

SENT BY EMAIL  
12/06/2025

Dear Inspectors

**St Albans Local Plan – Additional Duty to Co-operate evidence**

1. Thank you for opportunity to comment on the additional evidence published by the Council following stage 1 hearing sessions.
2. The evidence confirms that there were a significant number of meetings between the LPAs across Hertfordshire as well as between the those located in the South West Hertfordshire sub region. It is noted in the ED74 that at these meetings no mention was made of a crystallized unmet need – defined by SADC as being an identified shortfall which they were asking SADC to help meet. However, from this statement it is not clear whether the regulation 18 consultations undertaken by Hertsmere, Three Rivers and Dacorum, all of which proposed to reduce the supply of sites for residential development in the key period of September 2023 to November 2024, were discussed.
3. Given that there were discussions on the preparation of local plans it could reasonably be expected that these would be discussed given that they represented a significant shift in the approach being taken by those councils. It would, however, be helpful if the council could confirm this was the case, the meetings at which these discussions took place and what SADC's response was to what was being proposed. If this information is published HBF would be satisfied that the duty had been met by SADC as it relates to housing needs.
4. While it remains important that the Council provide evidence as to how they have co-operated with its neighbours on housing needs it is important to recognise the different circumstances under which these authorities are now planning now means that those discussions are not obsolete. Dacorum have submitted a local plan which proposes to meet housing needs in full, all be it under the transitional arrangements, and Three Rivers and Hertsmere are preparing new plans under NPPF24. It is, therefore, currently unclear as to whether under the new Framework, and its more positive position with regard to reviewing Green Belt, there will be unmet development needs in these two LPAs.

Yours sincerely,



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