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1. INTRODUCTION

1.1 The Core Strategy for Dacorum Borough has been prepared taking account of Government policy and regulation, technical evidence and consultation. Figure 1 shows the main periods of consultation, and how they related to phases in the preparation of the Core Strategy.

Report of Consultation

1.2 When the Core Strategy was published on 26 October 2011, a Report of Consultation was also published. The Report of Consultation outlined consultation between 2005 and June 2011: i.e.

- the key stages in public consultation on the Core Strategy;
- the weight given to consultation feedback;
- the legal and policy influences, which affected consultation about the Core Strategy; and
- the key issues and outcomes, explaining progress up to the publication of the Pre-Submission Draft Core Strategy.

It also explained how the consultation related to the Council's policy on consultation and engagement, the Statement of Community Involvement.

Report of Representations

Legal Background

1.3 Regulation 27 (Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008) requires the Council to:

- publicise the Pre-Submission Draft Core Strategy;
- advertise the representations procedure and availability of "proposed submission documents";
- make the "proposed submission documents" and notice of procedure available on the Council's website, at the main Council office and other places the Council considered appropriate; and
- contact the consultation bodies notified under Regulation 25

Consultation bodies comprise specific consultation bodies listed in the regulations and general consultation bodies. A statement of the representations procedure should be sent to all the consultation bodies. The specific consultation bodies should also be sent a copy of the "proposed submission documents".

1.4 Any person can make representations on the Pre-Submission Draft, provided the representations are sent to the Council (at Hemel Hempstead) within the time period (Regulation 28).

- 1.5 Regulation 29 requires the Council to request the opinion of the Secretary of State (for Communities and Local Government) as to the “general conformity” of the Core Strategy with the Regional Spatial Strategy (i.e. the East of England Plan). This request should be made at the beginning of the Pre-Submission period, allowing six weeks for the Secretary of State to respond in writing.
- 1.6 Regulation 30 requires the Council to prepare a statement setting out whether representations were received or not. Assuming representations are made, the statement should record the number and a summary of the main issues. The Council has called this statement the Report of Representations.
- 1.7 The Report of Representations should be published at the same time the Core Strategy is submitted to the Secretary of State for examination. The Report of Representations is also submitted to the Secretary of State then.
- 1.8 The Report of Representations is one of a number of “submission documents”, together with the Core Strategy itself, the sustainability appraisal, the Report of Consultation and other supporting documents.

What happened

- 1.9 The Core Strategy was published on 26 October 2011 at a stage known as “Pre-Submission”.
- 1.10 The Pre-Submission Draft of the Core Strategy set out the Council’s proposed planning policies (i.e. what it wished to adopt as the Core Strategy). It included:
 - an overarching sustainable development strategy, which would guide the amount and location of development;
 - individual strategies for specific places;
 - strategic sites and local (greenfield) allocations:
 - policies promoting economic prosperity, providing homes and community services and looking after the environment; and
 - guidance on the delivery of the strategy.

The Pre-Submission Draft consisted of a written statement, with key diagram and other diagrams, and changes to the Dacorum Borough Local Plan (1991-2011) Proposals Map.

- 1.11 The Pre-Submission Draft was published to allow representations to be raised within a six week period between 26 October and 5.15pm 7 December 2011.
- 1.12 A few changes to the Proposals Map, which the Council intended to make, were inadvertently omitted. These were the subject of a very specific

omissions consultation, **starting in February 2012**. This meant that the full Pre-Submission Consultation on the Core Strategy had two parts:

- the main pre-submission consultation; and
- the omissions consultation.

1.13 This report – the Report of Representations - contains:

- a record of the publicity given to the Pre-Submission Draft Core Strategy, including a list of organisations (or consultation bodies) notified;
- a summary of the main issues raised by representations on the Pre-Submission Draft Core Strategy.

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2. THE COUNCIL'S APPROACH

2.1 The Council set out its approach to the Pre-Submission stage, when it approved the Core Strategy on 28 September 2011.

2.2 The Council expected representations on the Pre-Submission Draft of the Core Strategy. Because of previous consultation, the Council thought that most representations would repeat issues. However there could be new matters which raised significant issues.

2.3 The Council therefore set in place the following procedure::

“... (a) If significant new issues are raised in the representations on [the] forthcoming consultation...to report to Cabinet and Council for a decision as to whether any change to the Core Strategy is justified.

- (b) If there are no significant new issues, to delegate authority to the Assistant Director (Planning, Development and Regeneration) to
- submit the Core strategy for examination, and
 - in consultation with the Portfolio Holder to agree any minor changes to the Core Strategy to resolve objections and improve the clarity of the document.”

2.4 The resolution meant that:

- officers would validate representations;
- officers would summarise valid representations and assess them to see whether there were any *new* issues;
- officers would report any *significant new* issues for consideration by the Council and recommend whether any changes should be made to the Core Strategy;
- if the Council made *significant changes*, the changes would be published to allow for representations;
- when there were no significant new issues and no significant changes proposed by the Council, the Core Strategy would be submitted to the Secretary of State for examination.

2.5 Validation of representations required checks to ensure that:

- the representation was received before the deadline;
- it related to the Core Strategy and referred to a planning matter; and
- was not inappropriate or offensive.

2.6 The Council thought that *minor* changes which clarified parts of the Core Strategy could be helpful. If there were any minor changes, they would be submitted to the Planning Inspector before and possibly during the examination.

3. NOTIFICATION AND PUBLICITY

3.1 The pre-submission stage was a formal one, designed to allow for representations about the soundness of the Core Strategy. The Council's approach followed the regulations.

3.2 The approach satisfied the intention set out in the Statement of Community Involvement. Under 'Submission to the Secretary of State', the Council intended to use the following techniques of consultation:

- advertising in the local press;
- displaying documents on the Council's website;
- making documents available at Council offices (the deposit points)
- by letter; and
- sending documents to appropriate consultation bodies.

Main Consultation

3.3 The main consultation was announced:

- by local advertisement (see Annex A Appendix 1); and
- by an article in the Council's newsletter, Dacorum Digest.

3.4 Stakeholders and representative groups were directly notified (see Annex A Appendix 2 for a distribution list, a list of consultation bodies notified and sample letters, memos and emails). Individuals who had previously commented or who had requested to be notified were also contacted. This notification amounted to around 1,500 people or organisations. Each notification was accompanied by:

- a notice with a Statement of Representations Procedure (see Annex A Appendix 3); and
- a note of available documents (see Annex A Appendix 4).

Some organisations (including specific consultation bodies) were also sent a copy of the documents.

3.5 Around 1,500 people were notified in addition through the Council's online consultation database (see Annex A Appendix 5).

3.6 All information was available on the Council's website – including a link to the consultation portal on the home page – and from Council offices and local libraries.

3.7 Town and Parish Councils (in Dacorum) received a presentation and preliminary notice through a Special Clerks Liaison Meeting on 19 October 2011.

- 3.8 The Secretary of State was notified of the consultation by letter (sent by recorded delivery). His opinion was requested as to the conformity of the Core Strategy with the East of England Plan (Regional Spatial Strategy) (see Annex A Appendix 6).
- 3.9 A small correction to Figure 23 in the Pre-Submission Draft (the Berkhamsted Vision Diagram) was notified to recipients of hard copies of the Core Strategy and CDs on 26 or 27 October 2011. Two education zones at Berkhamsted (which were shown in the Consultation Draft) had inadvertently been left off the diagram. Information on the website, the online portal and at deposit points was correct at the start of the pre-submission period. Libraries were notified on 26 October.

Omissions Consultation

Text to be added.

The process for the main consultation was repeated, other than the use of Dacorum Digest (this was precluded because of timing difficulties). Information will also be added to Annex A Appendices 7-12.

4. RESULTS

Main Consultation

- 4.1 **XX** valid representations were received.
- 4.2 All valid representations were analysed. All were checked to ensure the correct boxes had been completed, in particular to see:
- whether the commenter was supporting or objecting;
 - which part of the Core Strategy their representation related to; and
 - whether the commenter said the Core Strategy was legally compliant and/or was sound.

See Annex B Table 1.

- 4.3 Where the commenter did **not** comment on legal compliance and soundness, the following assumptions were made:
- Supporting representations meant that the Core Strategy was both legally compliant and sound.
 - Objections meant that the Core Strategy was unsound (and normally legally compliant).
 - If an objector had complained about the process, he/she felt the Core Strategy was not legally compliant.
- 4.4 Reasons for lack of soundness are recorded in Table 1: i.e.
- not justified,
 - not effective,
 - not consistent with national policy.
- Sometimes more than one reason was given. **However where a commenter did not give reasons, their objection was recorded as “commenting” in Table 1 (in Annex B).**
- 4.5 All valid representations were made available for inspection on the Council’s website or at the Civic Centre in Hemel Hempstead.
- 4.6 Five representations were received late and therefore not accepted as valid (see Annex B Table 4.1). There were no abusive or inappropriate submissions.
- 4.7 In addition there were:
- (a) **8 submissions saying “no comment”** and/or providing information for reference by the Council (see Annex B Table 4.2);
 - (b) **5 submissions providing significant comment** about the sustainability appraisal, strategic environmental assessment and or appropriate (habitats regulations) assessment (see Annex B Table 4.3).
- 4.8 There was no response from the Secretary of State (for Communities and Local Government). Consequently it was assumed that he had no matter to raise on

the question of general conformity of the Pre-Submission Draft Core Strategy with the East of England Plan.

Omissions Consultation

Text to be added

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5. SUMMARY OF THE MAIN ISSUES

Text to be added.

See Annex B Table 2 for a list of all the main issues with a suggested response..

Suggested, minor changes are in Annex B Table 3.

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TO BE COMPLETED

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PROVIDED IN A SEPARATE DOCUMENT