

Councils Response to Inspectors Initial Questions Friday 24th May 2019

4. Question 4

Have any significant concerns been expressed by interested parties about whether the Council has complied with the Duty to Co-operate in the preparation of the Plan?

- 4.1. Importantly, no prescribed bodies selected 'No' to the Council satisfying the 'Duty to Cooperate'.
- 4.2. The **Duty to Co-operate Statement (DtC) (CD 028)**, submitted on the 26th April 2019, forms part of Local Plan's evidence. A link to this document is below;

https://www.stalbans.gov.uk/Images/CD%20028%20SADC%20Duty%20to%20Co-operate%20Statement%20April%202019_tcm15-67182.pdf

- 4.3. The SWH **Statement of Common Ground (SoCG) (CD 007)** also demonstrates the compliance with Duty to Co-operate by confirming our agreement with neighbouring authorities and other bodies. A link to this document is below;

https://www.stalbans.gov.uk/Images/CD%20007%20SWHG%20Statement%20of%20Common%20Ground%20-%20Officer%20Agreed%20Draft%20Feb%202019_tcm15-67025.pdf

- 4.4. **Regulation 22 C Statement (CD 005)** sets out representations made to the Local Plan, including Duty to Co-operate. A link to this document is below;

https://www.stalbans.gov.uk/Images/CD%20005%20Regulation%2022%20C%20Statement_tcm15-67023.pdf

1 - Prescribed Bodies

- 4.5. No respondents selected 'No' to the Council satisfying the 'Duty to Cooperate'.
- 4.6. None of the issues raised are considered to be 'significant concerns' by SADC.
- 4.7. A summary of responses regarding the DtC is set out in the table below:

Consultee	Summary of representation
Dacorum Borough Council (1186054)	Consider DtC to have been met. However highlight concerns in relation to the soundness of the plan. These include: <ul style="list-style-type: none">• Update on evidence base/plan to show cross-boundary issues being dealt with• Preparation and publishing of one or two SoCG prior to submission• Agreement is needed on housing and employment need between DBC and SADC
Watford Borough Council (1122500)	Watford Borough Council supports progress on the Draft Plan and joint working between SADC and WBC. Recognise the increased joint working taking place between the two

	local authorities. Suggest the need for clarification on the types of strategic issues in the context of growth and a review of the JSP with SWHG once strategic issues have been identified and progressed.
Welwyn Hatfield Borough Council (52397)	Welcome acknowledgement of joint working between SADC & WHBC even through not part of South West Housing Market Area and Functional Economic Market Area. Note a number of objections that hope to be resolved with a SoCG / Memorandum of Understanding. This includes considering the potential to meet any unmet housing need from adjoining authorities.

2 - Statutory Consultees

- 4.8. 5 respondents selected 'No' to the Council satisfying the 'Duty to Cooperate'.
- 4.9. None of the issues raised are considered to be 'significant concerns' by SADC.
- 4.10. A summary of responses regarding the DtC is set out in the table below:

Consultee	Summary of Representation
St Stephen Parish Council (51804)	No evidence of co-operative working with London Colney given the allocation of Park Street Garden Village.
Colney Heath Parish Council (51891)	It appears the District Council is adopting a "Duty not to disagree" rather than openly working with neighbours continuing the ill found approach resulting in the failure of the previous SLP at Examination. The lack of transparency in publishing notes of meetings is a clear example of this intransigence.
London Colney Parish Council (52477)	London Colney Parish Council is pleased to engage in the consultation process with the District Council but considers that the method of consultation at this stage has not been conducted in a user-friendly manner. The consultation response document is overcomplicated and not easily understood by all residents. We would like to work with our residents and St. Albans District Council to develop and implement a local plan that is not to the detriment of current residents and their environment but provides suitable & sustainable enhancement for future generations
Redbourn Parish Council (759908)	The delivery of the housing allocation at Broad Location East of Hemel meets housing needs solely from St. Albans District and fails to address Duty to Cooperate

	<p>issues with Dacorum Borough Council, who continue object to this strategy. We understand that there are further deficiencies in technical evidence in terms of infrastructure in-particular that will prevent the level of delivery relied upon in the Local Plan. There is no timetable in place to address these concerns or achieve the necessary integration with any adjoining development in Hemel Hempstead. In reality, the current nature of evidence adds little further than defining the limited scope for land that might, at some point, be relevant to jointly address needs arising in Dacorum Borough and St Albans District.</p>
Network Rail (1184616)	<p>The apparent allocation of the whole of the site is in direct opposition to the outline consent for the SRFI and can only be viewed as an attempt to frustrate the development of the latter. Given the support of the Secretary of State to the proposal following lengthy consideration of the merits of the scheme, and its strategic importance in serving the north of London and the weight given to meeting targets for creating sustainable patterns of freight delivery we cannot see any justification given for the allocation of the whole site at Park Street.</p>

3 - Other respondents

4.11. 53 of 272 other respondents selected 'No' to the Council satisfying the 'Duty to Cooperate'.

4.12. None of the issues raised are considered to be 'significant concerns' by SADC.