities and have particular local significance in terms of recreation or natural value.   | No change |
| The designation restricts urban area development sites   | St Albans School (1187032)<br>52064  | Disagree | The Plan provides for development need. Local green spaces have important functions for health and wellbeing of communities and protection of the environment.   | No change |
| Harpenden Neighbourhood Plan designates 12 local green spaces  | Harpenden Town Council 51870)  | Noted    | The council are committed to supporting neighbourhood plans; the HNP designations now form part of the Development Plan.   | No change |
| The policy should ensure there are no unrealistic requirements on developers   | Hertfordshire County Council (837689)  | Noted    | Policy gives clarity on when ancillary development to support local green space would be acceptable.   | No change |

## L27 Green Space Not Designated as Local Green Space

| Representation Point  | Representor Raising Point                   | Outline Reply | Recommended Reply (including notes and references)  | Suggested Actions (including any Changes to Plan) |
|---|---|---------------|---|---|
| Policy scope and application is unclear and doesn't provide necessary clarity and certainty- better to rely on NPPF | Martin Grant Homes and Kearns Land (975683) | Disagree      | Policy is deliberately criteria based to support well balanced planning judgements on when ancillary built development would be supported and when loss of green space may be acceptable. NPPF is focused on sport and recreation facility issues, and does not deal with all relevant open space considerations (e.g. wildlife and urban landscape / visual value) | No change   |
| Policy should ensure wildlife conservation  | 1153802                                     | Noted         | Policy stipulates criteria that wildlife conservation is to be provided for in the design and landscaping of proposed development, maintain watercourses and would not damage or destroy the environment.   | No change   |
| Policy should ensure no unrealistic requirements are placed on developers   | St Albans School (1187032)<br>52064         | Noted         | Policy gives clarity on when loss of areas of green space would be acceptable. Inevitably the intention is to place appropriate requirements on development proposals.  | No change   |
| Policy should include reference to 8m buffer along watercourses   | Environment Agency (1147557)                | Disagree      | This issue is covered generally in Policy L29. There is no need to include all detailed guidance/ EA policy as this is available in supporting documents.   | No change   |

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| Not explicit how land which no longer serves recreational/sporting purposes will be assessed    | Sport England (824971)      | Agree | The wording can be amended from 'clearly demonstrated that the building or facility is no longer required' to incorporate the precise wording of para 97 criteria (a) of the NPPF to ensure that an assessment is undertaken to demonstrate surplus. | Minor modification<br><br>Amend to reflect specific NPPF wording criteria that 'an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements'.  |
| Does not specify that replacement land and facilities needs to be equivalent or better          | Sport England (824971)      | Agree | The wording can be amended from 'unless suitably re-provided elsewhere' to incorporate the precise wording of para 97 criteria (b) of the NPPF to ensure that facilities are the same or better and in the most appropriate locations.               | Minor modification<br><br>Amend to reflect specific NPPF wording that 'suitable replacement land and facilities of equivalent or better provision in terms of quantity and quality can be provide elsewhere' |
| Would prefer specific mentions of rivers Red, Ver and Lea, rather than vague term 'Watercourse' | Ver Valley Society (826041) | Noted | These are detailed matters about implementation of policy. They will be covered through detailed sector / local guidance.  | No change  |

## L28 Green Space Standards and New Green Space Provision

| Representation Point   | Representor Raising Point                                     | Outline Reply | Recommended Reply (including notes and references)   | Suggested Actions (including any Changes to Plan) |
|--|---|---------------|--|---|
| Policy allows no flexibility if there is overprovision   | Jarvis Homes (973180)   | Disagree      | Cross reference Policies L26/L27 which set out when it may be acceptable to lose green space. The purpose of the policy is to establish a baseline standard of provision required in new development.  | No change   |
| Policy should clarify what is meant by 'teenage areas' within tables                                   | Hertfordshire County Council (837689)                         | Disagree      | 'Teenage areas' is a term derived from PPS 17 typology of green spaces. SADC Green Spaces Technical Report 2016 defines this as areas for wheeled sports and pieces of equipment within existing parks. Multi-games courts and youth shelters are taken into consideration. The NPPF does not define a typology for this form of open space however in terms of equality and inclusion it is important that the local plan caters for all the community. | No change   |
| Policy should clarify whether Porters Hill Park is included within North East Harpenden Broad Location | Batford Community Action Group (1185696)                      | Disagree      | Cross reference Policies Map. Porters Hill Park lies immediately adjacent to the south of the Broad Location at NE Harpenden and is clearly not within the boundary. No need to refer to in the Policy.  | No change   |
| All development should contain open spaces and sports centres/facilities. These areas                  | Batford Community Action Group (1185696)<br>789007<br>1184750 | Noted         | Cross reference L24 and S6. The policy sets out green space standards for new residential areas. The policy states that designs must respond positively to environmental context and integrate with existing environmental character reflecting landscape character. Policies S6 within BL require delivery of recreation space and public open space and in   | No change   |

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| should not encroach upon proposed country park and should not affect tree retention /landscaping. Topography should be respected. |  |          | the case of S6 i), S6 iii) and S6 iv) (East Hemel North, East Hemel South and North Hemel) managed woodland and new Country Park. The BLs will be planned in detail through masterplanning processes and the factors referred to will be important considerations.   |           |
| Provision of green space and its management must be secured by planning obligations.  | Sport England (824971)<br>St Albans Civic Society (1156974)<br>Watford Borough Council (1122500) | Noted    | Cross reference Policy L17. Policy covers this. Direct provision of and financial contributions to infrastructure will be secured through S106 and CIL.  | No change |
| Quantity standards for amenity green space is not based on robust evidence  | Sport England (824971)   | Disagree | Quantity standards refer to the area of open space in sq m required for every person, within a set area.<br><br>Greenspace Strategy 2016 (SADC) set local quantity standards <a href="#">Green Spaces Technical Report 2011</a><br><br>The open space required from new development is based on the anticipated increase in population resulting from the new development. | No change |
| Quantity standards for amenity green space does not satisfy CIL Regulation 122 tests  | Sport England (824971)   | Disagree | Greenspace Strategy 2016 (SADC) set local quantity standards <a href="#">Green Spaces Technical Report 2011</a>  | No change |

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| Policy only covers grass pitches. Does not reflect priority for artificial grass pitch (AGP) provision.   | Sport England (824971)                                      | Agree | <p>Baseline and further work since Regulation 19 has been undertaken to inform specific development proposals. Playing Pitch Strategy update 2019 provides baseline data on grass and AGPs across the District taking into account the significant investment of SADC in AGP provision and trends within sports.</p> <p>Policy L28 states that the specific form/mix of provision will be negotiated in relation to the consideration of policy and green space deficiencies.</p>  | No change |
| Does not reflect Rugby Football Union priority for improvements to existing capacity rather than new pitches. Junior rugby pitch provision missing from Park St, East and North Hemel. Does not distinguish between individual sports | Sport England (824971)<br>St Stephen Parish Council (51804) | Agree | <p>Baseline and further work since Regulation 19 has been undertaken to inform specific development proposals. Playing Pitch Strategy update 2019 provides baseline data on grass and AGPs across the District taking into account the significant investment of SADC in AGP provision and trends within sports.</p> <p>Policy L28 states that the specific form/mix of provision will be negotiated in relation to the consideration of policy and green space deficiencies. Policy L28 also supports the enhancement of existing facilities.</p> | No change |
| Does not refer to Sport England latest guidance to calculate pitch needs of new development   | Sport England (824971)                                      | Agree | <p>Baseline and further work since Regulation 19 has been undertaken to inform specific development proposals. Playing Pitch Strategy update 2019 utilises the latest guidance from Sport England. Specific reference not needed in Policy.</p>  | No change |

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| Accessibility standard is inappropriate   | Sport England (824971) | Disagree | <p>The LP aims to promote sustainable transport through accessibility and NPPF para 104 states planning policies should provide for high quality walking and cycling networks. Natural England 'Accessible natural greenspace guidance' recommends greenspace no more than 300m from home. SADC Technical report green spaces refers to the FIT standards for play (HA per 1000 persons) and ANGTS (size OS 2ha = 300m)</p> <p>Greenspace Strategy 2016 (SADC) set local accessibility standards. <a href="#">Green Spaces Technical Report 2011</a></p> <p><a href="#">Natural England Nature nearby 'Accessible natural greenspace guidance' 2011</a></p> <p>300m is the typical distance threshold to small and local parks and areas of greenspace with a multi-functional role.</p> | No change  |
| Policy threshold of 100 dwellings for making green space provision is too low   | Sport England (824971) | Disagree | <p>Appropriate open space is important in developments of this size. This is particularly the case in respect of play.</p>   | No change  |
| Policy should refer to detailed design of sports facilities (floodlighting etc) | Sport England (824971) | Agree    | <p>Design of sports facilities captured within the general design principles L23. Design principle (j) captures floodlighting guidance from ILP and design for non-residential developments in excess of 1,000sqm will be subject to pre-application expert design review with appropriate community support.</p> <p>Policy L28 refers to play facilities designed and provided in accordance with national best practise guidance set out in Fields in Trust, supplementary planning documents and other local guidance. Reference could also be made to Sport England guidance.</p>  | <p>Minor modification</p> <p>Refer to Sport England design guidance as footnote P.61 LP.</p> |



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| No up to date evidence base on outdoor sports facilities | Sport England (824971) | Disagree | Baseline and further work since Regulation 19 has been undertaken to inform specific development proposals. Playing Pitch Strategy update 2019 provides baseline data on grass and AGPs across the District taking into account the significant investment of SADC in AGP provision and trends within sports. | No change |
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### **L29 Green and Blue Infrastructure, Countryside, Landscape and Trees**

| <b>Representation Point</b>   | <b>Representor Raising Point</b>                 | <b>Outline Reply</b> | <b>Recommended Reply (including notes and references)</b>   | <b>Suggested Actions (including any Changes to Plan)</b> |
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| Landscape impact assessment and EIA is required at development feasibility stage to ensure no loss of ecology | 1184750  | Noted                | Policy L29 seeks landscape impact assessments for all major development and those which may have significant effect on the local landscape. The policy biodiversity requirements also necessitate detailed assessment. 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. | No change  |
| Habitat networks and ecosystem services are green infrastructure  | Hallam Land Management Limited (1185998)         | Noted                | This is integral to policy.   | No change  |
| Rights of Way Improvement Plan implementation is required. Horse carriage driving                             | Hertfordshire County Council (837689)<br>1157340 | Noted                | This is covered under the countryside access heading. Specific mention of this detail is not necessary.   | No change  |

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| provision should be made   |  |       |  |           |
| <p>More detail is needed on biodiversity:</p> <ul style="list-style-type: none"> <li>- Landscape level biodiversity enhancement</li> <li>- refer to DEFRA Biodiversity Impact Assessment Calculator</li> <li>- Ecological surveys based on British Standards BS 42020:2013 Biodiversity</li> <li>- Seek advice from Hertfordshire Ecology &amp; Herts &amp;</li> </ul> | <p>Herts and Middlesex Wildlife Trust (866619)</p> <p>Hertfordshire County Council (837689)</p> <p>Redbourn Parish Council (759908)</p> <p>1153802</p> | Noted | These are detailed matters about implementation of policy and are not required in the policy itself. | No change |

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| Middlesex Wildlife Trust  |   |       |  |           |
| <p>More detail is needed on woodland protection:</p> <ul style="list-style-type: none"> <li>- Use Natural England's Ancient Woodland inventory assessment guide to assist appropriate development</li> <li>- Use Woodland Trust standard to determine how much woodland is required</li> <li>- Protect ancient woodland as per the NPPF</li> <li>- Reference Community orchards. Should reference tree specifications, arboriculture</li> </ul> | <p>Forestry Commission (1182710)</p> <p>HCC (837689)</p> <p>The Woodland Trust (1185811)</p> <p>Forestry Commission (1182710)</p> <p>St Albans Civic Society (1156974)</p> <p>1185704</p> | Noted | These are detailed matters about implementation of policy and are not required in the policy itself. | No change |

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| <p>surveys, soil handling and preparation</p> <ul style="list-style-type: none"> <li>- Integrate trees within wider landscape</li> </ul> |   |              |   |  |
| <p>Suggest inclusion of detailed footpath improvement proposals (listed)</p>   | <p>Ramblers Association (52420)</p> <p>St Albans &amp; District Footpaths Society (723340)</p> <p>British Horse Society (1187597)</p> | <p>Noted</p> | <p>These are detailed matters about implementation of policy. They will be covered through detailed sector / local guidance.</p>  | <p>No change</p>   |
| <p>Figure 2 Green Infrastructure does not indicate proposed country parks, wildlife sites, SSSI, rivers, specific, public access and</p> | <p>Ramblers Association (52420)</p> <p>St Albans &amp; District Footpaths Society (723340)</p> <p>Crown Estate (51946)</p>            | <p>Noted</p> | <p>Figure 2 sets out the key green infrastructure network although this is noted as for illustrative purposes only. This network is supplemented by the Green Infrastructure Plan 2011 of proposed green infrastructure network and projects and Watling Chase Supplementary Planning Guidance (Hertsmere Council). Policy states that enhanced public access improvements are a high priority. Watling Chase Community Forest designation is outlined on Figure 2.</p> | <p>Minor modification</p> <p>amend footnote 24 to corrected link</p> |

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| Watling Chase Community Forest   | Hertfordshire County Council (837689)<br>British Horse Society (1187597)<br>1153245 |              | Proposed country parks within the BL for development will be subject to Masterplanning and their exact locations are not presently known within the wider designation. |   |
| Policy fails to connect Green Ring and Heartwood Forest with green corridor within Welwyn Hatfield | Welwyn Hatfield Borough Council (52397)<br>867587                                   | Partly Agree | Ellenbrook County Park in WHBC area is shown in Figure 2. The focus of the policy / Figure 2 is developing and new proposals.  | Minor modification<br><br>Add bullet p64 - Connect Green Ring and Heartwood Forest with green corridor within Welwyn Hatfield |
| Policy should specifically mention main Green Corridor Routes / River Valleys                      | Ver Valley Society (826041)<br>Tarmac (1153267)                                     | Noted        | These are detailed matters about implementation of policy and are not required in the policy itself.   | No change   |

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| <p>Plan strategy should better recognise role of agricultural land to food production and ecology.</p> <p>The reference to the refusal of an application if it results in the loss of the most versatile agricultural land is inconsistent with the NPPF.</p> <p>Policy states development resulting in such land loss 'will normally be refused is unsound since the Council's Site Assessment Matrix confirms that some high quality agricultural land is contained within the proposed Broad Locations</p> | <p>RF Sinclair and Sons (1058251)</p> <p>St Albans School (1187032)</p> <p>Hertfordshire County Council (837689)</p> <p>Crown Estate (51946)</p> <p>52064</p> <p>1153802</p> <p>1158064</p> <p>1055738</p> <p>1184569</p> <p>1185704</p> | <p>Noted</p> | <p>This is primarily a matter for evidence and the SA. This acknowledges losses to development. SADC BLs are acknowledged to contain some higher quality areas of agricultural land, which has been taken into account in the overall development approach, alongside other factors such as the Green Belt.</p> | <p>No change</p> |
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| Clarify where grade 1,2 & 3A agriculture land is within the BL's.   |         |       |   |           |
| Housing areas should be designed to encourage wildlife e.g. The Wildlife Trusts' building homes for people and wildlife | 1184967 | Noted | <p>Reference document referred to:</p> <p><a href="https://www.wildlifetrusts.org/sites/default/files/2018-05/homes_for_people_and_wildlife_lr_-_spreads.pdf">https://www.wildlifetrusts.org/sites/default/files/2018-05/homes_for_people_and_wildlife_lr_-_spreads.pdf</a></p> <p>This is useful sector guidance on detailed implementation of policy.</p> | No change |

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| Sympathetic landscaping of development areas is required to preserve the character of Redbourn and East Hemel Hempstead   | 1153741  | Agree | Cross reference Policy S6. This is a matter for masterplanning.  | No change |
| Loss of green spaces and corridors between St Albans and Hatfield; including woodland and open space at Wynches Farm and Symondshyde Wood as quiet area and failure to develop Ellenbrook Fields Country Park | Aurora Properties Limited (1151817)<br><br>Ellenbrook Area Residents Association Committee (1185802)<br><br>1186129<br><br>1153245 | Noted | Cross reference policies L26 – 29, which protect the most important open spaces and woodlands. Ongoing liaison with Welwyn & Hatfield Council under DtC. Some specific matters are largely matters for WHBC Local Plan / policy. | No change |
| Opportunities in association with development should be taken to create new green corridors and link green spaces through   | Watford Borough Council (1122500)<br><br>1153802   | Noted | This is a matter for detailed masterplanning taking account of this Policy.  | No change |



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| new development.   |   |          |   |           |
| The policy should mention the role of green infrastructure in enhancing and conserving the historic environment and improving setting (such as at Napsbury Park) | Historic England (929489)   | Noted    | Cross reference Policy L30. This is covered under this policy. Napsbury Park is a designated Conservation Area and Historic Park & Garden.  | No change |
| Policy does not deal in sufficient detail with minimising flooding and surface water runoff risks.   | Hertfordshire County Council (837689)<br>Thames Water (931213)<br>Environment Agency (1147557)<br>1153802 | Disagree | This is a matter sufficiently dealt with in the overall policy and NPPF. More detail is available through references to relevant sector guidance. Detailed area specific evidence for the Local Plan is also available. | No change |

### L30 Historic Environment

| Representation Point   | Representor Raising Point   | Outline Reply | Recommended Reply (including notes and references)  | Suggested Actions (including any Changes to Plan) |
|--|---|---------------|---|---|
| Policy serves no purpose because it reiterates NPPF  | RF Sinclair and Sons (1058251)<br>St Albans School (1187032)<br>52064 | Disagree      | The NPPF states that strategic policies for the conservation and enhancement of the natural, built and historic environment should set out an overall strategy for the pattern, scale and quality of development. Para 185 states that plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets | No change   |
| Plan should encourage densification of appropriate sites in conservation areas (they should be prioritised above greenfield) | 1153802   | Noted         | It does - where proposed development meets the policy criteria within conservation areas.   | No change   |
| Review conservation area boundaries in light of future redevelopment of land on the western side of Bricket Road             | Eskmuir Properties Ltd (1156728)                                      | Disagree      | Conservation Areas are designated under the Planning (Listed Buildings and Conservation Areas) Act 1990 para 69. The Council will ensure that the conservation area justifies its special interest. The existence of a CA does not prevent appropriate development.   | No change   |

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| Heritage Assets / Archaeology in Broad Locations have not been considered   | 334023<br>1184969<br>1187597   | Disagree | The NPPF para 189 states that 'where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk based assessment and where necessary a field evaluation'.<br><br>This will be an important issue for the masterplanning process (S6). | No change   |
| Long views important in Conservation Areas for preserving heritage assets and tourism   | St Albans Civic Society (1156974)  | Agree    | The policy concurs, stating within development affecting heritage assets 'new development must respect the wider context of the asset, with particular regard to important views of the districts built heritage and landscapes'.  | No change   |
| Policy should refer to 'non-designated rather than 'undesigned' / clarify archaeological site of <i>national importance</i> ' | Crown Estate (51946)<br>Historic England (929489)<br>Crest Strategic Projects and Bloor Homes (1158079)<br>CEG (1158030) | Agree    | The NPPF para 197 p.56 refers to non-designated heritage assets.   | Minor modification - Amend terminology to accord with NPPF. |
| Policy paragraph 6 'the significance of the heritage asset' should be amended. 'Worthy of conservation' implies               | Historic England (929489)  | Agree    | The NPPF para 194 refers to the 'significance of the heritage asset'.  | Minor modification - Amend terminology to accord with NPPF  |

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| designated assets are not worthy  |  |          |  |   |
| Policy should mention setting of Conservation Areas & Listed Buildings.   | Crown Estate (51946)<br>Historic England (929489)<br>Crest Strategic Projects and Bloor Homes (1158079)<br>CEG (1158030) | Agree    | Amend to accord with the Act.  | Minor modification - to accord with the Act |
| Policy is incorrect as there is no enhancement of scheduled ancient monument test in NPPF.                        | CEG (1158030)  | Disagree | Para 184 of the NPPF refers to the desirability of sustaining and enhancing the significance of heritage assets.   | No change.                                  |
| Policy does not reflect NPPF, as it does not refer to the tests of 'substantial' and 'less than substantial harm' | Legal and General (1051022)  | Agree    | NPPF paras 195 & 196 refer to where a proposed development will lead to substantial harm, consent should be refused unless demonstrated that the substantial harm is necessary to achieve public benefits that outweigh that harm. | No change                                   |

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| Include locally specific/distinctive elements and possible criteria for the designation of locally listed buildings. | Historic England (929489) | Disagree | <p>The NPPF includes local listing within the definition of a heritage asset and conservation areas are designated heritage assets. Applications can be made to SADC for inclusion of a building that falls within designated conservation area on the local list that at present does not warrant inclusion on the statutory list. Local listed buildings are considered to make positive contribution to the character and appearance of the conservation area.</p> <p>LLB information and designation criteria are matters of detail recorded in CACS and GIS information.</p> | Website information will be updated as necessary on ongoing basis. |
| Policy should omit criterion (a) regarding flexible approach to viable uses  | Historic England (929489) | Disagree | The NPPF para 185 states that strategy for conservation should take into account the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation. It is not helpful to the future of listed buildings to preclude other viable uses which may secure upkeep and survival.   | No change  |
| Policy should refer to 'public benefits' rather than 'planning benefits'   | Historic England (929489) | Agree    | The NPPF refers to harm should be weighed against the public benefits of the proposal including securing its optimal viable use.  | Minor modification - to 'public benefits'                          |
| No policy for Heritage at Risk or for management of a register.  | Historic England (929489) | Disagree | The NPPF para. 185 states that plans should set out positive strategy for the historic environment including heritage assets most at risk. This is already set out in L30. Historic England maintain a list of buildings at risk (3 SADC – Devils Dyke & the Slad; Aubrey's Camp and Sopwell Priory and Sopwell House). The SA Scoping report lists the Buildings at Risk within SADC.  | No change  |

|  |  |          |   |           |
|--|--|----------|---|-----------|
| Include historic environment within monitoring indicators  | Historic England (929489)                              | Disagree | <p>Cross reference Monitoring Framework.</p> <p>It is acknowledged that monitoring and review are essential in establishing how the objectives of the plan are being achieved and whether any changes are required. However the Monitoring Framework is for core indicators only.</p> <p>In practice the Council will note any significant issues / changes in respect of the historic environment in its AMR.</p> <p>Buildings at risk records are maintained.</p> | No change |
| Include heritage technical terms within glossary   | Historic England (929489)                              | Noted    | <p>Within the library of documents for the LP 2018 there is a glossary which includes technical terms on the historic environment:<br/> <a href="https://www.stalbans.gov.uk/Images/Glossary_tcm15-64812.pdf">https://www.stalbans.gov.uk/Images/Glossary_tcm15-64812.pdf</a></p> <p>The intention is that this would be maintained as an online resource with a link to the final plan document.</p>   | No change |
| Include pre-application archaeological assessments within development briefs. Include reference to refusal of development that would adversely affect currently undiscovered assets. | Hertfordshire County Council (837689)<br>CEG (1158030) | Agree    | <p>The NPPF para 189 states that 'where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk based assessment and where necessary a field evaluation'.</p> <p>This will be an important issue for the masterplanning process (S6).</p>   | No change |

|  |                                       |       |  |           |
|--|---------------------------------------|-------|--|-----------|
| Suggest known heritage assets are recorded on the Hertfordshire County Council's Historic Environment Record | Hertfordshire County Council (837689) | Noted | The Hertfordshire Historic Environment Record is an online database and public resource. It would be of benefit that all heritage assets are recorded. This is already an agreed approach / process. It is not necessary to include this in the Plan policy. The Plan (Para 1.10) explains that information will be regularly updated on the on-line GIS based part of the policies map. | No change |
|--|---------------------------------------|-------|--|-----------|

### Appendix 1 – New Development Parking Guidance and Standards

| Representation Point   | Representor Raising Point | Outline Reply | Recommended Reply (including notes and references)  | Suggested Actions (including any Changes to Plan) |
|--|---------------------------|---------------|---|---|
| Parking provision shouldn't be set based on the assumption that potential buyers will predominantly be commuters | 1144419                   | Noted         | They haven't been. These parking provisions are set based on the evidence of a mix of buyers, many of whom will not be commuters.   | No change   |
| Sufficient parking must be provided to accommodate conversions to multiple occupation.                           | 1144419                   | Disagree      | Appendix 1 table sets out parking requirements for houses in multiple occupation.<br><br>As set out in policy L20, parking provision for changes of use or extensions shall reflect the number of spaces required for the new use of the extension. | No change   |

|   |         |       |  |           |
|---|---------|-------|--|-----------|
| Provision of more cycle parking spaces in residential areas is necessary to encourage cycling. They should also be provided in convenient locations with secure fixings. Cycle parking standards to reference the BRE Home Quality Mark scheme. | 1153802 | Noted | <p>Appendix 1 sets out cycle parking requirements for C3 Residential areas.</p> <p>Policy L20 and footnote 21 directs to guidance on the provision of good quality cycle parking.- The sources provided also cover safety and security for cycle parking spaces.</p> <p>Extract from LP Policy L20:</p> <p>“For guidance on the provision of good quality cycle parking refer to Chapters 2,3,4 and 5 of Transport Initiatives LLP and Cambridge City Council ‘cycle Parking Guide for New Residential Development 2010’^21 and any subsequent guidance/ amendments. This document is considered best practice and appropriate for application in St Albans District.”</p> | No change |
| More cycle parking required at rail stations based on current and future population changes and commute patterns. This should also take place in conjunction with designing cycle routes into town from developments.                           | 1153802 | Agree | <p>Appendix 1 sets out cycle parking requirements for Public Transport facilities.</p> <p>Refer to policies L18 and S6 which address the need for providing intra-urban cycle links and ones connecting new developments to city centres. Additionally, policy L23 sets out the design and layout requirements for new developments by highlighting the need for prioritising sustainable transport measures/ non-car movement.</p> <p>Sustainable transport measures are encouraged by Policy 18, 19 and 20.</p>  | No change |



|  |  |          |  |           |
|--|--|----------|--|-----------|
| Appendix 1 table doesn't prioritise cycling or follow the requirement for good quality cycle provision in residential areas. The Local Plan needs to adopt a much simpler Cambridge spaces standards.  | St Albans Cycle Campaign (346623)<br>1185967 | Disagree | <p>Appendix 1 sets out cycle parking requirements for C3 Residential areas.</p> <p>Policy L20 and footnote 21 directs to guidance on the provision of good quality cycle parking using the Cambridge's 'Cycle and Parking Guide for New Residential Development 2010'.</p> <p>Extract from LP Policy L20:</p> <p>"For guidance on the provision of good quality cycle parking refer to Chapters 2,3,4 and 5 of Transport Initiatives LLP and Cambridge City Council 'cycle Parking Guide for New Residential Development 2010'^21 and any subsequent guidance/ amendments. This document is considered best practice and appropriate for application in St Albans District."</p> | No change |
| The proposed parking provision will lead to an over-provision of parking spaces within residential developments which are located in highly accessible locations that are well-served by public transport services (this encourages vehicle use) | Hilton House Properties (1057476)            | Disagree | <p>Appendix 1 sets out cycle parking requirements for C3 Residential areas.</p> <p>The Plan promotes sustainable travel behaviour including through the introduction of parking zones where a degree of parking restraint is imposed. This approach reduces on site provision in the locations most accessible to services and facilities and to public transport.</p> <p>Refer to policy L20 for more information on car parking standards for new developments which are also based on the zonal approach.</p> <p>Appendix 1 zoning can allow for schemes below standards to be acceptable in sustainable locations.</p>   | No change |

## Appendix 2 – Housing Trajectory

| Representation Point   | Representor Raising Point  | Outline Reply | Recommended Reply (including notes and references)  | Suggested Actions (including any Changes to Plan) |
|--|--|---------------|---|---|
| Insufficient evidence to support the strategy for meeting the Council's housing requirement.   | Martin Grant Homes and Kearns Land (975683)<br>CP Holdings (1158145)<br>973643<br>1153650                              | Disagree      | Evidence on development strategy / site selection is available in full.   | No change   |
| The trajectory includes a number of dwellings that cannot be considered to be deliverable in the context of the definition in the glossary of the NPPF without further, clear justification. | Martin Grant Homes and Kearns Land (975683)<br>RF Sinclair and Sons (1058251)  | Disagree      | Evidence on development strategy/ site selection is available in full.  | No change   |
| No justification for the windfall allowance of 95 dwellings in 2020/21 and 105 dwellings per annum thereafter.   | Martin Grant Homes and Kearns Land (975683)<br>Hunston Planning Limited (1185622)<br>Minister Court Frogmore (1185980) | Disagree      | Paragraph 68 of the NPPF states the <i>“local planning authorities should support the development of windfall sites through their policies and decisions- giving great weight to the benefits of using suitable sites within existing settlements for homes.”</i> There is no conflict with NPPF. | No change   |

|   |   |          |  |           |
|---|---|----------|--|-----------|
|   | <p>London Colney Limited<br/>(977496)</p> <p>Home Builders<br/>Federation Ltd<br/>(1156936)</p> <p>973643</p>   |          |  |           |
| Don't believe the evidence supports the assumption that an additional 80 homes will be delivered from 2025/26 | Hunston Planning Limited (1185622)  | Disagree | Evidence on development strategy / site selection is available in full   | No change |
| No justification given for the delivery rates from the broad location sites.                                  | Martin Grant Homes and Kearns Land (975683)   | Disagree | Full and detailed justification is provided by evidence documents.   | No change |
| The trajectory is not anticipated to deliver the annual total of 913 homes until after 2025.                  | <p>RF Sinclair and Sons<br/>(1058251)</p> <p>Minister Court Frogmore<br/>(1185980)</p> <p>Thakeham Homes<br/>(1187005)</p> <p>Wrenbridge Land Ltd<br/>(1187023)</p> <p>London Colney Limited<br/>(977496)</p> | Disagree | The Plan necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy. | No change |

|   |   |          |   |           |
|---|---|----------|---|-----------|
|   | Home Builders Federation Ltd (1156936)  |          |   |           |
| No evidence has been provided to justify the split of annual housing requirement into three time periods  | Minster Court Frogmore (1185980)  | Disagree | The Plan necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy. There are sufficient deliverable sites for years 1-5. This is confirmed in relevant developer representations. | No change |
| Concerned about the provision of 2,300 homes from the 'Park Street Garden Village' given the fact this is a major Green Belt release and the potential challenge with rail freight. | RF Sinclair and Sons (1058251)  | Noted    | The Plan necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy.  | No change |
| Sceptical about the realistic housing delivery on large housing allocations.  | RF Sinclair and Sons (1058251)<br>Comer Group (872799)<br>Wrenbridge Land Ltd (1187023) | Noted    | The Plan necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy.  | No change |
| Concerns about the robustness of  | Hunston Planning Limited (1185622)  | Disagree | The Plan necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new  | No change |

|  |  |          |   |           |
|--|--|----------|---|-----------|
| the housing trajectory.  |  |          | sites that are best able to deliver to the overall plan development strategy.   |           |
| There is a lack of small and medium-sized sites.   | Hunston Planning Limited (1185622)   | Disagree | Concentrating development in larger sites that can create new communities and effectively deliver infrastructure is a key part of the development strategy. Small sites of half a hectare or less have been and will continue to be an important source of housing land supply through windfall.  | No change |
| No detailed evidence has been put forward to justify the stepped trajectory, nor to set out what alternative approaches the Council has explored.      | Wrenbridge Land Ltd (1187023)<br>London Colney Limited (977496)<br>Home Builders Federation Ltd (1156936)<br>Owners of Land South of Burydell Lane (1186128)<br>973643<br>1153650<br>1186131 | Disagree | The Plan necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy. There are sufficient deliverable sites for years 1-5. This is confirmed in relevant developer representations. | No change |
| There is a risk of a protracted legal dispute occurring for the garden village site which can derail the housing trajectory assumptions about dwelling | 973643   | Noted    | The main site owner has promoted the site as available and deliverable for housing. Considerations have taken into account the existing planning permission for an alternative use and other relevant factors.  | No change |

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|--|--|----------|---|-----------|
| completions on the site.   |  |          |   |           |
| Support the standard methodology of 913 dwellings per annum  | 973643<br>1153650  | Noted    | Support noted   | No change |
| Recommend speeding up delivery through granting planning permissions on some of the proposed allocations ahead of the Local Plan adoption. | 1153650  | Disagree | The Plan necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy. There are sufficient deliverable sites for years 1-5. This is confirmed in relevant developer representations.   | No change |
| The housing trajectory fails to meet the five year housing supply and appears to be unsubstantiated.                                       | Aurora Properties Limited (1151817)  | Disagree | The Plan necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy. There are sufficient deliverable sites for years 1-5. This is confirmed in relevant developer representations.   | No change |
| Recommend the allocation of more sites to ensure a five year housing land supply is provided with the starting year as 2018.               | Thakeham Homes (1187005)<br>Comer Group (872799)<br>Home Builders Federation Ltd (1156936) | Disagree | The Plan necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy. There are sufficient deliverable sites for years 1-5. This is confirmed in relevant developer representations. 2020 is the earliest realistically possible | No change |

|  |  |          |   |           |
|--|--|----------|---|-----------|
|  | CP Holdings (1158145)  |          | date of adoption of the Plan and is therefore appropriate in the context of the new draft and final NPPF.   |           |
| The plan relies on the plan period of 2020-2036 which is inconsistent with the PPG.              | Department of Health & Social Care and Bloor Homes (1156886)<br>977496               | Disagree | 2020 is the earliest realistically possible date of adoption of the Plan and is therefore appropriate in the context of the new draft and final NPPF.   | No change |
| Lack of evidence to justify the reason why the plan period begins from 2020 and not 2018         | Wrenbridge Land Ltd (1187023)<br>Gladman Developments Ltd (1187201)                  | Disagree | 2020 is the earliest realistically possible date of adoption of the Plan and is therefore appropriate in the context of the new draft and final NPPF.   | No change |
| Object to the plan period of 2020-2036.  | Gladman Developments Ltd (1187201)<br>London Colney Limited (977496)                 | Noted    | 2020 is the earliest realistically possible date of adoption of the Plan and is therefore appropriate in the context of the new draft and final NPPF.   | No change |
| There is a lack of flexibility provided with the housing trajectory.                             | Gladman Developments Ltd (1187201)<br>Owner Pound Farm & East of Sandridge (1187227) | Disagree | The Plan necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy. There are sufficient deliverable sites for years 1-5. This is confirmed in relevant developer representations. | No change |
| Request for the Council to amend the housing plan period to align with supporting evidence base. | Gladman Developments Ltd (1187201)   | Disagree | 2020 is the earliest realistically possible date of adoption of the Plan and is therefore appropriate in the context of the new draft and final NPPF. Evidence is available in full.  | No change |

|   |  |          |   |           |
|---|--|----------|---|-----------|
| The adoption of a more balanced strategy with a greater role for non-strategic sites would increase the amount of development which might realistically occur within the shorter term, therefore reducing the need for a stepped housing requirement. | Gladman Developments Ltd (1187201)             | Disagree | The Plan necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy. There are sufficient deliverable sites for years 1-5. This is confirmed in relevant developer representations. | No change |
| The plan relies heavily on large strategic growth locations to meet the District's housing needs.   | Owner Pound Farm & East of Sandridge (1187227) | Noted    | Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy.   | No change |
| The base date used for assessing housing needs is not consistent with the approach set out in the PPG.  | Home Builders Federation Ltd (1156936)         | Disagree | 2020 is the earliest realistically possible date of adoption of the Plan and is therefore appropriate in the context of the new draft and final NPPF  | No change |



|   |   |          |   |           |
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| Do not consider it appropriate for the unanticipated delay factor to be redistributed across the remaining plan period. Suggest that it would be better to rebase the plan period from 2018 and include any unimplemented planning permissions as part of their expected supply trajectory. | Home Builders Federation Ltd (1156936)                          | Disagree | 2020 is the earliest realistically possible date of adoption of the Plan and is therefore appropriate in the context of the new draft and final NPPF.               | No change |
| Urban optimisation allowance should be included in windfall allowance to avoid potential double counting in the supply estimates.   | Home Builders Federation Ltd (1156936)<br>CP Holdings (1158145) | Disagree | Supply from urban optimisation is categorised separately from windfall as it results from the new strategy set out in the new LP/NPPF. There is no double counting. | No change |
| Urban optimisation has no status or policy driver to implement it and   | Anderson Group (1146719)  | Disagree | The LP/NPPF prioritises achieving optimal housing densities and appropriate mix of sizes / types.   | No change |

|  |  |          |   |           |
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| should be removed  | Home Builders Federation Ltd (1156936) |          |   |           |
| Support the housing trajectory as robust and deliverable.  | Crown Estate (51946)                   | Noted    | Support noted   | No change |
| SHLAA should be reviewed to ensure there are enough sites to be delivered within 5 years of adoption   | CP Holdings (1158145)                  | Disagree | Please refer to Appendix 2. There are sufficient deliverable sites for years 1-5.   | No change |
| 364 dwellings for pre-application and submitted applications is unreliable as there is no guarantee the application will be submitted, or be refused | CP Holdings (1158145)                  | Disagree | Small sites of half a hectare or less have been and will continue to be an important source of housing land supply through windfall. Please refer to Appendix 2. There are sufficient deliverable sites for years 1-5.  | No change |
| Housing delivery should be focused on site allocations primarily   | CP Holdings (1158145)                  | Disagree | Concentrating development in larger sites that can effectively deliver infrastructure is a key part of the development strategy. Small sites of half a hectare or less have been and will continue to be an important source of housing land supply through windfall. Please refer to Appendix 2. | No change |

### Appendix 3 – Monitoring Framework

| Representation Point   | Representor Raising Point                        | Outline Reply | Recommended Reply (including notes and references)  | Suggested Actions (including any Changes to Plan) |
|--|--|---------------|---|---|
| Plan monitoring arrangements undeveloped: do not judge relative progress towards long-term aims                                    | Aboyne Residents Association (1181214)<br>867312 | Disagree      | The Monitoring Framework is deliberately designed to focus on the essential areas where the NPPF requires the Council to track progress, particularly in provision of development land. Other matters are contextual and it may be possible to include some elements in wider monitoring. | No change   |
| Include monitoring and indicators for the historic environment   | Historic England (929489)                        | Disagree      | This is not an essential part of the Plan Monitoring Framework. Other matters are contextual and it may be possible to include some elements, including historic buildings at risk and conservation area appraisal and enhancement progress in wider monitoring.                          | No change   |
| The monitoring target for “Metropolitan Green Belt” justifies the need to remove associated school build zones from the Green Belt | Hertfordshire Country Council (837689)           | Disagree      | This is a strategy and policy issue (dealt with elsewhere). It is not a matter relevant to the Monitoring Framework.  | No change   |

#### Appendix 4 – Infrastructure Delivery Schedule

| Representation Point  | Representor Raising Point                               | Outline Reply | Recommended Reply (including notes and references)   | Suggested Actions (including any Changes to Plan) |
|---|---|---------------|--|---|
| Support ongoing updates to the IDP  | Trustees of James Henry Frank Sewell Deceased (1185630) | Noted         | Support noted  | No change   |
| Support the IDS for providing the latest information on the IDP   | Department for Education (1186955)                      | Noted         | Support noted  | No change   |
| Suggest the provision of an addendum to the IDS which provides a summary for projections of capacity and need for school places and schools based on the forecast housing growth at allocated sites. This should also include any need for additional special educational needs places. | Department for Education (1186955)                      | 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.          |

|  |   |          |   |  |
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| IDP is not updated alongside IDS. This questions the robustness of the strategy.   | Redbourn Parish Council (759908)<br>Leverstock Green Village Association (1185907)<br>Hertfordshire County Council (837689) | 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. |
| Proposes an amendment to IDS to reflect the full range of infrastructure benefits arising from the NW Harpenden allocation.  | Legal and General (1051022)   | Noted    | IDS is a live document which will be updated at appropriate intervals as and when further information becomes available. Work on the infrastructure evidence base for Broad Locations such as NW Harpenden has been ongoing and IDP updates will reflect the latest position. | IDP will be updated on an ongoing basis. |
| Inconsistency between policy S6 viii) and IDS table: Appendix 4 indicates that North West Harpenden site will provide 139sqm on-site health facility which has not been stated as a requirement in policy S6 viii) policy. | Legal and General (1051022)   | Disagree | No inconsistency – health need and provision to be addressed through Masterplanning and planning applications, similarly to other Broad Locations.  | No change                                |

|  |  |          |  |  |
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| Request the removal of the reference to the delivery of 87sqm of healthcare floor-space at 'West of Chiswell Green' site. Given the existing healthcare capacity of the area and the size of the facility offered, this provision is not required. | Adrian Irving and Alban Developments Ltd (1156368) | Disagree | Health need and provision to be addressed through Masterplanning and planning applications, similarly to other Broad Locations.  | No change                                |
| Supports the requirement to make appropriate provisions to infrastructure.   | Welwyn Hatfield Borough Council (52397)            | Noted    | Support noted  | No change                                |
| The IDS doesn't identify the necessary highway/transport infrastructure that will be required.   | Hertfordshire County Council (837689)              | Disagree | That level of detail is not required for the IDS at this stage. The matter of highway/ transport infrastructure required can be properly addressed through the IDP and Masterplanning processes. | No change                                |
| IDS needs to be updated in relation to school provision and school costs   | Hertfordshire County Council (837689)              | Noted    | Ongoing iterative discussions with HCC   | IDP will be updated on an ongoing basis. |

## Appendix 5 - List of smaller residential sites with permission

| Representation Point  | Representor Raising Point           | Outline Reply | Recommended Reply (including notes and references)   | Suggested Actions (including any Changes to Plan) |
|---|-------------------------------------|---------------|--|---|
| Suggest a better presentation of the list of small sites by totalling them up   | RF Sinclair and Sons (1058251)      | Disagree      | This is done in Appendix 2 Housing trajectory  | No change   |
| Data used on small sites is not comprehensive due to the repeat entries and no presentation of the relationship to housing land supply. | RF Sinclair and Sons (1058251)      | Disagree      | Appendix 2 Housing trajectory deals with this – NB: Appendix 5 includes a couple of duplicate permissions on same sites. | No change   |
| It is unclear whether the housing supply for small sites is additional housing or whether it is net of any housing demolitions.         | Aurora Properties Limited (1151817) | Disagree      | Appendix 2 Housing trajectory deals with this  | No change   |
| Small sites will not address any percentage of the housing requirement in   | Hunston Planning Limited (1185622)  | Disagree      | The list was largely designed to be illustrative. Future supply will include additional small sites.                     | No change   |

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|--|------------------------------------|-------|--|-----------|
| the Local Plan because they will be built before the start of the Plan Period.                                 |                                    |       |  |           |
| Lack of evidence to show why the 10% target for small and medium sized sites, by the NPPF, cannot be achieved. | Hunston Planning Limited (1185622) | Agree | The housing trajectory (and other evidence) shows 10% level is achievable. | No change |

#### Appendix 6 – Housing Mix

| Representation Point  | Representor Raising Point | Outline Reply | Recommended Reply (including notes and references)  | Suggested Actions (including any Changes to Plan) |
|---|---------------------------|---------------|---|---|
| Question justification for mix  | 867068                    | Disagree      | Evidential basis is summarised in Appendix 6 itself and more detail supporting the Local Plan is available in full. | No change   |
| No evidence is provided to demonstrate what percentage of the local population cannot afford to buy (or rent) at the Market Value | 867068                    | Disagree      | Evidential basis is summarised in Appendix 6 itself and more detail supporting the Local Plan is available in full. | No change   |
| No justification has been provided for the  | 867068                    | Disagree      | Evidential basis is summarised in Appendix 6 itself and more detail supporting the Local Plan is available in full. | No change   |



|  |                   |          |  |           |
|--|-------------------|----------|--|-----------|
| proportion of affordable housing (types)   |                   |          |  |           |
| Mix results in over concentrations of affordable housing and will not create balanced communities  | 867312<br>1184750 | Disagree | Affordable housing will be of different types; creating a balanced housing offer meeting most pressing needs.  | No change |
| Concerns that different housing density requirements will be applied across the boundary of Dacorum and SADC.  | 867312            | Disagree | The NPPF prioritises achieving optimal housing densities and appropriate mix of sizes / types. This will apply to any urban development / expansion. | No change |
| Concerns that building mass concentrations of affordable units at the proposed mix of sizes, and on the scale proposed, will unbalance the structures necessary for thriving innovative- and | 867312            | Disagree | The NPPF prioritises achieving optimal housing densities and appropriate mix of sizes / types. This will apply to any urban development / expansion. | No change |

|  |  |          |   |           |
|--|--|----------|---|-----------|
| balanced-communities.  |  |          |   |           |
| The minimum target for affordable housing must be set to 75% affordable homes on sites of 10 dwellings or more, to match the level indicated in housing evidence | St Albans Labour Party (1183933)       | Disagree | This mix not appropriate due to viability, deliverability and community balance/ cohesion   | No change |
| Suggest a greater social mix with 40% social and affordable housing, 30-40% 2-4 bedroom housing and 20% 4-6 bedroom housing                                      | 1184750                                | Disagree | Evidential basis for specific mix is summarised in Appendix 6 itself and more detail supporting the Local Plan is available in full. This mix not appropriate as doesn't correlate to evidence and due to viability, deliverability and community balance / cohesion. | No change |
| Reducing the supply of large homes affects future flexibility for family use / community balance   | Aboyne Residents Association (1181214) | Disagree | The mix includes a substantial element of family size housing.  | No change |

|   |   |          |  |           |
|---|---|----------|--|-----------|
| Support approach to meeting affordable housing need, including mix    | Trustees of James Henry Frank Sewell Deceased (1185630) | Noted    | Support noted  | No change |
| Mix needs to be updated to match SWHG research (once it is completed) | Dacorum Borough Council (1186054)                       | Disagree | The mix does not differ greatly from that suggested by existing SWHG research and also reasonably reflects particular local needs as evidenced in more detail in SADC research evidence. | No change |

### **Annex 1 – Broad Location (BL) Area and Base Capacity Calculations (in Hectares – Ha)**

| <b>Representation Point</b>  | <b>Representor Raising Point</b>      | <b>Outline Reply</b> | <b>Recommended Reply (including notes and references)</b>  | <b>Suggested Actions (including any Changes to Plan)</b> |
|--|---------------------------------------|----------------------|--|--|
| Park Street Garden Village Broad Location and its associated data should be removed and replaced with the Butterfly World site in Chiswell Green | Butterfly World Project Ltd (1183965) | Disagree             | Site selection is firmly based on comprehensive GB work which identified the allocated Broad Locations.<br><br>Concentrating development in larger sites that can create new communities and deliver infrastructure is a key part of the development strategy. | No change  |
| Request school buildings as well as the playing fields be removed from the green belt  | Department for Education (1186955)    | Disagree             | Some school sites are on land excluded from the Green Belt and some are not, as set out here. Policy approach set out at S3 and L21  | No change  |

|  |                                       |          |  |           |
|--|---------------------------------------|----------|--|-----------|
| Query the justification of the school site allocations | Department for Education (1186955)    | Disagree | School site allocations based on evidence and work with HCC. Policy approach set out at S3 and L21 | No change |
| Delete 'in GB' from title of column six.               | Hertfordshire County Council (837689) | Disagree | School site allocations based on evidence and work with HCC. Policy approach set out at S3 and L21 | No change |

### Sustainability Appraisal

| Representation Point   | Representor Raising Point  | Outline Reply | Recommended Reply (including notes and references) | Suggested Actions (including any Changes to Plan) |
|--|--|---------------|--|---|
| The SA/SEA does not consider other/all specific sites that have been put forward and fails to provide an assessment for them, explaining why they have been rejected | <p>Taylor Wimpey Strategic Land (1187472)</p> <p>Martin Grant Homes and Kearns Land (975683)</p> <p>ERLP 1 Sarl (1123561)</p> <p>M Scott Properties (1185993)</p> <p>Mr Pete Hutchison (1153268)</p> <p>Department of Health &amp; Social Care and Bloor Homes (1156886)</p> <p>Owner Pound Farm &amp; East of Sandridge (1187227)</p> | Noted         | See Sustainability Appraisal full report.          | No change   |

|   |  |       |   |           |
|---|--|-------|---|-----------|
|   | Helioslough Ltd<br>(1182085)                             |       |   |           |
| The SA has not considered the impact of increasing the East Hemel South proposed dwellings development by 140%  | Leverstock Green Village Association (1185907)<br>334023 | Noted | See Sustainability Appraisal full report. | No change |
| The SA should contain a fuller assessment and development scoping exercise must be carried out on the East Hemel Hempstead (North) development to ensure that the area maintains an appropriate landscaping and character, sympathetic to the nearby settlement | 1153741  | Noted | See Sustainability Appraisal full report. | No change |

|  |   |       |   |           |
|--|---|-------|---|-----------|
| The SA doesn't currently provide any explicit commentary on the process the Council undertook to apply the sequential test based on the latest SFRA, taking future climate change into account | Environment Agency (1147557)  | Noted | See Sustainability Appraisal full report. | No change |
| Support the SA   | 1185695<br>1186062  | Noted | See Sustainability Appraisal full report. | No change |
| There is no compatibility between the Vision and Objectives listed within the Plan and the SA objectives   | Stackbourne Limited (1153646)   | Noted | See Sustainability Appraisal full report. | No change |
| The Plan and SA have not been positively prepared as they disregard the planning permission that   | Helioslough Ltd (1182085)<br>Department of Health & Social Care and Bloor Homes (1156886) | Noted | See Sustainability Appraisal full report. | No change |

|  |                           |       |   |           |
|--|---------------------------|-------|---|-----------|
| exists for the SRFI  |                           |       |   |           |
| Disagree with outcomes of SA assessment of Park Street Garden Village against the sustainability objectives                          | Helioslough Ltd (1182085) | Noted | See Sustainability Appraisal full report. | No change |
| SA incorrect that prior gravel extraction will have destroyed all remains as some of the site has not been quarried.                 | Helioslough Ltd (1182085) | Noted | See Sustainability Appraisal full report. | No change |
| SA incorrect to refer to site as previously developed land - land developed for minerals extraction excluded by paragraph 70 of NPPF | Helioslough Ltd (1182085) | Noted | See Sustainability Appraisal full report. | No change |
| SA and the Plan are not considered to be consistent with   | Helioslough Ltd (1182085) | Noted | See Sustainability Appraisal full report. | No change |

|  |   |       |   |           |
|--|---|-------|---|-----------|
| national policy as they don't aim to deliver sustainable development   |   |       |   |           |
| The SA is misleading in its assessment of PSGV. It includes ambiguous statements, does not consider site constraints which could hinder development proposals, and ignores the loss of benefits resulting from not providing the SRFI. | Helioslough Ltd (1182085)                               | Noted | See Sustainability Appraisal full report. | No change |
| No acknowledgement of the planning permission for the SRFI on the site of the proposed Park Street Garden Village  | M Scott Properties (1185993)                            | Noted | See Sustainability Appraisal full report. | No change |
| The SA demonstrates full compliance with the Plan's  | Trustees of James Henry Frank Sewell Deceased (1185630) | Noted | See Sustainability Appraisal full report. | No change |



|   |  |       |   |           |
|---|--|-------|---|-----------|
| requirement to consider social, economic and environmental factors  |  |       |   |           |
| SA methodology excludes small to medium sites in sustainable locations with facilities beneficial for any development   | M Scott Properties (1185993)   | Noted | See Sustainability Appraisal full report. | No change |
| SA is inconsistent with the proposed 2020 commencement date for the Local Plan  | M Scott Properties (1185993)   | Noted | See Sustainability Appraisal full report. | No change |
| The SA should provide an objective- led approach whereby the potential impacts of a development plan, its allocations and all reasonable alternatives are appraised to the same level of detail in order to | M Scott Properties (1185993)<br><br>Department of Health & Social Care and Bloor Homes (1156886) | Noted | See Sustainability Appraisal full report. | No change |

|   |                                  |       |   |           |
|---|----------------------------------|-------|---|-----------|
| identify their contribution to sustainable development  |                                  |       |   |           |
| Support the SA statement that not all villages are suitable for accommodating growth  | M Scott Properties (1185993)     | Noted | See Sustainability Appraisal full report. | No change |
| The SA fails to address the negative consequences of housing provision on large strategic sites and the impacts this has on supply  | Redbourn Parish Council (759908) | Noted | See Sustainability Appraisal full report. | No change |
| No consultation was undertaken for North East Redbourn site at the Issues and Options stage. Unclear how the site (as well as other 'omission sites') was explored as an alternative in the | Redbourn Parish Council (759908) | Noted | See Sustainability Appraisal full report. | No change |

|   |  |       |   |           |
|---|--|-------|---|-----------|
| Sustainability Appraisal (SA)   |  |       |   |           |
| The Plan and the accompanying SA rely on much of the previous work undertaken to support the Strategic Local Plan (SLP) and draft Detailed Local Plan (DLP), the evidence base for which is out of date | Department of Health & Social Care and Bloor Homes (1156886) | Noted | See Sustainability Appraisal full report. | No change |
| The council hasn't consulted on the SA  | Owner Pound Farm & East of Sandridge (1187227)               | Noted | See Sustainability Appraisal full report. | No change |
| Agree with the supporting statement in the SA with regards to flood risks but recommend the creation of an aim of new development that contributes to reducing existing flood risk (where applicable)   | Hertfordshire County Council (837689)                        | Noted | See Sustainability Appraisal full report. | No change |

|   |  |       |   |           |
|---|--|-------|---|-----------|
| Sustainability implications of the spatial strategy have not been properly assessed | Land at The Dak (1186131)<br><br>Owners of Land South of Burydell Lane (1186128) | Noted | See Sustainability Appraisal full report. | No change |
|---|--|-------|---|-----------|

### General Comments

| Representation Point   | Representor Raising Point    | Outline Reply | Recommended Reply (including notes and references)   | Suggested Actions (including any Changes to Plan) |
|--|------------------------------|---------------|--|---|
| The prolonged feedback process and website difficulties would deter people from submitting responses   | 1153741<br>963110<br>1185950 | Noted         | Public consultation processes are primarily statutory. Website used successfully by many hundreds of respondents. Alternative routes of submission – hard copy etc. – supported by SADC. | No change   |
| Concerns with the existence of a knowledge and expertise gap between policy and representations, arising from a lack of knowledge of the planning procedures. This suggests that some responses will have more weight in shaping | 963110<br>1185950            | Noted         | All consultation responses that raise material planning considerations are taken into account during the plan making process.  | No change   |

|  |  |       |   |           |
|--|--|-------|---|-----------|
| the local plan than others   |  |       |   |           |
| Agree with the figures used for the preparation of the Local Plan  | 1185775                                  | Noted | Support noted   | No change |
| Would like to see a stronger commitment to the residential development of brownfield land, particularly rear gardens of existing residential properties, as a method of increasing the number of new dwellings in the district | 1121386                                  | Noted | Policy S1 sets out a clear approach and positively supports residential development in existing urban areas, subject to other policies. | No change |
| Support all aspects of the Local Plan  | 1185695<br>1186018<br>1185939<br>1186062 | Noted | Support noted   | No change |
| CALA homes proposed development in Bedmond Lane Meadow must be   | 1185695<br>1185939<br>1186062            | Noted | Applications on this site will be assessed against relevant planning policies and material considerations.                              | No change |

|   |  |          |  |           |
|---|--|----------|--|-----------|
| refused as it is designated an Asset of Community Value   |  |          |  |           |
| Concern with the consistency of the local plan due to the existence of policies which fail to establish a link with the Government policy and guidance        | London Wates (Bricket Wood) Limited (1186996)<br>52064 | Disagree | Policies reflect overall government / NPPF approach  | No change |
| 'Chapter 5- Design, Conservation and Enhancement of the natural, built and historic environment', drawn up with the help of the communities, was not promoted | 1185950  | Disagree | There has been ongoing joint working with residents, landowners, local communities and other stakeholders. | No change |
| Recognise the importance of a new Local Plan  | St Albans Civic Society (156974)                       | Noted    | Noted  | No change |
| The LPA must adopt a more holistic spatial approach to  | Intrasales Ltd (1157383)                               | Disagree | Housing requirement/targets are based on the standard methodology set out by the government – see S4.      | No change |

|  |   |          |   |           |
|--|---|----------|---|-----------|
| delivering housing that plans positively and enables sustainable locations in the district to play a greater role in meeting the area's housing requirements |   |          | <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> |           |
| Difficulty in understanding the justification for the local plan policies due to the constant need to cross-reference with the SA                            | Martin Grant Homes and Kearns Land (975683) | Disagree | Full and detailed justification is provided by evidence documents. It is not necessary to justify the Plan within the Plan document itself. To do so would result unnecessarily in a longer and more complex document.  | No change |

## **List of Site Promotions: Residential (Strategic and Small Scale), Employment and Mixed Use**

### **Residential (Strategic and Small-scale)**

Burston Garden Centre

CWC Group (no specific site promotion)

Dunstable Road Redbourn

Eaton Lodge, Punch Bowl Lane

Former Butterfly World

Former HSBC Training Centre at Smug Oak Lane

Glinwell site, Hatfield Road, St Albans

Hanstead Park

Harper Green Garden Village

Harper Lodge Industrial Estate and Ivory Racing Stables

Land adjacent to Breakspears

Land at Batchwood Drive

Land at Boissy Close

Land at Common Lane, Harpenden

Land at Gaddesden Lane

Land at Greenway to the South of London Road

Land at Hill Dyke Road, Wheathampstead

Land at Lye Lane- Intrasaes Ltd



Land at Noke Side, Chiswell Green

Land at Park Street Lane, How Wood

Land West of Watling Street, Park Street

Land at Piggottshill Lane

Land at Roundhouse Farm

Land at the Dak, Colney Heath Lane

Land at Tollgate Road

Land at Windridge Farm

Land between Bedmond Lane and Mayne Avenue

Land between Tollgate Road & Coursers Road

Land East of Common Lane, Batford

Land east of Redbourn

Land north east of Redbourn

Land north of Ragged Hall Lane, Chiswell Green

Land North Of Redbourn

Land North of Sandridge

Land off Shenley Lane, London Colney

Land Rear of the Cherry Tree, Wheathampstead

Land South of Alban Way

Land South of Burydell Lane

Land south west of Fishpool Street

Land to the East of Napsbury Lane [Napsbury Fields]

Land to the east of Sandridge

Land west of Redbourn

Land West of Westminster Fields Harpenden

Land West of London Colney

Moor Mill North

Moor Mill South

Sauncey View Lodge, Common Lane, Harpenden

North of Napsbury

North of Wheathampstead Road

Notcutts Garden Centre, Hatfield Road, St Albans

Orchard Drive, How Wood, St Albans

Orchard Garage Woodcock Hill

Park Street Baptist Church, Tippetdell Lane

Pound Farm

Radio Nurseries

Radlett Road, Frogmore, St Albans

Land at Radlett

Redbourn Golf Club & Aldwickbury Park Golf Club

Roundhouse Farm

Tollgate Farm

Townsend Lane

Tyttenhanger- Tarmac

Vacant Weight Training Club, Leyland Avenue

Verulam Golf Club, London Road

Land at Wheathampstead

### Employment

Land adjoining Copsewood, North Orbital Road, St Albans

Land at Roehyde

Land North West of Colney Fields

### Mixed Use

Burston Site

Land east of Watling Street

Smallford Works

### **List of abbreviations used**

BL – Broad Location

CCOS – City Centre Opportunity Site

CHP – Combined Heat and Power

DBC - Dacorum Borough Council

EHH – East Hemel Hempstead

EIA – Environmental Impact Assessment

EZ – Enterprise Zone

GBR – Green Belt Review

GDPO - General Permitted Development Order

GTANA – Gypsy and Traveller Accommodation Needs Assessment

HBC – Hertsmere Borough Council

HCC – Hertfordshire County Council

HSE – Health and Safety Executive

IDP – Infrastructure Deliver Plan

IDS – Infrastructure Delivery Schedule

JSP – Joint Strategic Plan

LEP – Local Enterprise Partnership

LGS – Local Green Space

LP - Local Plan

LPA - Local Planning Authority

SADC – St Albans City and District Council

MMTI – Multi Modal Transport Interchange

MoU – Memorandum of Understanding

NPPF – National Planning Policy Framework

PSGV – Park Street Garden Village

SA – Sustainability Appraisal

SEA – Strategic Environmental Assessment

SEP – Strategic Economic Plan

SFRA – Strategic Flood Risk Assessment

SRFI – Strategic Rail Freight Interchange

SWHG– South West Herts Group

SHMA – Strategic Housing Market Area

WHBC – Welwyn Hatfield Borough Council