



SITE ALLOCATIONS

(Pre-Submission incorporating Focused Changes)

STATEMENT OF COMPLIANCE WITH THE DUTY TO CO-OPERATE

Addendum

January 2016

Foreword

This Statement of Compliance with the Duty to Co-operate covers the Pre-Submission version of Dacorum's Site Allocations DPD (incorporating Focused Changes). It needs to be read in conjunction with the Duty to Co-operate Statement prepared for the Core Strategy (June 2012) and its Addendum (August 2012).

This statement was first issued alongside the Pre-Submission document in order to enable all neighbouring authorities, the County Council and other 'prescribed bodies' under Section 33A of the Planning and Compulsory Purchase Act 2004 and all other interested parties to comment on this legal requirement should they wish, through representations to the Pre-Submission document.

The draft of this addendum document (September 2014) has now been updated to include liaison with prescribed bodies up to the point that the Council agreed Submission of the Plan to the Secretary of State.

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1. Introduction

- 1.1 The Council acknowledges and embraces its duty to co-operate with other local authorities and bodies in addressing the strategic (planning) issues which are relevant to this area. The duty was formally introduced by the Localism Act 2011, and while the duty is important because the Act has resulted in the removal of regional or county-wide strategic planning advice, the Council sees co-operation and collaboration as good practice.
- 1.2 The duty itself requires ongoing, constructive and active engagement on the preparation of planning documents and related activities concerned with sustainable development and the use of land. This is normally most important in considering the location of development and availability of strategic infrastructure.
- 1.3 The National Planning Policy Framework (March 2012) says that plans should be based on joint working and co-operation to address larger than local issues (paragraph 17), and in particular co-operation with neighbouring authorities, public, voluntary and private sector organisations (paragraph 157). Further advice is provided in the Planning Practice Guide (PPG), first published in March 2014.
- 1.4 The purpose of this statement is to explain how Dacorum Borough Council has co-operated with other public bodies in the preparation of its Site Allocations DPD.
- 1.5 It is intended as an update to the Duty to Co-operate Statement and addendum prepared for the Core Strategy in June and August 2012 respectively. It does not seek to repeat the information contained within that statement, but to expand and update it as appropriate.
- 1.6 This statement also excludes coverage of duty to co-operate activity directly related to the early partial review of the Core Strategy and production of a new, single, Local Plan. This wider activity is summarised in the Council's Annual Monitoring Report. The AMR for 2014/15 is available on the Council's website <http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/local-planning-framework/monitoring-reports-land-position-statements>.
- 1.7 This statement covers the period up to the submission of the Site Allocations DPD for examination. It therefore covers both the Pre-Submission (Publication) version of the document, and the subsequent Focused Changes process.

2. National and Legal Context

Co-operation and Collaboration

2.1 Statutory requirements regarding co-operation and collaboration remain largely as set out in the Core Strategy Duty to Co-operate Statement.

2.2 In summary, key requirements are as follows:

- Section 33A of the Planning and Compulsory Purchase Act 2004 (as inserted by the Localism Act 2011) imposes a “duty to co-operate” on local authorities and other bodies in the planning of sustainable development;
- The Act requires local planning authorities and other bodies to engage constructively, actively and on an ongoing basis in the preparing of development plan documents so far as relating to strategic matters. A strategic matter is defined as the sustainable development or use of land for or in connection with infrastructure that has or would have a significant impact on at least two planning areas;
- The Town and County Planning (Local Planning) (England) Regulations 2012 specify the bodies (in addition to local planning authorities and county councils) that are required to co-operate under Section 33A referred to above.
- Further guidance is provided in the National Planning Policy Framework (March 2012), particularly in paragraphs 151-152, 156 and 178-181).

2.3 The PPG was first published in March 2014 as an online body of advice that would be updated as and when necessary. The PPG adds detail to the advice contained in the NPPF with regard to how Councils interpret and action the duty to co-operate.

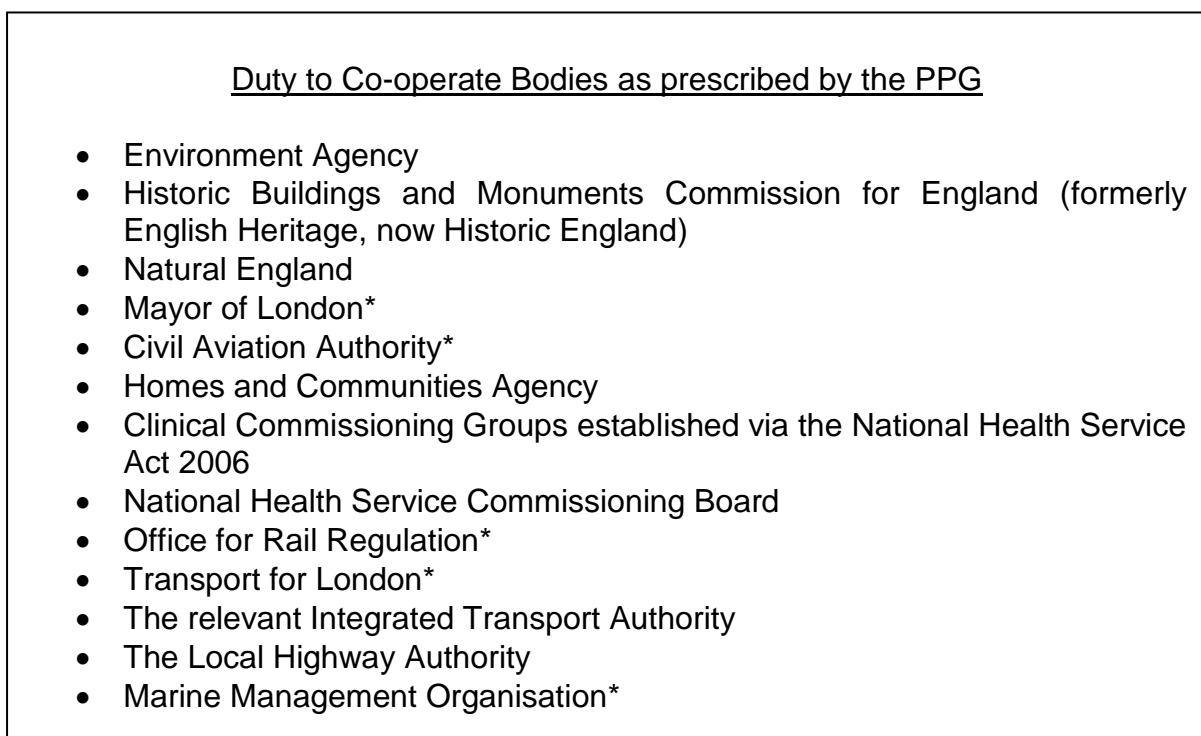
2.4 It provides further clarification on a number of key points:

- The bodies to whom the DTC applies (see Figure 1 below);
- The importance of focussing on the outcome of discussions, not solely on whether such discussions have taken place;
- The need for co-operation to occur throughout the plan making process, rather than at any one point in the process;
- The need for close co-operation in shire authorities to ensure appropriate planning of strategic matters
- That Local Enterprise Councils (LEPs) and Local Nature Partnerships (LNPs) are not subject to the requirements of the duty. However, local planning authorities should engage with them when preparing their Local Plans.

Relevant bodies

- 2.5 The PPG confirms that, in addition to relevant local planning authorities and the County Council, the bodies listed in Figure 1 are subject to the duty to co-operate.
- 2.6 For the purposes of the Site Allocations DPD, those denoted with an asterisk are not generally considered to be relevant for Dacorum. This is because there are either no direct linkages due to the location of the borough, or any linkages are only at the very strategic (Core Strategy level), i.e. relating to overall jobs and housing targets.

Figure 1



* Denotes bodies whose role is considered to have limited relevance to Dacorum

3. Dacorum Context

- 3.1 The Dacorum context remains as set out in the original Duty to Co-operate Statement with regard to:
- Geography;
 - Routes and Designations; and
 - Organisational Arrangements.
- 3.2 With regard to ‘Strategic Planning’, the principal changes are as follows.

Strategic Economic Plan and associated documents

- 3.3 In January 2013 the regional strategy for the area (the East of England Plan) was formally revoked.
- 3.4 Whilst key decisions regarding housing and employment targets are now the responsibility of local planning authorities, the future strategic planning context should be informed by new Strategic Economic Plan (SEPs) prepared by Local Economic Partnership (LEPs).
- 3.5 The Hertfordshire LEP published their plan – ‘Perfectly Placed for Business’ in March 2014:
<http://mediafiles.thedms.co.uk/Publication/BH-Herts/cms/pdf/Herts%20-%20SEP%20FINAL.pdf>
- 3.6 Production of the LEP SEP was supported by the publication of a draft Spatial Plan for Hertfordshire, prepared by the Hertfordshire Planning Group (HPG) and endorsed by the Hertfordshire Infrastructure and Planning Panel (HIPP). The intention is that this is updated and elaborated to provide a ‘Local Strategic Statement’ for the County. This will look in greater details at both pressures and opportunities relating to growth and infrastructure. This work has been informed by a workshop facilitated by Catriona Riddell of POS, involving senior Officers and Members from Hertfordshire authorities. The report from this workshop has been considered by HIPP and agreed recommendations will be taken forward by both HIPP and HPG as appropriate (see section 5: Continuing Co-operation).

Management Plan for the Chilterns

- 3.7 The Chilterns Conservation Board has also prepared and published a new Management Plan for the Chilterns Area of Outstanding Natural Beauty (2014-2019), although the general approach to conserving and enhancing the designated area remains unchanged:

http://www.chilternsaonb.org/uploads/files/ConservationBoard/ManagementPlan/Management%20Plan%202014-19/chilterns_management_plan_2014-19_final.pdf

Waste Plan

- 3.8 Hertfordshire County Council is responsible for minerals and waste planning. Since the Duty to Co-operate Statement was prepared for Dacorum's Core Strategy, Hertfordshire County Council has adopted their Waste Site Allocations DPD (July 2014). The County Council commenced work in November 2014 on a review of the current Hertfordshire Minerals Local Plan. The review is scheduled for adoption in summer 2018. Four stages of public consultation are planned throughout the review process, starting with an Initial Consultation document (published August 2015).
- 3.9 The Waste Local Plan for Hertfordshire consists of the following DPDs which should be read together:
- Waste Core Strategy and Development Management Policies Document (adopted on 5 November 2012); and
 - Waste Site Allocations Document (adopted on 15 July 2014).
- 3.10 In May 2015, the County Council published the Employment Land Areas of Search Supplementary Planning Document consultation version. The purpose of this document is to provide further planning guidance on the suitability of waste related development on the 60 Employment Land Areas of Search (including eight areas in Dacorum) identified in the Waste Site Allocations document.
- 3.11 It is important to ensure that site-specific policies and guidance within these documents are reflected in the Dacorum's Site Allocations DPD.

Community Infrastructure Levy

- 3.12 The final significant change to the spatial planning context relates to work carried out by Dacorum Borough Council to progress a new Community Infrastructure Levy (CIL) for the Borough. This work has involved extensive and on-going consultation with Hertfordshire County Council (in their capacity as the local education and highway authority) and other infrastructure providers.
- 3.13 Dacorum's CIL was submitted to Government for Examination in July 2014 and came into effect on 1 July 2015.
- 3.14 All documents relating to the submission, adoption and operation of CIL (including technical studies) are available on the CIL page of the Council's website:

[http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/developer-contributions/community-infrastructure-levy-\(cil\)](http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/developer-contributions/community-infrastructure-levy-(cil))

4. Implementation of the Duty

Duty to Co-operate Issues

4.1 As outlined in legislation, the duty to co-operate:

- relates to sustainable development and use of land that would have a significant impact on:
 - a) at least two local planning areas; or
 - b) a planning matter that falls within the remit of a county council;
- requires that councils set out planning policies to address these issues;
- requires councils and other bodies to ‘engage constructively, actively and on an ongoing basis’ to develop strategic policies; and
- requires councils to consider joint approaches to plan making.

4.2 The Council has worked collaboratively with a wide range of organisations and interests and actively engaged the local community in the preparation of its new Local Plan.

Core Strategy

4.3 The Core Strategy sets out the planning framework for delivering growth and development within the Borough, and the infrastructure which supports it. Preparing and consulting on the Core Strategy, working on other borough-wide strategies and initiatives (such as developing the Community Infrastructure Levy), and commissioning and managing numerous technical studies, has involved a close working relationship with other local planning authorities, the County Council and other key agencies and stakeholders.

4.4 This co-operation began as part of developing the Core Strategy, which was adopted in September 2013. The Report of Consultation (completed in 2011) and Report of Representations (June 2012) explains much about this collaboration and engagement. It is summarised in a Duty to Co-Operate Statement (and addendum statement) that formed one of the Core Strategy submission documents.

4.5 The Core Strategy DTC Statement noted that the main strategic issues arising were:

- The homes needed;
- The jobs needed;
- Retail and leisure demands;
- Health and education facilities;
- Managing the water environment;
- Transport;
- Climate change and energy;
- Waste and minerals planning; and
- Conservation and enhancement of the natural and historic environment.

4.6 The majority of these issues have been addressed through the Core Strategy, although some continue to be of relevance for the duty to co-operate (albeit at a more site specific scale) to the Site Allocations. These issues are summarised in Table 1.

Site Allocations

4.7 The Site Allocations DPD provides locally specific policies and proposals which implement the Core Strategy and seek to further its objectives. It is considered that the majority of the evidence required to show compliance with the Duty to Co-operate will of necessity be about collaborative working on strategic level issues, which have already taken place through the Core Strategy process. This in turn has directly informed the preparation of the Site Allocations DPD.

4.8 Work on the Site Allocations DPD began in 2006 and was initially carried out in parallel with the Core Strategy. Whilst the last formal Site Allocations consultation was in 2008 (Supplementary Issues and Options), many issues pertinent to the Site Allocations have been progressed and discussed via the Core Strategy DPD and work on master plans for the six Local Allocations (Green Belt housing sites) identified within it.

4.9 A timeline of key stages of Site Allocations preparation is set out in Figure 2.

4.10 As Figure 2 illustrates, key consultation stages for the Site Allocations took place before the Duty to Co-operate came into force. However, in practice, the Duty to Co-operate is a formalisation of good planning practice, and Dacorum has consulted extensively with the specified bodies (and others) throughout the plan preparation process.

4.11 Further information regarding these consultation stages, and the responses received, are set out in the consultation report that accompanies each stage:

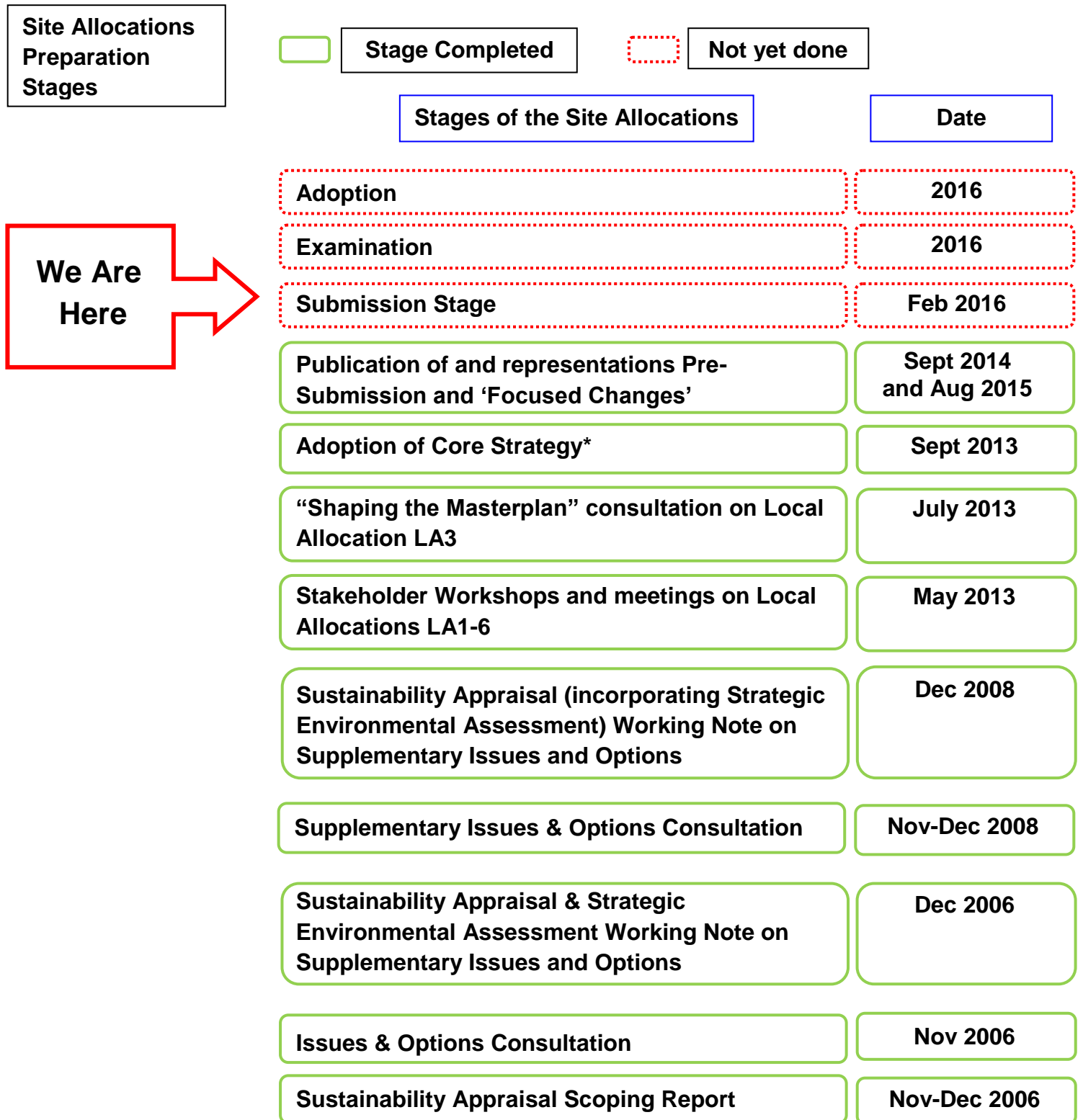
- Site Allocations - Issues and Options 2006 (November 2006)
- Site Allocations: Supplementary Issues and Options 2008 (November 2008)
- Stakeholder workshops for Local Allocations LA1, LA3 and LA5 (May 2013)
- Stakeholder meetings for Local Allocations LA2, LA4 and LA6 (May 2013)
- Consultation on draft master plan principles for LA3 (July 2013)
- Publication of Pre-Submission Site Allocations DPD (September 2014)
- Publication of Focused Changes to the Pre-Submission Site Allocations DPD (August 2015)

4.12 Table 2 sets out the DTC bodies consulted at each stage in production of the Site Allocations DPD (and associated site master plans). Where a specified body did not exist at the time of that consultation, their predecessor organisation or an appropriate proxy is identified, from whom feedback was sought.

- 4.13 A letter was also sent to all duty to co-operate bodies and other key stakeholders in May 2014. This enclosed a summary of the coverage proposed in the Pre-Submission Site Allocations DPD and asked if there were any duty to co-operate issues that anybody wished to either raise prior to the document being considered by Dacorum's Cabinet and full Council, or that they wished to meet and discuss. A copy of this letter is contained as Appendix 1.
- 4.14 Table 4 summarises the responses received and any action taken as a result of this letter.
- 4.15 All relevant bodies were also consulted regarding the Pre-Submission representations stage itself, and the subsequent 'Focused Changes' consultation. Tables 5 and 6 summarise out any representations received and action taken. Full information regarding both consultation stages is contained in the relevant Reports of Representation:

<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/local-planning-framework/site-allocations>

Figure 2: Stages of Preparation on the Site Allocations



*Note: Please see Figure 2 in Core Strategy for stages in the preparation of that document.

Table 1

Overview of Key Duty to Co-operate Issues for Site Allocations DPD

Issue	Summary of duty to co-operate implications
<p>The homes needed</p> <p>(a) Overall number and distribution</p> <p>(b) Gypsy and Traveller pitch provision</p>	<p>(a) The need identify sources of housing provision of an appropriate scale to provide sufficient homes to meet the housing target set out in the Core Strategy.</p> <p>(b) The need to ensure that Gypsy and Traveller needs across the county and beyond are understood and appropriate provision made for new sites.</p>
<p>The jobs needed</p>	<p>The need to ensure sufficient sites are allocated to meet the overall jobs target and B class jobs target set out in the Core Strategy.</p>
<p>Health and education facilities</p>	<p>Distribution and cumulative impact of new residential development needs to be understood by local education authority and health providers, to inform future service provision.</p> <p>Consideration needs to be given as to whether provision is supported through appropriate developer contributions, or on-site provision.</p>
<p>Waste planning</p>	<p>The need to refer to waste areas of search (from the County Council's waste plan), where these relate to designated sites i.e. existing General Employment Areas (GEAs).</p>
<p>Managing the Water Environment</p>	<p>Ensure consideration is given to the management of water run-off, flood risk and water pollution with regard to new development: particularly the Local Allocations. Requires liaison with the Hertfordshire County Council in their capacity as the future Sustainable Drainage Advisory Board (SAB) and the Environment Agency.</p> <p>Consider the capacity of existing waste water and potable water infrastructure and its ability to accommodate new development.</p> <p>Issues relating to maintaining river levels and quality.</p>
<p>Transport</p>	<p>The need to ensure that transport issues are addressed within the Borough, as they relate to the impact of new development, and any potential cross boundary issues addressed and/or ameliorated.</p>

Table 2

Site Allocations DPD Consultation Notifications

(a) Duty to Co-Operate Bodies

Organisation	Consultation stage						
	Pre-Duty to Co-Operate		Post Duty to Co-Operate				
	2006 Issues and Options	2008 Issues and Options	Local Allocations workshops and meetings (May 2013)	LA3 masterplan principles consultation (July 2013)	DTC letter prior to Pre-Submission (May 2014)	Pre-Submission (September 2014)	Focused Changes to the Pre-Submission (August 2015)
Environment Agency	✓	✓	✓	✓	✓	✓	✓
English Heritage	✓	✓	✓	✓	✓	✓	✓
Natural England	English Nature	✓	✓	✓	✓	✓	✓
Mayor of London	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Civil Aviation Authority	N/A	N/A (Ministry of Defence & London Luton Airport Operations Ltd)	N/A	N/A	N/A	National Air Traffic Service (NATs), Ministry of Defence Luton Airport Operations Ltd	National Air Traffic Service (NATs), Ministry of Defence Luton Airport Operations Ltd
Homes and Communities	✓	✓	✓	N/A	✓	✓	✓

Agency (formerly English Partnerships)						✓	✓
Clinical Commissioning Groups (Herts Valley Clinical Commissioning Group)	West Herts Health Authority, Hospital Trust, Hemel Hempstead District Hospital, West Herts PCT, Dacorum PCT, Hemel Hempstead General Hospital, East of England Strategic Health Authority, St Albans and Hemel Hempstead NHS Trust & West Herts NHS Trust	West Herts Health Authority, Hospital Trust, Hemel Hempstead District Hospital, West Herts PCT, Dacorum PCT, Hemel Hempstead General Hospital, East of England Strategic Health Authority, St Albans and Hemel Hempstead NHS Trust & West Herts NHS Trust		Dacorum PCT	✓	Herts Valley Clinical CCG	Herts Valley Clinical CCG
National Health Service Commissioning Board			Watford and Three Rivers PCT & Dacorum PCT	Dacorum PCT & East of England Strategic Health Authority	East of England Strategic Health Authority & National Health Service Executive	East of England Strategic Health Authority & National Health Service Executive	East of England Strategic Health Authority & National Health Service Executive
Office for Rail	Network Rail	Network	N/A	N/A	Network Rail	Network Rail	Network Rail

Regulation		Rail & Railtrack					
Transport for London	N/A	N/A	N/A	N/A	N/A	N/A	N/A
The relevant Integrated Transport Authority (Highway Agency)	✓	✓	N/A	N/A	✓	✓	✓
Local Highway Authority (HCC)	✓	✓	✓	✓	✓	✓	✓
Marine Management Organisation	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Adjoining Local Planning Authorities	✓*	✓**	✓***	N/A	✓****	✓****	✓****

- * Hertfordshire County Council, Bucks County Council, Bedfordshire County Council, Aylesbury Vale District Council, Chiltern District Council, East Herts District Council, Hertsmere Borough Council, Luton Borough Council, North Herts District Council, South Beds District Council (now part of Central Beds), St Albans City and District Council, Stevenage Borough Council, Three Rivers District Council, Watford Borough Council, Hertfordshire County Council and Welwyn Hatfield Borough Council.
- ** Hertfordshire County Council, Bucks County Council, Bedfordshire County Council, Aylesbury Vale District Council, Chiltern District Council, East Herts District Council, Hertsmere Borough Council, Luton Borough Council, North Herts District Council, South Beds District Council (now part of Central Beds), St Albans City and District Council, Stevenage Borough Council, Three Rivers District Council, Watford Borough Council, Hertfordshire County Council and Welwyn Hatfield Borough Council.
- *** Hertfordshire County Council, Buckinghamshire County Council (LA5 only), Aylesbury Vale District Council (LA5 only).
- **** Welwyn Hatfield Borough Council, Watford Borough Council, Three Rivers District Council, Bedfordshire County Council, Herts County Council, Aylesbury Vale District Council, Bucks County Council, Chiltern District Council, East Herts District Council, Hertsmere Borough Council, Luton Borough Council, Milton Keynes Council, North Herts District Council and Stevenage Borough Council.

(b) Other key bodies

Organisation	Consultation stage						
	Pre-Duty to Co-Operate		Post Duty to Co-Operate				
	2006 Issues and Options	2008 Issues and Options	Local Allocations workshops and meetings (May 2013)	LA3 masterplan principles consultation (July 2013)	DTC letter prior to Pre-Submission (May 2014)	Pre-Submission (September 2014)	Focused Changed to the Pre-Submission (August 2015)
Local Nature Partnership (LNP)	Wildlife Trust, Hertfordshire Biological Records Centre, Chilterns Conservation Board, The Chiltern Society	Wildlife Trust, Hertfordshire Biological Records Centre, Chilterns Conservation Board, The Chiltern Society	Wildlife Trust (LA3 only), Friends of Shrubhill Common (LA3 only), Chilterns Conservation Board (LA5 only), Hertfordshire Biological Records Centre, (LA1, LA3 and LA5)	✓	✓	✓	✓
Local Economic Partnership (LEP)	Hertfordshire Prosperity, Chambers of Commerce & East of England Development	Hertfordshire Prosperity, Chambers of Commerce & East of England Development Agency	N/A	Business Link Herts, Herts Chamber & Berkhamsted and District Chamber of	✓	✓	✓

	Agency			Commerce.			
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Notes:

- Where a DTC organisation did not exist at the time of consultation, or was not considered relevant to Dacorum, the appropriate proxy organisation(s) that were consulted are shown.
- N/A – denotes organisation not considered to be relevant to planning in the Dacorum area.
- Many organisations who were not considered appropriate to consult on the Site Allocations DPD were however fully consulted on the Core Strategy, which covers strategic planning matters.

Table 3**Summary of Nature of Liaison with Duty to Co-operate Bodies**

Note: The co-operation listed focusses on that directly related to the Site Allocations DPD and associated Local Allocations master plans. It therefore excludes that related to production of the Core Strategy and outlined within the 2012 Duty to Co-operate Statement. It also excludes liaison related to work on Dacorum's early partial review process. For a full summary of all DTC activity please refer to the 2014/15 Authority Monitoring Report (AMR).

(a) Duty to Co-Operate Bodies

Organisation	Nature of Co-operation
Environment Agency	<ul style="list-style-type: none"> • Consulted on joint framework for Sustainability Appraisal of planning documents (framework covers Three Rivers, Watford and St Albans as well as Dacorum) • Statutory consultation (<i>See Table 2 and relevant Reports of Consultation and Representations for more detail</i>) • Collaboration on infrastructure provision. • Engaged in joint study work on water and potable water infrastructure within Hertfordshire. • Waste water infrastructure meeting - also involving Thames Water (March 2015), which resulted in addition of text to Site Allocations via Focused Changes process. • Preparation of a joint Statement of Common Ground with Thames Water pertaining to Site Allocations document and future joint working on water issues (December 2015). • Draft master plans
English Heritage (Historic England)	<ul style="list-style-type: none"> • Consulted on joint framework for Sustainability Appraisal of planning documents (framework covers Three Rivers, Watford and St Albans as well as Dacorum) • Statutory consultation (<i>See Table 2 and relevant Reports of Consultation and Representations for more detail</i>) • Indirect liaison (via Hertfordshire Garden Trust) to inform consideration of locally designated parks and gardens of historic interest. • Draft master plans
Natural England	<ul style="list-style-type: none"> • Consulted on joint framework for Sustainability Appraisal of planning documents (framework covers Three Rivers, Watford and St Albans as well as Dacorum) • Statutory consultation (<i>See Table 2 and relevant Reports of Consultation and Representations for more detail</i>) • Engaged in joint study work on green infrastructure. • Draft master plans
Mayor of London	N/A
Civil Aviation Authority	<ul style="list-style-type: none"> • Whilst direct liaison is not considered necessary, there has been on-going liaison on aviation matters pertaining to Luton Airport through attendance at meetings of the London

	<p>Luton Airport Consultative Committee (LLACC) and liaison with Luton Borough Council on airport expansion issues.</p> <ul style="list-style-type: none"> • Response received to Pre-Submission and Focused Changes consultation from Heathrow Airport Ltd regarding the need to ensure there is appropriate protection of airspace due to the location of key flightpaths.
Homes and Communities Agency (formerly English Partnerships)	<ul style="list-style-type: none"> • Statutory consultation (<i>See Table 2 and relevant Reports of Consultation and Representations for more detail</i>) • Involved with regard to Local Allocation LA1 due to land ownership. • Ongoing liaison with Dacorum's Property Team regarding purchase of land at Bunkers Park for use as cemetery extension and informal leisure uses. • Draft master plans
Clinical Commissioning Groups (Herts Valley Clinical Commissioning Group)	<p>During the production period Site Allocations DPD there have been considerable changes to the organisational structure of bodies responsible for health provision within Dacorum. The Council has sought to consult with the most relevant organisation at the time. This has included:</p> <ul style="list-style-type: none"> • Statutory consultation (<i>See Table 2 and relevant Reports of Consultation and Representations for more detail</i>) • Collaboration on infrastructure provision and Dacorum Infrastructure Delivery Plan Update in particular. • Site specific liaison – particularly with regard to future of Hemel Hempstead Hospital; future GP provision at West Hemel Hempstead and potential of Local Allocation LA3 (Policy LA3) to support this (through on-site provision of a GP surgery, or appropriate off-site contributions). • Desire for 'super-surgery' in Berkhamsted raised by Town Council on behalf of local GP surgeries. Delivery of scheme hampered by restricted land availability in the town and Green Belt constraints. • Draft master plans – especially LA3
National Health Service Commissioning Board	
Office for Rail Regulation	<ul style="list-style-type: none"> • Not considered key consultees for Site Allocations DPD. However, appropriate rail organisations (Railtrack and Network Rail) and the Department for Transport were consulted as part of statutory consultation (<i>See Table 2 and relevant Reports of Consultation and Representations for more detail</i>). • Collaboration on infrastructure provision. • Collaboration has also taken place with Network Rail on infrastructure provision and Dacorum Infrastructure Delivery Plan Update in particular. • Liaison with Network Rail on feasibility study relating to Hemel Hempstead Station Gateway (Proposal MU/4), and station upgrades at Tring and Hemel Hempstead. • Liaison with Network Rail regarding potential for Crossrail extension to Tring and potential future implications for local rail services.
Transport for London	

The relevant Integrated Transport Authority (Highways Agency)	<ul style="list-style-type: none"> • Statutory consultation (<i>See Table 2 and relevant Reports of Consultation and Representations for more detail</i>) • Meeting to discuss representations submitted on Pre-Submission Site Allocations DPD (April 2015), which resulted in clarification of Highway Agency position and better understanding of highway technical work undertaken and update to transport section in Sustainable Development Background Issues Paper which accompanies Site Allocation DPD.
Local Highway Authority (HCC)	See 'Hertfordshire County Council' below.
Marine Management Organisation	N/A.
Adjoining Local Planning Authorities	<p><u>Aylesbury Vale:</u></p> <ul style="list-style-type: none"> • Statutory consultation (<i>See Table 2 and relevant Reports of Consultation and Representations for more detail</i>). • Liaison (including attendance at landowner meetings) regarding Policy LA5: Icknield Way, Tring and feedback from public exhibition (October 2014) • Liaison regarding Vale of Aylesbury Plan and new Vale of Aylesbury Local Plan, and associated technical studies. • Meeting to discuss Buckinghamshire Housing and Economic Development Assessment (HEDNA), involving other Bucks authorities (September 2015). • Feedback on Vale of Aylesbury Local Plan – Issues and Options (December 2015). • Draft master plans LA5. • Ongoing liaison via Chilterns AONB Planning Forum. <p><u>Chiltern:</u></p> <ul style="list-style-type: none"> • Statutory consultation (<i>See Table 2 and relevant Reports of Consultation and Representations for more detail</i>) • Duty to Co-operate meeting to discuss plan progress, key technical studies, approach to Gypsy and Traveller provision etc (19 June 2014), following response to Duty to Co-Operate letter. • Meeting to discuss Buckinghamshire Housing and Economic Development Assessment (HEDNA), involving other Bucks authorities (September 2015). • Joint tendering and commissioning of consultants to carry out Conservation Area Appraisals (with South Bucks District Council). • Consultation on any strategic issues raised by proposed joint Local Plan for Chiltern and South Bucks (October 2015). • Ongoing liaison via Chilterns AONB Planning Forum. • Ongoing informal liaison, as required. <p><u>Central Bedfordshire:</u></p>

	<ul style="list-style-type: none"> • Statutory consultation (<i>See Table 2 and relevant Reports of Consultation and Representations for more detail</i>). • Liaison regarding Luton and Central Beds SHMA and associated Memorandum of Understanding. • Response to Revised Pre-Submission Development Strategy (August 2014). • Comment made with regard to the (subsequently withdrawn) Central Bedfordshire Development Strategy (January 2015) • Ongoing informal liaison, as required. <p><u>St Albans:</u></p> <ul style="list-style-type: none"> • Statutory consultation (<i>See Table 2 and relevant Reports of Consultation and Representations for more detail</i>) • Ongoing informal liaison via Hertfordshire Planning Group (and its sub-groups) and Hertfordshire Infrastructure and Planning Partnership (HIPP). • Submitted comments on draft St Albans Strategic Local Plan (November 2014), raising initial concerns regarding future planning of Gorhambury land. • Informal liaison (at Officer and Member level) on various matters relating to Gorhambury land and potential governance arrangements for proposed East Hemel Hempstead Area Action Plan. Including attendance by DBC Officer (in capacity as an ‘observer’) at meeting between The Crown Estates and SADC to discuss Gorhambury proposals at East Hemel Hempstead. • Involvement in Maylands Implementation Team meeting. • Participation in Hertfordshire authorities’ duty to co-operate workshop facilitated by Catriona Riddell of the Planning Officers Society. • Attendance at Gypsy and Traveller training event organised by Dacorum Borough Council for all Hertfordshire local authorities (Members and Officers). • Ongoing informal liaison, as required. <p><u>Watford:</u></p> <ul style="list-style-type: none"> • Statutory consultation (<i>See Table 2 and relevant Reports of Consultation and Representations for more detail</i>) • Ongoing informal liaison via Hertfordshire Planning Group (and its sub-groups) and Hertfordshire Infrastructure and Planning Partnership (HIPP). • Participation in Hertfordshire authorities duty to co-operate workshop facilitated by Catriona Riddell of the Planning Officers Society. • Attendance at Gypsy and Traveller training event organised by Dacorum Borough Council for all Hertfordshire local authorities (Members and Officers). • Ongoing informal liaison, as required.
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Three Rivers:

- Statutory consultation (*See Table 2 and relevant Reports of Consultation and Representations for more detail*)
- Ongoing informal liaison via Hertfordshire Planning Group (and its sub-groups) and Hertfordshire Infrastructure and Planning Partnership (HIPP).
- Commissioning and preparation of joint Travellers Needs Assessment (January 2013).
- Participation in Hertfordshire authorities' duty to co-operate workshop facilitated by Catriona Riddell of the Planning Officers Society.
- Attendance at Gypsy and Traveller training event organised by Dacorum Borough Council for all Hertfordshire local authorities (Members and Officers).
- Ongoing informal liaison, as required.

Luton:

- Statutory consultation (*See Table 2 and relevant Reports of Consultation and Representations for more detail*)
- Liaison regarding Luton and Central Beds SHMA and associated Memorandum of Understanding.
- Duty to Co-Operate meeting (with North Herts) on April 2013.
- Response to Luton's draft Local Plan (August 2014).
- Officer meeting to discuss plan updates and content of Luton's Pre-Submission Local Plan (November 2015). Comments were generally supportive in nature, but raised concerns regarding continuing reference to potential role of Dacorum in meetings some of Luton's unmet housing needs.
- Feedback on Luton's Pre-Submission Local Plan (December 2015), with follow-up Member meeting to discuss content of a proposed Memorandum of Understanding (January 2016).
- Ongoing informal liaison, as required.

Others:

Milton Keynes, Bedford, Stevenage, North Herts, East Herts, Hertsmere, Broxbourne, Welwyn Hatfield.

- Statutory consultation (*See Table 2 and relevant Reports of Consultation and Representations for more detail*)
- Ongoing informal Liaison with Hertfordshire authorities via Hertfordshire Planning Group (and its sub-groups) and Hertfordshire Infrastructure and Planning Partnership (HIPP).
- Participation in Hertfordshire authorities' duty to co-operate workshop facilitated by Catriona Riddell of the Planning Officers Society.

	<ul style="list-style-type: none"> • Attendance at Gypsy and Traveller training event organised by Dacorum Borough Council for all Hertfordshire local authorities (Members and Officers). • Duty to Co-Operate meeting hosted by Welwyn Hatfield Council to discuss their Local Plan and issues of cross boundary interest (January 2015). • Feedback on Broxbourne Council's Duty to Co-operate framework (November 2015). • Liaison between Welwyn Hatfield and Dacorum's Economic Wellbeing team to discuss establishment of a stronger economic development role at Welwyn Hatfield Council. • Ongoing informal liaison, as required.
County Councils	<p><u>Hertfordshire:</u></p> <ul style="list-style-type: none"> • Statutory consultation (<i>See Table 2 and relevant Reports of Consultation and Representations for more detail</i>). • Ongoing informal liaison via Hertfordshire Planning Group (and its sub-groups) and Hertfordshire Infrastructure and Planning Partnership (HIPP). • Participation in Local Allocation workshops. • Information monitoring and liaison (residential and employment). • Took the lead on preparation of draft Spatial Plan for the county, with associated MOU, which has been signed by all authorities and provides a general basis for cross-boundary liaison. • Advice on sustainable drainage matters with regard to the Local Allocations, including preparation of a Sustainable Drainage Advice Note (July 2015). • Collaboration on infrastructure provision and Dacorum Infrastructure Delivery Plan Update in particular. • Ongoing liaison regarding strategic highway aspects of key sites (particularly Local Allocations), attendance at Local Allocation landowner meetings as appropriate and advice on scope and content of Schedule of Transport Proposals and Sites. • Assistance with commissioning and interpreting 2015 run of Hemel Hempstead Transport Model. • Ongoing liaison regarding strategic highway issues via regular STIBlet meetings – including a specially convened meeting to discuss development of a new Growth and Transport Plan for Hemel Hempstead, to be used as a pro-type for elsewhere in the county. • Ongoing liaison regarding future educational needs of the Borough, including the identification of additional 'Education Zones,' on-site provision of new primary schools as part of Local Allocation LA3 and MU/1. Including meeting to discuss schooling issues (February 2015), Sites update meeting (May 2015) and meeting to discuss Nash Mills

	<p>Education Zone (November 2015).</p> <ul style="list-style-type: none"> • Liaison with and advice from, Gypsy and Traveller Unit regarding new site provision and future management issues. • Liaison with and advice from ecological and heritage advisers, regarding future site and designations; particularly Local Allocations. • Consultation and liaison regarding content of new Waste Local Plan and associated SPG, including meeting to ensure consistency between development plan documents (November 2014). • Collaboration on infrastructure provision and Dacorum Infrastructure Delivery Plan Update and HHS update in particular. • Liaison regarding development of CIL charging schedule for Dacorum. • Participation in Hertfordshire authorities' duty to co-operate workshop facilitated by Catriona Riddell of the Planning Officers Society. <p><u>Buckinghamshire:</u></p> <ul style="list-style-type: none"> • Statutory consultation (<i>See Table 2 and relevant Reports of Consultation and Representations for more detail</i>). • Informal liaison regarding Local Allocation LA5 and impact on local road network.
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(b) Other key bodies

Organisation	Nature of Co-operation
Local Nature Partnership (LNP)	<ul style="list-style-type: none"> • Statutory consultation (<i>See Table 2 and relevant Reports of Consultation and Representations for more detail</i>). • Ongoing informal liaison via Hertfordshire Planning Group (and its sub-groups) and Hertfordshire Infrastructure and Planning Partnership (HIPP). • Discussion via HPG Development Plans sub group on Ecological Networks Study published by LNP. This work has subsequently been referenced within the Local Allocations master plans.
Local Economic Partnership (LEP)	<ul style="list-style-type: none"> • Statutory consultation (<i>See Table 2 and relevant Reports of Consultation and Representations for more detail</i>). • Ongoing informal liaison via Hertfordshire Planning Group (and its sub-groups) and Hertfordshire Infrastructure and Planning Partnership (HIPP). • Participation in Hertfordshire authorities' duty to co-operate

	workshop facilitated by Catriona Riddell of the Planning Officers Society.
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Table 4

Summary of Responses Received to Duty to Co-operate Letter (May 2014)

Organisation	Summary of Response Received	Action Taken
Bedford Borough Council	<ul style="list-style-type: none"> • No comments at the present time. • Look forward to being formally consulted at the Pre-Submission stage. 	<ul style="list-style-type: none"> • None required. • Bedford Borough Council to be consulted at Pre-Submission stage.
English Heritage	<p><i>(Response via telephone).</i></p> <ul style="list-style-type: none"> • Requested a summary of key policies and designations relating to the historic environment. • Welcomed the inclusion of a new designation related to locally important historic parks and gardens. 	<ul style="list-style-type: none"> • None required. • English Heritage to be consulted at Pre-Submission stage.
Herts County Council Minerals and Waste Unit	<ul style="list-style-type: none"> • Please to see that Policy SA5 of the draft document contains a paragraph that relates to their status as employment land areas of search (ELAS) in the Waste Site Allocations document. • Suggests that these are amended to include their ELAS reference numbers, in order to avoid 	<ul style="list-style-type: none"> • Necessary minor amendments made to text of Pre-Submission Site Allocations. • Liaison with Minerals and Waste Unit remains on-going and will be consulted at formal Pre-Submission stage.

	<p>confusion.</p> <ul style="list-style-type: none"> • Note that none of the proposed boundary changes to the employment areas will be contrary to their designation as ELAS. However, although the change in site boundary for Icknield Way will exclude its eastern part, on this occasion it is doubtful that we would object to this, as you are proposing to offset this with an extension of the employment land to the west. • Look forward to being consulted formally in due course. 	
Chiltern District	<p>Key issues raised related to:</p> <ul style="list-style-type: none"> • The need to discuss housing need generally, and more particularly the potential for unplanned housing needs in Chiltern to be met in Dacorum and/or considered further as part of Dacorum's duty to co-operate discussions with other authorities. • The need to discuss the potential for needs arising in Chiltern District for Gypsies and Travellers and travelling showpeople to be met in Dacorum as part of work on Green 	<p>Meeting held on 19 June 2014. Agreed actions as follows:</p> <ul style="list-style-type: none"> • Agree to continue on-going liaison and meet regularly (in line with the Duty to Co-Operate) to discuss areas of interest/strategic priorities for both Councils and explore potential opportunities for joint working under the Duty to Co-operate, especially work on Strategic Housing Market Areas (SHMA), Employment, Green Belt Review and AONB; • CDC to share outputs of AVDC/PAS Green Belt Review Workshop on 9 July 2014; • DBC to provide CDC with information on success of Maylands Business Centre; and • Both Councils to update each other when necessary on progress of Plan preparation; CDC with the Delivery

	<p>belt review and planned major housing developments.</p> <ul style="list-style-type: none"> • Dacorum’s approach to meeting employment needs, especially office accommodation, the needs of small businesses and infrastructure requirements generally. 	<p>DPD and early review, and DBC with the Site Allocations DPD and Early Partial Review of the Core Strategy.</p>
NHS England	<ul style="list-style-type: none"> • Look forward to the Site Allocations being made public and will then be in a position to provide formal and more detailed consultation comments pertaining to General Medical Services (GMS) provided by GPs. • Highlight that there may be non-GMS health services that operate from the premises of the surgeries most like to be affected, which are the responsibility of the relevant Clinical Commissioning Group (in this case Herts Valleys CCG,), and they should be consulted separately regarding capacity issues. 	<ul style="list-style-type: none"> • Herts Valleys CCG were separately consulted and will continue to be so. • NHS England to be consulted at Pre-Submission stage.

Table 5

Summary of Representations Received to Pre-Submission Site Allocations (2014) from DTC Bodies

Organisation	Summary of Representations Received	Action Taken
<p>Aylesbury Vale District Council</p>	<p>Concerns raised regarding a number of issues relating to Local Allocation LA5 (Icknield Way, Tring), including:</p> <ul style="list-style-type: none"> • Location of proposed Gypsy and Traveller site that forms part of Local Allocation LA5 at Icknield Way, Tring. • The need to clarify that the cemetery extension will be primarily for green burials. • The need to minimise the scale and impact of the proposed play area. • The needs to strengthen the text regarding the enhancement of background views of Tring from the Chilterns AONB. 	<p>Concerns reported to Members and discussed with specialist advisers i.e. Gypsy and Traveller Unit and at Herefordshire County Council and DBC Cemeteries Manager as appropriate. As a result of these discussions the following changes were made to the Pre-Submission Site Allocations DPD through the 'Focused Changes' process. Changes included:</p> <ul style="list-style-type: none"> • Amending development principles for Policy LA5 to clarify expectation that a significant area of the cemetery would be for natural burials; • No change required to text re new play area as para 5.40 of the draft master plan provides appropriate guidance. It states that the area should be designed creatively to fit in with the AONB and that brightly coloured metal equipment should be avoided. The

		<p>indicative layout plan in Policy LA5 already shows the indicative position of the play area, with the master plan again providing further guidance. The facility will be relatively small (about 0.1 ha), which equates to about 1.5% of the proposed western fields public open space.</p> <ul style="list-style-type: none"> • A change is proposed (MC63) relating to Proposal C/1 (cemetery extension) to refer to the need for the Chilterns Conservation Board to be consulted as part of the cemetery extension.
Chiltern District Council	Support.	N/A
Luton Borough Council	<p>Highlighted Luton's unmet housing need and the fact that they would look to immediate Housing Market Area neighbours (such as Dacorum) to help deliver this unmet need.</p> <p>Request to be informed of future technical work being undertake to support the early partial review process.</p>	<p>Comments noted and have been discussed through subsequent DTC meetings.</p> <p>The role of the Site Allocations DPD is to deliver the housing target set out in the adopted Core Strategy: not to revisit this figure. Luton's request can therefore be considered when the current plan is reviewed. However, it is noted that Dacorum does not fall within the defined 'best fit' Luton HMA and the part of the</p>

		<p>borough that falls within the ‘full’ HMA is not an appropriate or sustainable location to accommodate significant housing development.</p> <p>Luton has been involved in the SW Herts SHMA and Economy Study work to inform the new Dacorum Local Plan as members of the Project Advisory Group (PAG).</p>
Hertfordshire County Council (Services)	<p>Welcome ongoing collaboration and appropriate cross references to the waste plan. Highlighted a small number of omissions to the document which need to be rectified:</p> <ul style="list-style-type: none"> • Error on map showing education zone north west of Berkhamsted. • Omission of leisure designation related to detached playing fields for Tring School. • The need for the document to include reference to a 2 form entry primary school at Spencers Park. • Noted recent Timmins High Court judgement and potential implications for cemetery extension and detached playing fields at Tring. 	<p>All omissions highlighted have been corrected through amendments to the Site Allocations document introduced through the ‘Focused Changes’ process. The text and mapping for these changes was discussed and agreed with the County Council, prior to publication of these changes for formal representations.</p> <p>Changes include:</p> <ul style="list-style-type: none"> • a new leisure proposal (introduced via CS10 and MC60) for detached playing fields at Dunsley Farm, Tring. • Correction (via MC62) to map for Education Zone EZ/3 in Berkhamsted to include land north west of Bridgewater School and ensure site

		<p>area reflects that illustrated in the Core Strategy.</p> <ul style="list-style-type: none"> • Adding reference to the need for the new school two form entry primary school to serve phase 2 of Spencers Park (MC61). <p>Legal advice was taken on implications of Timmins judgement for cemetery extension in Tring has resulted in amendment to document via 'Focused Changes' process to remove this area from the Green Belt.</p>
Hertfordshire County Council (Highways)	Support.	N/A
Herefordshire County Council (Minerals and Waste)	<p>Note that the loss of Proposal H/18 in the Dacorum Borough Local Plan will mean there is a slight mis-match between the Waste Site Allocations and this document, until the Waste Plan is reviewed.</p> <p>Note that a few minor boundary changes i.e. to Bovingdon Brickworks allocation will need to be reflected in the Minerals Local Plan review (which is underway).</p>	Comments noted and discussed with appropriate Officers at the County Council. Agreed that no changes required to the Site Allocations DPD as a result of comments.
HCC Ecology	No specific comments received on the Site Allocations DPD, but detailed feedback provided on the SA/SEA Report that accompanied it.	All comments were passed to C4S, the Councils independent sustainability consultants, and any changes they deemed necessary were made to the SA document.

Highways England	No formal objection(s) made, but raised concerns regarding the adequacy of technical work looking at the capacity of the strategic road network.	<p>Meeting held with Officers in May 2015 to discuss representations. Follow up email received on 6/5/15, which stated <i>“I would like to re-iterate that neither letter is an objection to the consultations – it is for your local council to decide on the housing numbers that it needs to support its local communities. I did however set out a number of concerns regarding the level of transport information that was available at the time of my response. However, following our discussion last week, I understand that work is ongoing to address this and that you are also working with Hertfordshire County Council to understand the transport model outputs and the impact on the local and strategic road network. It would be useful if you could confirm this and set out what work is taking place, along with timescales for when you will have a clearer idea on the impact.”</i></p> <p>As a result of this discussion, further information regarding highway modelling and transport technical work has been added to the Sustainable Development Background Issues paper to ensure this</p>
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		provides the necessary explanatory information.
English Heritage (Historic England)	<p>16 representations received, 8 of support and 8 of objection.</p> <p>Supporting representations related to:</p> <ul style="list-style-type: none"> • Housing Proposals H/15, H/16 and H/17. • Policy SA5 regarding General Employment Areas • Policy SA1 re Major Developed Sites in the Green Belt • Place Strategies • Section 9: Conserving the Historic Environment • Proposal L/1 <p>Objections related to the need to take further account of the historic environment with regards to the following sites:</p> <p><u>Housing Proposals</u></p> <ul style="list-style-type: none"> • H/6 – 39-45 Marlowes, Hemel Hempstead. • Housing Proposal H/20 – Former Depot, Tring. • Housing Proposal H/22 – Hicks Road, Markyate. • Proposal MU/1 – West Herts College site, Hemel Hempstead <p><u>Local Allocations</u></p> <ul style="list-style-type: none"> • LA1 – Marchmont Farm, Hemel Hempstead • LA2 – Old Town, Hemel Hempstead 	<p>Support for the policies / proposals listed is welcomed.</p> <p>The Council made a number of amendments through the ‘Focused Changes’ process to try to resolve a number of the objections received.</p> <p>This included:</p> <ul style="list-style-type: none"> • Deletion of Proposal H/6 (via MC47). • LA1 – additional text added (via MC17) to development principles to refer to the need for building heights to be appropriate in terms of topography and visual impact. Wording has also been clarified in the master plan that has been prepared for the site to clarify requirements regarding the landscaped buffer. • LA2 – text added (via MC21) to refer to if there are any building elements higher than 2 storey then these must not be harmful to the historic environment.

	<ul style="list-style-type: none"> • LA3 – West Hemel Hempstead • LA4 – Hanburys, Berkhamsted. 	<ul style="list-style-type: none"> • LA3 – text added to development principle to refer to safeguarding of heritage assets both within and adjoining the development. <p>Historic England will be consultees at the planning application stage for all relevant sites, as if appropriate, also involved at the pre-application advice stage.</p> <p>All planning applications will also need to comply with Policy CS27: Quality for the Historic Environment.</p> <p>For a more detailed response to specific issues raised, please refer to the Report of Representations.</p>
West Herts Hospital Trust	<p>Support the strategic objectives of the DPD to promote healthy and sustainable communities.</p> <p>Disappointed that the Council’s interpretation of the NPPF is that provision only needs to be made to deliver sufficient community and cultural facilities to meet local needs. For example, stronger support for secondary healthcare facilities to cope with the ageing population.</p> <p>Strong support for proposal MU/2 for the redevelopment of the Hemel Hospital site. Notes that the proposal will be</p>	<p>Support welcome.</p> <p>It is considered that the plan (when read in conjunction with the adopted Core Strategy) already reflects needs for secondary healthcare facilities without any further changes being required.</p> <p>The proposal for MU/2 has deliberately been worded in a flexible manner to reflect the fact that the Hospitals’ plans</p>

	further refined when the Trust's clinical strategy is published.	are not yet finalised. The proposals refers to the fact that a Development Brief will be required once the landowners' intentions are finalised.
Environment Agency	<p>Submitted two sets of comments, one within the consultation period and one after the closing date:</p> <p><u>Original Submission:</u> Consider the document sound as there is an adequate evidence base and consideration of flood risk to support the policies and sites. Request some minor amendments to H22 (Hicks Road) to refer to the need for a flood risk assessment.</p> <p><u>Late Submission:</u> Raise concerns over water quality and a lack of evidence showing that the proposed allocations ca be served by the waste water network with no detrimental impact on the water environment.</p>	<p>A meeting was held with the EA (and Thames Water) to discuss how the concerns raised in the late representations could be overcome. Thames water suggested that additional text was added to appropriate sites in the housing schedule and Local Allocation policies to refer to the need for early liaison with relevant bodies on water issues. This additional text was introduced through the Focused Changes process and has the support of Thames Water.</p> <p>A Statement of Common Ground has been prepared for the Site Allocations examination setting out the pertinent issues and the positons of the EA, Thames Water and the Council. This has been signed by all parties. It includes a clear commitment from Dacorum to progress technical work on potable and waste water issues as part of the early partial review process. This work is</p>

		<p>already underway and being carried out by specialist consultants Arcadis on a countywide basis (with Hertfordshire County Council taking a lead co-ordinating role).</p>
<p>Natural England</p>	<p>Welcome the fact that no sites previously objected to have been included within the Site Allocations. Request that Major development Sites (MDSs) and Employment Areas in the Green Belt respect their AONB context. Support requirements for enhanced footpath and cycle links. Welcome requirement for environmental improvements at specified General Employment Areas. Note that all Local Allocations have the potential to impact on the AONB, so will require Landscape and Visual Impact Assessments (LVIA).</p> <p>Specific advice provided on Local Allocations:</p> <p><u>Policy LA1</u></p> <p>Support for retained green infrastructure and positive effects identified in the Sustainability Appraisal. Results of ecology study noted. No particular comments on the proposed traveller site (Policy SA9)</p> <p><u>Policy LA2</u></p> <p>Support for retained green infrastructure and positive</p>	<p>No change required regarding comments re MDSs and Employment Areas in the Green Belt, as any development in these locations would already be required to respect AONB context via Core Strategy Policies CS24: The Chilterns Area of Outstanding Beauty and CS25: Landscape Character.</p> <p>The need for all Local Allocations to take account of their landscape impact is noted and already appropriately highlighted through the relevant Local Allocations policies in the Site Allocations document and through further advice in the associated site master plans.</p> <p>All of the Local Allocations master plans have been amended to include the requirement for LVIA's.</p> <p>Specific advice on Local Allocations</p>

	<p>effects identified in the Sustainability Appraisal. Results of ecology study noted.</p> <p><u>Policy LA3</u></p> <p>Support for retained green infrastructure, mitigation for the visual impact on the landscape, and the positive effects identified in the Sustainability Appraisal. Results of ecology study noted. No particular comments on the proposed traveller site (Policy SA9)</p> <p><u>Policy LA4</u></p> <p>Adverse impacts noted in the Sustainability Appraisal on biodiversity, soils, use of brownfield sites and landscape resulting in a loss of landscape character</p> <p>Recommendations including retaining the pond, mature planting on to Shootersway and providing a coherent and wildlife friendly open space network that links to the surrounding countryside are supported. Also, support for existing ecological studies for the site and the proposed heavy landscaping, together with the overall design of the site with landscaping, and the green links to the countryside</p> <p>As an amendment is it recommended that biodiversity offsetting is a planning requirement for the development</p> <p><u>Policy LA5</u></p>	<p>reflected in revision to Local Allocations policies and/or site master plans as appropriate. See Report of Representation and Reports of Consultation for Local Allocations master plans for further details.</p>
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	<p>The proposals have the potential to have significant adverse effect on a nationally designated landscape and visual amenity (CAONB). However, noted that the part of the site in the AONB is undeveloped farmland and to be used for formal playing pitches and recreation space</p> <p>No particular comments on the proposed traveller site (Policy SA9), other than noted location within the AONB.</p> <p>It is noted that a LVIA has already been undertaken and that more detailed assessment will be required for the planning application such as night time lighting. The impact on the Ridgeway National Trail should also be considered</p> <p>It is recommended that the Chilterns Conservation Board are consulted on the detailed designs to ensure that the special qualities of the AONB are conserved and enhanced, in line with the NPPF</p> <p>Support for further protected species studies to be undertaken, and support for the proposals to incorporate biodiversity enhancements</p> <p><u>Policy LA6</u></p> <p>It is noted that ecological surveys have been undertaken, and recommended that these are updated when further details are available. Mitigation and biodiversity enhancements should be incorporated in the</p>	
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	development. Provision of pedestrian access and cycle access to Hyde Land and Lancaster Road, and promoting sustainable travel options are welcomed	
Heathrow Airport Ltd	No safeguarding issues raised regarding aerodrome safeguarding perspective. Advice provided on wind turbines, including suggested text for a policy.	No changes required, the suggested policy wording is more appropriate for inclusion within a future Development Management policy than for the Site Allocations DPD. The Site Allocations DPD does not include any proposals for wind farm developments.

Table 6

Summary of Representations Received to Focused Changes to Pre-Submission Site Allocations (2015) from DTC Bodies

Organisation	Summary of Representations Received	Action Taken
Historic England	<p>No representations made relating to the ‘significant changes.’ Submitted a number of representations with regard to the ‘minor changes.’ Whilst 7 of these were in support of the wording changes proposed, 2 were objections. Both related to the wording of the planning requirements for Local Allocation LA1: Marchmont Farm, Hemel Hempstead. These objections related to:</p> <ul style="list-style-type: none"> • MC16 and MC17 – Note that part of their original objections, relating to building heights has been addressed. However, still wish text to refer to significance and setting of Piccotts End Conservation Area and the requirement for the planted buffer should be at least 15 metres wide. 	<p>Comments of support welcomed.</p> <p>Neither of the two objections raised are considered to relate to the overall soundness of the plan (as they are concerned with minor changes to the plan). Rather they relate to the detailed development requirements set out in the document for one of the Local Allocations that is close to the Piccotts End Conservation Area. The Council has considered earlier representations made regarding the same matters and considers that the text now set out in the Site Allocations DPD is appropriate. Detailed matters can be more properly</p>

		considered at the planning application stage, when Historic England would also be consulted. For a more detailed response to specific issues raised, please refer to the Report of Representations for the Focused Changes.
Local Nature Partnership	Standard response stating that they cannot provide comments on individual planning documents, but cross referring to ensure compliance with advice set out in their published guidance.	No action required. The Council is aware of the LNP guidance document and has taken this into account when preparing its Site Allocations DPD and associated master plans for the Local Allocations.
Homes and Community Agency	Objection to a minor change that add a cross reference to the need for a two-form entry primary school as part of the Phase 2 Spencers Park development.	No change required. This is a statement of fact and relates to advice from Hertfordshire County Council (in their capacity as the local education authority). The issue relates to a minor change only, so does not raise any overall soundness issues.
Environment Agency	Reiterate their previous objections to the Pre-Submission document with regard to concerns over the capacity of the waste water network in the Borough. Welcome the additional text added to the housing proposals relating to the need or early liaison on waste water issues with Thames	No change. This is a reiteration of comments made to the Pre-Submission document (see above). A

	<p>Water. Aware the Council is involved in the Hertfordshire Water Projects and that a statement of Common Ground is being prepared by the Council, which will also be agreed with Thames Water.</p>	<p>Statement of Common Ground (between the Council, the EA and Thames Water) has been agreed and will be submitted as part of background information to inform the Examination process.</p>
<p>Hertfordshire County Council – Ecology</p>	<p>Regarding Policy LA3:</p> <ul style="list-style-type: none"> • Notes there is a new development principle (introduced by MC24) which considers heritage assets. Suggest this principle is extended to refer to ecological assets too. • Important that the extension to Shrub Hill Comon LNR is designed and managed so it performs as a genuine ecological corridor. • Note that the ecological corridor to the north-west is not being pursued. Acknowledges that the east-west ecological corridor provides an acceptable alternative. However, is concerned that whilst the delivery of this corridor is the stated aim of the LPA, the intention may not be robust enough to ensure it is delivered. <p>Feedback also given on the SA/SE for Focused Changes.</p>	<p>A further change is proposed to Focused Change MC 24 to widen it to cover ecological assets – both within and adjoining the development.</p> <p>The acceptance of the east-west ecological corridor as an acceptable alternative to the north west corridor is welcomed. The Borough Council, through Policy LA3 already includes a clearly expressed requirement to deliver an ‘<i>extension of Shrubhill Common Nature Reserve and the creation of wider green infrastructure links.</i>’ This requirement is shown on the indicative spatial layout within the policy and</p>

		<p>elaborated within the master plan that has been prepared for the site. The expectation is known and accepted by the landowners – who have been working jointly with the Council in preparing the master plan document. Much of the corridor also has no development potential as it follows the route of a high pressure gas main. The advice of the HSE is that dwellings should not be located within a 70m cordon either side of the pipeline – though gardens and open space uses are acceptable within this cordon (see paragraph 4.9 of the masterplan).</p> <p>For response to comment on the SA/SEA see Sustainability Report – Submission Statement (January 2016).</p>
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<p>East Herts District Council (on behalf of the LNP)</p>	<p>General reiteration of the role of the LNP and the high level principles they wish to be incorporated within Local Plans:</p> <p>Six principles of planning for biodiversity and the natural environment</p> <ol style="list-style-type: none"> 1. Recognise the value of the natural environment and the range of benefits and services it provides 2. Protect and enhance existing biodiversity assets 3. Seek opportunities to improve habitat connectivity 4. Integrate biodiversity opportunities within new development 5. Make decisions informed by the best available ecological information and data 6. Secure the long term management of existing and new habitats/sites 	<p>Comments noted. The Council considers it has reflected these principles in its Core Strategy and the current Site Allocations DPD) and associated local allocations masterplans.</p>
<p>Heathrow Airport and the Ministry of Defence (Assistant Safeguarding Officer)</p>	<p>Objections related to location of Berkhamsted, Tring and Hemel Hempstead within an area where building heights should be limited to protect aviation airspace and the need for these organisations to be consulted on relevant planning applications</p>	<p>This issue was not directly related to the Focused Changes consultation. Neither does the wider Site Allocations DPD include any sites where tall buildings are specified or promoted. If any such applications were to be received, the Council's Development Management team already notifies relevant organisations as part of standard procedures. No changes are therefore warranted to the Site Allocations document as a result of these representations.</p>

Other Co-Operation and engagement

4.16 In addition to the prescribed DTC bodies, the Council's approach to engagement and collaboration has also embraced a range of other organisations and individuals who are considered to have an interest in local plan-making. These include utilities, infrastructure and service providers, private sector bodies, including business interests, local (parish) councils, amenity, environmental and residents organisations, and the voluntary sector; landowners and individual residents. Details of consultation and engagement with these non DTC bodies are set out in the Reports of Consultation and Reports of Representations relating to the Site Allocations DPD.

Evidence Gathering

4.17 Evidence supporting the new Local Plan consists of a range of studies, technical information and advice. Gathering the evidence normally involved collaboration and/or consultation with neighbouring authorities, Herts County Council and/or other public bodies. Consultation is normally reported with the relevant study.

4.18 The Council's approach has included:

- joint commissioning of many of the studies (see Core Strategy Statement) the remainder being specific to Dacorum.
- the involvement of local authorities and other public bodies, which were relevant to the particular study (e.g. English Nature and Green Infrastructure; the Environment Agency and the Strategic Flood Risk Assessment and Water Cycle Report; St Albans Council and the Town Stadium/Community Sports Facility; Landscape Character and the Chilterns Conservation Board)
- agreement over the output: the recommendations of all commissioned studies were independent – the role of the bodies involved was to ensure that the study met the project brief and that the recommendations of the study logically related to the evidence and expertise of the consultants.

4.19 A few studies applied to Dacorum only – urban design assessment, urban nature conservation, retail and open space being the most important. Their preparation involved a workshop and/or other consultation.

4.20 The majority of technical work was prepared in support of the Core Strategy and remains relevant to the Site Allocations DPD.

4.21 Table 7 summarises the technical studies completed since the Core Strategy was submitted for Examination, and the nature of the DTC activity with regard to these.

Table 7**Technical Studies Completed Since June 2012**

Study¹	Nature of Co-operation under the DTC
Traveller Needs Assessment (January 2013)	Commissioned and prepared jointly with Three Rivers District Council and involving liaison with adjoining local planning authorities to ensure the study takes account of the wider context.
Studies to inform Local Allocation masterplans	<p>Various studies have been commissioned either by the Council, or developers, to help inform the master plans for the Local Allocations and subsequent planning applications:</p> <ul style="list-style-type: none"> • Transport studies have been passed to the local Highway Authority for comment and agreement, with a representative from the Highway Authority attending landowner meetings as required; • Archaeological Assessments (including geophysics studies) have been prepared for LA1, LA2, LA4, LA5 and LA6, in conjunction with the Historic Environment Adviser at Herts County Council; • Where appropriate, ecological assessments for sites have been passed to the Council's Ecological Adviser (at Hertfordshire County Council) for comment and advice; and • Advice on the provision of traveller pitches within LA1, LA3 and LA5 from the County Council's Gypsy and Traveller Unit; and • Advice on sustainable drainage (SUDs) issues has been sought from the County Council in advance of their formal establishment as the SUDs Approval Body (SAB).
Community Infrastructure Levy: Updated Viability Study (July 2013)	An update to CIL viability work. Included consideration of infrastructure needs (informed by the Infrastructure Delivery Plan) and the ability of development to support contributions towards this infrastructure.
Strategic Sites Testing (October 2013)	An addition to the Borough-wide CIL viability testing work, focussing on the ability of key development sites to support the proposed CIL charge, in addition to relevant S106 contributions.
Infrastructure Delivery Plan Update (January 2014)	An update of the current position regarding infrastructure projects, funding and delivery mechanisms for Dacorum Borough. The update involved discussion with infrastructure and service providers (Hertfordshire County Council, Thames water etc) and reflects feedback received.

¹ Note: This list excludes studies commissioned to inform the early partial review of the Core Strategy. These are referred to under section 5: Continuing Co-operation. It does also not include technical work specific to the Local Allocations, which is separately listed on the Council's website.

Berkhamsted and Tring Urban Transport Plan (May 2013)	Prepared by the Highway Authority, in liaison with Dacorum Borough Council, to add local level information to the Local Transport Plan (LTP). This has been used to inform the content of the Transport Schedule for the Site Allocations document, pertaining to Berkhamsted and Tring.
Hertfordshire Infrastructure and Investment Strategy (HIIS) Update (January 2013)	An update of the original HIIS, published in 2009. This report provides a county-level overview of infrastructure planning and delivery. Prepared by consultants RS Regeneration on behalf of Hertfordshire County Council, with close liaison and input from all local planning authorities
Infrastructure Delivery Plan (InDP) – 2015 update.	An update of the 2014 version of the Infrastructure Delivery Plan, with representations made to the Pre-Submission Site Allocations document helping to inform discussions with providers and ensure key issues of local concerns are addressed.
Outdoor Leisure Facilities Study (September 2014)	Steering group included regional representatives from sports bodies (such as Sport England, FA, CCB, Lawn Tennis Association etc), local sports clubs, Sports Space and internal Officer representation. Outputs have informed Schedule of Leisure Proposals and Sites and requirements regarding Local Allocations.
Playing Pitch Strategy and Action Plan (2015)	Builds on the above work, but setting out a clear strategic framework for the improvement of existing playing pitches and facilities, and new / improved facilities required if finances and opportunities allow over the next 10 years (2015-2025)
Hemel Hempstead Transport Model Update: 2031 Scenario testing (2015 run) (July 2015)	An updated model run commissioned to help understand the impact of the level of new development proposed in the Pre-Submission Site Allocations DPD on the local road network and the likely need for a range of transport improvements and mitigation measures.. Report is accompanied by an advice note prepared by DBC and HCC.

Ongoing Liaison

- 4.22 Informal discussion and liaison is not recorded as formal consultation has been, but it is important. Understanding with key public bodies has often come through liaison at special or standing meetings and other networking. Such understanding has been helpful in gathering evidence, assisting the Council to deliver a balanced strategy, handling infrastructure issues and minimising any differences.
- 4.23 Regular liaison with the County Council has been especially important. As local highway authority they continue to inform consideration of local allocations and site assessment work and this has helped link transport and planning policy. This has involved the consideration of outputs from the Hemel Hempstead Transport model and work to update this. Advice from specialists in

archaeology, ecology and flood risk at the County Council has also been invaluable in informing the Site Allocations DPD.

4.24 The following groups have played (and continue to play) an important role in this ongoing process of co-operation:

- Hertfordshire Infrastructure Planning Partnership
- Hertfordshire Planning Group (HPG) - Main
- Hertfordshire Planning Group (HPG) – Development Plans
- Hertfordshire Planning Group (HPG) – Landscape
- Hertfordshire Economic Development Officers’ Group (HEDOG)
- Community Infrastructure Levy (CIL) reference Group (replaced with the Infrastructure Advisory Group in 2015)
- Building Futures Group
- Hertfordshire Information Liaison Group
- Transport Liaison Groups i.e. STIBlet meetings

Assessment of compliance

4.25 Paragraph 182 of the National Planning Policy Framework states the basis on which the Site Allocation (and all other DPDs) will be examined:

“The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Co-operate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:

- *Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;*
- *Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;*
- *Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and*
- *Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.”*

Conclusions

4.26 There are two aspects of the responsibility to co-operate with regard to the Site Allocations DPD:

1) Preparing the Site Allocations

- The legal test introduced as Section 33A, Planning and Compulsory Act 2004 is concerned with the process of preparing the Site Allocations: i.e. constructive engagement, involving adjoining planning authorities and statutory consultees, and maximising the effectiveness of preparation: the potential for joint agreements and even joint plans should be considered.

2) Testing the soundness of the Site Allocations

- The examination into the Site Allocations will assess its soundness: the key tests relating to co-operation are the 'positively prepared' and 'effective' tests described above (see paragraph 4.23). Both tests consider the policies in the Site Allocations: i.e. whether they are positively prepared and effective.

4.27 The Council is satisfied that it has fulfilled the duty to co-operate in preparing the Site Allocations, as is explained in this document. However, confirmation of soundness can only be given as an outcome of the Examination process.

4.28 It is also acknowledged that co-operation extends well beyond preparation of the Site Allocations DPD. Whilst this document focusses on co-operation pertaining to the Site Allocations DPD, there is wider on-going co-operation with regard to other planning matters: in particular the early partial review of the Core Strategy and preparatory work for the new single Local Plan that is progressing in parallel. This wider duty to co-operate activity is summarised in the Council's Authority Monitoring Reports (see section 1 above).

5. Continuing Co-operation

- 5.1 The Statement of Compliance with the Duty to Co-operate (Addendum) has focused on co-operation with key public sector bodies up to the Pre-Submission of the Site Allocations. Co-operation does not, however, end here or with the adoption of the Site Allocations DPD.
- 5.2 It will continue through the completion of the current Local Planning Framework (i.e. the Development Management DPD and East Hemel Hempstead Area Action Plan) and through the delivery and review of the Core Strategy.
- 5.3 Examples of co-operation already underway to inform subsequent DPDs and the early partial review process are given in Table 8.
- 5.4 Actual co-operation will be reported every year in the Authority Monitoring Report in accordance with Regulation 34(6) in the Town and Country Planning (Local Planning) (England) Regulations 2012.

Table 8

Examples of Anticipated Future Co-operation

Organisation	Nature of Co-operation
Aylesbury Vale District Council	<ul style="list-style-type: none"> • Completion of the local planning framework. • Completion of master plan for Local Allocation LA5: Icknield Way, Tring, the subsequent planning application and its delivery. • Liaison on technical work to inform Dacorum's early partial review process (particularly the SHMA, Green Belt Stage 2 study and Economy Study). • Liaison on Aylesbury's forthcoming Housing and Economic Development Needs Assessment (HEDNA) and Buckinghamshire-wide work pertaining to the definition of Housing Market Areas (HMAs) and Functional Economic Areas (FEMAs).
Buckinghamshire County Council	<ul style="list-style-type: none"> • Completion of the local planning framework. • Completion of master plan for Local Allocation LA5: Icknield Way, Tring, the subsequent planning application and its delivery (with regards to local highway impacts)
Central Bedfordshire Council	<ul style="list-style-type: none"> • Completion of the local planning framework. • Ongoing liaison as set out in Memorandum of Understanding pertaining to the Luton / Central Bedfordshire SHMA. • Liaison on technical work to inform Dacorum's early partial review process (particularly the SHMA, Green Belt Stage 2 study and Economy Study).

Chiltern District Council	<ul style="list-style-type: none"> • Completion of the local planning framework • Countryside policy (particularly with regard to the Chilterns AONB) • Liaison re Buckinghamshire-wide work pertaining to the definition of Housing Market Areas (HMAs) and Functional Economic Areas (FEMAs). • Liaison on technical work to inform Dacorum's early partial review process (particularly the SHMA, Green Belt Stage 2 study and Economy Study). • Liaison on Conservation Area Appraisals and sharing of best practice as a result of joint commissioning of consultants. • Liaison on potable and waste water issues as a result of Chilterns' involvement in Hertfordshire-wide study.
Hertfordshire County Council	<ul style="list-style-type: none"> • Completion of the local planning framework • Service capacity and needs, and infrastructure delivery • Transport planning (including development of county-wide traffic model and progression of Growth and Transport Plan for Hemel Hempstead)), parking strategy and site access issues. • Liaison on potable and waste water issues as a result of Hertfordshire-wide study.
Luton Borough Council	<ul style="list-style-type: none"> • Completion of the local planning framework. • Ongoing liaison as set out in Memorandum of Understanding pertaining to the Luton / Central Bedfordshire SHMA and other key studies. • Liaison on technical work to inform Dacorum's early partial review process (particularly the SHMA, Green Belt Stage 2 study and Economy Study).
St Albans City & District Council	<ul style="list-style-type: none"> • Joint planning at East Hemel Hempstead – through the East Hemel Hempstead Area Action Plan or a joint master plan. • Infrastructure planning for East Hemel Hempstead. • Completion of the local planning framework. • Liaison on technical work to inform Dacorum's early partial review process (particularly the SHMA, Green Belt Stage 2 study and Economy Study). • Delivery of new EnviroTech Enterprise Zone, which includes land in Dacorum and St Albans. • Liaison on the content of St Albans' Strategic Local Plan – particularly relating to future of Crown Estates Gorhambury land. • Liaison on potable and waste water issues as a result of Hertfordshire-wide study.
Three Rivers District Council	<ul style="list-style-type: none"> • Completion of the local planning framework. • Infrastructure planning in the lower Gade valley (and Kings Langley) • Joint commissioning of technical work to inform

	<p>Dacorum's early partial review process (SHMA, Demographic modelling and Economy Study).</p> <ul style="list-style-type: none"> • Liaison on potable and waste water issues as a result of Hertfordshire-wide study.
Watford Borough Council	<ul style="list-style-type: none"> • Completion of the local planning framework • Joint commissioning of technical work to inform Dacorum's early partial review process (SHMA, Demographic modelling and Economy Study). • Sharing of 'good practice' and experience with regard to suitability and delivery of tall buildings. • Liaison on potable and waste water issues as a result of Hertfordshire-wide study.
Hertsmere Borough Council	<ul style="list-style-type: none"> • Completion of the local planning framework • Joint commissioning of technical work to inform Dacorum's early partial review process (SHMA, Demographic modelling and Economy Study). • Liaison on potable and waste water issues as a result of Hertfordshire-wide study.
Mayor of London and London Boroughs	<ul style="list-style-type: none"> • Whilst not considered directly relevant to production of the existing local planning framework, it will be important to engage with the Further Alterations to the London Plan (FALP) and subsequent full review of the London Plan: as there may be implications for local planning authorities close to London in terms of being requested to meet some of London's un-met housing needs. • Consultation and response to London Infrastructure Plan (via HIPP).
Environment Agency	<ul style="list-style-type: none"> • Continuing advice on flood risk management and water environment, particularly pertaining to identified sites and proposals. • SA/SEA pertaining to Dacorum's early partial review. • Liaison on county-wide water study.
English Heritage (Historic England)	<ul style="list-style-type: none"> • Continuing advice on historic environment, particularly pertaining to identified sites and proposals. • SA/SEA pertaining to Dacorum's early partial review.
Natural England	<ul style="list-style-type: none"> • Continuing advice on natural environment, particularly pertaining to identified sites and proposals. • SA/SEA pertaining to Dacorum's early partial review.
Homes and Communities Agency	<ul style="list-style-type: none"> • Delivery of regeneration proposals and new development for which HCA have landowner interest i.e. Maylands Gateway. • Completion of master plan for Local Allocation LA1: Marchmont Farm, the subsequent planning application and its delivery. • Potential for LA6 (Bovingdon) to be delivered by HCA on behalf of Ministry of Justice (the current

	<p>landowners).</p> <ul style="list-style-type: none"> • Support delivery of new EnviroTech Enterprise Zone – as one of the landowners in the Gateway.
Clinical Commissioning Groups and other relevant NHS bodies	<p>The Council will continue to liaise on issues pertaining to:</p> <ul style="list-style-type: none"> • to delivery of the ‘Hospital Zone’ in Hemel Hempstead town centre (Proposal MU/2); • provision of expanded GP services in west Hemel Hempstead (through the delivery of Local Allocation LA3); and • ensuring appropriate healthcare infrastructure to support the level of development established through the early partial review process.
Network Rail / Office for Rail Regulation	<ul style="list-style-type: none"> • Completion of the local planning framework • Delivery of Station Gateway site (Proposal MU/4). • Potential redevelopment and improvement of Tring railway station (within existing site) and Hemel Hempstead station. • Liaison regarding potential plans to extent Crossrail into Dacorum.
Highways Agency	<ul style="list-style-type: none"> • Transport planning and modelling pertaining to the early partial review and preparation of the East Hemel Hempstead Area Acton Plan or master plan. • Liaison on strategic road issues – including Maylands Growth Corridor, Growth and Transport Plan for Hemel Hempstead and county-wide traffic model.
Herts Local Enterprise Partnership	<ul style="list-style-type: none"> • Completion of the local planning framework • Liaison pertaining to the early partial review process and establishment of revised housing and employment targets. • Investment support and priorities. • Delivery of EnviroTech Enterprise Zone. • Support for infrastructure projects, including Maylands Growth Corridor. • Liaison regarding future development of Gorhambury land (with St Albans and the Crown Estate).
Local Nature Partnership	<ul style="list-style-type: none"> • Completion of the local planning framework, particularly with regard to detailed policies relating to the natural environment. • Liaison pertaining to the early partial review process.

Appendices

Appendix 1

DTC letter (May 2014)

Date: 23 May 2014
Your Ref.
Our Ref:
Contact: Laura Wood
Email: Laura.Wood@dacorum.gov.uk
Directline: 01442 228661
Fax:



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Dear,

Duty to Co-Operate: Dacorum's Pre-Submission Site Allocations DPD

As you may be aware, Dacorum adopted its Core Strategy in September 2013. Since this date, work has been progressing on the next document that will make up the Council's new Local Plan: the Site Allocations DPD. We are writing to advise you of the timetable for this document and to offer the opportunity to discuss any issues that you may wish to raise under the duty to co-operate.

Pre-Submission Site Allocations:

The role of the Site Allocations is to help deliver the vision and strategy set out in the Core Strategy. A summary of its broad coverage is enclosed.

The Pre-Submission version of the Site Allocations document (Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012) will be considered by Cabinet on 24th June, before being referred to full Council on 9th July. Members will be asked to agree the content of the document for consultation and the detailed consultation arrangements. We expect the consultation period to run for 6 weeks from the beginning of September in order to avoid the peak summer holiday period.

Alongside the Site Allocations document, work has also been progressing on preparing master plans for the six Local Allocations. These are the sites identified through the Core Strategy to be removed from the Green Belt for future housing and associated development. Key requirements for each Local Allocation will be set out in the Site Allocations DPD, with the master plans providing further detailed information and requirements. Cabinet will consider these draft master plans on 22nd July and we will seek feedback on them alongside the Site Allocations DPD.



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Whilst we hope we have addressed key strategic cross boundary issues through the Core Strategy and on-going liaison with relevant organisations, if you do have **any feedback or comments on any issues pertaining to the duty to co-operate, we would be grateful if you could let us know by Wednesday 11th June**. This will enable us to raise any concerns with Members and/or make any necessary changes to the document prior to consultation commencing.

Comments can be made in writing, or alternatively, if you would prefer to meet to discuss any concerns then we would be happy to arrange this.

If you would like further information regarding the detailed wording or content of any sections of the Site Allocations document, then please let us know. Where organisations have had ongoing liaison with the Council on specific issues, Officers will be in touch shortly to provide further information and seek specific feedback on detailed policy wording and content.

There will of course be further opportunity to raise issues as part of the formal consultation process.

Legal Challenge and Early Partial Review Update:

The Council received a legal challenge to the adopted Core Strategy, from developers Grand Union Investment Ltd. This challenge was heard in the High Court in late March and the outcome is still awaited. Your views on any duty to co-operate issues relating to the Site Allocations DPD and Local Allocations master plans will be helpful regardless of the result of this challenge.

As you may be aware, the Council has agreed to carry out an early partial review of the Core Strategy, primarily to reconsider housing need and the role of the Green Belt. Work on the evidence base to support this review has begun and further work is scheduled for autumn 2014 onwards. This will include a Strategic Housing Market Assessment (SHMA) and Stage 2 of a comprehensive Green Belt review. We will contact relevant organisations regarding these studies in due course.

If you have any questions or would like to arrange a meeting to discuss duty to co-operate issues, please contact either myself or Sarah Churchard in the Strategic Planning team on 01442 228660 or email strategic.planning@dacorum.gov.uk.

Yours sincerely,

A handwritten signature in blue ink that reads "LWood". The signature is written in a cursive style and is underlined with a single blue line.

Laura Wood
Team Leader – Strategic Planning and Regeneration

Site Allocations DPD - Summary of Content

The structure and content of the Site Allocations broadly reflects that of the Core Strategy. Strategic Objectives from the Core Strategy are repeated at the beginning of each section. The content of the Core Strategy is not repeated, although necessary cross-references are made. Coverage of each section is outlined below:

The Sustainable Development Strategy – This section sets out the extent of key boundaries relating to the Green Belt, Rural Area, major developed sites in the Green Belt and individual towns and villages. These boundaries are important as they affect the approach to development that will be taken in different locations. In recognition of the increased role of ‘mixed use’ schemes within the Borough, a number of mixed use development sites are also identified. These will deliver a range of complementary uses as part of their development or redevelopment. Sites are also identified and protected for transport uses.

Providing Home and Community Uses – One of the main functions of the Site Allocations is to identify how specific sites will contribute towards delivery of the housing target, which is set out in the Core Strategy. Key housing sites are identified, detailed requirements set for the Local Allocations, and specific provision is also made for travelling communities. In order to ensure appropriate supporting infrastructure is provided to support residents and workers, a number of sites are specifically identified and protected for community and leisure uses and open land.

Promoting Economic Prosperity – A review of employment allocations and designations within the Borough has been carried out. This review has sought to ensure that sufficient good quality employment land is available to meet the Core Strategy’s employment targets (for offices and industrial, storage and distribution floorspace). The scope to reallocate some employment land for housing development has also been considered. This work has also sought to ensure the uses permitted in designated employment areas remains appropriate in terms of their character and current market demands and supports growth in local economic prosperity. Following changes in national policy on retail matters, the opportunity has been taken to update the Council’s approach to the main retail centres, and in particular to redefine the role and extent of protected shopping frontages within the Borough’s three town centres. The approach to the Borough’s more numerous local centres remains unchanged.

Looking after the Environment – Identifies designations relating to landscape, biodiversity and historic heritage that are illustrated on the Policies Map, updating these as necessary. Some designations are defined locally by the Council, in consultation with its advisers, whilst others reflect designations that are set at a national or European level.

Place Strategies – Individual strategies are set out in the Core Strategy for each of the Borough’s town and large villages and for the countryside. The Place Strategies within the Site Allocations set out how these place visions will be delivered by pulling together key allocations by settlement, rather than by use.

Monitoring and Review – provides further explanation (in addition to that set out in the Core Strategy) regarding how sites will be monitored and any issues with delivery addressed.

Appendices – provide more detailed information, including an updated schedule of superseded policies, a glossary and a revised housing trajectory.

Please contact Dacorum Borough Council if you require more detailed information regarding any of the above sections.