

**Submission to Planning Inspector by West Hemel
Action Group [WHAG]**

**Examination of the Dacorum Site Allocations
Development Plan document – October 2016**

Dacorum Site Allocations DPD

Matters, Issues and Questions

**Matter 1 – Legal compliance, including duty to co-
operate**

Matter 1 - Legal compliance

1. Overall, has the Plan been prepared in accordance with relevant legal requirements, including the 'Duty to Cooperate' imposed by Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended)? Has the duty to co-operate been met? What has been the nature of the co-operation and on what issues? How is the 'Duty to Co-operate' work of the various planning authorities co-ordinated?

No comments on this topic by WHAG

2. **Has the Plan been prepared in accordance with the Council's Statement of Community Involvement and met the minimum consultation requirements in the Regulations?**

Overall consultation

1. WHAG's view in terms of DBC's overall consultation, going to the start of the development of the Core Strategy, has been poor. We acknowledge that DBC may have followed "due process" but for the people impacted by a development of the size and scale of LA3 there has been little direct notification. The first time that people overlooking LA3 were notified was in May 2013 in advance of a workshop organised by DBC over the layout of LA3. It should be noted that this was *after* the initial Planning Inspector's review in late 2012. It is interesting to note that since WHAG was formed (May 2013) DBC has been keen to use us as a conduit to the local residents. Much of the information sent out by DBC from 2013 onwards to people who were not closely involved would have helped very little to understand the size, scope and impact of LA3.
2. In addition, neither of the two recent consultation processes as they related to LA3 were in any way user friendly and seemed designed to limit the opportunity for individuals to make an informed response. The 'Pre Submission Site Allocation' document was completely impossible to respond to as a layman and the process of responding to the Draft Master Plan was so laborious and time consuming that it seemed designed to discourage democratic participation.

Consultation on updated viability testing of the strategic sites,

3. In The Inspector's letter dated 16th May, it mentions that "*I am satisfied that your suggestion of updating the viability testing of the strategic sites, that contain traveller sites within them, will overcome my concerns in this regard and I look forward to receiving that report towards the end of June. I am also content with your approach to resolving my concerns*

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*about the **sustainability appraisal**. Again, I look forward to receiving this shortly. Neither of these additional pieces of evidence will require specific public consultation, **provided that this is not a requirement of your Statement of Community Involvement.***

4. DBC's **Statement of Community Involvement** states on page 23-24, the following: "4.10 The Local Plan also requires a Sustainable Appraisal (incorporating Strategic Environmental Assessment) where the economic, social and environmental impacts of a plan are considered. **This Sustainability Appraisal must also be made available as part of the consultation.**"

However, although this document has been included in the library of documents for the planning inspection, it has not been put out for consultation. Therefore, we believe that DBC must be required to submit this document for public consultation.

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3. Having regard to the scope of the adopted Core Strategy (CS) and the Council's intentions, as set out in the Local Development Scheme, are there any obvious omissions, in terms policy guidance, from the submitted Plan?
 4. Is the Plan based on a sound process of sustainability appraisal? Does it test reasonable alternatives? Does it represent the most appropriate strategy in the circumstances? Does the final report set out the reasons for rejecting earlier options?
 5. What were the main findings of the Habitat Regulations Assessment (HRA) that was carried out in relation to this Plan?

No comments on q3-5 by WHAG

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