

**Redbourn Parish Council Response to:  
Duty to Cooperate (DtC) Targeted Consultation (June 2025)**

1. Redbourn Parish Council (RPC) has reviewed the documentation published by SACDC for consultation as part of this DtC Targeted Consultation and sets out its observations below. We note that the email from the Programme Officer inviting comments clearly states that *"comments are only invited on the documents SADC/ED74 and appendices SADC/ED74A to SADC/ED74E, and that this is not an opportunity to make further representations on other aspects of the Local Plan or the evidence base"*. We have therefore kept our comments focused strictly on these documents only.
2. As SACDC states at Paragraph 1.4 of its DtC Addendum (May 2025) (SADC/ED74), the key focus of the Addendum, and therefore the additional documentation provided by the Council for this consultation, is on the 'Key Period' between September 2023 and November 2024 and the issue of unmet housing need. This was directed by the Inspectors at the Stage 1 Hearings. The focus of our comments is therefore on these matters.

**Regulation 18 Responses from Neighbouring LPAs**

3. The first new evidence provided by SACDC are the Reg 18 responses of seven LPAs. Firstly, RPC brings into question how Reg 18 representations from neighbouring authorities can be considered by SACDC as 'new evidence' for consultation? Simply responding to a Reg 18 consultation does not help evidence that SACDC has engaged constructively, actively and on an ongoing basis to maximise the effectiveness of the Plan regarding potential unmet housing needs. If anything, using Reg 18 consultation responses by neighbouring LPAs should point to SACDC's over-reliance on public consultation to help meet its legal requirement to discharge the DtC rather than engaging with other LPAs constructively, actively and on an ongoing basis.
4. SACDC states that none of the Councils raised any crystalised unmet housing needs at this stage. However, this logic by SACDC is an 'argument from silence' whereby 'because it wasn't mentioned, it must not be true'. This is clearly not a sound approach or argument by SACDC.
5. Furthermore, there are some examples in these Reg 18 responses that we wish to highlight:

Central Bedfordshire Council

CBC states that: *It is CBC's understanding that St Albans are able to meet all of their housing requirement in full and are therefore not seeking assistance from neighbouring authorities. Whilst this was also discussed at a recent DtC meeting on 18th September, it would be helpful if this was confirmed in the*

*plan for clarity.* This suggests that SACDC was not asking neighbouring authorities to assist with its own unmet housing needs at the Regulation 18 stage and that CBC was unclear on whether SACDC was intending to meet its own needs or not.

#### Dacorum Borough Council

DBC does not refer to unmet housing needs (going either way) apart from whether some of Dacorum's needs for custom and self-build housing should be met in St Albans as part of the Hemel Garden Communities. It states these discussions should take place 'outside the Local Plan process' – we were not aware of there being another process at play?

In relation to the above, it is noted that the Statement of Common Ground with DBC (ED5) states that a *"significant proportion of nomination rights in the Hemel Garden Communities growth areas will be offered in the first instance to households on Dacorum's Housing Register"*. This clearly suggests and is evidence that a significant level of Dacorum's unmet affordable housing needs are being planned to be delivered in St Albans District.

#### Three Rivers District Council

The response from Three Rivers DC appears to suggest that SACDC's Spatial Strategy of seeking to meet its unconstrained needs in full does not consider the potential cumulative unmet needs from other SWH authorities including Three Rivers explaining that it does have unmet housing needs.

Three Rivers DC appears to be suggesting that it is perhaps surprised that SACDC does not have unmet housing needs itself given that 81% of St Albans District is Green Belt.

### **Officer Meetings**

6. SACDC explains that there were also a significant number of meetings where there was officer discussion of progress on respective Local Plans and that these included issues on potential unmet housing needs.
7. SADC then lists a number of meeting dates for the following Officer Groups / DtC Meeting:

#### Hertfordshire Planning Group (HPG) – Development Plans Sub-Group

To evidence the DtC, SACDC attaches an example of an Agenda and example of Meeting Notes (both from 5<sup>th</sup> April 2024). Having reviewed this one set of Agenda and Meeting Notes, nowhere in the Agenda or the Meeting Notes does it mention housing needs or unmet needs. As there is only one set of an

Agenda and Meeting Notes it is simply not possible to review in any further detail.

SACDC again uses the argument in relation to HPG that 'at no point did any other LPA raise crystallised unmet housing needs'.

South West Hertfordshire (SWG) Joint Strategic Plan (JSP) Spatial Planning Officer Group (SPOG)

In relation to the SWG, JSP, SPOG meetings SACDC attaches an example of an Agenda and an example of Meeting Notes. Neither of these documents refer to housing or unmet housing needs.

SACDC again asserts that *"none of the Councils raised any crystallised unmet housing needs (ie an identified shortfall which they were asking SADC to help meet) in these meetings"*.

South West Herts (SWH) DtC Meetings

SACDC lists four meeting dates and explains that these DtC Meetings do not have set Agendas or Meeting Notes and use an informal 'Chatham House' format. It explains again that *"None of the Councils raised any crystallised unmet housing needs (ie an identified shortfall which they were asking SADC to help meet) in these meetings"*.

**SACDC Regulation 19 Responses from LPAs**

8. The final part of the Addendum prior to the conclusion, is reference to Reg 19 responses from LPAs which are already part of the evidence base. This states again that *"As can be seen, none of the Councils raised any crystallised unmet housing needs (ie an identified shortfall which they were asking SADC to help meet) at this stage"*.

**Conclusion**

9. There is effectively no additional evidence / documentation provided by SACDC to help demonstrate that SACDC has discharged the DtC. All that has been provided are 'examples' of two agendas and 'examples' of two meeting notes - none of these documents set out any evidence of DtC regarding housing or unmet housing needs whether these are from other authorities or SACDC having its own unmet needs.

10. SACDC is relying on an 'argument from silence' whereby SACDC claims that since other LPAs did not raise 'crystallised unmet housing needs' then it must not be true that unmet housing needs exist for neighbouring LPAs (and SACDC). This is clearly not a sound approach or argument particularly given that there is a lack of supporting evidence provided by SACDC.
11. Given the clear lack of evidence and transparency, RPC reconfirms its position that it considers SACDC has not discharged its Duty to Cooperate.