



# Strategic Planning & Environment

## Overview & Scrutiny

### Agenda

**WEDNESDAY 6 SEPTEMBER 2023 AT 7.30 PM**

#### **Conference Room 2 - The Forum**

The Councillors listed below are requested to attend the above meeting, on the day and at the time and place stated, to consider the business set out in this agenda.

#### Membership

Councillor Anderson  
Councillor Birnie  
Councillor Deacon (Vice-Chairman)  
Councillor Gale  
Councillor Hobson (Chairman)  
Councillor Hobson  
Councillor Mitchell

Councillor Patterson  
Councillor Pringle  
Councillor Riddick  
Councillor Santamaria  
Councillor Timmis  
Councillor Walker  
Councillor C Wyatt-Lowe

For further information, please contact Corporate and Democratic Support or 01442 228209

### **AGENDA**

1. **MINUTES** (Pages 3 - 14)  
To agree the minutes of the previous meeting.
2. **APOLOGIES FOR ABSENCE**  
To receive any apologies for absence.
3. **DECLARATIONS OF INTEREST**  
To receive any declarations of interest.
4. **PUBLIC PARTICIPATION**
5. **CONSIDERATION OF ANY MATTER REFERRED TO THE COMMITTEE IN RELATION TO CALL-IN**
6. **Q1 FINANCIAL PERFORMANCE REPORT** (Pages 15 - 21)

**7. Q1 ENVIRONMENTAL SERVICES QUARTERLY REPORTS**

Report to follow

**8. Q1 ENVIRONMENTAL AND COMMUNITY PROTECTION UPDATE (Pages 22 - 25)**

**9. Q1 PLANNING, DEVELOPMENT AND REGENERATION QUARTERLY REPORTS**

Report to follow

**10. SOUTH WEST HERTS JOINT STRATEGIC PLAN (Pages 26 - 89)**

**11. WORK PROGRAMME (Pages 90 - 93)**

## MINUTES

### Dacorum Borough Council

#### Strategic Planning and Environment Tuesday 5<sup>th</sup> July

**Councillors:** Cllr Pringle  
Cllr Patterson  
Cllr Santamaria  
Cllr Gale  
Cllr Birnie  
Cllr Anderson  
Cllr Wyatt-Lowe  
Cllr Walker  
Cllr Timmis  
Cllr Birnie  
Cllr Mitchell  
Cllr S Hobson  
Cllr C Hobson (Chair)  
Cllr Deacon (Vice Chair)

Also in attendance:

Cllr Bromham  
Cllr Wilkie

**Officers: (6)**

Aidan Wilkie – Strategic Director - People and Transformation  
Philip Stanley – Head of Development Management  
Diane Southam – Assistant Director - Place Communities & Enterprise (Virtual)  
James Doe – Strategic Director - Place  
Simon Rowberry – Assistant Director - Place

The meeting began at 19:30

**1 MINUTES**

The Chair confirmed that the date on the electronic minutes was incorrect and advised that the minutes are for the meeting held on 13 June 2023.

The minutes of the previous meeting were formally approved as an accurate record.

Cllr Birnie referred to the action list on page 18 of the pack and suggested that there were duplicated headings in the table. Cllr Birnie queried what a CSU subscription is. It was noted that the officer was not present and Cllr Birnie agreed to contact him by email. The Chair asked that queries be submitted to LFowell.

LFowell advised that an update has been circulated following the circulation of the action points.

The Chair suggested that other action points could be addressed during the meeting.

Cllr Timmis referred to the action on affordable housing and noted that it states they are checked and made available by May or June. Cllr Timmis asked if this meant in 2023 and whether they are therefore available. It was confirmed that this is not yet available and that it would be followed up next week.

## **2 APOLOGIES FOR ABSENCE**

There were apologies from Cllr Riddick

## **3 DECLARATIONS OF INTEREST**

It was noted that Cllr Deacon was made Chair of Avid this week

## **4 PUBLIC PARTICIPATION**

There was no public participation. However, William Wyatt-Lowe was viewing online on behalf of the Hemel Place Board.

## **5 CONSIDERATION OF ANY MATTER REFERRED TO THE COMMITTEE IN RELATION TO A CALL-IN**

None.

## **6 ACTION POINTS FROM THE PREVIOUS MEETING**

As covered under item 1.

## **7 TOWN CENTRE VISION**

SWhelan gave a short presentation on the Hemel Hempstead Town Centre Vision with an overview of the Hemel Place Board, which advocates for Hemel Hempstead and considers the investment opportunities to get the best out of all interventions that are operating and horizon scanning going forward. The strategy will bring together current programmes and consider the town centre as a first step with short, medium and longer-term interventions, and the strategy looks to grow relationships across Hemel Hempstead and integrate with communities and businesses. A consultation took place at the start of the work and focused on the idea of growing a fresh new future for Hemel Hempstead with themes focusing on enterprise, connections and wellbeing. The story was launched in July 2022 and is now part of the vision being presented.

The town centre vision links all the interventions taking place and considers how the town centre needs these interventions to support its growth. The vision is an overarching view of the aims and ambition and is not a delivery plan, it is aimed towards investors and how to increase the profile of Hemel Hempstead. Throughout previous planning, Hemel Hempstead has fallen below the radar in terms of investment. The drivers for change include reduced footfall and decrease in footfall, as well as considering how people now use town centre spaces and how to mitigate climate change. The five priorities for the town centre are (1) focus on Bank Court as the heart of the town centre, (2) improve east-west connections, (3)

reimagining Waterhouse Street, (4) reconnecting the old and new towns and (5) Hemel Imaginarium, which looks at revitalising the town centre in the short-term.

The natural environment is a strong asset of the town centre. Opportunity sites are critical and a flexible approach will be taken. A soft-launch of the vision was given at UKREiiF and was positively received.

Cllr Pringle asked how flexible and future-proof the vision is, noting that the work started a few years ago and that they are only reflecting on the long-term change catalysed by the pandemic. Cllr Pringle queried if they should look at the plan in terms of future-proofing and lifestyle changes are still being observed so the vision needs to be innovative and flexible.

Commenting on the post-pandemic world, SWhelan advised that this has been considered with economic development and that feedback from surveys is that businesses are still learning, such as around hybrid working and spaces are required. SWhelan stated that research suggests that, by 2030, much of the office space will be for co-working. On land uses, SWhelan advised that the plan takes the opportunity sites and is open to what the land uses could be, and the vision is firmer on Marlowes and the main retail hub. SWhelan suggested that they not pause as there could be an unknown amount of delay and the vision has been kept open enough. SWhelan noted the feedback from the community regarding the access to nature and that this will be a key area of focus.

Cllr Birnie commended the report and asked how many respondents are represented in charts, noting that this is not included within the report. Cllr Birnie referred to page 43, appendix 1, noting that this includes the numbers of respondents for each category and only added up to 430. Cllr Birnie queried if they had only taken on the views of 430 people to make their assumptions.

SWhelan confirmed that 430 survey responses were taken forward to analyse and that this was felt to be a good response. On the assumptions for the vision, SWhelan advised that these did not solely come from community consultations and are also from discussions with investors and considerations about opportunities for the town centre following the master plan 10 years ago.

DSoutham agreed with the need for flexibility within the document and why the plan remains at a high level. DSoutham stated that they need to be able to respond to market potential and other opportunities at any given time. On the consultation, DSoutham suggested that the level of engagement is relatively high for this stage in the process and that there will be further engagement as the delivery plans evolve.

Cllr Birnie suggested that 430 respondents out of a population of around 80,000 is a respectable sample. Cllr Birnie agreed that the views of potential investors should be carried forward but that the electorate also needs to be brought forward, stating that officers may be reinforcing their own views without reference to the people that live in the area. Cllr Birnie referred to the strapline 'Hemel is a family of welcoming neighbourhoods' and suggested that this is not what the respondents believe, noting that on page 42, appendix 1, the pie charts show significant disagreements with this view. Cllr Birnie advised that he was not surprised by this response and that residents in his ward are completely neglected where the shopping centre has been described to him as 'like something left over from East Germany during the Soviet era' where elderly people are afraid to go out later in the evening. Cllr Birnie commented that these areas need to be addressed before considering the town centre.

The Chair commented that her understanding of the document is that it is to encourage investors and to promote the area, though the focus of the work also needs to be on what they are doing for their own community to improve things for residents, not just for investors.

JDoe advised that the consultation was carried out via a number of platforms, including a residents' group, business group and voluntary sector group, as well as the use of the Commonplace platform, an interactive mapping tool where residents can leave comments. JDoe explained that whilst the plan isn't exclusively for the investment community, they are a strong recipient and that they will not see real change in the town centre before investment is brought in. JDoe advised that the Council needs to be clear on what it expects to see and also needs a convincing narrative to bring this investment in. JDoe commented that the Council does not own much property in the town centre and that they are therefore working with the investment and development communities to shape the use of properties. JDoe noted that when consultants visited the town centre, they remarked on how green the area is and that this should be highlighted through the strapline.

Regarding neighbourhood centres, JDoe confirmed that these have not been forgotten and that the Hemel Spatial Vision document references neighbourhood centres across Hemel Hempstead. JDoe advised that DSoutham and SWhelan have been asked to look at this as part of the strategy and more information will come.

Cllr Birnie commented that the own charts contradict what is being said as part of the sales pitch. The Chair agreed with Cllr Birnie's comments and suggested they continue to monitor if they can address the tension between the promotional advertising and the reality.

Cllr Walker advised that he worked as a commercial agent in Hemel Hempstead for 20 years and that the town centre has changed beyond recognition. It was previously a business town and this has now gone. Cllr Walker suggested that the best views for office buildings are in Waterhouse Street looking over the park area, though it is different from the other side of the building. Cllr Walker commented on the large amount of concrete running through the centre of town and queried how many people will walk from the new town and old town, stating that it is too far and they are different entities. Cllr Walker stated that he was Chair of the BID and suggested that they use the data collected by BID. Cllr Walker noted that there is currently no night-time economy and there is no reason to come into the town centre at night, stating that places such as the bowling alley and cinema were taken out.

The Chair noted that a number of new restaurants are now opening in the area.

Cllr Walker suggested that the main issue for Hemel town centre is where the train station is situated.

Cllr Deacon commented that the documents do not focus on the amount of green space as much as they could.

Cllr Pringle responded to concerns raised by Cllr Birnie and suggested that the vision is part of a wider malaise, stating that residents and businesses can't just be viewed separately. Cllr Pringle voiced her concerns around the democratic deficit with a sense of alienation and that people feel they are not being consulted, advising that they therefore need to look at creating a new narrative and bringing people along with them. Cllr Pringle stated that the vision needs to be inclusive and should be based on serving residents.

Cllr Gale commented on the Hemel Vision Board and asked how board representation is decided. SWhelan advised that a report from April 2021 seeks permission to start Hemel Place work and to set up a board. SWhelan confirmed that they have looked at best practice from elsewhere and that feedback suggests there should be diversity from the public and private sectors as well as the community. SWhelan confirmed that she could circulate the terms of reference, noting that companies such as CAE have been brought onto the board as they are so proactively invested and that the third sector is also well represented.

SWhelan suggested that the board composition is productive but that there are no set rules and any feedback on this would be welcomed.

Cllr Gale asked for a definition of the third sector. It was confirmed that this relates to charities.

Cllr Gale referred to the picture of how Bank Court could look and asked who decides on these and who owns the land. SWhelan advised that this is a vision. The Chair noted that it provides investors with an idea of how the area could look. SWhelan confirmed that the next step will be to engage with landowners

Cllr Gale commented that whilst it is a high-level vision, they also need to ensure they have a say on what happens in the town. Cllr Gale queried how the image of Bank Court was come up with. SWhelan explained that this was part of the Levelling Up Fund proposals with a bid put forward to central government for £10m and if they had been successful they would have gone through public consultation to seek the community's views on the vision.

A councillor commented that some of the Bank Court photos are at least two years out of date. It was also noted that Kodak is spelt incorrectly in the plan.

Cllr Anderson voiced his disagreement with the portrayal that the vision is brand new. Cllr Wilkie stated that this was an inappropriate comment at a scrutiny committee. The Chair agreed with Cllr Wilkie, noting that the councillor is free to voice his opinion but that the plan was not being presented as something that has been created in the last two months.

Cllr Anderson welcomed the strategy and stated that his support comes with two caveats that they monitor trying to attract leisure use in the centre and to ensure that external factors don't harm what the plan is looking to achieve.

Cllr Patterson referred to UKREiiF and asked for further information on how this was seen as a success. SWhelan advised that the success of the event was around increasing the profile of Hemel Hempstead and having a stand presence allowed for passing trade with detailed conversations with investors from Hong Kong and investors who are focused on London but are now looking at tertiary towns around the M25. SWhelan advised that the approach from a Hertfordshire wide point of view was very positive with the three investment towns across Hertfordshire being Stevenage, Watford and Hemel Hempstead, and that Hertfordshire as a whole county is well placed to capitalise on the filming industry, for example. SWhelan noted the importance of having a relationship with the Hertfordshire LEP and being willing to engage as a local authority. For 2024, Hertfordshire LEP would like to lead the expo of Hertfordshire and are looking at broader branding without losing the message of the three main investment towns. This will be seen as a wider benefit and will be a benefit to put in to get funding to increase their profile further. SWhelan advised around 50 contacts were made and are being followed up with one-to-one meetings and a number of contacts were made with consultants or agents, as well as networking contacts with other public sectors. SWhelan advised that they will likely take up a more senior cohort for 2024 and look to have one-to-one meetings as well as have a stand presence to increase their profile.

DSoutham commented on Hemel Place branding and that this significantly helped attract people to the stand at UKREiiF. DSoutham stated that the branding as well as the ambitions and aims of the vision were well received and that they are still following up on the 50 contacts made with further contacts that have been made since. DSoutham noted that they had received a lot of positive feedback, including from people who have lived in the area and know the town centre well.

Cllr Mitchell asked what percentage of the public they would hope to engage with, agreeing that more engagement is needed and that there needs to be greater community regeneration. Cllr Mitchell commented that they live in a neglected and socially deprived area and acknowledged that they need to attract investment to address this. Cllr Mitchell described Hemel Hempstead as a 'patchwork quilt', stating that there is a distinct lack of cohesion and that the positive work done in the Old Town and Water Gardens now needs to be replicated in other areas.

Cllr Gale referred to Cllr Mitchell's comments regarding a lack of cohesion, noting that the report highlights that 58% of respondents have a negative view of interaction between communities and that the town has poor nightlife with underdeveloped evening and leisure economies that fails to make the most of its natural assets. Cllr Gale then referred to page 123 of the report, noting the reference to the oversupply of retail and weak offering of sports, culture and restaurant facilities with Hemel Hempstead being the third weakest of 109 town centres. Cllr Gale supported Cllr Tindall's vision to transform Hemel Hempstead town centre into a thriving and busy leisure and cultural quarter with a mix of use and activities, stating that he also states that with fewer people coming into the town centre to work and shop, these locations need an alternative to attract locals and visitors from further afield.

Cllr Gale next looked to the aims regarding civic pride, the town centre, culture and leisure, and asked if there is any place for a sustainable community-based cultural centre in the new plan. Cllr Gale noted the possible replacement for the pavilion, stating that it was once a cultural centre, and suggested that a community arts organisation could provide cohesion. Cllr Gale advised that they are unusual in being a major town without a central arts venue, noting that the Hemel Vision Board is fairly commerce driven, and asked how much arts and culture are represented on the board.

The Chair referred to Dunstable, noting that they have an arts centre and drama school.

SWhelan responded to the earlier query regarding the consultation, noting that the document is not community-led and that there may be a degree of consultation fatigue with a consultation regarding the Old Town 4 months previously as well as a consultation piece around the Paradise Design Code area. SWhelan confirmed that there will be further community engagement and that this would be required if they attracted significant funding.

SWhelan noted the importance of arts and culture, stating that the Dacorum Creatives came from the Hertfordshire Year of Culture in 2020 and there is a live creative culture. The area's assets are strong in nature and biodiversity. SWhelan suggested that, as they bring communities closer and work with them in a more integrated way that they may find other themes, such as music, but they need to be authentic to what their groups currently are, which are currently arts and culture and biodiversity. As this is nurtured and as the Council looks outward to Tring that has strong assets, they can build relationships across the whole borough. SWhelan confirmed that they did consider a large bid to government for a cultural venue in the market square but that this was pushed back and therefore a priority in the delivery plan will be Hemel Imaginarium, which meanwhile uses a programme with good funding behind it from the UK Shared Prosperity Fund. Most of this will be held outside to allow culture and arts outside, and there may also be the taking over of vacant shops. SWhelan reassured members that arts and culture is a priority.

The Chair reminded officers of the need to bring the community along with them.

Cllr Pringle commented on the need to understand Hemel's identity and the importance of being authentic. Cllr Pringle acknowledged the borough's diverse communities and that this can be brought together through music. Cllr Pringle suggested that they need to be the catalyst for investment and make the most of the assets it already has, including the energy,



enthusiasm and talent of local people, which will naturally help express the identity of people. Cllr Pringle suggested that they take the consultation to the people and better understand them, noting the impact they could see if they let people lead this with the oversight of the Council, and suggested that they look at a festival in the Water Gardens.

Cllr Wyatt-Lowe commented on the issues with the pavilion and that the decision was taken to demolish the pavilion with the aspiration to rebuild it. Cllr Wyatt-Lowe advised that whilst there isn't a formal arts centre, there is a strong cultural heritage in Hemel Hempstead and Dacorum that deserves an outlet. In 2008, the Council was in partnership with Thornfield and there was a well-developed plan for a theatre in the market square that would act as a multi-purpose centre, but the plan collapsed with the financial crash. Cllr Wyatt-Lowe noted that revenue is required to ensure the survival of venues.

Cllr Mitchell suggested that they should look to use open spaces and referred to Pub in the Park in St Albans and recommended that they look at how they use Gadebridge Park. Cllr Mitchell noted that the recent festivals in the park had been a success and that there is an appetite for music and the arts in Hemel Hempstead. The Chair suggested that the event was noisy for local residents.

Cllr Anderson advised that the pavilion cost the Council £200k to keep the building open every year and advised that it folded as the area can't compete with London. Cllr Anderson commented that many areas around London don't have arts venues because of this.

Cllr Anderson referred to previous place making consultations for Hemel Hempstead and stated that a performing arts venue has appeared low in the list of priorities with green, open spaces coming out as the top priority. Cllr Anderson acknowledged the wish for a performing arts venue but noted that it is not a high priority for constituents. Cllr Anderson commented that any performing arts venue will need to be viable. The Chair added that the space would need to be multi-use.

The Chair acknowledged the comments regarding the pavilion and having an arts space.

Cllr Walker commented on the arts centre in Aylesbury and noted the financial burden this is, which becomes more challenging as the building becomes older.

Cllr Walker advised that the town centre is primarily a retail high street and queried what types of investors they are looking for. Cllr Walker commented that the area would not necessarily attract high earners and suggested that the leisure plans for the Marlowes would bring a huge benefit to the town.

Cllr Gale commented on the brochure for Hemel Garden Communities, noting the image of what the public space will look like and queried the status of the public areas in these communities, whether these will be truly public or will be made private. The Chair advised that this was outside the scope of the discussion and that this could be addressed when looking at Hemel Garden Communities. SWhelan confirmed that the decision on whether the roads will be council-owned or private is yet to be made, and whilst the main highways are likely to be adopted, they have not yet been granted planning permission.

Cllr Pringle remarked that they are selling a post-pandemic vision of a post-pandemic town within commuting distance from London where they work, live and socialise. With people not commuting into London every day, this will bring the market into Hemel and this needs to be taken into account. Cllr Pringle suggested that what residents would previously have got from London now needs to be brought into the local area. Cllr Pringle commented that they could look for Hemel to become a centre for the arts and that it is an exciting time to focus on this post-pandemic.

The Chair asked the Committee if it felt it had received enough information to understand the Hemel Vision to take to Cabinet.

Cllr Patterson asked what the vision is for Market Square, suggesting that this is an area that requires detailed development.

Cllr Birnie commented that the vision appears to be too prescriptive and officer-driven, stating that it is too far removed from the people of Hemel Hempstead.

The Chair noted the changing demographic in Hemel Hempstead as people are being priced out of London, St Albans and Berkhamsted so are now looking at areas such as Boxmoor and Old Town. The Chair referred to the recent development of £1m homes on Green End Road and suggested that businesses look at the area to understand the demographic as there may be an incorrect perception of the current demographic.

JDoe confirmed that they would present the demographic data, noting that this is already available to view. The Chair queried how up to date this information is given the number of young professionals that have recently moved to the area.

JDoe thanked the Committee for its feedback and for looking at the vision in such detail. On the vision being officer-led, JDoe stated that the vision was put together by officers, but this is not in the absence of taking soundings from the community at different levels. Regarding the vision being described as too prescriptive, JDoe suggested that this is one of the least prescriptive documents that he has worked on as it is a vision, not a masterplan or planning development brief, and it aims to inspire ideas from the private sector if they are looking to take particular sites on. JDoe noted that they will be discussing regeneration plans with the new long leaseholders at Riverside and that these will be brought to the Council in due course. JDoe advised that as the Council doesn't own much property in the area, many controls will be through town planning, though they can use other tools such as design codes and scrutiny through the Development Management Committee.

JDoe referred to a previous question regarding membership of the Hemel Vision Board, noting that this is the Council's gift. A report went to Cabinet in 2021 that suggested certain groups for inclusion and that this can be expanded.

JDoe noted the feedback regarding arts and culture and raised that, as the place directorate develops over the coming months, they will be appointing a Head of Arts and Culture through the restructuring of DSoutham's area and this head of service will be tasked with driving this creative agenda across Dacorum. This person will have responsibility of the Old Town Hall and how to expand its reach.

JDoe explained that the vision is to help inspire confidence within the private sector and that they are in competition with other areas, so if they aren't confident as a place on what they have to offer then they will be unable to attract investment. JDoe noted that they are openly publishing data, including areas of weakness, and that they are looking to lead communities and businesses to help address these.

The Chair provided a summary, noting the people and those across Dacorum along with the vision. The Chair suggested that the portfolio holder and Cabinet consider whether a community representative be part of the Hemel Vision Board as well as someone who can also represent arts and culture. The Chair commented on the focus around arts and culture, though any actions around this need to be data-driven. The Chair noted that whilst travel was not discussed much by the Committee, they should look at ways to help connect areas, and that there should also be further information provided on regeneration of neighbourhood

centres. Looking at further engagement, the Chair suggested that all members receive a briefing on what Hemel Hempstead has to offer to ensure consistency across members.

A comment was raised regarding youth facilities in the town centre to help prevent anti-social behaviour, which may potentially be on the increase. A councillor commented on the shutting down of Quasar during the pandemic and advised that a bowling alley and other youth facilities would make Hemel Town Centre a more positive place as young people currently have nothing to do. The Chair agreed, noting that this also links to civil pride.

Cllr Mitchell asked if social media groups are being used to gather feedback. The Chair agreed that this would help engage members.

The Chair noted that any further feedback could be submitted to SWhelan.

## **8 ANNUAL ENFORCEMENT REPORT**

PStanley presented the report, noting that specific enforcement cases could be looked at in more detail outside of the meeting. The previous 12 months have seen a number of challenges and successes and PStanley referred to issues within the service with the amount of live cases that remain on their books. Staffing over the last 12 months has been challenging and the principle planning enforcement officer and planning enforcement positions have now been filled. On performance, PStanley noted a downward trend in live enforcement case numbers, which peaked at 620 and are now at around 400, which is due to a declining number of cases being received as well as the work being put in with the 400 Plan with dedicated focus on geographic areas and case types.

PStanley noted the errors under part 3, stating that the intention was to present 1st June 2022 to 31st May 2023 and members were instead pointed to the data contained within the tables. PStanley advised that the key messages within the section remain true with further closures and live cases coming down. Around 25% of cases are closed due to establishing there was no breach to start with, just over 25% are closed as the team has concluded that it would not be expedient to take further action as the case is a minor breach. Around 45% of cases are closed due to the actions of the team, such as securing planning permission or the offender voluntarily resolving the issue.

PStanley referred to the focus on dealing with the most harmful cases and serving of enforcement notices with 19 enforcement notices issued in the first 6 months of this year, compared to 10 in the last year, though this also results in greater appeal work, which requires further resourcing. PStanley advised that this then means there is reduced resource to attend sites regarding new cases and therefore the Principal Planning Enforcement Officer is triaging cases to assess the level of harm and the requirement for an urgent site visit. PStanley explained that the focus is on cases that are the most harmful and that are in danger of becoming immune through the 4- or 10-year rule.

PStanley next looked at the KPIs, noting that this was raised at the last meeting, and also referred to the suggested KPIs from local government. Looking ahead, PStanley explained that they are now looking at the 300 Plan to create a more sustainable caseload for the team and that various measures are being worked on to achieve this. There are upcoming challenges in terms of biodiversity net gain and the expectation that local planning authority

enforcement teams will be required to monitor the agreements. PStanley summarised that the team is performing well, that there are cases where they have not acted as timely or completely as they would like, but that the team is working well in terms of driving down live case numbers and taking formal action.

Cllr Pringle acknowledged the need to prioritise cases and noted her concern on how this applied in the public interest. Cllr Pringle commented on concerns regarding retention and development of staff, noting that there is central government funding available for apprenticeships and recommended they look at this to help with both bringing people into the industry and handle the volume of work by having trainees or apprentices filter the work for officers.

PStanley first looked at expediency, noting that they can't create set rules for this as it changes according to the circumstances on the ground and therefore an individual assessment is required. PStanley explained that for breaches they will either invite a retrospective planning application, which can enable a consultation process with the area, or they can serve a formal enforcement notice. PStanley advised that if they refuse to submit a planning application then they will either service an enforcement notice or the file is closed as there are no further options.

Regarding recruitment, PStanley confirmed that they are looking at the areas suggested by Cllr Pringle and that they have had some planning trainees who spent their first 6 weeks with the planning enforcement team, and this will be explored further.

Cllr Santamaria asked what the planning backlog was like pre-Covid and what the realistic final target is. PStanley advised that they receive approximately 500 enforcement cases per year and that it can take years for a case to be resolved. Cases were increasing by approximately 40 cases per year for around 7-8 years and a 250 live caseload for the current team would be the target to enable each officer to have a manageable caseload to undertake first visits and formal action when required.

Cllr Timmis commented that the report does not include getting more resources for the department. Cllr Timmis noted issues around retaining and recruiting staff and suggested that planning enforcement officers being paid less than planning officers should be addressed. Cllr Timmis added that further resources are required to ensure that the team can cope with the current burden of work, particularly given the number of appeals. The Chair suggested that this be discussed with the portfolio holder outside of the meeting and that they come back to the Committee on what can be done regarding resources.

PStanley responded to the query regarding retention, noting that planning officers and planning enforcement officers have received their letter regarding the market forces supplement. This budget was approved by the Council and is being awarded to officers. The Chair queried if this is ongoing or for one year. PStanley advised that all market forces supplements are subject to review and must be reviewed at least every two years.

The Chair agreed that further information in response to Cllr Timmis' comments should be brought back in future. JDoe advised that they have put into the budget a request for a

further permanent officer for planning enforcement, though this will be subject to member scrutiny.

Cllr Birnie congratulated PStanley and his team, noting that the team is performing better than any other council in Hertfordshire in terms of enforcement, as stated in paragraph 48 of the report.

Cllr Birnie referred to table 3 in the report and queried the difference between adverts and agent's boards, noting that they are a form of advertising. Cllr Birnie also asked what an S215 notice is. Cllr Birnie suggested that it would be helpful if the officer could address what are considered the most egregious forms of behaviour that require the team's attention, suggesting that some attention should be paid to the amount of people who suffer from the breach.

Regarding the difference between estate agent boards and adverts, PStanley advised that in 2022 no estate agent board cases were created, which is likely to be because they were given the advert suffix and that they have differentiated between them in the past. On S215, PStanley explained that this is part of the Town and Country Planning Act that deals with a lack of proper maintenance of land or buildings and action can be taken with a S215 notice. On which activities the planning enforcement team should focus on, PStanley confirmed that there is a priority system within the local enforcement plan that divides development into three levels of priority with the top priority being listed buildings and protected trees as well as irreversible damage to areas of outstanding beauty.

The Chair asked if the local enforcement plan could be shared with the Committee. PStanley confirmed that this is available to view on the Council's website.

Cllr Anderson noted the drop in planning applications in the past 3-4 weeks and asked if there is an opportunity for some case officers to be put on secondment to assist with planning enforcement cases. Cllr Anderson commented that it had emerged at a meeting last year that there could be an opportunity for setting up courses at the college to get students interested in planning and suggested that there is a short window of opportunity to get cases down and also train students.

SWhelan advised that she had spoken to the LGA regarding the cohort of 30 apprenticeships and that they would be keen to put themselves forward for this. This will close on 5th September and SWhelan confirmed she would be liaising with the management team on how to take this forward given previous success with 4 officers coming through the apprenticeship levy.

SWhelan commented that she had spoken to Oaklands, West Herts College and University of Hertfordshire following the Hemel Place discussion regarding whether they could have a local town planning course and help get town planners. In taking this forward, the challenge is that University of Hertfordshire is Royal Town Planning Institute accredited and that they are not viable to be able to look at opening another town planning course. SWhelan advised that instead they are focusing on pushing town planning more broadly and this is being picked up by national bodies.

In response to the comment regarding diverting resources and seconding officers, SWhelan advised that the Habitat Regulation Assessment work has distracted a lot of planning officer capacity in terms of legal agreements and has absorbed capacity.

Cllr Birnie acknowledged the pressure that the team is under and asked if they should look to conduct early site visits in all instances to help avoid fewer problems in future and therefore reduce officers' work. PStanley advised that this is where an early site visit is beneficial and that it also allows them to close down cases where there is no breach quickly, and the team are mindful of the council target to carry out 100% of early site visits in time. Due to the absence of having a principal planning enforcement officer for some time, PStanley advised that there was a build up of formal work and this has therefore impacted first site visits. As resources increase, it is hoped that performance will improve.

Cllr Pringle referred to the focus on getting into Year 12 students and suggested that they could also look at post-graduate students wanting to do PhDs and that they could contact local universities, particularly regarding the Chiltern Beechwoods. Post-graduate students may also be interested in a one-year conversion whilst working part time.

PStanley commented that there are an increasing number of university students taking a year out and that they are looking at attracting these students.

## **10 WORK PROGRAMME**

The Chair advised that the next meeting will take place in September and will cover reports and is more policy-led. The next meeting is currently empty and members were asked to consider items. The Chair noted she is keen for officers to bring the Local Plan Update as early as possible and that this could possibly be included in the October or December meeting.

It was asked if the question mark could be removed from the Rural Plan.

There being no further business, the meeting was formally closed.





### **Agreed Actions**

- Officer to contact Cllr Birnie regarding table in action points on green waste and duplicated headings and to confirm meaning of CSU subscription (TPugh?)
- To follow up affordable housing information (JDoe)
- To circulate documents regarding Hemel Vision Board (SWhelan)
- To provide demographic data for Hemel Hempstead (JDoe)
- To discuss resources for planning enforcement with portfolio holder and bring back further action to the Committee.
- For question mark to be removed from the Rural Plan (LFowell)



Overview and Scrutiny Committee

<b>Report for:</b>	Strategic Planning and Environment Overview and Scrutiny Committee
<b>Title of report:</b>	Financial Performance Quarter 1 2023-24
<b>Date:</b>	5th September 2023
<b>Report on behalf of:</b>	Cllr Sally Symington, Portfolio Holder for Corporate and Commercial Services
<b>Part:</b>	I
<b>If Part II, reason:</b>	N/A
<b>Appendices:</b>	Appendix A – General Fund Forecast Outturn Position Q1 2023-24 Appendix B– SPaE Projected Capital Outturn Q1 2023-24
<b>Background papers:</b>	None.
<b>Glossary of acronyms and any other abbreviations used in this report:</b>	GF – General Fund HRA – Housing Revenue Account

<p><b>Report Author</b> Clare Dempsey, Financial Planning and Analysis Manager</p> <p> </p> <p>Clare.Dempsey@dacorum.gov.uk / 01442 228264 (ext. 2264)</p> <p><b>Responsible Officer</b> Fiona Jump, Head of Financial Services</p> <p> </p> <p>Fiona.Jump@dacorum.gov.uk / 01442 228162 (ext. 2162)</p>	
<b>Corporate Priorities</b>	<ul style="list-style-type: none"> <li>A clean, safe and enjoyable environment</li> <li>Building strong and vibrant communities</li> <li>Ensuring economic growth and prosperity</li> <li>Providing good quality affordable homes, in particular for those most in need</li> <li>Ensuring efficient, effective and modern service delivery</li> <li>Climate and ecological emergency</li> </ul>

<b>Wards affected</b>	All
<b>Purpose of the report:</b>	1. To provide details of the projected outturn 2023-24 as at quarter 1 for the: <ul style="list-style-type: none"> <li>• General Fund</li> <li>• Capital Programme</li> </ul>
<b>Recommendation (s) to the decision maker (s):</b>	1. That Committee note the financial position for 2023-24 as at Quarter 1.
<b>Period for post policy/project review:</b>	The Council's financial position is reported to committee on an ongoing, quarterly basis.

## 1 Introduction:

**1.1** This report presents the Council's forecast outturn for 2023-24 as at quarter 1, 30<sup>th</sup> June 2023. The report focuses in particular on services within the Strategic Planning and Environment area with associated appendices:

- General Fund – Appendix A. Across all scrutiny committee areas, a surplus against budget of £0.766m is forecast. Included in this is a pressure of £0.789m against Strategic Planning and Environment services.
- Capital Programme – Appendix B. Strategic Planning and Environment General Fund capital schemes are currently forecasting a pressure of £0.100m.

## 2 General Fund Position – all Scrutiny Committee Areas

**2.1** Appendix A provides an overview of the General Fund forecast outturn position.

**2.2** The table below provides an overview by Scrutiny area of the provisional outturn for controllable budgets within the General Fund.

Table 1 Scrutiny Committee	Current Budget £m	Forecast Outturn £m	Variance	
			£m	%
Finance & Resources	10.937	11.760	<b>0.823</b>	7.5%
Strategic Planning and Environment	12.299	13.088	<b>0.789</b>	6.4%
Housing and Community	1.903	1.933	<b>0.030</b>	1.6%
<b>Total Operating Cost</b>	<b>25.139</b>	<b>26.781</b>	<b>1.642</b>	6.5%
Core Funding	(25.140)	(27.548)	<b>(2.408)</b>	9.6%
<b>(Surplus)/ Deficit</b>	<b>(0.001)</b>	<b>(0.767)</b>	<b>(0.766)</b>	

**2.3** Key variances against General Fund and HRA service areas (greater than £0.100m) are outlined in section 3 below.



### 3 General Fund Position- Strategic Planning and Environment

Table 2 – Strategic Planning and Environment Quarter 1	Current	Forecast	Variance	
	Budget	Outturn	£m	%
	£m	£m	£m	%
Neighbourhood Operations	11.310	11.399	0.089	0.8%
Housing & Property	0.053	0.098	0.045	84.9%
People & Transformation	(0.114)	(0.165)	(0.051)	44.7%
Place	1.050	1.756	0.706	67.2%
<b>Total Operating Cost</b>	<b>12.299</b>	<b>13.088</b>	<b>0.789</b>	<b>6.4%</b>

#### 3.1 Neighbourhood Operations – pressure of £0.089m

Staffing pressures for waste services are forecast to be £0.520m for the year, due to additional agency requirements to meet service demand. The waste transformation program is nearing completion with the new rounds having commenced from the beginning of August. The breakdown of this pressure is split between current operational structures causing a pressure £0.250m, and the new rounds including staff absence pressures are expected to cause a further pressure of £0.270m for the remaining 8 months of the year. The pressure in 23/24 is a significant reduction on 22/23 financial pressures due to the implementation of the route optimisation project and further cost reductions are expected going forward.

There is a pressure of £0.175m on hire vehicle budgets due to the ongoing breakdowns from the existing fleet. The service is working with the supplier to find a resolution to the problems and options to reduce / control these pressures moving forwards.

A surplus of £0.700m on Garden Waste income is reported. Take up of the scheme is much higher than anticipated when the charge was introduced at the end of 2022-23 and hence the underlying service financial pressure is significantly reduced.

#### 3.2 Place – pressures of £0.706m

The planning service has seen the pressures on their planning income continue from 2022-23. The income pressure for 2023/24 is £0.500m for planning income and £0.050m for land searches fees. The pressures are linked to the impact of the current economic conditions on developers and the associated adverse impact on planning income. There are smaller pressures across the service contributing to the balance of pressures.

### 4 Capital Programme

#### 4.1 Appendix C shows the projected capital provisional outturn in detail by scheme.

The table below summarises the overall capital outturn position for Strategic Planning and Environment committee area.

The current budget is the original budget approved by Cabinet in February 2023, plus approved amendments.

The 'rephasing' column refers to projects where expenditure is still expected to be incurred but will now be in 2024-25 rather than 2023-24 ('slippage'), or conversely, where expenditure planned initially for 2024-25 has been incurred in 2023-24 ('accelerated spend').

The 'Variance' column refers to projects which are expected to come in under or over budget and projects which are no longer required.

Table 3- Capital Outturn 2023-24	Current Budget	Re-phasing (To)/from future years	Revised Budget	Forecast Outturn	Variance	
	£m	£m	£0m	£m	£m	%
Strategic Planning and Environment	6.261	(3.373)	2.888	2.988	<b>0.100</b>	<b>3.46%</b>

#### 4.2 General Fund Capital Programme Major Variances

Strategic Planning and Environment capital schemes are reporting slippage of £3.373m. The slippage includes the following items over £0.100m:

- Fleet Replacement Programme £0.750m, additional time taken to review the requirements of fleet moving forward and delays in delivery of orders.
- The Bury £2.623m. This project is still under review to determine the best use of the site moving forwards.

There is an expected pressure on Strategic Planning and Environment capital projects of £0.100m. This relates to Wheeled Bins and Boxes. The service has experience continuing high level of demand for replacement bins following the deterioration of existing bins splitting and requiring replacement. A large proportion of the defective bins have now been replaced and therefore spend is expected to fall within budget in future years.

#### 5. Financial implications

5.1 Contained within the body of this report.

#### 6. Legal implications

6.1 There are no direct legal implications arising from this report.

#### 7. Risk implications

7.1 Regular monitoring and reporting on the Council's financial position is one of the key ways in which the organisation manages the potential risk of the weakening of its financial resilience.

#### 8 Equalities, Community Impact and Human Rights

8.1 Community Impact Assessments on Council activities are carried out by relevant services with responsibility for those activities. A separate Community Impact Assessment has not been carried out in respect of this report.

8.2 There are no Human Rights Implications arising from this report.

#### 9 Sustainability implications

9.1 There are no specific sustainability implications arising from this report.

#### 10 Council infrastructure

**10.1** The content of this report sets out the implications of the Council’s activities for its financial resources for 2023-24.

**11 Conclusions**

**11.1** The forecast position for 2023-24 at quarter 1 is a surplus of £0.766m against Council General Fund budgets, covering all scrutiny committee areas. Housing Revenue Account budgets are reporting a pressure of £0.390m.

**11.2** The forecast position for 2023-24 at quarter 1 is slippage of £3.373m for Strategic Planning and Environment capital schemes.



## Dacorum Borough Council

### Revenue Budget Monitoring Report for June 2023 (Cost of Services Analysis By Scrutiny Committee)

	<i>Month</i>			<i>Year-to-Date</i>			<i>Full Year</i>		
	Budget £000	Actuals £000	Variance £000	Budget £000	Actuals £000	Variance £000	Budget £000	Forecast Outturn £000	Variance £000
<b>Cost of Services</b>									
Finance and Resources	421	1,185	764	1,301	1,780	479	10,937	11,760	823
Housing and Community	310	(312)	(622)	554	(654)	(1,208)	1,903	1,933	30
Strategic Planning and Environment	828	1,339	511	2,155	2,112	(43)	12,299	13,088	789
<b>Net Cost of Services</b>	<b>1,559</b>	<b>2,212</b>	<b>653</b>	<b>4,010</b>	<b>3,238</b>	<b>(772)</b>	<b>25,139</b>	<b>26,781</b>	<b>1,642</b>
<b>Other Items</b>									
Investment Income	(63)	(628)	(565)	(189)	(259)	(70)	(755)	(3,053)	(2,298)
Interest Payments and MRP	62	332	270	185	332	147	741	741	0
Parish Precept Payments	0	0	0	1,234	1,234	0	1,234	1,234	0
Government Grants	(141)	(849)	(708)	(423)	(2,446)	(2,023)	(1,693)	(1,723)	(30)
Taxation (Council Tax and Business Rates)	(1,563)	(43,423)	(41,860)	(4,688)	(38,159)	(33,471)	(18,552)	(18,552)	0
<b>Surplus / Deficit on Provision of Services</b>	<b>(1,705)</b>	<b>(44,568)</b>	<b>(42,863)</b>	<b>(3,881)</b>	<b>(39,298)</b>	<b>(35,417)</b>	<b>(19,025)</b>	<b>(21,353)</b>	<b>(2,328)</b>
<b>Transfers between Reserves / Funds</b>									
Net Recharge to the HRA	(510)	(167)	343	(1,529)	(17)	1,512	(6,115)	(6,195)	(80)
<b>Net Movement on General Fund Working Balance</b>	<b>(656)</b>	<b>(42,523)</b>	<b>(41,867)</b>	<b>(1,400)</b>	<b>(36,077)</b>	<b>(34,677)</b>	<b>(1)</b>	<b>(767)</b>	<b>(766)</b>

**APPENDIX B CAPITAL PROGRAMME MONITORING BY SCRUTINY COMMITTEE FOR JUNE 2023**

Scheme	Original Budget	Prior Year Slippage	Adj's, Supps, Virements	Adjustments (Slip. C/F)	In-Year Adjustments	Current Budget	YTD Spend	Projected Outturn	Forecast Slippage	Projected Over / (Under)
<b>General Fund</b>										
<b>Strategic Planning and Environment</b>										
<b>Assistant Director - Place, Communities and Enterprise</b>										
162 Urban Park/Education Centre (Durrants Lakes)	0	134,015	0	0	0	134,015	8,625	134,015	0	0
163 The Bury - Conversion into Museum and Gallery	2,570,000	53,150	0	0	0	2,623,150	0	0	(2,623,150)	0
	<b>2,570,000</b>	<b>187,165</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2,757,165</b>	<b>8,625</b>	<b>134,015</b>	<b>(2,623,150)</b>	<b>0</b>
<b>Head of Development Management</b>										
43 CIL Capital Projects	0	0	0	0	0	50,000	50,000	50,000	0	0
	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>50,000</b>	<b>50,000</b>	<b>50,000</b>	<b>0</b>	<b>0</b>
<b>Head of Environmental Services</b>										
167 Waste Services IT upgrade	0	80,000	0	0	0	80,000	0	80,000	0	0
168 Wheeled Bins & Boxes for New Properties	100,000	0	0	0	0	100,000	50,868	200,000	0	100,000
169 Litter Bin Upgrade	85,000	0	0	0	0	85,000	0	85,000	0	0
170 Play Areas & Open Spaces - replace equipment	250,000	137,470	0	0	0	387,470	0	387,470	0	0
171 Gadebridge Park - Splash Park	70,000	0	0	0	0	70,000	36,128	70,000	0	0
172 Resurfacing Works and Building Improvement to Depot	0	60,000	0	0	0	60,000	0	60,000	0	0
173 Chipperfield Common Car Park Resurfacing	0	200,000	0	0	0	200,000	0	200,000	0	0
174 Waste Transfer Site Upgrade Works	0	262,461	0	0	0	262,461	0	262,461	0	0
175 Water Gardens Fencing	25,000	0	0	0	0	25,000	0	25,000	0	0
176 Fleet Replacement Programme	(312,221)	2,341,332	0	0	0	2,029,111	56,116	1,279,111	(750,000)	0
	<b>217,779</b>	<b>3,081,263</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>3,299,042</b>	<b>143,112</b>	<b>2,649,042</b>	<b>(750,000)</b>	<b>100,000</b>
<b>Head of Property Services</b>										
180 Allotment Improvement Programme	0	47,970	0	0	0	47,970	0	47,970	0	0
181 Stone Works to Charter Tower	15,000	18,000	0	0	0	33,000	0	33,000	0	0
182 Nickey Line Bridge Refurbishment	0	50,000	0	0	0	50,000	0	50,000	0	0
183 Bennetts End Adventure playground - Cabin Roof	24,000	0	0	0	0	24,000	0	24,000	0	0
	<b>39,000</b>	<b>115,970</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>154,970</b>	<b>0</b>	<b>154,970</b>	<b>0</b>	<b>0</b>
<b>Totals: Strategic Planning and Environment</b>	<b>2,826,779</b>	<b>3,384,398</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>6,261,177</b>	<b>201,737</b>	<b>2,988,027</b>	<b>(3,373,150)</b>	<b>100,000</b>



## Strategic Planning and Environment

### Overview and Scrutiny Committee

<b>Report for:</b>	Strategic Planning and Environmental Overview and Scrutiny Committee
<b>Title of report:</b>	Q1 Environmental and Community Protection Update
<b>Date:</b>	6 <sup>th</sup> September 2023
<b>Report on behalf of:</b>	Councillor Robin Bromham, Portfolio Holder for Regulatory and Community
<b>Part:</b>	I
<b>If Part II, reason:</b>	N/A
<b>Appendices:</b>	
<b>Background papers:</b>	
<b>Glossary of acronyms and any other abbreviations used in this report:</b>	

#### Report Author / Responsible Officer

Emma Walker

Head of Regulatory Services, Environmental and Community Protection



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<b>Corporate Priorities</b>	<ul style="list-style-type: none"> <li>A clean, safe and enjoyable environment</li> <li>Building strong and vibrant communities</li> <li>Ensuring economic growth and prosperity</li> <li>Providing good quality affordable homes, in particular for those most in need</li> <li>Ensuring efficient, effective and modern service delivery</li> <li>Climate and ecological emergency</li> </ul>
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<b>Wards affected</b>	All
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<b>Purpose of the report:</b>	<b>1.</b> To provide members with the performance report for quarter 1 in relation to Regulatory Services.
<b>Recommendation (s) to the decision maker (s):</b>	<b>1.</b> For information only.
<b>Period for post policy/project review:</b>	

## **1 Introduction/Background:**

1.1 For the purpose of this report, 'Environmental and Community Protection' includes the following services:

- Environmental Health Team (Covid 19 Outbreak Control, Food Safety, Health and Safety Enforcement, Statutory Nuisances, Contaminated Land, Drainage, Private Water Supplies, Infectious Diseases, Air Quality Management, High Hedges). Team Manager- Sarah Stefano, team of 7 FTE's and 3 temps (1 Vacancy).
- Operations Team (Public Health, Pest Control, Animal Welfare, Dog Warden Services, Environmental Enforcement and management of District Enforcement Littering and PSPO Enforcement Contract). Team Manager, Dawn Rhoden and Team of 5.5FTE and 2 Temps.
- Corporate Health, Safety and Resilience Team (Internal Health and Safety Advice, Technical Support, Emergency Planning and Business Continuity). Team Manager Interim, Claire Saunders and Team of 3.4 FTE and Two vacancies.

## **2 Environmental and Community Protection – Q4 Performance Indicators**

2.1 ECP09, Number of High risk food hygiene inspections carried achieved within the quarter was 87.25%. The Food Safety Recovery Plan has been running to target and is due to see the remaining small back log of low risk premises resolved by Q2 23/24. This has seen significant improvements in the backlog caused by Covid-19 work.

## **3 Environmental Health Team - Sarah Stefano**

3.1 During Q1 the Food Standards Agency revoked the post Covid- 19 recovery plan and Local Authorities will now be expected to comply with all elements of the Food Law Code of Practice and Practice Guidance. The team had made above expected progress on the plan and will be clear of backlog by Q2 23/24. The Team continue to receive a steady flow of new Food Business Registrations and participated in the register your business publicity campaign.

3.2 The Annual Air Quality Status Report for 2023 was submitted for approval and ratification from DEFRA. Work continues with partners on the installation of the new air quality analyser (Aspley) and PM 2.5 monitors (Swing Gate School, Bennetts End Road, and Lawn Lane). Report on Air Quality drafted and issued to Chair of SPAE Committee.

3.3 The Team continuing to support the Local Resilience Forum Working Groups for Covid-19 also attend District Outbreak Planning Meetings and Winter Planning Groups.

#### **4 Corporate Health and Safety Team**

4.1 Russell Ham Team Manager has left the Council after 5 years we would like to express thanks for all the hard work Russell has put into the service. Interim arrangements have been put in place, Claire Saunders will be interim Team Manager.

4.2 Interim Consultant Claire Saunders was appointed to review Health and Safety Arrangements in the Council. Claire has met with 35 Managers, Union representatives and employees to understand Health and Safety Culture at DBC. Her results will be reported to Senior Leadership Team.

4.3 All departments have been tasked with completing annual self-audits for Health and Safety alongside review of Service Business Continuity Plans and Business Impact Assessments. These will then be reviewed by Corporate Health and Safety.

4.4 The Team have worked with other district and borough councils to implement a memorandum of understanding between all partners in case of Emergency Plan Activation, agreements for mutual aid.

#### **5 Operations Team**

5.1 21 Stray dogs were collected by the authority in Q1. 9 were returned to owners and 12 were rehomed. 27 Dangerous Dogs complaints were received and investigate as well as 62 Animal Welfare concerns.

5.2 8 Community Protection Warnings were served, and 5 Microchipping of Dogs Notices.

5.3 We continue to see a reduction in Filthy and Verminous complex cases, a further 6 in Q1 (13 in Q4). These are domestic premises in any tenure that are either filthy or verminous in nature. Filthy or verminous premises are properties that are considered verminous (including rats, mice, insects or parasites including their eggs, larvae and pupae) or in such a filthy condition as to be prejudicial to health (usually means that there is rotting food, human or animal excrement inside the property). These premises usually require a multi-disciplinary team (MDT) of professionals to deal with the issues from a variety of partner agencies.

5.4 Report prepared for SPAE Committee on Littering and Public Space Protection Order Enforcement.

5.5 District Enforcement have served 500 Fixed Penalty Notices on those that chose to litter or breach the Councils Public Space Protections Orders in Q1

5.6 On 5 July 2023, at St Albans Magistrates' Court, Edward Meredith, of Priory Orchard, Flamstead, pleaded guilty to the unauthorised deposit of controlled waste in Caddington Common on 5 November 2022. Meredith was ordered to pay a total of £2,222, which consisted of a £1,230 fine, £500 costs and a victim surcharge of £492.

5.7 Regulatory Services have chaired a multi departmental task force that have been working on improvements in Gadebridge Park. Officers from this team alongside officers from district enforcement and police colleagues have increased visibility in the park following a period of increased littering an anti-social behaviour. Colleagues work closely with Clean, Safe and Green staff to deter negative behaviours and reports received from Clean Safe and Green staff are that litter has reduced and behaviours improved in the vicinity. Fixed Penalty Notices have been served in the area for littering and breach of Public Space Protection Order.



- 5.8 21 prosecutions were brought by the council for littering or public space protection order offences. 100% of these cases were successful in court 21 were taken through the single justice procedure. £3220 total fines, £2985.15 total costs and £1288 total Victim surcharges.
- 5.9 On 14<sup>th</sup> June 2023 at Hatfield Remand Court, Dacorum Borough Council successfully prosecuted Mr Jake Putman of Hasedines Road, Hemel Hempstead for a fly tipping offence that occurred last year. Mr Putman was picked up by Police and the same day brought before the court on an arrest warrant issued by St Albans Magistrates Court in May 2023. Putman pleaded guilty to the unauthorised deposit of controlled waste in a garage block in Paston Road, Hemel Hempstead on or before the 4<sup>th</sup> September 2022. The defendant was fined £480, ordered to pay costs of £500 and a victim surcharge of £192. The court heard that on 5<sup>th</sup> September 2022 an Environmental Enforcement Officer attended the garage block in Highfield following a report of a flytip. There the officer found a large pile of dumped household rubbish, including packaging with the defendants details on it. Mr Putman was issued a £400 Fixed Penalty Notice for the offence but failed to pay and engage with the Council despite reminders. The council referred the matter to Court where Mr Putman did not attend Summons to St Albans Magistrates Court on 1<sup>st</sup> March 2023 nor an adjournment on 10<sup>th</sup> May 2023. At the second hearing, the Council were granted a request for a warrant of arrest due to his non-attendance.

**7 Options and alternatives considered**

No options to consider, for information only.

**8 Consultation**

N/A

**9 Financial and value for money implications:**

N/A

**10 Legal Implications**

N/A

**11 Risk implications:**

N/A

**12 Equalities, Community Impact and Human Rights:**

There are no Human Rights Implications arising from this report.

**13 Sustainability implications (including climate change, health and wellbeing, community safety)**

N/A

**14 Council infrastructure (including Health and Safety, HR/OD, assets and other resources)**

N/A

**15 Conclusions:**

Report to be noted by the Committee.



## Strategic Planning & Environment Overview and Scrutiny Committee

<b>Report for:</b>	Strategic Planning and Environment Overview and Scrutiny Committee
<b>Title of report:</b>	Consultation responses and endorsement of an amended Vision and Objectives for the South West Herts Joint Strategic Plan
<b>Date:</b>	6 September 2023
<b>Report on behalf of:</b>	Councillor Wilkie, Portfolio Holder for Place
<b>Part:</b>	I
<b>If Part II, reason:</b>	N/A
<b>Appendices:</b>	<ul style="list-style-type: none"> <li>• Appendix 1(a) - South West Herts JSP Consultation Report Part 1: What we did <a href="https://www.swhertsplan.com/26615/widgets/75394/documents/45438">https://www.swhertsplan.com/26615/widgets/75394/documents/45438</a></li> <li>• Appendix 1(b) - South West Herts JSP Consultation Report Part 1: What we did (Appendices) <a href="https://www.swhertsplan.com/26615/widgets/75394/documents/45441">https://www.swhertsplan.com/26615/widgets/75394/documents/45441</a></li> <li>• Appendix 2(a) - West Herts JSP Consultation Report Part 2: What you said <a href="https://www.swhertsplan.com/26615/widgets/75394/documents/45442">https://www.swhertsplan.com/26615/widgets/75394/documents/45442</a></li> <li>• Appendix 2(b) - West Herts JSP Consultation Report Part 2: What you said (Appendices) <a href="https://www.swhertsplan.com/26615/widgets/75394/documents/45447">https://www.swhertsplan.com/26615/widgets/75394/documents/45447</a></li> <li>• Appendix 3 - Extract - Recommended changes to the vision and objectives</li> <li>• Appendix 4 - Extract - Schedule of recommended changes to the Sustainability Appraisal Scoping Report</li> <li>• Appendix 5 – Community Impact Assessment</li> </ul>
<b>Background papers:</b>	<ul style="list-style-type: none"> <li>• Regulation 18 document 'Realising Our Potential' (September 2022) <a href="https://www.swhertsplan.com/foreword">https://www.swhertsplan.com/foreword</a></li> <li>• Sustainability Appraisal Scoping Report (September 2022) <a href="https://www.swhertsplan.com/sustainability-appraisal-scoping-report">https://www.swhertsplan.com/sustainability-appraisal-scoping-report</a></li> <li>• Topic Papers <a href="https://www.swhertsplan.com/key-documents">https://www.swhertsplan.com/key-documents</a></li> <li>• Statement of Community Involvement <a href="https://www.swhertsplan.com/key-documents">https://www.swhertsplan.com/key-documents</a></li> <li>• Regulation 18 Communications and Engagement Plan <a href="https://www.swhertsplan.com/key-documents">https://www.swhertsplan.com/key-documents</a></li> </ul>
<b>Glossary of acronyms and any other abbreviations used in this report:</b>	<p>CIA: Community Impact Assessment</p> <p>DLUHC: Department of Levelling Up, Housing and Communities</p> <p>EqIA: Equalities Impact Assessment</p> <p>HIA: Health Impact Assessment</p> <p>JSP: Joint Strategic Plan</p> <p>LPA: Local Planning Authority</p> <p>R18: Regulation 18</p> <p>SA: Sustainability Appraisal</p> <p>SAC: Special Area of Conservation</p>

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<b>Corporate Priorities</b>	<ul style="list-style-type: none"> <li>• A clean, safe and enjoyable environment</li> <li>• Building strong and vibrant communities</li> <li>• Ensuring economic growth and prosperity</li> <li>• Providing good quality affordable homes, in particular for those most in need</li> <li>• Climate and ecological emergency</li> </ul>
<b>Wards affected</b>	ALL
<b>Purpose of the report:</b>	<p>To progress a report to Cabinet with the following recommendations:</p> <ol style="list-style-type: none"> <li>1. To provide an overview of responses received to the Regulation 18 ‘Realising Our Potential’ document and associated draft Sustainability Scoping Report; and</li> <li>2. To endorse the amended Vision and Objectives for use in guiding future iterations of the Joint Strategic Plan (JSP) and associated technical work.</li> </ol>

<p><b>Recommendation (s) to the decision maker (s):</b></p>	<p>To progress a report to Cabinet with the following recommendations:</p> <ol style="list-style-type: none"> <li>1. Note the feedback received on the SW Herts Joint Strategic Plan Regulation 18 consultation (see Appendices 1 and 2);</li> <li>2. Recommend Cabinet endorse the revised Vision and Objectives for the Plan, incorporating changes recommended as a result of the consultation responses (see Appendix 3);</li> <li>3. Recommend Cabinet agree the recommended changes to the Sustainability Appraisal Scoping Report (see Appendix 4); and</li> <li>4. Recommend Cabinet delegate authority to the Strategic Director –Place, in consultation with the Leader of the Council, to agree any non-substantive changes, finalise and publish: <ol style="list-style-type: none"> <li>(a) a document setting out the revised Vision and Objectives; and</li> <li>(b) an updated Sustainability Appraisal Scoping Report.</li> </ol> </li> </ol>
<p><b>Period for post policy/project review:</b></p>	<p>On-going</p>

## 1 Introduction/Background:

### Role and Scope of the JSP

- 1.1 The South West Hertfordshire authorities (Dacorum Borough Council, St. Albans City and District, Watford Borough Council, Hertsmere Borough Council and Three Rivers District Council, with the support of Hertfordshire County Council) have agreed to work together to produce the South West Hertfordshire Joint Strategic Plan (JSP). This will provide an integrated strategic planning framework and supporting evidence base to support sustainable growth in the area to 2050.
- 1.2 The JSP will be a statutory planning document, prepared under Section 28 of the Planning and Compulsory Purchase Act 2004 (as amended). The Plan will identify the overall quantum of housing and economic growth within South West Hertfordshire to be planned for to 2050 and its broad distribution across the area. The plan will identify strategic allocations and priorities, as well as the strategic infrastructure necessary to deliver the spatial strategy.
- 1.3 The JSP will focus on climate resilience, infrastructure delivery, strategic housing and employment. However it will be about more than planning and will help create a framework for investor confidence in SW Herts.
- 1.4 The benefits of a JSP include:
  - Increased potential for unlocking infrastructure investment from Government;

- Creating a bigger canvas to make decisions about future growth;
- Allowing an infrastructure-led approach; not ‘planning by numbers’; and
- Enabling a coordinated approach to investment and delivery of infrastructure giving priority to strategic solutions.

1.5 All five local planning authorities will retain ‘sovereignty’ over the JSP process, with the plan following essentially the same process as individual Local Plans. It will therefore need approval from each of the partner authorities at each key stage of its preparation and final adoption.

#### Relationship of the JSP to district Local Plans

1.6 Each of the South West Hertfordshire authorities is in the process of updating their individual Local Plans, which currently run to between 2031 and 2038. The JSP will not affect the content of this current round of Local Plans. Rather these Local Plans will help inform the JSP by establishing the medium term planning strategy for the area. The Joint Strategic Plan will then look further ahead in a more co-ordinated way, to 2050, to help provide a longer-term framework for the area. When each authority comes to review their Local Plan again, they will be able to frame those new policies in the context of the jointly developed policies in the Joint Strategic Plan. The next round of Local Plans will also add more detail to the policies of the Joint Strategic Plan and facilitate their delivery. Working in the context of the jointly developed Joint Strategic Plan policies, these more detailed Local Plan policies will be more effective in delivering the overall policy aims for the South West Hertfordshire area.

#### Content of the Issues and Options document

1.7 The Planning and Compulsory Purchase Act 2004 (as amended) and associated regulations leave matters such as the number and nature of consultations undertaken at the Regulation 18 stage very much to the discretion of authorities involved. It has however been agreed through the Statement of Common Ground signed by the five district authorities and county council in 2021, that engagement on the JSP will involve two Regulation 18 (R18) stages. The first will be an ‘Issues and Options’ document, focussing on establishing a clear vision and set of objectives for the plan. The second R18 stage will comprise a draft ‘Spatial Options’ document. The recent consultation was on the first of these documents – entitled ‘Realising Our Potential.’

1.8 This consultation document set out the long term planning issues that are expected to face the SW Herts area to 2050, and suggested some broad principles that could be used to develop a plan to address these issues. It also began a high level discussion on the types of future growth that could be considered for the area.

1.9 The document was intentionally high level at this first formal consultation stage. Importantly, it did not include any indicative housing or employment targets or suggest any locations where growth may occur. This is because:

- (a) It is unclear at the present time what any future housing and employment targets for the area will be on a long term basis; and
- (b) Technical work to inform any decisions on the appropriate scale and location of growth has not been completed.

1.10 Feedback was sought through a series of yes/no questions, with the opportunity for respondents to explain the reasons for their answers.

1.11 All of the SW Herts authorities agreed the ‘Realising Our Potential’ document and associated Sustainability Appraisal Scoping Report for consultation during meetings in June and July 2022.

#### Sustainability Appraisal

- 1.12 As required by the Strategic Environmental Assessment Directive and Government Guidance on Sustainability Appraisal as set out in the Planning and Compulsory Purchase Act 2004 and associated Regulations, the Issues and Options document is accompanied by a Sustainability Appraisals Scoping Report. This was prepared by Land Use Consultants Ltd on behalf of the SW Herts authorities. The principal role of this Scoping Report is to set out a suggested framework against which future iterations of the plan could be assessed to establish its likely social, economic and environmental impacts. It also included a high level initial assessment of the proposed vision and objectives and growth types, to help ensure these are comprehensive and that any potential social, environmental and economic impacts are highlighted at an early stage in the plan-making process.
- 1.13 As the JSP progresses, the Sustainability Appraisal work will be extended to reference the conclusions of a separate process relating to the Habitats Regulations Assessment which must also accompany the later stages of a statutory plan. This will be particularly important considering the recent report prepared into the impact of visitor numbers, air pollution etc. on the Chiltern Beechwoods Special Area of Conservation (SAC) within Dacorum Borough: the impact of which extends beyond the borough boundary.
- 1.14 As required by the regulations, feedback was sought on this Sustainability Appraisal Scoping Report as part of the R18 engagement.

#### Approach to consultation

- 1.15 As with Local Plans, there is a legal requirement to undertake public consultation on statutory Joint Strategic Plans. The broad arrangements for engagement in plan-making are set out in the Statement of Community Involvement (SCI), which was adopted by all the SW Herts authorities in July 2022. This SCI was supplemented by an updated Communications and Engagement Plan, prepared by specialist engagement consultants Icenl and the JSP Communications Officer, in liaison with Communications Officers at each of the participating SW Herts authorities.
- 1.16 The consultation was largely funded through a 'Proptech' grant from the Department for Levelling Up, Housing & Communities (DLUHC) which enabled the JSP team to deploy an innovative approach to engagement using a variety of social media platforms, as well as develop a bespoke engagement website - [www.swhertsplan.com](http://www.swhertsplan.com). The approach to engagement was influenced by the lessons learned from a successful informal engagement 'SW Herts – Your Future' carried out in early 2020.
- 1.17 As set out in Part 1 of the Consultation Report (see Appendix 1), the engagement employed a range of tools and approaches to raise awareness and increase response rates to the consultation material, including:
- An interactive consultation document hosted on the SW Herts website, with supporting material.
  - A linked social media based campaign, supported by short videos and graphics, utilising a shortened version of the full R18 document, with simplified questions.
  - Paper copies of consultation material and response forms issued to all libraries and deposit points within the SW Herts area.
  - An introductory video hosted on SW Herts website.
  - Direct notification letters / emails to all key consultation bodies listed in the Statement of Community Involvement, plus other groups and individuals on JSP consultation database.
  - Articles in district / county e-newsletters / newsletters / magazines as timing permitted.
  - The signposting of the consultation website via the SWH partner authority websites.
  - Press release(s) – co-ordinated by JSP team and issued by each authority.
  - Business cards with QR code information on the consultation distributed to colleges, libraries and deposit points in the SW Herts area.
  - Posters provided for display at libraries and deposit points.

- An updated 'Frequently asked Questions' on website.
- Dedicated briefings for Town and Parish Councils.
- A workshop event held for sixth form students.

1.18 As this engagement took place over the summer period, it was extended from the usual six weeks to eight weeks (as per paragraph 2.12 of the Statement of Community Involvement), running from 5th September until 4th November 2022.

1.19 The social media focussed element of the engagement, ran for a more limited time period (5th to 28th September inclusive), as the results had to be reported to Government (DLUHC) by the end of September to meet the conditions of the PropTech grant. Having a shorter consultation period for the social media based element of the consultation was not problematic, as the consultants who ran this element of the engagement advised that three weeks was the optimum period for the poll to remain live and as summarised out below, the response rate achieved was very high.

Level of feedback received

1.20 As Part 2 of the Consultation Report (see Appendix 2) illustrates, the consultation is considered to have been very successful. The table below shows how responses were received via the online survey, social media hosted poll, email and letter – equating to over 3,400 responses in total. The online survey and poll alone this provided over 27,300 individual pieces of feedback. Awareness of the consultation was also very high, with the social media adverts released via the Councils' social media accounts being seen by almost 45,500 people and the website visited more than 8,700 times over the course of the consultation period.

1.21 The participation levels for the poll compare very well with the 'Your Future' poll the JSP programme carried out in early 2020. This earlier poll had 3,291 voters, casting 15,042 votes and leaving 2,082 pieces of written feedback.

Method of response	Respondees	Individual pieces of feedback
Online survey	204	2,569
Give My View poll	3,122	24,734 (including 5,198 pieces of written feedback)
Email	138	Not assessed
Letter	1	Not assessed
TOTAL	3,465	N/A

**2 Key Issues/proposals/main body of the report:**

Nature of feedback received

2.1 Although a number of different feedback mechanisms were used, and there were variances between the views expressed within them, some common themes did arise. These are illustrated by the word cloud below which, although generated from the poll, highlights the key issues raised across the consultation. These also reflect the concerns emerging through Local Plan consultations within the area too.





however picked up through the wording of another – as a lot of issues cut across the six thematic pillars.

- 2.6 A number of changes are recommended to the vision and associated objectives as result of the feedback received. In addition, a minor amendment is suggested to the overarching vision statement. This is to include specific reference to the word 'health' and to ensure it is clear that the future being planned for must benefit both people and the environment. The recommended revised vision statement is as follows:

**Realising our Potential**

*“South West Herts will realise its full potential of being globally connected, nationally recognised and locally cherished. Known for its creative spirit, collaborative working and willingness to accelerate positive change, it will be a place where sustainable growth provides a better and healthy future for ~~everyone~~ both people and the environment.”*

- 2.7 As set out in Appendix 3 some amendments are also recommended to the objectives that sit below the six thematic pillars. This includes amendments to existing objectives and the inclusion of some new ones, to improve clarity and ensure the following key issues are fully reflected:

- Historic environment;
- Both urban and rural employment sectors;
- Protection of water resources; and
- Air quality.

- 2.8 Two minor changes to phraseology are also proposed to ensure consistency of wording across the text.

*Feedback on Growth Types*

- 2.9 Another key aim of the consultation was to obtain feedback on potential growth options that will help inform the next stage of the JSP. The consultation asked for views on the following (albeit inter-related) typologies:

- (a) Growth within existing large settlements;
- (b) Outward growth of existing large settlements;
- (c) New settlements;
- (d) Growth of groups of settlements;
- (e) Growth along sustainable transport corridors;
- (f) Growing the best connected places; and
- (g) Scattered growth.

- 2.10 The views expressed through the consultation feedback varied depending on the category of respondent and also between the poll, survey and email responses. Many individuals expressed a strong desire to protect green spaces and the Green Belt, and some considered there should be no further growth in the area at all. Unsurprisingly, responses from developers and landowners were often influenced by the location of the site(s) they were promoting – although some did offer more balanced observations about the relative sustainability of the options suggested. ‘Growth of existing

large settlements' was generally the preferred growth type, although clear caveats were expressed with regard to density, additional infrastructure needs and the protection of greenspaces.

- 2.11 In response to the question 'Are there any other growth types we have not mentioned that you think should be considered?', no realistic alternative options were put forward. Many suggestions were outside the scope of what planning can influence, or were relevant to all growth types i.e. making best use of previously developed land and considering densification. It was also correctly noted that not all of the options put forward within the consultation were necessary alternatives – as many overlap with one another.
- 2.12 As a result, no changes are recommended to the growth types that will be considered as the JSP progresses. However the consultation responses have been passed to consultants advising the JSP programme on potential spatial strategies, as the information is very helpful in articulating the likely pros and cons, and the broad acceptability or otherwise, of the different approaches.

#### *Feedback on the Sustainability Appraisal Scoping Report*

- 2.13 Feedback received on the Sustainability Appraisal Scoping Report are summarised in Appendix 4. It is recommended that many of the suggested changes are not taken forward, as they related to feedback from landowners seeking a more favourable assessment of the growth type which most closely reflected their particular site(s) interest. Other comments related to the technical nature of the document, which is unfortunately hard to overcome in a report that needs to comply with specific regulatory requirements.
- 2.14 A number of changes are however recommended. These will be taken forward when the revised Scoping Report is issued later this year. The majority of these changes involve adding additional text as suggested by key organisations such as Natural England and the Environment Agency. The proposed changes to the vision and objectives will also need to be assessed by the consultants in due course.

### **3 Options and alternatives considered**

- 3.1 Set out below are the following two alternative options that were considered and not recommended.
- 3.2 Option 1: To leave the wording of the plan vision and objectives and Sustainability Appraisal Scoping Report unchanged from that consulted upon. Whilst the vision and objectives and Sustainability Appraisal Scoping Report were generally supported by the consultation feedback, the responses received highlighted a limited number of key issues that were omitted. The proposed amendments set out in this report seek to ensure that these are included and should ensure that the vision and objectives for the JSP, and the associated Sustainability Framework against which future policies and proposals are assessed, are clearer and more comprehensive as a result.
- 3.3 Option 2: To await agreement of the vision and objectives until the next formal stage of the JSP is progressed. Early endorsement of the JSP vision and objectives will allow them to be reflected with additional weight when preparing technical work that will inform the plan, and provide a clear platform upon which Officers can progress the next iteration of the JSP.

### **4 Consultation**

- 4.1 The following officers have been consulted on the work undertaken to date:
- James Doe, Strategic Director (Place)
  - Sara Whelan, Assistant Director (Place)
  - Ronan Leydon, Team Leader - Strategic Planning

### **5 Financial and value for money implications:**

- 5.1 None arising from this report. The Joint Strategic Plan Programme is supported by an annual contribution of £40k from each of the participating authorities. The costs of preparing and consulting on this Issues and Options document are however covered by a Government 'Proptech' fund grant, so is at nil capital cost to the Council.

## **6 Legal Implications**

- 6.1 None arising from this report.

## **7 Risk implications:**

- 7.1 One of the main risks is that this Council (or another of the participating Councils) does not approve the same recommendations as set out in this report. This would delay progressing future iterations of the Plan and supporting technical work, the JSP vision and objectives would not be as comprehensive or as clear, and they will not be afforded relevant weight when preparing the evidence base to inform the Plan.

## **8 Equalities, Community Impact and Human Rights:**

- 8.1 The Council has also undertaken a Community Impact Assessment (CIA) of the Statement of Community Involvement. This is attached in Appendix 5.
- 8.2 The consultation document was supported by an independent Sustainability Appraisal Scoping Report (see paragraph 9.1 for further details). The final Sustainability Appraisal report will also incorporate equalities and health impact assessments.
- 8.3 There are no Human Rights Implications arising from this report.

## **9 Sustainability implications (including climate change, health and wellbeing, community safety)**

- 9.1 The consultation document was supported by an independent Sustainability Appraisal Scoping Report prepared by Land Use Consulting Ltd. This considers the impact of the document against a sustainability framework, covering a range of environmental, social and economic objectives. The final Sustainability Appraisal report will also incorporate a high level Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA).

## **10 Council infrastructure (including Health and Safety, HR/OD, assets and other resources)**

- 10.1 None arising from this report.

## **11 Conclusions:**

- 11.1 The production of the Joint Strategic Plan will provide a long term strategic framework for the South West Hertfordshire Authorities, including Dacorum. The JSP will focus on climate resilience, infrastructure delivery, strategic housing and employment. However it will be about more than planning and will help create a framework for investor confidence in SW Herts. The JSP will increase potential for unlocking infrastructure investment from Government, creating a bigger canvas to make decisions about future growth, allowing an infrastructure-led approach; not 'planning by numbers' and enable a coordinated approach to investment and delivery of infrastructure giving priority to strategic solutions.
- 11.2 This report seeks approval for three key early documents underpinning the JSP, without which progress on the JSP will be delayed.

## Recommend changes to the vision and objectives

**(A) VISION / OBJECTIVES**

The following changes are suggested as a result of feedback received:

Section	Change suggested	Recommendation
<b>VISION</b>	Add clearer reference to the environment.	Wording changed to ' <i>...it will be a place where sustainable growth provides a better <u>and healthy</u> future for <del>everyone</del> <u>both people and the environment.</u></i> '
	Add reference to 'health/ healthy'.	
<b>PILLAR: Living green in a healthy natural environment</b>	Clarify explanatory text of 'Commit to net zero' objective to reflect the way other objectives are worded.	Refer to 'carbon performance of <i>the</i> existing built environment' rather than ' <i>....our</i> existing environment.'
	Add a specific reference to protection of water resources.	Amend the ' <i>Create sustainable buildings and infrastructure</i> ' by adding ' <i>.... <u>and protect and enhance water resources</u></i> ' to the end of the explanatory text.
<b>PILLAR: Growing opportunities to work locally</b>	Amend wording of the 'Create space to grow' objective to ensure it is clear that it refers to both urban and rural economic sectors.	Amend the 'Create space to grow' objective to read ' <i>Support the delivery of a wide range of quality workspaces, where new and existing businesses from different sectors, <u>in both urban and rural areas</u>, can grow and flourish.</i> '
<b>PILLAR: Living in healthy, thriving local communities</b>	Make more explicit reference to air quality.	Add new objective ' <i>Improve air quality</i> ' and explanatory text to read ' <i>Maximise opportunities to maintain and enhance air quality standards.</i> '
<b>PILLAR: Moving easily in connected places</b>	Make clear that reference to neighbourhoods is plural.	Change ' <i>a neighbourhood</i> ' (singular) to ' <i>neighbourhoods</i> ' (plural) under the 'Create walkable neighbourhoods' objective.

<b>PILLAR: Building homes and places that people are proud of</b>	Add more explicit reference to heritage protection.	Add a new objective entitled <i>'Value the historic environment'</i> and associated explanatory text to say <i>'Development to reflect and respect the historic environment.'</i>
<b>PILLAR: Delivering robust and sustainable infrastructure</b>	N/A	No changes.

The following extracts from the Regulation 18 document show how these changes would appear in the document. New text in red italics, deleted text in red strike through.

## The draft vision – tell us what you think

We have drafted a vision statement for the South West Herts Joint Strategic Plan, which we would like your feedback on.

This vision has been developed in line with issues raised about our environment, and living, working, playing and moving around in the area.

Our vision  
statement

### Realising our potential

*“South West Herts will realise its full potential of being globally connected, nationally recognised and locally cherished. Known for its creative spirit, collaborative working and willingness to accelerate positive change, it will be a place where sustainable growth provides a better *and healthy* future for ~~everyone~~ *both people and the environment.*”*



# Living green in a healthy natural environment

We have nationally recognised and locally cherished green and open spaces, but our natural environment is fragile. We are facing a climate and ecological emergency and it is time for us to accelerate change. Our future will balance demand for resources and growth with the natural capacity of our environment. We must be greener, healthier and leaders in climate action.

## Our objectives



### Commit to net zero carbon

Ensure all new development is net zero carbon and striving to be carbon negative, while improving the carbon performance of *the our* existing built environment.



### Bring people closer to nature

Protect the natural, recreational and character value of the area's green spaces, integrate nature into all new development, and improve existing links.



### Create sustainable buildings and infrastructure

Introduce nature based solutions that are resilient to the effects of climate change *and protect and enhance water resources.*



### Enrich native biodiversity and ecology

Protect, enhance and connect new and existing biodiversity and ecological networks.



### Green construction

Build responsibly with modern methods that reduce resource consumption and reuse materials.



# Growing opportunities to work locally

We have a high performing economy with globally leading scientific research, film, TV and creative media together with office and service sector jobs. But it will not be enough to rely on these businesses and sectors alone to drive our future. We must embrace new and growing sectors, new models of working, and new ways of shopping and accessing services. There must be opportunities for everyone.

## Our objectives



### Create space to grow

Support the delivery of a wide range of quality workspaces, where new and existing businesses from different sectors, *in both urban and rural areas*, can grow and flourish.



### Target investment

Encourage investment in new and high performing sectors to allow the local economy to prosper and keep the workforce local.



### Diversify and increase activity in centres

Encourage the resilience of high streets and town centres by supporting mixed use and their diversified role as destinations for leisure, culture and work.



### Retain and develop talent

Support and promote the provision of facilities, funding, and links to business for education and training, including access to higher education, lifetime learning, apprenticeships, and re-skilling for all.



### Strengthen the visitor economy

Build on our globally recognised attractions, to develop a thriving visitor economy.





# Living in healthy, thriving local communities

Our area is a desirable and attractive place to live. Our population is generally healthy, prosperous and people feel positive about the experience of living and working here. But this must not mask our challenges. We have areas of deprivation and a number of services under pressure. We know that our people are our future, and we must help both new and existing communities achieve the highest quality of life and support their physical and mental health and wellbeing.



## Our objectives



### Provide healthy places to live

Focus on creating homes and neighbourhoods that provide opportunities for healthy living and strong physical and mental wellbeing.



### Locate facilities to encourage community interaction

Support the timely delivery of well located, flexible spaces for work, leisure, health, learning, cultural, community and shopping facilities.



### Ensure safe and inclusive places and spaces

Create and protect environments where individuals and communities feel safe and supported.



### Improve air quality

*Maximise opportunities to maintain and enhance air quality standards.*

# Moving easily in connected places

Our area is defined by its location and its easy access to London. However, our roads are congested and east-west public transport links are poor. It is time for us all to change the way we travel. We need a future where fast, efficient and affordable public transport and walkable neighbourhoods encourage greener travel, where our communities feel connected and where our people, businesses, visitors and goods can move around easily.

## Our objectives



### Transform travel

Encourage a radical shift away from car travel by providing accessible, efficient, safe, and affordable alternatives.



### Connect towns and villages

Make travel between new and existing communities easier by strengthening public transport, cycle and walking networks and promoting on-demand services.



### Improve delivery solutions

Support a move towards carbon negative and more sustainable delivery networks.



### Create walkable neighbourhoods

Create a neighbourhoods full of activity, where people can access all their daily needs, workplaces and transport options by foot and bike, and where life is active.



# Building homes and places that people are proud of

Our area's distinct qualities have long attracted people to move here. The natural environment, the mix of towns and villages and the proximity to London are all key factors in what makes the area an enviable place to be. There is no single unifying character, but this variety is our strength. We want to build on our diversity and desirability by making strategic decisions about where and how we build.

## Our objectives



### Design attractive places

Deliver places that are fit for current and future needs, where high quality buildings and public spaces create places that people feel proud to call home.



### Celebrate a diverse place

Reinforce the varied urban and rural character of the area.



### Deliver new homes in the right places

Ensure homes are built in sustainable, well connected locations, accompanied by the timely delivery of new infrastructure.



### Recognise current and future housing needs

Ensure current and future residents can live in a high quality home they can afford, that is flexible and adaptable to different lifestyles and work patterns.



### *Value the historic environment*

*Development to reflect and respect the historic environment.*



# Delivering robust and sustainable infrastructure



Our area is growing and there is an ever increasing demand on resources. This will not change and indeed we want to actively encourage continued investment in our area. But we must change how we do this. We need a proactive and positive approach to planning and delivering infrastructure that focuses on a more resilient and sustainable future.

## Our objectives



### Deliver key infrastructure

Identify the infrastructure required to support new and existing growth, work with partners to deliver it in a timely manner and ensure it meets local needs, and adapts to the effects of climate change.



### Green energy generation

Promote local energy production with an increased focus on renewable sources.



### Promote circular economies

Minimise waste by promoting the reduction, reuse and recycling of materials.



### Advance digital infrastructure

Ensure everyone can be connected through fast digital networks.

**(B) OTHER SECTIONS OF CONSULTATION**

The following table lists a range of other helpful comments and suggestions that were made regarding the wider Regulation 18 document. Whilst they do not directly impact on the wording of the vision and objectives, it is recommended that the suggestions are noted and taken forward through:

- Information being passed on to relevant consultants to inform technical work;
- Amending / updating the Topic Papers that will continue to accompany and inform future iterations of the JSP;
- Reflecting the points in the wording of future iterations of the JSP itself; and/or
- Influencing responses to consultation documents published by third parties.

Issue raised and recommendation re how they are taken forward
Refer to 'sites of nature value' within the area (alongside the landscape and countryside designations already referred to) in future iterations of the plan.
Ensure that the Chilterns AONB and Chilterns Beechwoods SAC are referred to as separate entities in future iterations of the plan, as they are different designations and cover different areas.
Ensure the fact that SW Herts's high quality environment is one of the reasons that attracts business and employees to the area is reflected in future iterations of the plan and relevant Topic Paper updates. This is already covered in the text under Pillar – 'Building homes and places that people are proud of,' where it says ' <i>Our area's distinct qualities have long attracted people to move here.</i> '
JSP team to keep an eye out for any consultations relating to potential extensions to HS2 which may affect the SW Herts area and respond accordingly.
Pass comments relating to the issues with infrastructure provision / quality with the area to consultants preparing a Strategic Infrastructure Baseline for the JSP.
Add reference to 'Living Landscapes' work to relevant Topic Papers when these are updated.
Add reference to the need to take account of flood risk and agricultural land quality to relevant Topic Papers when these are updated and ensure these factors are fully reflected in technical work to inform potential spatial options.
Add reference to the Hertfordshire Green Infrastructure Plan top relevant Topic Paper(s) when these are updated.
Amend the 'How the Joint Strategic Plan links to other key documents' graphic if this is used in further iterations of the JSP, to include reference to Minerals and Waste Plans alongside Local Plans.
Pass comments relating to the pros and cons of the growth types put forward for consideration to consultants carrying out the Strategic Growth Locations Study and Multi Modal Study, to ensure the relative merits of each growth option are fully considered.
Acknowledge SPZs as being a significant development constraint in future iterations of the plan and in relevant Topic Paper(s) and technical work.

Consider adding more explicit reference to the value of the chalk streams in the SWH area and the need for their protection, restoration and enhancement in future iterations of the plan and ensure they are referenced appropriately within relevant Topic Paper(s).

Check and correct number of registered parks or gardens if this is referenced again.

Reference should be to 'The Making of Harry Potter' Studio Tour rather than 'the Studio.'

## Schedule of recommended changes to the Sustainability Appraisal Scoping Report

Note: Further changes will be made to the Sustainability Scoping Report to reflect the changes recommended to the draft vision and objectives.

Respondent	Summary of Comments	Response
<b>STATUTORY CONSULTEES FOR THE PURPOSES OF SA/SEA</b>		
Environment Agency	<p><b>CHAPTER 3: BASELINE INFORMATION – CLIMATE CHANGE MITIGATION AND ADAPTATION</b></p> <p>See the preparation of this Joint Strategic Plan, including the Sustainability Appraisal, as a key opportunity to strengthen the role that the planning system plays in mitigating and adapting to climate change, and to ensure a fair transition to a low carbon economy.</p> <p>Local evidence of climate change impacts will be valuable towards identifying location specific vulnerabilities. The Sustainability Appraisal should also include mitigation (i.e. net zero) policy measures that may be required to further limit climate change, and associated flood risk and water resource issues arising from the changing climate and that we need to be much better prepared for.</p> <p>Reference should be made to the Strategic Flood Risk Assessments (SFRA) for each Local Authority, which are crucial evidence documents for understanding the impacts of climate change on all sources of flood risk over the anticipated lifetime of any proposed development.</p> <p>The EA's climate change allowances for flood risk assessments should inform the SFRA(s) and have been updated to reflect the UK Climate Projections 2018 (UKCP18). This information is available at <a href="https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances">https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances</a></p> <p>For information, the Royal Town Planning Institute (RTPI) and Town and Country Planning Association (TCPA) have produced guidance on 'The Climate Crisis – A Guidance for Local Authorities on Planning for Climate Change'. Available at:</p>	<p>Noted.</p> <p>The SA Scoping Report will be updated to include the additional publications referenced. In addition, the baseline information regarding flood risk, water and biodiversity will be updated based on the comments referenced.</p> <p>Flooding will be included as a separate sustainability issue and Sustainability Issue 13 will be updated to include reference to chalk streams.</p> <p>The Sustainability Appraisal framework will be updated to incorporate further appraisal questions as set out by the Environment Agency.</p>

Respondent	Summary of Comments	Response
	<p><a href="https://www.rtpi.org.uk/media/9379/tcpa-rtpi-climate-guide_oct-2021_final.pdf">https://www.rtpi.org.uk/media/9379/tcpa-rtpi-climate-guide_oct-2021_final.pdf</a></p> <p><b>CHAPTER 3: BASELINE INFORMATION - FLOOD RISK</b></p> <p>Welcome the inclusion of paragraph 3.13 concerning the impact of new development on flood risk. We recommend the inclusion of separate sections for the different types of flooding i.e., fluvial, surface water, and groundwater flooding.</p> <p><b>Fluvial flood risk</b></p> <p>In regard to fluvial flooding, it is important to note that flood risk mitigation can also be achieved by following a sequential approach as outlined in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). This is to steer new development to areas with the lowest risk of flooding and ensure that the most vulnerable developments are located in the areas with the lowest risk. This will also minimise the future necessity for new or improved carbon-intensive flood defences.</p> <p>Where development is deemed to be necessary, it should be safe for its lifetime without increasing flood risk elsewhere. Where possible, opportunities for betterments should be sort, for example adding more space for water and adding future attenuation areas.</p> <p>Additionally, properties at the highest risk are those situated within the functional flood plain (Flood Zone 3b). Only Essential Infrastructure or Water Compatible uses may be considered in Flood Zone 3b.</p> <p><b>Flood resistance and resilience</b></p> <p>If alternative sites are not available to locate development away from areas at risk of flooding, then developments need to enact appropriate flood resilient and resistant measures. Guidance on flood resistance and resilience can be found at:</p> <ul style="list-style-type: none"> <li>• Government guidance on flood resilient construction <a href="https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings">https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings</a></li> <li>• CIRIA Code of practice for property flood resilience <a href="https://www.ciria.org/CIRIA/Resources/Free_publications/CoP_for_PFR_resource.aspx">https://www.ciria.org/CIRIA/Resources/Free_publications/CoP_for_PFR_resource.aspx</a></li> <li>• British Standard 85500 – Flood resistant and resilient construction</li> </ul>	



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	<p><a href="https://www.floodguidance.co.uk/bs-85500/">https://www.floodguidance.co.uk/bs-85500/</a>  <b>PPG – Flood Risk and Coastal Change</b>  The PPG guidance on Flood Risk and Coastal Change was updated in August 2022 and provides comprehensive advice on a number of considerations. For example, additional guidance has been provide to clarify the sequential test approach; how to use natural flood management techniques; and the use of Sustainable Urban Drainage Systems (SuDS). Additional advice is also available on the Strategic Flood Risk Assessment (SFRA) and assessment of infrastructure needs, and how to take an integrated approach to flood risk management. This guidance is available online at <a href="https://www.gov.uk/guidance/flood-risk-and-coastal-change">https://www.gov.uk/guidance/flood-risk-and-coastal-change</a></p> <p><b>Buffer zones</b>  In reference to paragraph 3.13, the EA are pleased to see the link has been made between the loss of greenfield land and the increase of flood risk. Development in the green belt leading to loss of habitat and flood water storage should be strongly resisted, and brownfield sites prioritised over greenfield. To strengthen this position, we recommend the inclusion of the following: ‘leaving appropriate undeveloped buffer between river and development can reduce the flood risk of the development and its vicinity. This can also eliminate the need for a Flood Risk Activity Permit.’  For development within close proximity to a main river, the EA would be looking for a commitment for a natural undeveloped 8 metre buffer between all new development and the top of riverbank / flood defence / culvert. This should be free from hard standing and structures.  Note that Flood Risk Activity Permits are required for certain activities, such as works/development within close proximity to a main river. Full guidance is available at <a href="https://www.gov.uk/guidance/flood-risk-activities-environmental-permits">https://www.gov.uk/guidance/flood-risk-activities-environmental-permits</a></p> <p><b>CHAPTER 3 – BASELINE INFORMATION: WATER</b>  <b>Water Framework Directive</b>  In reference to paragraph 3.50, they are pleased to see that reference has been made to the Water Framework Directive and note that these regulations are also referenced in Appendix A (paragraph A.52). WFD requirements will</p>	

Respondent	Summary of Comments	Response
	<p>need to be considered in the Sustainability Appraisal and throughout the development of the Joint Strategic Plan. Local Planning Authorities have an important role in implementing the WFD and making sure new development does not cause deterioration and whenever possible supports measures to improve waterbodies.</p> <p><b>Chalk streams and Chalk aquifers</b></p> <p>In reference to paragraph 3.51, the EA are pleased to see acknowledgement of the importance of Chalk Streams. However, paragraphs 3.47 - 3.51 do not identify the presence of the Chalk bedrock, which is a principal aquifer and the source of regional potable supply along with providing baseflow to surface waters, such as chalk streams.</p> <p>It is important to note that the Upper Colne and some of the smaller tributaries, such as the Mimms Hall Brook, also run over the chalk bedrock and should be considered chalk streams. There are more than three chalk streams within South West Herts, the ones named are only the larger ones.</p> <p>The River Colne Catchment Action Network (ColneCAN) are the catchment hosts for the Colne, of which the Chilterns Chalk Streams Project are a partner/co-host with Groundwork South and the Colne Valley Regional Park. The partnership brings together stakeholders of all kinds to support the conservation and restoration of the Colne Catchment. There are six main goals identified across the catchment; control invasive species, involve people in their local waterbodies, improve wildlife corridors, improve water quality, manage flow, and work together. More information on ColneCAN is available at: <a href="http://www.colnecan.org.uk/">http://www.colnecan.org.uk/</a>.</p> <p><b>Localised evidence bases relating to water resources and quality</b></p> <p>Water Cycle studies and Infrastructure Delivery Plans are important for informing water resources and water quality policies. Guidance is available at: <a href="https://www.gov.uk/guidance/water-cycle-studies">https://www.gov.uk/guidance/water-cycle-studies</a></p> <p>River Basin Management Plans - The Sustainability Appraisal should also consider the current classification of waterbodies and how to improve their ecological health and chemical status, as set out by the objectives of the Thames River Basin Management Plan (TRBMP).</p>	

Respondent	Summary of Comments	Response
	<p>Water Resources Management Plans (WRMPs) assess pressures on future water supplies. WRMPs are an essential evidence source for ascertaining water availability within the context of climate change. Water company drainage and wastewater management plans account for climate change, ensuring drainage infrastructure can cope with increased intensity of storms. The Environment Act (2021) has made these plans statutory, collaborative and they should be integrated into long term planning documents such as the JSP.</p> <p>Water stress areas – their evidence on water stress should be referred to in consideration of water efficiency requirements. Available at: <a href="https://www.gov.uk/government/publications/water-stressed-areas-2021-classification">https://www.gov.uk/government/publications/water-stressed-areas-2021-classification</a></p> <p><b>CHAPTER 3 – BASELINE INFORMATION: BIODIVERSITY</b></p> <p>In reference to Chapters 3.57 - 3.61, we welcome comments referencing the main priority habitats within the area. However, we note no reference has been made to the main priority/protected species. For example, Water Vole (<i>Arvicola amphibious</i>) have been reintroduced to the St Albans District. Work by the combined effort of Herts and Middlesex Wildlife Trust and the Colne Valley Fisheries Consultative has shown that this species is more widespread than initially realised, with a good population found in the Rickmansworth area. This species is iconic to chalk streams and should be protected along with the priority habitat. Additionally, no reference has been made to the impacts of invasive species within the area. This information should be included in the Sustainability Appraisal.</p> <p><b>CHAPTER 4: KEY SUSTAINABILITY ISSUES AND THEIR LIKELY EVOLUTION WITHOUT THE JSP</b></p> <p>Agree with the numerous sustainability issues recognised in this chapter. However, they have the following comments to make in regard to Issues 1, 3 and 13.</p> <p><b>Sustainability Issue 1</b></p> <p>Note that flood risk is mentioned in Issue 1 in respect of the impacts of climate change. However, climate change should be linked more directly to an increase in flooding, especially since people who are not at risk now may become at risk in the future. Strongly recommend that flooding is put forward</p>	

Respondent	Summary of Comments	Response
	<p>as being a separate sustainability issue, and the potential increase in the risk of flooding through development should be highlighted as a key concern. This is in line with paragraph 153 of the NPPF (July 2021).</p> <p><b>Sustainability Issues 3 and 13</b></p> <p>Regarding Issue 3 which considers access to natural green space, and Issue 13 on the potential to harm local landscape, they recommend reference is made to the lack of connection to river corridors and engagement with communities and rivers and the wider water environment. Specifically in respect of Issue 13, adding a reference to the protection of chalk streams would be beneficial.</p> <p><b>CHAPTER 5: SUSTAINABILITY APPRAISAL FRAMEWORK</b></p> <p>This next section considers the Sustainability Appraisal (SA) objectives that fall within the EA's remit and that have been identified through this Scoping Report.</p> <p><b>SA Objective 1: To minimise SW Hertfordshire's contribution to climate change and build resilience for adaptation to the changing climate</b></p> <p>Pleased to see a strong vision and strategic objective on climate change mitigation and adaption. Significant climate impacts are inevitable, especially on several constraints within our remit, such as flood risks, water management, freshwater wildlife and industrial regulation. In regard to climate change resilience, we encourage the use of nature-based solutions (NbS) to support local environments in becoming more resilient to climate impacts, such as flooding, drought and overheating, and absorb and store greater quantities of carbon. Without that resilience, there is a risk that progress on net zero will be undermined.</p> <p><b>SA Objective 3: To improve the health and wellbeing of SW Hertfordshire's population</b></p> <p>Strongly support the consideration of maintaining, connecting and creating multifunctional open spaces and green infrastructure. We encourage that this is considered alongside natural flood management approaches, such as river restoration, the protection of existing assets, as well as the discouragement of culverting.</p> <p>In regard to encouraging and facilitating walking and cycling, they recommend consideration is given to enhancing green corridor networks and local nature recovery networks.</p>	

Respondent	Summary of Comments	Response
	<p>For information, Public Health England have produced guidance on improving access to greenspace, in the context of protecting and improving health and wellbeing. This document is accessible online at:  <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904439/Improving_access_to_greenspace_2020_review.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904439/Improving_access_to_greenspace_2020_review.pdf</a></p> <p><b>SA Objective 7: To reduce the need to travel by car</b>  As mentioned in reference to Objective 3, the provision of new cycling and walking infrastructure should also seek to maximise opportunities to integrate connected green and blue infrastructure along transport corridors.</p> <p><b>SA Objective 8: To minimise air and noise pollution in SW Hertfordshire</b>  Recommend the inclusion of approaches to waste management when considering the reduction of air, noise, and odour pollution. For example, improved efficiency and compliance by regulated facilities will decrease emissions of pollutants, as well as greenhouse gas emissions, in particular carbon dioxide from combustion.</p> <p><b>SA Objective 9: To maintain and enhance water quality and quantity</b>  Considering the question of how to help safeguard the water quality and ecological integrity of waterbodies, they recommend consideration is given to the Thames River Basin Management Plan (TRBMP). The TRBMP requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery, including that of groundwater bodies (GwB). This is consistent with the SA Objective 9. The relevant GwBs within the area of the JSP are:</p> <ul style="list-style-type: none"> <li>• Mid-Chilterns Chalk - Classification Poor</li> <li>• Upper Lee Chalk - Classification Poor</li> <li>• Radlett Tertiaries - Classification Poor</li> <li>• Chiltern Chalk Scarp - Classification Poor</li> <li>• Upper Bedford Ouse Chalk - Classification Poor</li> </ul> <p>Welcome the acknowledgment in in SA Objective 9 regarding appropriate development in Source Protection Zones (SPZs). Particular care should be taken regarding the types of developments considered within SPZ1, which are generally the most sensitive locations with respect to potable supplies. It is important to note that the distribution of SPZ1s is not uniform, for example a</p>	

Respondent	Summary of Comments	Response
	<p>significant area of Hertsmere District B lies within an SPZ1, as does Watford District B and Three Rivers District. Due to the scale of this JSP, they consider it to provide an excellent opportunity to identify the less sensitive groundwater areas to develop.</p> <p><b>SA Objective 10: To reduce the risk from all sources of flooding in SW Hertfordshire</b></p> <p>Welcome the questions put forward regarding flood risks. Please ensure that all flooding related guidance; including the relevant paragraphs of the National Planning Policy Framework and the relevant chapter of the planning practice guidance (PPG) are considered. In addition, up-to-date climate change data should be used to inform assessments and plans around flood risks.</p> <p>The EA have powers over and responsibilities for watercourse management, including working on main rivers and managing flood risk. Therefore, new development should not restrict access to main rivers and flood defence assets. As a minimum, we will be looking for an 8 metres undeveloped buffer zone to facilitate this access.</p> <p>Opportunities to de-culvert watercourses and remove obstructions to flow and fish passage should be pursued. Additionally, reconnecting to the floodplain by softening banks and allowing rivers to expand where possible and appropriate, may provide natural storage upstream of towns at risk.</p> <p>Considering the question of how to help promote the use of SuDS and flood resilient design, they agree there are multiple benefits from SuDs, including for water quality. However, careful consideration must be given to their location and design. Proposals involving infiltration SuDs in SPZ1 must be supported by a hydrogeological risk assessment. Whilst not mentioned explicitly, of particular concern are the use of deep borehole soakaways. They concentrate the discharge on location and bypass the soil layers, which limits the ability of the ground to attenuate pollutants and presents a greater risk of groundwater pollution. When considering drainage schemes, every effort should be made to ensure that alternative drainage options are used.</p> <p><b>SA Objective 11: To protect SW Hertfordshire's soils and ensure efficient use of land</b></p>	

Respondent	Summary of Comments	Response
	<p>Considering the question of how to take an appropriate approach to remediating contaminated land, they are happy to see the remediation of land acknowledged in SA Objective 11.</p> <p>Would like to clarify that remediation should ensure that it is 'suitable for use', which means suitable for the environment as a whole, and not just for use by people. Protecting groundwater and surface water may mean carrying out work on land affected by pollution over and above that required to make the land suitable for the proposed development and to protect human health. When dealing with land contamination the process set out in Land contamination risk management (LCRM) should be followed. Available at: <a href="https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm">https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm</a></p> <p><b>SA Objective 13: To conserve and enhance SW Hertfordshire's biodiversity and geodiversity</b></p> <p>Strongly support the objectives to conserve, connect and enhance ecological networks, and to achieve biodiversity net gain. Biodiversity net gain offers considerable scope to help create resilient places, through maximising opportunities to improve the water environment, manage flood risk and addressing climate risks. This should be considered alongside efforts to help tackle climate change, such as nature-based solutions. Furthermore, it is expected that Local Nature Recovery Strategies will be used to help inform how and where biodiversity net gain should be delivered. As mentioned earlier in this response letter, we encourage the protection of the area's chalk streams, which are a priority habitat, are considered and incorporated into the Sustainability Appraisal.</p>	
Natural England	<p>Natural England broadly agrees with the conclusions of the Sustainability Appraisal Scoping Report.</p> <p>The report assesses the potential impacts associated with six different growth types: The report states that "Growth types c, d and g are likely to have the most potential negative effects because they may result in more new growth across the more rural areas of the area, where environmental assets are more likely to be adversely affected and where accessibility may be less good and levels of car use higher." Natural England advises that any growth type should seek to</p>	<p>Support noted.</p> <p>The Scoping Report will be updated to include additional references to chalk streams and reference to the recreational pressure on the Chilterns Beechwoods SAC will be included where appropriate. It should be noted that a separate</p>

Respondent	Summary of Comments	Response
	<p>minimise impacts on environmental assets (including habitat loss and greenbelt impacts) and be directed towards the most sustainable locations. Denser development in urban areas and/or around sustainable transport nodes would make district heating easier and use less energy per dwelling than lower density communities. This, combined with the reduced need to travel, would likely result in significant positive effects from Growth Types a, b, e and f on SA objective 1 (climate change). This has the potential to help minimise negative effects on biodiversity assets and achieve the more efficient use of land.” Given the strong focus on climate change within the JSP, Natural England suggests that any growth type that has significant positive effects for this objective should be given greater weight. However, Growth Type b in particular is still likely to result in large urban extensions at existing settlements, resulting in the loss of greenfield land. Furthermore, the densification of existing centres could result in fewer green spaces in and around urban areas, with associated losses of biodiversity. Natural England would stress that any growth type must be sustainable and ensure positive outcomes for the environment. Would not support a growth type that reduces the availability of greenspace and leads to losses in biodiversity. Growth Types d and g could result in growth within the rural areas of SW Hertfordshire away from the main service centres. As such, it is likely these Growth Types will utilise more greenfield land for development compared to the other Growth Types, resulting in less efficient use of land and greater potential for the loss of habitats. In addition, there are many Local Wildlife Sites, patches of Ancient Woodland, Local Nature Reserves and SSSIs that could be adversely impacted by development in the rural areas of the area, resulting in the potential for significant negative effects on SA objectives 11 (soils) and 13 (biodiversity). Similar to Growth Types d and g, Growth Type c is likely to utilise Page 8 of 8 more greenfield land for new settlements compared to the other Growth Types, resulting in less efficient use of land and greater potential for the loss of habitats. Natural England would like to see a strong commitment to protection and enhancement of existing greenspaces, protected sites and local nature sites, including ambitions to develop and expand the nature recovery network. Any growth type must align with the commitments of the Environment Act. The report states that the JSP will “provide an opportunity to encourage better and</p>	<p>Habitats Regulations Assessment (HRA) will be commissioned as part of the JSP process.</p>



Respondent	Summary of Comments	Response
	<p>more sustainable use of water resources". Natural England supports the principle of this but we would want the wording to be strengthened from "encourage" as this is likely to be insufficient in such a populated area with high growth pressure.</p> <p>As mentioned above, rare chalk stream habitats are already at risk from over abstraction and this is likely to increase in the future. This strengthening of language should be applied across the Plan to ensure a greater commitment to environmental targets.</p> <p>The report should also make greater reference to the risk of drought, particularly given the current pressures on water resources and the impacts of climate change.</p> <p>The report makes reference to the impacts associated with air quality – particularly in relation to transport. This should also consider air quality impacts from other sources, such as construction and agriculture.</p> <p>Note the reference to the Chiltern Beechwoods SAC and recreational pressure. This will need to be considered within the Sustainability Appraisal as it's a key issue within South West Hertfordshire (refer to section on designated sites for more information).</p> <p>The Report acknowledges that the impacts of the JSP will need to be reviewed in isolation as well as in-combination. This is strongly encouraged and the report should take a holistic approach, with clear links between themes, acknowledging the multifunctional benefits associated with a healthy environment.</p>	
Historic England	Encourage local authorities to work with local conservation officers, archaeology officers and local heritage community groups in the preparation of the Sustainability Appraisal. Our advice note provides more guidance to developing a robust sustainability appraisal framework.	Noted.
<b>OTHER SPECIFIC CONSULTATION BODIES</b>		
Hertfordshire County Council - Minerals and Waste Team	Glad to see the inclusion of SA Objective 12: To safeguard SW Hertfordshire's mineral resources.	Support noted.

Respondent	Summary of Comments	Response
Croxley Green Parish Council	<p>Question what ‘sustainable growth’ means? Considers this is an oxymoron and no amount of analysis can paper over the fact that the level of development within SW Herts is already unsustainable in the longer term.</p> <p>Chapter 2 sets the “policy context” for the JSP and demonstrates that there is already a plethora of plans. What targets have been set within them, how are they measured and monitored, and where are they reported?</p> <p>Chapter 3 sets out the “baseline information” but with differing perspectives leads to inevitable conflicts.</p> <p>The conflict between national statistics and the Government’s policy framework on the need (the unsustainable need) for local housing is evident.</p> <p>There is no analysis of occupancy levels in existing housing – neither of overcrowding, nor of “under occupancy” (implying waste) in the existing stock. (An issue of inequity)</p> <p>Some of the data presented is very out of date (2011 census) and, in some places, there are no comparisons between local and national data trends. (e.g. pregnancy and maternity)</p> <p>Paragraph numbering goes awry after 3.44</p> <p>The river CHESH is omitted from para 3.51(sic)</p> <p>Chapter 4 lists 13 “sustainability” issues. How many of these are (a) national issues, (b) purely local issues and (c) directly incompatible with one another? What are the relative priorities between them?</p> <p>Stresses the Importance of getting the right appraisal framework (asking the right questions, setting the right priorities), as the results of any appraisal process will confirm any biases built into the framework and the questions.</p> <p>Given that the current development pattern within SW Herts is already unsustainable this approach is simply tinkering with the problems. An alternative approach should be based on a planning for a sustainable future WITHIN the environmental constraints and our geographic and administrative area.</p>	<p>Noted.</p> <p>Chapter 2 of the SA report sets out the JSPs relationship with other relevant plans and programmes and outlines environmental protection objectives at international and national levels, as required by the SEA Regulations. It is not the role of the SA to seek to report on how these are measured, reported and monitored.</p> <p>The baseline information will be updated with the most up to date evidence in every iteration of the SA report.</p> <p>The SA does not itself assess issues such as occupancy levels of existing housing. These are matters for specific technical studies such as Local Housing Needs Assessments, which will inform future stages of the JSP process. Any such evidence will be reflected in the SA baseline where relevant.</p>
Tring Town Council	<p>Document is too technical at this point and need budgetary and implementation data to give proper feedback.</p>	<p>Noted. The SA Scoping Report is by its very nature a technical document. Its content will expand as it is updated through the plan-preparation process. Budgetary and</p>

Respondent	Summary of Comments	Response
		implementation data does not form part of the SA Reporting process.
<b>GENERAL CONSULTATION BODIES</b>		
Save Our Shenley	<p>The response of Hertfordshire County Council officers and Hertsmere Borough planning and environmental health officers in terms of upholding the policy direction of SW Hertfordshire stated on your webpage -"The onus will be to encourage people to avoid using their cars, while ensuring that there are realistic and affordable alternative ways to move around" has been very poor to date (see planning application reference 22/0971/OUT).</p> <p>Would also like:</p> <ol style="list-style-type: none"> <li>1. a commitment to go above and beyond minimum policy requirements i.e. regarding the approach to biodiversity offsetting; and</li> <li>2. a greater commitment to localism. When a community has expressed its views in sufficient numbers, the council should take this on board There is massive support for sustainable development and huge anger building about the continued development of green belt land in unsustainable locations.</li> </ol>	Noted. These are matters to consider through the JSP itself, rather than the SA Report.
Look After Nature, Ridgeway Residents	<p>Main issue is that the supposed demand for housing is based on 2014 data. The answer is not to decimate green belt to let more and more people live there but to make the places that people are trying to leave, more attractive.</p> <p>Should make better use of existing small green spaces within towns and change planning policy so that gardens are not decimated by development, turned into areas devoid of any wildlife habitat and corridors closed off by gravel boards.</p> <p>The most acceptable development would be to improve existing building stock and or convert to smaller, more affordable units.</p>	Noted. Comments relate to general planning issues rather than anything specific within the SA Scoping Report
<b>RESIDENTS / INDIVIDUALS</b>		
Kenneth A Gallagher	<p>Questions what 'sustainable growth' actually means.</p> <p>Concerned that the amount of detail in the report is simply concealing the fact that SW Herts is already unsustainably overdeveloped.</p> <p>Some of the baseline data is already out of date.</p> <p>The paragraph numbering breaks down at 3.44.</p> <p>The River Chess has been omitted from the chalk stream listed in para 3.51.</p>	Noted. With or without the JSP, SW Hertfordshire will be subject to population growth and change. The role of the JSP is to ensure that this growth is carried out in as sustainable a manner as possible. There will always be tensions

Respondent	Summary of Comments	Response
	<p>Unclear how the long list of sustainability issues fits together and the relative priority between them.</p> <p>It is very important that the sustainability appraisal asks the right questions and sets the right priorities, otherwise it will not give a meaningful result when it is simply concealing the basis facts.</p> <p>As SW Herts is already unsustainably overdeveloped the propose analysis won't reveal anything meaningful in terms of sustainability.</p> <p>There is a better, bottom-up approach, starting from the existing environmental constraints and social needs, as set out in 'Doughnut Economics' by Kate Rawoth. The starting point should be what is needed in SW Herts and what can be afforded in terms of the environmental constraints.</p>	<p>between growth and many of the sustainability objectives identified.</p> <p>The aim is to balance the often-conflicting objectives in the most appropriate way possible. The preparation of an SA report is an important (and statutorily required) tool to inform how best to achieve this balance.</p> <p>The baseline information will be updated with the mots up to date evidence in every iteration of the SA. Reference to the River Chess will be added to paragraph 3.51 and the paragraph numbering checked prior to final publication of the document.</p> <p>The content sand approach of SA Reports is set by the SEA Regulations.</p>
Julia Battersby	<p>Disappointed there is no data showing the basis upon which the Housing Projection Requirement was calculated including the number of disabled people requiring purpose built homes, the gap between social housing demand and supply, a breakdown of demand per year from people currently living out of county who take up residence in South West Herts and net loss of locals.</p> <p>Does not agree that development would create regeneration in deprived areas. In some it might and in many it will make matters worse. The Map of Areas of Multiple Deprivation is also misleading and over-states some areas of relative deprivation. For example, the large expanse of Batchwood Hall is shown as a relatively deprived area even though it is mainly farmland and a golf course.</p> <p>There is no consideration of the impact of previous proposals for the Chilterns to attain National Park Status. This would have an impact across areas of the South West including housing, transport and employment.</p>	<p>Noted, however the SA process is focused on assessing the JSP and many of the factors that are picked up in this comment go beyond the scope of the SA. For example, it is not relevant to the SA process to take account of proposals or to explain why certain trends such as relating to recycling may be occurring – as in many cases this is not known.</p> <p>Further to this, the suggested additions to the SA objectives are too detailed for inclusion in a SA</p>

Respondent	Summary of Comments	Response
	<p>3.46 There is no indication of why recycling rates went down in some areas. Charities not accepting donations during early covid period or something else?</p> <p>3.47 It would be helpful to know whether the report is referring here about actual consumption of water by households, or in general. Also would be helpful to have estimates of the amount used in industry/manufacturing, used in domestic consumption and lost through infrastructure failure such as broken pipes and leaks.</p> <p>3.48. We have many natural springs throughout South West Herts and places where run off can be collected. The most obvious thing – planning for places where new reservoirs can be created is missing and should logically be part of a strategic area plan.</p> <p>3.51. With many steep sided valleys in the vicinity, run-off of rain water and associated surface water flooding should be included here.</p> <p>Fig 3.8 Biodiversity. Shows designated Wildlife Sites but does not show high quality wildlife areas 1 and 2 as defined by Herts Records. Grade 1 areas should be set aside for protection and grade 2 as an opportunity for enhancement of biodiversity. Nor does this map show designated wildlife corridors which are also key to maintaining biodiversity.</p> <p>Historic Environment – does not include recognised World Heritage Award sites such as Apsley Paper Trail which potentially have international importance, or important Archaeological areas such as Roman settlements, or notable historic farming features such as fields with Saxon farming layouts and watercress beds.</p> <p>Landscape – The importance of preventing habitat fragmentation and loss of wildlife corridors should be highlighted here.</p> <p>3.77 Fig 3.12 should state what the definition is of the areas that are not designated Green Belt or urban areas e.g. around The Gaddesdens. Assume it is rural?</p> <p>Comments on the SA Objectives as follows:</p> <ul style="list-style-type: none"> <li>– (9) Measures should help safeguard water quality and ecological integrity of the waterbodies including the chalk streams.</li> <li>– (10 &amp; 11) to reduce flood risk consideration of measures to green areas on upper slopes of valleys particularly through increasing tree cover which slows down run-off</li> </ul>	<p>framework which is used to assess a strategic-level plan.</p> <p>It is also not possible to reference and map every single landscape / heritage / biodiversity designation within SW Hertfordshire. It is considered that the information currently included is proportional to the scope of the SA.</p> <p>The matters raised under Health Impact Assessments are not planning matters and therefore not suitable for inclusion in this report.</p>

Respondent	Summary of Comments	Response
	<ul style="list-style-type: none"> <li>- (12) The strategic overview should identify future mission critical needs in the event of international or domestic interruption of supplies such as war e.g. minerals, food, key resources that we would locally need and how they could be transported in i.e. extreme contingency planning.</li> <li>- (13) Suggest this is amended to safeguard, expand and enhance SW Herts woodland. Planning that considers mitigating the emerging disease threats to trees such as Ash Dieback that could affect large areas of woodland and wood production would be a positive inclusion here.</li> <li>- (14) Include remnants of local historic industry, their settings and management practice within considerations for conservation.</li> <li>- (15) Would like to see that the characters of villages are preserved by maintaining some green space separation and rural/ semi-rural boundaries (e.g. ancient lanes with hedgerows) between one historical village and the next where it is still possible to do so.</li> </ul> <p><u>Health Impact Assessment</u>  Training and local retention of health and care staff is as key to providing efficient health facilities as providing surgeries for them to practice from. Consideration of Halls of Residence near our new hospital facilities for nurses for example, or preferential housing stock should be incorporated here.</p> <p><u>Biodiversity</u>  Often biodiverse zones are on the periphery of existing settlements, particularly those that have very old hedges and orchards. These old hedgerows are actually more important for the preservation of biodiversity and vulnerable wildlife than the field they enclose.  The impact of biodiversity measures, greenspace and activities such as volunteering to maintain them all contribute to positive mental health which is a benefit not recognised here.</p> <p>6.18 The impact of human behaviour and convenience should be considered e.g. although within walking distance the car is used on the school run  Connectivity – need to take into account topography as cross valley travel transport is more challenging to individuals than movement from one end of a valley to the other. There are significant hills in many areas which can affect mobility of the elderly for example.</p>	

Respondent	Summary of Comments	Response
	<p>Settlement types – using settlement types as a premise for planning is flawed as every settlement area has different features so should be looked at individually. Better to follow general principles for development e.g. 1) develop brownfield sites; 2) increase density only where the character of the area is not adversely affected 3) preserve semi-rural features of current green sites and settlement boundaries 4) identify sites suitable for infrastructure development e.g. solar power, waste removal, water provision, etc</p> <p>SA13 – add trees /tree lined verges to improve character</p> <p>There should be a clear requirement to establish an expectation that increasing biodiversity means preserving and enhancing vulnerable and uncommon native species, not substituting them with larger numbers of common species such as occurs when a few oak trees are planted after a hedgerow is removed. In doing the latter there may be a local (but meaningless) increase in biodiversity but on a county, national and international level it would be seen that we have brought about a decrease in overall biodiversity through loss of our rarer habitats and species.</p> <p>Page 135 Include to develop a native recovery network to protect and restore native wildlife including reintroductions e.g. water voles; and removal of invasive species such as Mink and Himalayan Balsam.</p> <p>General Note – the 500m exclusion zone around the Chiltern Beechwoods does not take account two key factors:</p> <ol style="list-style-type: none"> <li>1) The impact that the vast number of people who travel in from as far afield as Luton.</li> <li>2) That locals tend to respect and care for the local environment more than non-locals.</li> </ol> <p>I would argue that the exclusion zone should be increased to at least 1km and that Green Belt areas should be protected.</p>	
Malcom Gesthuysen	Comments relating to perceived poor English, relating to compound modifiers and compound nouns lacking hyphens, missing and incorrect commas and incorrect / complex words.	As the questionnaire recognised, the SA Scoping Report is by its very nature is a technical document that uses specific terminology and wording that is not necessarily common. The final report will be

Respondent	Summary of Comments	Response
		checked for grammatical errors and written in Plain English as far as is possible for a technical document. A non-technical summary will also be prepared to accompany the final SA report, in line with the requirements of the SEA Regulations.
Helena Holliday	<p>There is an assumption that the population must grow. There is data that we will have less water than before. Hence, growth is unsustainable (Sustainability Issues 1 - Climate Change and 11 - Water). Urban heat island effect would accelerate climate change if further growth in population.</p> <p>Considers population growth is also unsustainable as:</p> <ul style="list-style-type: none"> <li>- Much of the county is Green Belt.</li> <li>- There is a deficiency in green space (3.26) and a desire to improve links to the West of the county. However, there is already pressure on the Chiltern Beechwoods Special Area of Conservation (SAC) in the West. Also, Sustainability Issue 13 refers to harm to the Chilterns Area AONB.</li> </ul>	<p>Noted. With or without the JSP, SW Hertfordshire will be subject to population growth and change. The role of the JSP is to ensure that this growth is carried out in as sustainable a manner as possible. There will always be tensions between growth and many of the sustainability objectives identified. The aim is to balance the often-conflicting objectives in the most appropriate way possible. The preparation of an SA report is an important (and statutorily required) tool to inform how best to achieve this balance.</p>
Miklos Bansagi	<p>More and better built bike lanes required, with existing ones needing better maintenance and connecting up to make them more suitable for use by commuters. Also need to be electric busses and separate bus-lanes to speed up journey and some bike storage next to bus shelters.</p>	<p>Noted. This comment relates to the general approach that needs to be taken to the future transport policies in the SW Herts JSP, rather than commenting specifically on the SA Scoping Report.</p>
Jane Slatter	<p>The response to COVID does not take into account the type of housing people now want because of the health and wellbeing problems of living in some dwellings (eg flats) during a pandemic.</p>	<p>Noted. The potential implications of Covid on how the future of SW Herts is planned is covered by the 'Our</p>



Respondent	Summary of Comments	Response
		World is Changing' section of the Realising Our Potential document. It is referenced in Sustainability Issue 8 regarding its impact on economic productivity, and the baseline will be updated to incorporate the various social and economic impacts.
Johnbelljubble	<p>The report is very long and wordy. The key findings of the report could and should be summarised, and the information laid out in a format more easily accessible to the audience (the general public).</p> <p>The report is generally qualitative rather than quantitative and lacks numerical analysis and evidence to back up the statements made. For example, on p55 there is a statement that walking and cycling networks are considered to meet current demands, where the reference is to the "Dacorum Local Plan (2020-2038) Emerging Strategy for Growth Interim Sustainability Appraisal Report Appendices (November 2020)", which itself simply states this as a fact without providing evidence or quantifying the demand or provision.</p> <p>In particular and of more importance, the first bullet point on p80 states that "Without the emerging JSP, it is likely that the impacts of climate change will still be mitigated against". There is no evidence or reference whatsoever to back this statement up. If the JSP is written on the basis that sufficiently mitigating against climate change will just simply happen, then it is fundamentally flawed. This document and the JSP must quantify exactly how climate change will be mitigated against.</p> <p>The Appraisal Questions are all qualitative and give no numbers with which to judge how positive or negative one action will be. They need to have numbers associated with them so they can be challenged.</p> <p>Notes that all Growth Types are expected to have a negative impact on biodiversity, which surely means they must all therefore be rejected?</p> <p>Notes that Growth Types a, b, e and f are expected to have a strong positive effect on climate change. How can this be the case, where new houses are to be built, provisioned and heated? Is their construction expected to suck carbon</p>	<p>The statement on page 80 will be updated to state that there will be national and local targets set by the Government and local authorities via their Local Plans, regardless of whether a JSP is prepared.</p> <p>Many of the issues considered through the SA Scoping Report are almost impossible to quantify as such, it will be the role of the JSP itself as it progresses through the plan-making process to establish a series of quantifiable criteria that can be measured and reported on as part of the Authority Monitoring Reports to gauge how successful the performance of key policies are.</p>

Respondent	Summary of Comments	Response
	out of the air? This must be grossly inaccurate, and again there is a lack of evidence or numerical analysis to understand how this can possibly be accurate.	
This_frog	Any plans to build on the green belt should be scrapped indefinitely. The small towns of Hertsmere cannot/should not be used as a dumping ground for London's overflow.	Noted. This comment relates to the spatial approach to the planning of SW Herts, rather than commenting specifically on the SA Scoping Report.
Potters Bar Ian	Given the importance the government and local residents attach to protection of the Green Belt the Sustainability Appraisal Scoping report makes very limited reference to this important issue. Given recent government statements "Brownfield, Brownfield, Brownfield" and the Levelling up agenda, the report needs to be rewritten to reflect latest government thinking.	The content of SA Reports is currently set by the SEA Regulations, not by Government policy. It is important to note that Green Belt is not a landscape issue. Whilst Green Belt land may be valuable in these respects it is not a requirement or purpose of the designation to provide such qualities. Furthermore, Green Belt is a policy designation and not an environment or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues. However, matters often linked to people's understanding of Green Belt, such as protecting soils and ensuring efficient use of land, conserving biodiversity and geodiversity and enhancing SW Herts's landscape character and quality are clearly articulated within the proposed SA objectives, against which the

Respondent	Summary of Comments	Response
		emerging strategy and policies within the plan will be assessed.
Ann Johnson	It places too much emphasis on 'Growth' with is undefined and fails to comment, mention and protect the areas of Green Belt within it. Protecting green space, agriculture and the environment should come first with 'growth' second and subject to the aforementioned.	Noted. The comment encompasses general observations relating to the Realising Our Potential document and the general approach that needs to be taken to the future planning of SW Herts, rather than commenting specifically on the SA Scoping Report. As explained above, the Green Belt is not an explicit consideration for the SA as it is not an environmental / landscape designation.
Caroline 66	Concerned about the volume of population growth and whilst thought has been given to transport, infrastructure and health etc, none of that is currently forthcoming. All the while our natural habit and environment continue to decline. It seems that this is only being considered as something that needs to be done, alongside population growth, rather than the number 1 priority. We have seen the increasing impacts of extreme weather, and that is not going to hold off getting worse whilst South West Herts works out how and when it will get the money to do something. The green belt must be protected at all costs, and enhanced as a priority, building should be upwards in a few specific high density locations, Watford, Hemel and St Albans with green corridors to the defined green spaces. One of the most important Infrastructure projects, has to be fibre broadband for all. This would enhance the lives of many at the lowest infrastructure costs. It will provide opportunities for improved stay at home health care, monitoring, communication, entertainment etc.	Noted. The comment encompasses general observations relating to the Realising Our Potential document and the general approach that needs to be taken to the future planning of SW Herts, rather than commenting specifically on the SA Scoping Report. As explained above, the Green Belt is not an explicit consideration for the SA as it is not an environmental / landscape designation.
BJH	Agrees with the vision outlined by the document and would support plans to implement it locally. There will be tough decisions to take, but the objectives are worthwhile.	Noted. The comment relates to the Realising Our Potential document rather than the SA Scoping Report.

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Cliff Hawkins	<p>Reports contains a good deal of important data but is far too complex and filled with acronyms and jargon. This makes it difficult, if not impossible for members of the public to gain enough understanding to comment adequately.</p> <p>The recent abandonment of Local Plans due to public disquiet is evidence that many of the outcomes of the planning process are deeply unpopular. By directing unpopular policy from above, the JSP could be used to justify development of contentious sites at local level. If the objective is to co-ordinate the provision of affordable housing that is to be commended, but not if it is to drive unacceptable over-building on green belt sites against popular public opinion.</p> <p>In terms of housing numbers and future provision, there is no discussion of the inconsistency of the population projections in Table 3.4 with the housing projections in para 3.29. The population across the five authorities is projected to grow modestly between now and 2040, yet it is suggested that we need many times more homes than would be needed to accommodate that increase. No sustainability appraisal can be taken seriously unless it addresses this fundamental inconsistency in a satisfactory manner.</p> <p>There is very little discussion of the vital importance of green belt in this report. Building on green belt is always unsustainable, since green belt cannot be replicated without effectively moving it out to neighbouring authorities.</p> <p>Sustainable has become the 'catch all' term to justify almost any policy. There is no formal agreement on the meaning of the word sustainable so it can be interpreted to mean whatever the author wishes it to mean.</p> <p>The proposals regarding development around transport hubs are really directed at railway stations. The assumption that they are the ultimate in terms of sustainability ignores the fact that Hertfordshire railways really only serve north - south routes.</p> <p>The recognition of flood risk in para 3.13 is welcome. Little attention is however paid to the ground conditions in south and east Herts. The heavy clay layer in these areas means that SuDS cannot provide the answer to the development of flood risk sites. Why this report should seek to provide support for the development of flood risk sites when the NPPF 'sequential test' should rule them out is puzzling.</p>	<p>Noted. Many of the comments relate to concerns about the role and potential future content of the JSP itself – rather than being directly related to the SA Scoping report. It is not the role of the SA to assess any discrepancies between population growth projects and the housing figure generated by the Government's Standard method calculation. These discussions will happen between the district authorities and Government which is outside of the SA process.</p> <p>The report does not indicate support for building in flood zones. SA Objective 10 is to 'reduce the risk from all sources of flooding in SW Hertfordshire'; and one of the appraisal questions relates to minimising built development in areas prone to flooding.</p> <p>The reference to Watford in para 3.14 regarding flood risk will be clarified.</p>

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	<p>Also puzzling is the comment in para 3.14 regarding the highest flood risk area being Watford when the table beneath suggests Watford has the least number of properties with a 1 in 30 risk.</p> <p>Lack of reference to Potters Bar in the report – fear this indicates it will be forgotten.</p>	
Rodney Tucker	<p>His experience from working in the field of environmental scoping, impact and protection is that a key element of the final documents must include an environmental management plan that clearly defines responsibilities for ensuring that impacts are sustainably managed.</p>	Noted.
Jamie Trybus	<p>The Appraisal scores the 1st of the 6 pillars "Living green in a healthy natural environment" highly against: climate change, flooding, biodiversity and geodiversity.</p> <p>However there is a significant lack of focus on these elements within the SW Hertfordshire 2050: Realising Our Potential' document.</p> <p>Within the Sustainability Appraisal "therefore a significant positive effect is expected in relation to SA objective 13 (biodiversity and geodiversity).’ Unsure as to how this will be realised with the heavy focus on growth within the SW Hertfordshire 2050: Realising Our Potential’ document.</p> <p>A critique of the appraisal is the lack of score for SA15 - Landscape. Landscape should be a high scoring metric for the Sustainability Appraisal.</p>	Noted. Further assessment of the JSP will be undertaken in the next iteration of the SA. As such, the current findings may change as the spatial strategy and related policies evolve.
Tim Morris	<p>There are no keys to explain or define the graphics and colours used in the tables, so it is impossible to objectively assess and understand the SA findings in Chapter 6.</p>	Table 5.1 in Chapter 5 – ‘Use of the SA Framework’ provides a key to the symbols and colour coding used in the SA assessment in the following section. Cross referencing will be added to Chapter 6.
Anne Samson	<p>It all sounds good in principle. The test will be in actually making it happen – not because of legislation but because it is the right thing to do. Does not consider the report is good use of taxpayers’ money. The simple strategy for ensuring all works in harmony is respect (love) for each other and our environment. This might sound naïve but by constantly working with this in mind, win win solutions</p>	Noted. The preparation of an SA Scoping Report is a legal requirement when preparing a plan such as the JSP and its broad content and coverage are also legally prescribed.

Respondent	Summary of Comments	Response
	can be found – there’s currently too much about individual rights at all layers of interaction and not enough about living together in community.	
<b>DEVELOPERS / LAND PROMOTERS / PLANNING CONSULTANTS</b>		
Barton Willmore on behalf of Railway Pension Nominees Ltd	<p>Generally accepting of the scoping work make following comments around the economic elements and growth options:</p> <ul style="list-style-type: none"> <li>– The paragraph numbering within the report appears to have been formatted incorrectly as it jumps from paragraph 3.44 back to paragraph 3.1 on page 43.</li> <li>– Welcome the recognition in the second bullet of paragraph 3.21 on page 50 that there is an under-supply in employment space across the JSP area. As outlined in our response to Topic Paper 4, this under-supply has stifled employment opportunities and businesses investment plans and it is critical that this historic under-supply is accounted for when projecting forward for land supply and growth. The outcome of this is reflected in points 3.23 and 3.24 where the lack of high-quality business space and supply are known to be at a critically low level.</li> <li>– Believe the JSP area is well located to absorb the loss of employment floorspace being experienced in London. This is most pressing for industrial/logistics uses, where the most sustainable locations in built-up areas are under pressure to deliver higher density housing and town centre uses. For instance, over the last 20 years, London has lost some 24% of its industrial land<sup>2</sup>. South West Hertfordshire as an adjacent neighbour, should be seeking to accommodate and attract these businesses moving out of the capital, rather than losing them to competing regions where it may be geographically far less sustainable to serve their natural markets.</li> <li>– Chapter 4 - consider that the text under: Sustainability 7 – ‘Critically low amount of available employment space’ should be expanded to addressing the chronic under-delivery and under-allocation of sites historically, and ensure future market trends and projected forward appropriately.</li> <li>– Chapter 5, SA Objective 6: ‘To support the development of SW Hertfordshire’s economy and achieve high and stable levels of</li> </ul>	<p>Noted. Further detail relating to the amount of available employment space and how to address this going forward are matters for an Economy Study to assess and advise on, rather than matters for the SA Scoping to assess further. The SA Scoping Report states that <i>“As the Issues and Options document explains, it is likely that a number of growth types would ultimately make up the spatial strategy for the plan.”</i></p> <p>The paragraph numbering will be amended.</p>

Respondent	Summary of Comments	Response
	<p>employment' does not address the existing under-supply clearly. Believe that this should reflect back and ensure that the growth options considered, can also address the historic chronic shortfall. The Savills proposed methodology would be the most appropriate way of ensuring the land supply requirements are appropriately understood.</p> <ul style="list-style-type: none"> <li>- Chapter 6 contains 'pillars' which have been created to support the overall vision for the JSP area. Pillar 2 relates to 'growing opportunities to work locally', it is our view this should be widened to include meeting identified floorspace and employment requirements. Support the general premise of the pillar but it is not considered specific enough or measurable.</li> <li>- The growth option to be considered may require a mixed approach which involve new settlements, existing urban settlement growth and growth along key transport corridors.</li> <li>- The options put forward also fail to recognise that these options may not happen independent of one another. It is unlikely that there is a one size fits all approach to the whole JSP area, and one that meets all the demands of different uses (housing, employment, leisure, health, etc). The approach to growth needs to be flexible. For instance, it will be critical for I&amp;L occupiers to be located on key transport routes with access to London.</li> </ul>	
Lichfields on behalf of Commercial Estates Group	<p>Whilst it is acknowledged that the Sustainability Appraisal (SA) can only provide a certain degree of detail at this early stage, the SA provides some initial findings on the 7 growth types that have been identified by SW Herts. It is evident that whilst all of the typologies can potentially provide for sufficient housing (save for perhaps any strategy that solely focusses on growth within existing built-up areas on brownfield sites only, which might see significant negative socio-economic and housing consequences), there are certain growth types that can deliver other particular benefits that will help SW Herts deliver their vision for sustainable growth.</p> <p>Table 6.2 of the SA confirms that Growth Type B (Growth of existing communities) would respond positively to the requirement to consider the need to mitigate against climate change, as well as provide benefits in respect of</p>	Noted. The response does not relate to any issues or concerns with the SA Scoping Report as currently written. It is acknowledged that further assessment work will need to be carried out on individual sites as part of future work on the JSP to ensure that specific characteristics are taken into account.

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	<p>economic growth. Further, pursuing this growth type would also enable SW Herts to positively respond to objective SA7, which is to reduce the need to travel by car and promote walking and cycling. Developing within or on sustainably located places on the edge of existing communities promotes the delivery of well-connected local areas with facilities such as schools and shops within walking distances, which provide the basis for concepts such as the 15 minute neighbourhood.</p> <p>However, whilst certain Growth types initially score higher within the SA, different sites within the same growth types will perform differently based on their own particular credentials against the SA criteria. This is particularly notable for criteria such as SA3 (Health), SA4 (inequalities) and SA5 (communities), which the SA currently considers these to be '+/- 'i.e., having the potential for both positive and negative effects. For these particular criteria, the score to which an individual development could be graded will vary significantly on the quality and design of a particular scheme.</p>	
Lichfields on behalf of L&G	<p>The Sustainability Appraisal supporting the JSP notes the effects of Growth Type B (Outward Growth) as having significant positive effects in relation to the following objectives:</p> <ul style="list-style-type: none"> <li>- SA Objective 6 (Economy): providing nearby access to local employment opportunities</li> <li>- SA Objective 7 (Travel): providing easily accessible and potentially 20-minute neighbourhoods</li> <li>- SA Objective 1 (Climate Change): reduction of travel distances</li> <li>- SA Objective 2 (Housing): Potential to deliver a significant number of new homes</li> </ul> <p>All of these positive effects support the pillars and objectives of the JSP. This is supported by national planning policy and in particular NPPF para. 73.</p>	Noted.
Roebuck Land and Planning on behalf of Hallam Land Management	<p>The SA must be supported by a full Green Belt review. As part of the strategic plan, it is necessary to establish whether the Green Belt as currently defined across the constituent authorities currently fulfils the fundamental aim and purposes of Green Belt policy within the NPPF. Particularly, a comprehensive assessment of the Green Belt around the main towns and centres of population to check whether the boundaries are properly defined and recognisable.</p>	Noted. As stated above, Green Belt is a policy designation and not an environment or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues.



Respondent	Summary of Comments	Response
	<p>There are several edges, particularly in Dacorum (i.e. north Hemel Hempstead) where the boundaries have no degree of permanence and are not clearly defensible in the long term.</p> <p>The consequences of achieving sustainable development in the Southwest Herts area is acknowledged by the partner authorities as requiring Green Belt release through their early work on the emerging local plans.</p> <p>The JSP provides an opportunity to plan for safeguarded land to meet longer term needs stretching well beyond the plan period to guide future local plan reviews. Whilst it does not intend to identify specific sites or boundaries, it must be sufficiently targeted to provide clear direction to local authorities to avoid lengthy examinations for any subsequent 'part 2' local plan stages thereafter.</p> <p>Acknowledge that the next Regulation 18 consultation for the JSP will seek to identify a preferred option or options for growth. The scale of growth to be considered through the JSP is not yet determined, nonetheless the JSP should carefully consider the site size threshold for identifying broad locations for growth.</p> <p>If the JSP is to operate beyond the current Local Plans being prepared to 2038 and only deal with Strategic Development Locations for 3,000+ homes for the period 2038/2040 onwards, then it must establish clear parameters for plan-making. HLM would expect all sites/new communities of that scale (and any parts thereof) to be excluded from the current Local Plan processes (i.e. Hemel Garden Communities).</p>	<p>Similarly, the issue of defining appropriate thresholds for the size of sites considered by the JSP is not a matter for the SA Scoping Report. As the plan making process progresses, the SA will assess various iterations of the JSP.</p>
Pegasus Group on behalf of L&Q Estates	<p>This sets out relevant policy and strategy as well as contextual information. From this latter source, sustainability issues and likely evolution without the Plan are identified. These are considered to be very relevant issues to be addressed, however, addressing issues such as high house prices and affordability issues, ageing population and critically low amount of available employment space without the remit of being able to review and amend, where justified the Green Belt boundary.</p> <p>In terms of the Sustainability Framework, it is suggested that a further appraisal question is added.</p> <p>"Is the economic strategy, and related land supply, aligned with the housing strategy, and related land supply, to enable its successful implementation?"</p>	<p>Noted. The SA Report will be updated to further assess housing and employment issues when there is clarity over the precise levels of homes and jobs that the JSP could seek to deliver and what an appropriate balance should be.</p>

Respondent	Summary of Comments	Response
	<p>In relation to the SA Findings for the Vision, Objectives and Growth Types, it is considered that throughout the benefit of providing housing to support the economy is not recognised. The scores should be updated to reflect this.</p> <p>In terms of the growth types, it is considered that a combination of the scenarios will be needed to accommodate the anticipated levels of growth and, therefore, considering each option is unrealistic, particularly when the development requirements have not been identified. All combinations and alternatives should be thoroughly examined so not to be vulnerable to challenge.</p>	
Stantec on behalf of L&Q Estates	<p>The results within table 6.2 show that outward growth of existing large settlements scores joint highest in terms of its response. The supporting text in chapter 6 of the report shows the benefits that result, such as benefits to the economy, and connectivity.</p> <p>A further advantage of outward growth relates to the provision of affordable housing. Redevelopment of previously developed land often brings with it large demolition and remediation costs. The potential impact is to affect the viability of bringing sites forward. More often than not, it is the affordable housing project which is used as a lever to reduce development costs, with a resulting reduction in provision. The risk of reduced affordable housing provision is much lower when considering outward growth, where development costs would generally be lower.</p> <p>The Report does criticise outward growth of settlements in terms of the loss of green space and associated losses in biodiversity. However, this does not need to be the case and should be assessed on a site by site basis. Our land interests provide the opportunity to ensure that the extension to the large settlement will be able to provide on-site biodiversity net gain accordingly.</p>	Noted.
Turley on behalf of Crown Golf	<p>It will be important for the SA to test a range of growth and spatial distribution scenarios. This will allow informed decisions to be taken to arrive at a preferred strategy in light of further public consultation. These options should extend beyond just minimum capped needs deduced by the current standard housing method (or other method to be confirmed through forthcoming planning reforms). This should consider the implications for meeting the actual assessed needs (i.e., uncapped), as well as the areas needs full need for affordable housing. It should also explore the extent to which adjustments are needed to support the</p>	Noted. The SA must consider reasonable alternatives as a Plan evolves; therefore the next iterations of the SA report will consider this.

Respondent	Summary of Comments	Response
	<p>social and economic objectives of the plan, including the benefits of accommodating the economically active workforce needed to support these objectives, and in locations that foster more sustainable patterns of growth. Finally, we suggest further options are tested to assess the contribution the plan could make to addressing the unmet needs of adjoining LPAs, such as those already identified through the London Plan.</p>	
<p>Claremont Planning Consultancy on behalf of European Property Ventures</p>	<p>The SA Scoping Report provides a useful high level assessment of the emerging Plan against key sustainability objectives. However, as the plan progresses it is considered critical that the Sustainability Appraisal takes a more detailed review of these sustainability issues, ensuring that the decision making process is fully informed. The reporting must be clear to provide sufficient transparency around the decision making process.</p> <p>The extent of the Green Belt within the Plan area, and the level of housing need that the Plan must address, is such that it is considered likely that the JSP must consider the release of land from the Green Belt. As it is a joint strategic plan, it is acknowledged that this may result in identifying the direction for future growth and Green Belt releases, rather than the release of specific sites. However, if this is an issue that the JSP intends to address, then the Sustainability Appraisal must consider the implications of releasing land from the Green Belt.</p>	<p>Noted. Further assessment of the JSP will be provided within the next iteration of the SA report.</p> <p>As stated above, Green Belt is a policy designation and not an environment or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues.</p>
<p>Carter Jones on behalf of Beechwood Homes</p>	<p>We note with interest that paragraph 3.29 of the Sustainability Appraisal (SA) refers to the NPPF's Standard Method for assessing local housing need. It draws on 2014 - based household projections and increases the local housing need based on local affordability. It states that the average workplace-based mean affordability ratio in the Housing Market Area (HMA) is 13.9, when using the prescribed formula, the local affordability ratio results in an average uplift of 61%. This means the latest local housing need projection for the area, as set out in the Local Housing Needs Assessment, has increased from 2,888 dwellings to 4,043 dwellings per annum from the period 2020 to 2030. If 4,043 dwellings per annum are provided this would likely result in an additional 122,682 people in the area, over the period 2020-2036, likely to be divided as follows:</p> <ul style="list-style-type: none"> <li>- Dacorum: 31,724</li> <li>- Hertsmere: 21,765</li> <li>- St. Albans: 26,128</li> </ul>	<p>Noted. Currently, housing numbers do not form part of the detailed consideration of the Regulation 18 plan. The document's focus is on setting a vision and objectives for the plan.</p>

Respondent	Summary of Comments	Response
Stantec on behalf of Urban & Civic	<p data-bbox="607 256 931 284">– Three Rivers: 18,294</p> <p data-bbox="562 304 1603 635">The Sustainability Appraisal Scoping Report (SA) considers the various options identified in terms of their impacts from a sustainability perspective. Paragraph 6.15 states that types c) new settlements, d) growth of groups of settlements, g) scattered growth, have the most potential for negative effects as they may result in more new growth across the more rural areas, where environmental assets are more likely to be adversely affected and where accessibility may be less good. This conclusion would clearly depend on the site in question and the approach taken to the landscape and other assets. This conclusion also fails to recognise that new settlements can bring forward high quality accessibility via sustainable modes.</p> <p data-bbox="562 643 1603 839">Paragraph 6.22 states that although new service centres would be created in new settlements, they are unlikely to be of a scale needed for the level of growth required in the area, meaning increase in vehicular movements. Again, this assumption fails to recognise the fact that new settlements are able to plan for new infrastructure and services at scale and in the case of the U&amp;C master developer approach, alongside the delivery of new homes.</p> <p data-bbox="562 847 1603 1177">Paragraph 6.25 states that new settlements could promote the cohesion of new communities through the provision of social infrastructure, providing neighbouring communities with additional services and facilities, creating minor positive effects in Health, Inequalities and Communities. It is stated that given the delivery period, these minor positives can also be negative during to the timing of infrastructure. The delivery of services alongside new homes is facilitated through the U&amp;C Master Developer approach. This allows for the effective and phased delivery of infrastructure alongside new homes and, in many cases, ahead of time as evidenced through U&amp;C's on-site delivery at sites such as Alconbury Weald, Waterbeach, Wintringham and Houlton.</p> <p data-bbox="562 1185 1603 1342">Paragraph 6.26 states that new settlements are likely to provide local job opportunities but still with questions of delivery, so mixed minor positive and negative effectives. It adds that the timing of infrastructure would increase the use of the private car which could be reduced through good design. This is not necessarily the case, and the delivery of new homes and employment can be</p>	Noted. The assessment of the growth types is intentionally high level at this initial stage of the SA process. As the plan progresses, a more detailed assessment will be undertaken.

Respondent	Summary of Comments	Response
	<p>brought forward in tandem. Indeed, at U&amp;C's site at Alconbury Weald in Huntingdonshire employment provision came forward ahead of homes. Paragraph 6.27 states that new settlements are more likely to be built on greenfield land resulting in less efficient use of land and greater potential for the loss of habitats, also potentially increasing the risk of flooding. Therefore, using the precautionary principle there could be uncertain significant negative effects in relation to flooding, soils, biodiversity, and landscape. Again, this entirely depends on the site in question and on the approach adopted. For example, the focus for U&amp;C is to deliver at least 12% BNG (more than the national requirement of 10% set out in the Environment Act).</p> <p>Overall, U&amp;C is concerned that the SA fails to recognise that if planned and delivered effectively, new settlements can deliver a critical mass of activity in a successful and phased manner with high quality design and is therefore unduly skewed towards spatial options that relate to existing urban areas as a result. As an example, urban extensions have the potential to place greater load on existing social infrastructure such as schools and may lack the critical mass to create additional infrastructure. The benefits of new settlements are that by planning holistically and at scale the infrastructure required to accommodate the residential development is provided largely onsite.</p>	
Stantec on behalf of Crest Strategic Projects	<p>The Sustainability Appraisal Scoping Report is supportive of our recommended hybrid growth type with Options A, B, E and F scoring 'highest' against the SA objectives. Most significantly, these options are the only to score positive (in each case being 'double positive') for climate change and travel (with the other options scoring negatively or neutral), supporting a number of the 6 Pillars.</p>	<p>Noted. The SA Scoping Report only seeks to provide a high level assessment of broad growth types at this early stage in the process. As the plan progresses, a more detailed assessment will be undertaken.</p>
Pegasus Group on behalf of Bloor Homes and the Department of Health	<p>Notes that Table 6.2 in the SA summarises the findings of the assessment of the growth types against the 15 SA Objectives and summarises these conclusions. The assessment states that C new settlements would most likely have negative because it may result in more growth across the rural areas. This is misleading as new settlements/garden villages can provide the opportunity for sustainable development. An objection is made to this sweeping assessment of new settlements, careful review of this growth scenario is required as it fails to look at the sustainable opportunities a new settlement/Garden village can deliver.</p>	<p>Noted.</p>

Respondent	Summary of Comments	Response
	At this stage as the level of growth is unknown the SA is an academic exercise. It is likely that the strategy will be a combination of the growth types with the exception of scattered growth.	
Turley on behalf of Tarmac	Paragraph 3.29 of the SA states that the average workplace-based mean affordability ratio in the Housing Market Area is now 13.9, when using the currently prescribed formula and that the local affordability ratio results in an average uplift of 61%. This means the latest local housing need projection for the area, as set out in the Local Housing Needs Assessment, has increased from 2,888 dwellings to 4,043 dwellings per annum from the period 2020 to 2030. Tarmac considers this situation to be untenable for such an important sub-region to the national economy and so requires a bold, creative and sustained planning response, taking into account the comments and suggestions made in the various criteria listed above. Offer to assist in this process and welcome further discussion with all of the relevant stakeholders in the Joint Strategic Plan making process.	Noted. Currently, housing numbers do not form part of the detailed consideration of the Regulation 18 plan. The document's focus is on setting a vision and objectives for the plan.
RPS on behalf of Richborough Estates	<p>Regarding baseline information the response notes that the report highlights:</p> <ul style="list-style-type: none"> <li>- the housing affordability pressures facing households living in the area congestion being a major concern in SW Herts, and which is likely to continue to be an issue based on future trip forecasts.</li> <li>- the area around Croxley / West Watford is not impacted on by any Air Quality Management Areas (AQMAs).</li> </ul> <p>Considers there should be recognition given to potential initiatives coming forward to address congestion and promote modal shift, notably the Hertfordshire Essex Mass Rapid Transit proposals. This infrastructure scheme should be identified in the SA as this will be relevant to the appraisal of sites and broad locations in the Croxley/West Watford area of search.</p> <p>Regarding key sustainability issues they consider that many of the issues identified can all be tackled positively through appropriately planned, well-designed and well-located development delivered at a scale that address a wider range of issues on a comprehensive basis, which should include larger-scale development on the edge of existing, accessible settlements.</p> <p>Notes the use of a 'coding' approach in the SA Framework graded from - - to ++ based on negative and positive effects. Consider it is not clear on what basis a</p>	<p>Noted. The role of the baseline section of the SA Scoping Report is to set out the current situation within the SW Herts area under key headings. Its role is not to consider potential future projects that may change this baseline position. However, updates to baseline information will be included in the next iteration of SA where available and appropriate.</p> <p>The approach to colour-coding used in the SA Scoping Report is standard practice for SA Reports and together with the associated commentary is considered to provide sufficient information regarding why a particular effect has been</p>

Respondent	Summary of Comments	Response
	<p>specific coding will be triggered and then applied to options against each SA objective, which will make it difficult to compare the scores for each option on a consistent basis. This runs the risk of a lack of clarity and transparency in the selection of preferred options (and rejection of reasonable alternatives) at a later stage. Consequently, a suitable system should be defined in the SA framework so the reader can understand why a particular effect has been assigned to each option to improve the robustness of the appraisal process.</p> <p>Notes that the report does not draw any conclusions on the seven growth types tested at this stage. Nonetheless, it is noted that options b, e, and f all perform markedly better than options c, d and g. The higher performing options would direct growth to the edge of major settlements (option b), for example Watford, and locations well-related to existing public transport corridors (option e) and areas where transport improvements could potentially come forward (option f). On this basis, RPS concludes that the SA process thus far is broadly supportive of directing growth at or adjacent to existing large settlements as well as on or in proximity to sustainable transport corridors, in favour of other less performing options. RPS would broadly accord with these findings.</p> <p>It is important that the initial appraisal findings are reflected on as part of ongoing appraisal work, in particular consideration should be given to identifying potential mitigation measures that could address any potential adverse effects of the options, which has not been carried out to date, in line with planning practice guidance.</p>	<p>identified. SA reports are based on overall assessments of likely effects – rather than being an exact qualitative process.</p> <p>Future SA work will be carried out in full accordance with the relevant regulations and guidance. As the plan progresses, a more detailed assessment will be undertaken.</p>
Carter Jonas on behalf of Apsley Developments Ltd	<p>Note that the report refers to the NPPF's Standard Method for assessing local housing need and refers to some of the conclusion in the HMA regarding affordability ratios. Considers this means there is now an even greater scale housing supply that is now required across South West Hertfordshire.</p> <p>Notes that the SA suggests that without the emerging JSP it is likely that housing and services and facilities would still be delivered through each of the District and Borough Local Plans, but without a strategic approach it may be more difficult to keep pace with demand, and it is likely that house prices will continue to rise within the area. As highlighted in the South West Hertfordshire Local Housing Needs Assessment (LHNA), there are affordability pressures</p>	<p>Noted. Currently, housing numbers do not form part of the detailed consideration of the Regulation 18 plan. The document's focus is on setting a vision and objectives for the plan.</p>

Respondent	Summary of Comments	Response
	within the South West Hertfordshire Housing Market Area (HMA), and without a strategic approach it will be difficult for affordable housing delivery.	
Studio LK on behalf of Affinity Water (estates team) <sup>1</sup>	<p>The baseline accompanying the report is quite thorough. It would be improved if, in addition to the Hertfordshire Water Study, it had regard to the relevant water companies' WRMPs too. LUC's assessment of the proportion of the JSP area covered by Green Belt is at odds with DLUHC data (66%).</p> <p>Affinity broadly agrees with the Sustainability Issues, but would like the term 'strategic' under Sustainability Issue 11 to be replaced with 'all'.</p> <p>SA objective 1 should be amended to specifically refer to water consumption. In addition SA objective 2 does not adequately address the affordability issues identified within the baseline. Therefore, it should be amended to: To provide a wide range of good quality new homes in sustainable locations to meet SW Hertfordshire's housing needs. Finally, the JSP authorities may wish to add a further objective: as follows: SA objective 16: To promote efficient use of natural resources including water</p>	<p>Noted.</p> <p>The baseline information will be updated to include reference to the relevant water companies' WRMPs. Additionally, Sustainability Issue 11 will be updated.</p> <p>SA objective 2 will be updated as suggested. It should be noted that water is addressed within SA objective 9: To maintain and enhance water quality and quantity, therefore an additional objective will not be added. However, an additional appraisal question will be included under that objective: 'promote the efficient use of water?'</p>

Changes will also be required to the SA Scoping Report to reflect the revised assessment of the vision and objectives as a result of the changes recommended.

The following groups / individuals made reference to the SA Scoping in their responses, but did not make any comment on its actual content:

- Central Bedfordshire Council
- Open Spaces Society
- Woolf Bond Planning on behalf of Gilston Investments Ltd
- St Albans & District Footpaths Society

<sup>1</sup> It has been confirmed by Affinity Water that these comments are submitted by their estates arm and so should be treated separately for their formal response as a statutory consultee.





# Dacorum BC Community Impact Assessment (CIA) Template

Policy / service / decision

Consultation responses and endorsement of an amended Vision and Objectives for the South West Herts Joint Strategic Plan

## Description of what is being impact assessed

*What are the aims of the service, proposal, project? What outcomes do you want to achieve? What are the reasons for the proposal or change? Do you need to reference/consider any related projects?*

*Stakeholders; Who will be affected? Which protected characteristics is it most relevant to? Consider the public, service users, partners, staff, Members, etc*

*It is advisable to involve at least one colleague in the preparation of the assessment, dependent on likely level of impact*

Dacorum Borough Council, St Albans City & District Council, Hertsmere Borough Council, Three Rivers District Council, Watford Borough Council, with the support of Hertfordshire County Council, are preparing the South West Hertfordshire Joint Strategic Plan (JSP). The JSP will provide a strategic planning framework for growth and infrastructure up to 2050 across the South West Hertfordshire area.

The JSP is accompanied by a Statement of Community Involvement (SCI) which is a legal requirement to prepare during the plan-making process. It was adopted by all the SW Herts authorities in July 2022:

<https://www.swhertsplan.com/13315/widgets/38228/documents/29755>

The SCI demonstrates that these legal requirements are being met in developing the JSP. The document seeks to positively address the needs of all members of the community where they are influenced by the built environment or provision of infrastructure signalled by this plan.

The first stage 'Issues and Options' (I&O) Regulation 18 consultation on the JSP has been guided by the SCI. The latter mirrors the framework used by our own planning consultation document and which has been tested on a number of occasions in practice.

The SCI sets out these Councils' shared approach to community involvement in undertaking the I&O consultation of the JSP and later stages of engagement. The JSP team has used its strategy for actively engaging the community (in a meaningful and

appropriate fashion). It has been supplemented by a more detailed Communications and Engagement Strategy prepared by the JSP Comms Officer (in liaison with District Comms Officers) specifically for the I&O stage:

<https://www.swhertsplan.com/18515/widgets/53801/documents/31328>

The SCI (and the more detailed Communication and Engagement Strategy) ensures that these authorities take account of various planning regulations (which we have to accord with), and the emergence of new consultation techniques/processes. In consulting on the I&O consultation, the SCI allowed the JSP team to carry out more efficient, effective and innovative ways of working and communicating with the local community. The consultation was largely funded through a 'Proptech' grant from the Department for Levelling Up, Housing & Communities (DLUHC) which enabled the team to be more innovative in their approach to engagement by using a variety of social media platforms, as well as develop a bespoke engagement website. However, this did not exclude the use of some more traditional forms of engagement.

The SCI establishes an inclusive and positive approach to engagement with the community, including those with protected characteristics, alongside a range of other stakeholders. Through its objectives, it aims to promote equality for all and a more inclusive and sustainable communities.

It is important that the authorities consult with as wide an audience as possible to reduce inequality and accessibility. Thus the SCI ensures a positive impact on all groups in the local community when consulting on the JSP, and all planning officers are expected to accord with the SCI in the Plan's development. This affects anyone who lives, studies, works, visits, or has an interest in Dacorum and the South West Hertfordshire area, such as:

- The community (residents, businesses, voluntary and specialist groups (i.e. residents associations))
- Those who engage in planning matters in Dacorum
- Parish, Town and County Councils (including those within and surrounding the South West Hertfordshire area)
- Interested developers, landowners and agents
- Statutory consultees and various partners

- Council staff and elected members

The SCI seeks to improve access to the planning process in order to provide greater opportunities to better understand, engage with and influence the preparation of the JSP, including during the first stage I&O consultation. Certainly, the JSP team employed a varied range of tools and approaches to raise awareness and increase response rates to the consultation material.

In addition to following the requirements of the SCI, the Regulation 18 consultation on the JSP was accompanied by a Sustainability Scoping Report. The role of this document is to set an appraisal framework to ensure that the environmental, economic and social impacts of the plan are taken fully in to consideration. As the Sustainability Appraisal process moves forward it will also be widened to include an Equalities Impact Assessment (EqIA).

## Evidence

### **What data/information have you used to assess how this policy/service/decision might impact on protected groups?**

*(include relevant national/local data, research, monitoring information, service user feedback, complaints, audits, consultations, CIAs from other projects or other local authorities, etc.). You should include such information in a proportionate manner to reflect the level of impact of the policy/service/decision.*

1. South West Hertfordshire Initial Engagement Results – ‘Your Future’ (July 2020). This was the initial engagement on the JSP and relied solely on a social media-hosted poll to obtain feedback. The success of the R18 social media poll element of the consultation has been bench-marked against the 2020 poll participation rates.
2. The SCI to the JSP has been compared against our own SCI (and associated CIAs) for the Regulation 18 Local Plan, and also the groups we actually engaged with as part of recent consultations on this Plan.
3. The Regulation 18 consultation report provides a comparison profile of respondents and methods of communication (and their relative success).

**Who have you consulted with to assess possible impact on protected groups?** *If you have not consulted other people, please explain why? You should include such information in a proportionate manner to reflect the level of impact of the policy/service/decision.*

As the SCI to the JSP mirrors the Council’s own SCI to the Local Plan (and which has previously been subject to the CIA process and consultation), no further individuals or groups have been consulted. Furthermore, the SCI to the JSP has also itself been subject to consultation involving a number of community groups.

Officers at each of the six authorities were asked to advise on any key groups who should be directly notified about the consultation.

**Analysis of impact on protected groups (and others)**

The Public Sector Equality Duty requires Dacorum BC to eliminate discrimination, advance equality of opportunity and foster good relations with protected groups. Consider how this policy/service/decision will achieve these aims. Using the table below, detail what considerations and potential impacts against each of these using the evidence that you have collated and your own understanding. Based on this information, make an assessment of the likely outcome, **before** you have implemented any mitigation.

- The PCs of Marriage and Civil Partnership and Pregnancy and Maternity should be added if their inclusion is relevant for impact assessment.
- Use “insert below” menu layout option to insert extra rows where relevant (e.g. extra rows for different impairments within Disability).

Summary of impact		Negative impact / outcome	Neutral impact / outcome	Positive impact / outcome
<b>Protected group</b>	<i>What do you know? What do people tell you? Summary of data and feedback about service users and the wider community/ public. Who uses / will use the service? Who doesn't / can't and why? Feedback/complaints?</i>			
<b>Age</b>	The SCI seeks to guide engagement activities when preparing the JSP, across all age ranges, in order to reach as many sectors in the local community as possible, including ‘hard to reach’ groups. It includes a wide range of consultation methods aimed at every age group that can be used when appropriate e.g. the use of the internet and emails and online consultation may make it more accessible to younger people, the working population and those who find it physically difficult to access Council offices or other deposit points. Other forms of communication (e.g. hard copy documents and use of	□	□	☒

	<p>local press notices) should also ensure that those who do not have access to the internet can be catered for, including the elderly. The SCI encourages a wide range of people to get involved in planning, including those who cannot go to events and/or come to the office (due to their age / disability / other factors). The SCI ensures improved general accessibility to information and better engagement with the plan-making process for the benefit of all protected groups in the community. The greater availability of information online may help reduce barriers to involvement for those with physical and mental disabilities, age related or otherwise, who may find it difficult to access Council information and events in traditional ways.</p> <p>The SCI should enable all to have an equal opportunity to both be involved (if they so wish) in planning and to better influence outcomes. Furthermore, reasonable adjustments to meet needs can be made where required.</p> <p>The social media based poll ('Give My View') was specifically targeted at harder to reach groups – especially residents in the 18-25 year age category.</p>			
<p><b>Disability (physical, intellectual, mental)</b></p> <p><i>Refer to CIA Guidance Notes and Mental Illness &amp; Learning Disability Guide</i></p>	<p>(see above)</p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>
<p><b>Gender reassignment</b></p>	<p>No material impact on this protected group.</p>	<p><input type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>	<p><input type="checkbox"/></p>

<b>Race and ethnicity</b>	No material impact on this protected group.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Religion or belief</b>	No material impact on this protected group.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Sex</b>	No material impact on this protected group.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Sexual orientation</b>	No material impact on this protected group.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Not protected characteristics but consider other factors, e.g. carers, veterans, homeless, low income, loneliness, rurality etc.</b>	The SCI encourages the use of a wide range of engagement methods and tools. Information will be more accessible to a variety of disadvantaged groups in the community, and thus more people can better participate / have their say in the plan-making process and how it affects them. This ensures both individuals with and without protected characteristics have improved opportunities to become involved in the process and to better influence outcomes.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Negative impacts / outcomes action plan**

Where you have ascertained that there will potentially be negative impacts / outcomes, you are required to mitigate the impact of these. Please detail below the actions that you intend to take.

<b>Action taken/to be taken</b> <i>(copy &amp; paste the negative impact / outcome then detail action)</i>	<b>Date</b>	<b>Person responsible</b>	<b>Action complete</b>
n/a	Select date		<input type="checkbox"/>
	Select date		<input type="checkbox"/>
	Select date		<input type="checkbox"/>
	Select date		<input type="checkbox"/>
	Select date		<input type="checkbox"/>
	Select date		<input type="checkbox"/>
	Select date		<input type="checkbox"/>
	Select date		<input type="checkbox"/>



**If negative impacts / outcomes remain, please provide an explanation below.**

n/a

**Completed by (all involved in CIA)**

**Francis Whittaker**

**Date**

**14/08/2023**

**Signed off by** *(AD from different Directorate if being presented to CMT / Cabinet)*

**Sara Whelan – Assistant Director (Place)**

**Date**

**14/08/2023**

**Entered onto CIA database - date**

**To be reviewed by** (officer name)

**Review date**

# Agenda Item 11

## SPAEC OSC Work Programme 2023/2024

Meeting Date	Report Deadline	Items	Contact Details	Background information
4 Oct 23	25 Sept 23	Action Points (from previous meeting)		
1 Nov 23	23 Oct 23	Action Points (from previous meeting)		
		<b>Q2 Quarterly Budget Monitoring Report</b>	Claire Dempsey – Financial Planning & Analysis Team Leader <a href="mailto:Claire.dempsey@dacorum.gov.uk">Claire.dempsey@dacorum.gov.uk</a>	
		<b>Q2 Environmental Services Quarterly Reports</b>	Robert Williams – Head of Environmental Services <a href="mailto:Robert.williams@dacorum.gov.uk">Robert.williams@dacorum.gov.uk</a>	
		<b>Q2 Environmental &amp; Community Protection Quarterly reports</b>	Emma Walker – Head of Environmental and Regulatory Services <a href="mailto:Emma.walker@dacorum.gov.uk">Emma.walker@dacorum.gov.uk</a>	
		<b>Q2 Planning, Development and Regeneration</b>	Simon Rowberry – Interim Assistant Director Strategic Planning and Regeneration	

		<b>Quarterly reports</b>	<a href="mailto:Simon.rowberry@dacorum.gov.uk">Simon.rowberry@dacorum.gov.uk</a>	
<b>6 Dec 2023</b>	<b>27 Nov 2023</b>	<b>Action Points (from previous meeting)</b>		
		Joint Budget <i>Ideally no further items to be added</i>		
<b>10 Jan 2024</b>	<b>28 Dec 2024</b>			
		<b>Action Points (from previous meeting)</b>		
<b>7 Feb 2024</b>	<b>29 Jan 2024</b>	<b>Action Points (from previous meeting)</b>		
		Joint Budget <i>Ideally no further items to be added</i>		

<b>6 March 2024</b>	<b>28 Feb 2024</b>	<b>Action Points (from previous meeting)</b>		
		<b>Q3 Quarterly Budget Monitoring Report</b>	Claire Dempsey – Financial Planning & Analysis Team Leader  <a href="mailto:Claire.dempsey@dacorum.gov.uk">Claire.dempsey@dacorum.gov.uk</a>	
		<b>Q3 Environmental Services Quarterly Reports</b>	Robert Williams – Head of Environmental Services  <a href="mailto:Robert.williams@dacorum.gov.uk">Robert.williams@dacorum.gov.uk</a>	
		<b>Q3 Environmental &amp; Community Protection Quarterly reports</b>	Emma Walker – Head of Environmental and Regulatory Services  <a href="mailto:Emma.walker@dacorum.gov.uk">Emma.walker@dacorum.gov.uk</a>	
		<b>Q3 Planning, Development and Regeneration Quarterly reports</b>	Simon Rowberry – Interim Assistant Director Strategic Planning and Regeneration  <a href="mailto:Simon.rowberry@dacorum.gov.uk">Simon.rowberry@dacorum.gov.uk</a>	

Items to be planned in by chair

Local Plan

Luton Airport

Chilterns Beechwood Mitigation Strategy

Economic Development Update

Place Strategies (Hemel, Berko, Tring)

Maylands Master Plan

Visit to Cupid Green and CCTV

Hemel Garden Communities

Air Quality

Water – Sewage

Rural Plan

Visit Fly Tip – In small groups