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Laura Wood
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18th April 2016

Dear Ms Wood,

Thank you for your detailed response to my letter dated 15 March 2016. I have considered the letter carefully and looked at the various core documents that you have drawn to my attention.

Firstly, in terms of the viability testing of the Plan, the primary role of a Local Plan viability assessment is to provide evidence to show that the requirements set out within the National Planning Policy Framework are met. That is, that the policy requirements for development set out within the plan do not threaten the ability of the sites and scale of that development to be developed viably.

While I note that the strategic sites LA1 – LA6 were tested in detail in 2013, that work did not consider the inclusion of traveller sites within them, as is now the case with 3 of the sites. The landowner of site LA5 has questioned the viability of this site now that there is a requirement for a traveller site to be provided as part of it.

Whether or not this site is viable is critical not only in terms of the Council's overall housing and traveller site strategy, but it forms part of the Council's 5 year supply of deliverable housing land and is required to meet the identified traveller pitch requirements for this period. If it is not viable then it is questionable whether it is deliverable within the next 5 years.

Can you please explain whether this work has been carried out and if so provide the relevant report. If it has not been done can you please explain how the Council intend to rectify this situation and how long it will take.

Turning to the matter of the Sustainability Appraisal (SA), it is essential that it properly deals with reasonable and unreasonable alternatives and that they are assessed on a like for like basis. It is also important that one is able to ascertain this without a paper chase. This principle has

been established through case law (Heard v Broadland District Council, South Norfolk District Council and Norwich City Council).

This case also established that although not an explicit legal requirement, the alternatives should be appraised to the same level as the preferred option. The final SA report must outline the reasons why the various alternatives previously canvassed are still not as good as the proposals now being put forward in the plan.

Having regard to this legal judgment can the Council consider whether the work that has been undertaken is fit for purpose and that the audit trail is adequate. The Council may wish to take legal advice on this matter and if so it would be appropriate to make the advice available for the examination.

Also, can the Council please direct me to where the alternative traveller sites to those in the Plan were considered and the justification for selecting the final sites.

If the Council considers that further work is needed in relation to the SA, can you please identify what steps you propose taking and the timescales needed to carry these out.

Should further work be required to either the SA or the viability assessment it is likely that this will need to be consulted upon. Bearing all of the above in mind I would like to hear the Council's views on the examination timetable going forward, including the hearing sessions.

I would like a reply by 29 April 2016, if possible. Should you require additional time, please let me know.

Yours sincerely

Louise Crosby

INSPECTOR