

Dacorum Borough Council Core Strategy Examination in Public, 2012

AMEC on behalf of The Crown Estate (ID: 211068)

Hearing Session: Thursday 18th October 2012 10.00

Issue 17: Implementation, Delivery, Infrastructure and Monitoring

Written Representations

Question 17.2 Are the organisational mechanisms in place to ensure that joint working with other agencies (including adjoining local planning authorities) can be ensured where required?

1. The Crown Estate does not consider that appropriate organisational mechanisms are in place to ensure effective joint working with other local authorities and St Albans in particular.
2. The NPPF sets out the duty that local authorities have to cooperate on planning issues that cross administrative boundaries particularly those issues which relate to the strategic priorities identified in the NPPF which include homes and jobs. The Government expects joint working on areas of common interest especially where development requirements cannot wholly be met within their own areas. Also the NPPF sets out that local planning authorities will be expected to demonstrate evidence of having effectively cooperated when their plans are submitted for examination.
3. The eastern boundary of Hemel Hempstead abuts or is very close to the administrative boundary with St Albans District. When considering future development at Hemel Hempstead consideration should be given to all reasonable alternatives for growth including land on the east side of the town in St Albans. The proximity of St Albans District to Hemel Hempstead requires effective joint working and cooperation over a range of planning issues most notably those related to providing homes and jobs. The Council has failed to undertake any effective joint working over these issues and the Plan is not therefore considered to be sound.
4. In short, the Council has failed to comply with the 'duty to cooperate' and is therefore contrary to Section 33A of the Planning and Compulsory Purchase Act 2004 and the NPPF (paragraphs 178-181). Specific failings relate to:
 - Not planning for the objectively assessed housing needs of the housing market area as a whole (London Commuter Belt (West) HMA). For further details see the Crown Estate's representations under Issue 6 'Providing Homes'.
 - Not ensuring effective joint working with St Albans City and District to secure effective delivery of the East Hemel Hempstead Area Action Plan. For further details see the Crown Estate's representations under Issue 5 'Strengthening Economic Prosperity'.

- Not carrying out review of green belt boundaries to meet the exceptional circumstances of addressing future requirements for homes and jobs. For further details see the Crown Estate's representations under Issue 2 'The Distribution of Development (Settlement Hierarchy) and the Green Belt'.

5. The Council's statement of compliance with the Duty to cooperate (SUB 8) identifies the history of liaison with St Albans over the growth of Hemel Hempstead, the role of Maylands and extension of the town eastwards (SUB 8, para 4.16d). There was significant liaison between the two authorities up until the quashing of policies in the RSS but since then there has been little or no joint working. Since 2009 the only liaison appears to have been a joint member /officer meeting on the 27 October 2011 (although it is not completely clear whether this was a joint meeting between Dacorum and St Albans) and a meeting between Manpreet Kanda (policy officer) of St Albans and Richard Blackburn of Dacorum on 29 November 2011.

6. The extremely limited scope of liaison with St Albans is demonstrated by the lack of any joint committee, any memorandum of understanding or a jointly prepared strategy – all indicators of effective cooperation identified in the NPPF (para 181). Also there has been no 'continuous process of engagement' as again identified in the NPPF (para 181).

Conclusions on Issue 17

7. The Core Strategy is considered to be unsound throughout because of the non compliance with the duty to cooperate which impacts on the overall strategy of the plan (see the Crown Estate's representations under Issue 1 'Basis of the Overall Strategy') as well as specific issues related to homes, jobs and green belt.

8. It is considered that the Core Strategy fails the test of being 'effective' because it is not based on effective joint working on cross boundary strategic priorities especially, homes and jobs and green belt.

WORD COUNT: 704