

Responses to draft Statement of Community Involvement for the SW Herts JSP

Organisation	Summary of comment	Officer response	Change required to document and/or any other related actions?
<p><b>Affinity Water</b> (James Kenyon)</p>	<p>No specific comments to make on the document.</p> <p>Welcome the opportunity to engage at the appropriate stages of any plan and policy document development. In addition, welcome the opportunity to engage as early as is practicable with the planning application process.</p>	<p>Noted.</p> <p>The JSP will not be consulting on or determine planning applications – this will be done by the relevant district council.</p>	<p>No</p>
<p><b>Planning Property Team, Hertfordshire County Council</b> (Andrea Gilmour)</p>	<p>No comments to make on the document.</p>	<p>Noted.</p>	<p>No</p>
<p><b>Sport England</b> (Roy Warren)</p>	<p>Request that Sport England is added to the list of specific statutory consultation bodies in Appendix 1. As set out in the Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595), Sport England (the English Sports Council) is a statutory consultee on planning applications affecting playing fields. Furthermore, we are also a formal non-statutory consultee on a range of planning application types as listed in the Government's</p>	<p>The JSP will not be consulting on or determining planning applications – this will be done by the relevant district council in which the application site falls. The SCI therefore does not cover this aspect of planning consultations. There is therefore no legal or procedural requirement to include Sport England in Appendix 1 of the SCI.</p> <p>This does not mean that Sport England will not be consulted on relevant JSP matters.</p>	<p>Yes.</p> <p>Amend the text in section 2 of the SCI to ensure it is clear that consultation on the JSP will include those on the</p>

	<p>Planning Practice Guidance  <a href="https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space">https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space</a>. Consultation on strategic development plan documents such as the JSP would allow Sport England to offer advice on strategic sport and physical activity infrastructure matters. Direct consultation by email would be Sport England's preferred method of engagement.</p> <p>For future reference, consultations should be sent to our generic planning administration email address  <a href="mailto:planning.south@sportengland.org">planning.south@sportengland.org</a></p>	<p>The email address provided will be added to the JSP consultation database to ensure that they are made aware of all relevant plan-related consultations and can offer advice on strategic sport and physical activity infrastructure matters as appropriate.</p>	<p>consultation database as well as the bodies listed in Appendix 1.</p> <p>Add generic planning email address to JSP consultation database.</p>
<p><b>Environment Agency</b>  (Becki Ingram - Hertfordshire and North London Team)</p>	<p>No comments to make on the document.</p> <p>Look forward to seeing further consultations on the Plan as time progresses.</p>	<p>Noted.</p>	<p>No.</p>
<p><b>Natural England</b>  (Dominic Rogers)</p>	<p>Supportive of the principle of meaningful and early engagement of the general community, community organisations and statutory bodies in local planning matters, both in terms of shaping policy and participating in the process of determining planning applications.</p> <p>Are unable to comment in detail on individual SCIs, but information on the planning service offered is available online.</p> <p>Request that all planning consultations are sent electronically to the central hub at  <a href="mailto:consultations@naturalengland.org.uk">consultations@naturalengland.org.uk</a>.</p>	<p>Noted.</p>	<p>No changes required to SCI.</p> <p>Add generic planning email address to JSP consultation database.</p>

<p><b>Defence Infrastructure Organisation</b>, Ministry of Defence, on behalf of the Secretary of State for Defence. (Louise Dale)</p>	<p>Grateful for the opportunity to comment on the above emerging Statement of Community Involvement (SCI).</p> <p>Note that the MOD military establishment Northwood Headquarters is located within the Three Rivers District Council area. Request that the MOD are specifically listed as being a consultee, via the Defence Infrastructure Organisation Town Planning team, as it is important that planning authorities and development plans recognise that MOD establishments are of strategic military importance to the UK. Therefore, they should be consulted as part of the local planning policy process to ensure MOD assets are not degraded due to development.</p>	<p>There is no legal or procedural requirement to include the Defence Infrastructure Organisation in Appendix 1 of the SCI, as they are not one of the bodies or organisations specified in the relevant regulations.</p> <p>This does not mean that the Defence Infrastructure Organisation will not be consulted on relevant JSP matters. The specific named contact for the Defence Infrastructure Organisation’s planning team will be added to the JSP consultation database to ensure that they are made aware of all relevant plan-related consultations. They can therefore respond with regard to their landholdings as appropriate.</p>	<p>No changes required to SCI.</p> <p>Add email address for the Defence Infrastructure Organisation planning team to JSP consultation database.</p>
<p><b>Hertfordshire Gardens Trust</b> (Kate Harwood)</p>	<p>Responding on behalf of The Gardens Trust, statutory consultee for historic parks and gardens, on planning issues in Hertfordshire.</p> <p>Welcome the joint plan and are satisfied with the consultation strategy set out in the SCI document.</p> <p>Would welcome:</p> <p>(a) Clarity on the linking of Local Plans by each authority and the Joint Plan and whether comments made by stakeholders at various stages during the preparation of Local Plans by each authority will also be taken into consideration during preparation of the Joint Local Plan; and</p>	<p>Support for the principle of the JSP and content of the SCI is welcomed.</p> <p>With regard to the other two matters on which clarity is sought, the response is as follows:</p> <p>(a) Whilst in principle a summary of responses provided with regard to individual Local Plans consultations being used to inform work on the JSP is supported, due to the number of responses made to each Local Plan, it will be hard to guarantee that this cross-over occurs fully. The JSP will also be planning on a much larger geography than the individual Local Plans, on a much</p>	<p>No changes required to SCI.</p> <p>A reply has been sent by email to Hertfordshire Garden Trust in response to matters (a) and (b).</p>

	<p>(b) More information on the additional documents and evidence base which will support this plan and how these documents from each Local Plan are to be reconciled.</p>	<p>more strategic scale (with a focus on a limited number of high level policies) and cover a different timeframe. Direct responses to the JSP itself and the specific matters its raises will therefore be encouraged from consultees, rather than a reliance on comments made to the current round of Local Plans. That said, district representatives on the Strategic Plan Officers Group (who are planning policy managers or equivalent) will be asked to highlight key Local Plan matters that are of relevance to the JSP as the JSP process progresses (and vice versa if appropriate).</p> <p>(b) The range of evidence required by the JSP versus the next iteration of Local Plan is currently being discussed by Officers. Whilst for some strategic matters there will be some reliance (at least initially) on the evidence that has been prepared to support the current round of Local Plans, much of this evidence base will require updating to support the JSP and the next iteration of Local Plans. The precise scope, sequence and timing of this work has yet to be agreed, but there will be opportunities to comment on the evidence base as the JSP is developed and consulted upon.</p>	
<p><b>Nash Mills Parish Council</b> (Nikki Bugden)</p>	<p>Confirmed that the Parish Council's working group did not have any specific comments on the document itself and were pleased to note</p>	<p>Support for content of the SCI welcomed.</p>	<p>No changes required to SCI.</p>

	<p>that “town councils and parishes” are listed on page 8 as an example of groups that will be engaged with during the JSP preparation process.</p> <p>Queried how the JSP would align with others such as Dacorum’s Local Plan and the Hemel Garden Communities (HGC) project.</p> <p>Noted two updates to dates and links required on the JSP website.</p>	<p>With regard to the relationship to other plans and projects, each of the South West Hertfordshire authorities is in the process of updating their individual Local Plans, which will cover the period up to around 2038. The JSP will not impact upon the content of these plans, or the HGC project that is linked to the current Local Plans being prepared by Dacorum and St Albans Councils. Rather the Joint Strategic Plan will look further ahead, to 2050, to help provide a longer-term framework for the area. Together the councils, through the Joint Strategic Plan, will set the high-level strategic policies on issues such as climate change mitigation, delivering net zero carbon, housing, employment and infrastructure to 2050. 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.</p>	<p>Reply sent by email to Nash Mills Parish Council in response to the relationship with Local Plan and related projects following liaison with Dacorum Officers.</p> <p>The necessary updates to JSP website have been made.</p>
<p><b>Harlow Borough Council</b> (Andrew Bramidge)</p>	<p>Suggests that:</p> <p>(a) As public consultation on the Regulation 18 plan is set to begin in spring 2022, it would be prudent to expand on the engagement methods if</p>	<p>(a) The first R18 consultation is programmed for summer 2022, and will be primarily web and social media based. It is also not known what, if any, Covid restrictions will be in place at that time. No amendments are therefore</p>	<p>Yes.</p> <p>Add reference to submission stage to Table 1.</p>

	<p>Covid-19 restrictions are in place to allow for plan-making to progress.</p> <p>(b) Paragraph 2.4 should be expanded to include how hard to reach groups will be consulted with, as well as adding that the documents will be clearly written. This is especially important if electronic engagement is to be the primary portal for consultation on the draft JSP.</p> <p>(c) Table 1 should be extended to mention how consultation will occur during the submission and adoption stages, as it is important to keep key stakeholders informed and engaged during the whole process.</p> <p>(d) Information should be included on the consultation procedures to be undertaken for Supplementary Planning Documents.</p> <p>(e) Requests that Harlow Council are consulted on other specific cross county matters, such as the Herts and Essex Rapid Transit (HERT).</p>	<p>considered necessary to the document. A more detailed communications plan will be published to accompany the R18 stage.</p> <p>(b) The precise methods to be used to elicit responses from harder to reach groups will be set out in the detailed communications plans for each stage of the plan-making process and will reflect current and emerging good practice. Due to the timeframes of the JSP, the key hard to reach group is that of the 18-25 demographic. For the R18 engagement it is hoped that a youth forum can be established to advise on the engagement material to ensure it is likely to elicit responses from this age group, as well as to other individuals, groups and organisations. It is not considered necessary to reference the fact that engagement documents will be clearly written. This is always the intention with all consultation material and the JSP programme will seek support from council communications teams and/or external communications advisers to ensure this is the case. Section 2 of the SCI also already states that all documents will be written in plain English.</p> <p>(c) Agreed that a line should be added to Table 1 to reference the submission stage. The adoption stage is already</p>	<p>Add a new section to the SCI to reference SPDS and that the SCI will need to be reviewed before any of these documents are consulted upon.</p> <p>The request to ensure Harlow continue to be consulted on progress of the HERT project has been passed to relevant Officers at Herts County Council, who are leading the project.</p>
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		<p>included, so no further information required re that stage of the process.</p> <p>(d) SPDs cannot be progressed by the JSP programme until there are adopted, or well progressed policies for them to relate to. Due to the limited size and resources of the JSP team, the work programme is not expected to include production of any JSP-sponsored SPDs until the JSP itself is adopted. Any joint SPDs in the meantime will be prepared by the districts and therefore need to comply with the requirements set out in their individual SCIs and relate to policies within their adopted Local Plans. It is agreed that this position should be referenced in the JSP SCI. More detailed reference to engagement on SPDs will be considered when the SCI is next reviewed. This review needs to be carried out at least every 5 years</p> <p>(e) The JSP programme will continue to consult adjoining authorities such as Harlow on documents directly related to the JSP. The HERT project is at present a stand-alone infrastructure scheme and consultation is the responsibility of Hertfordshire County Council as the local highway authority. If and when it progresses as a defined proposal, then this will need to be referenced in the JSP and feedback sought upon this proposal (along with other relevant strategic</p>	
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		infrastructure projects) as the JSP process progresses.	
<b>National Highways</b> (Janice Burgess)	<p>National Highways (formerly Highways England) has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN).</p> <p>Highlights key areas of the SRN located in SW Herts area and the guidance document that sets out how they will engagement with local authorities, communities and developers in the preparation of planning documents.</p> <p>Note that they are a statutory consultee and have a duty to cooperate with local authorities to support the preparation and implementation of development plan documents.</p> <p>They welcome the fact that SCI identifies them as a statutory consultee and welcomes engagement on the preparation of a JSP, with consideration given to development impacts identified for the SRN.</p> <p>They look forward to continuing to participate in future consultations and discussions regarding the JSP, as well as reviewing the traffic modelling and mitigation strategy as it develops.</p>	<p>Noted.</p> <p>It is understood that Highways England was rebranded as National Highways on 19 August 2021. References within the document should be amended accordingly.</p>	<p>Yes.</p> <p>Amend reference in Appendix 1 from 'Highways England' to 'National Highways' to reflect formal name change, and add generic planning email address to JSP consultation database.</p>



	<p>Note that the SRN covered by the SW Herts JSP is administered through two National Highways Regional offices and it is important that a collaborative approach is taken to working together to ensure that the views of officers from both Regional offices are considered for the appropriate sections of our network.</p> <p>Provides a general contact address of <a href="mailto:planningse@highwaysengland.co.uk">planningse@highwaysengland.co.uk</a>.</p>		
<p><b>Canal and River Trust</b> (Anne Denby)</p>	<p>Note that the Trust is a statutory consultee for Development Management matters and welcome their inclusion as a specific group in Appendix 1. The reference is however to their old title of 'British Waterways' and this needs to be updated.</p> <p>The Trust wishes to engage with the production of the JSP and would like their generic email <a href="mailto:planning@canalrivertrust.or.uk">planning@canalrivertrust.or.uk</a> added to the consultation database.</p>	<p>Noted.</p> <p>British Waterways (now the Canal and River Trust) were erroneously included in the list of statutory consultation bodies for plan-making in Appendix 1 of the draft SCI. It is therefore appropriate to remove them from this list and instead add them to the JSP consultation database. This is consistent with the approach suggested for Sport England and Defence Infrastructure Organisation and reflects legal advice.</p>	<p>No changes required to SCI.</p> <p>Add generic planning email address to JSP consultation database.</p>
<p><b>Berkhamsted Residents Action Group (BRAG)</b> (Antony Harbidge)</p>	<p>Notes that as is standard for a Statement of Community Involvement, in addition to specific statutory consultation bodies there is a commitment to consult with relevant organisations representing the interests of local residents, the environment, businesses etc in the area.</p> <p>In BRAG's experience it is left to these organisations to engage with the process</p>	<p>Noted.</p>	<p>No changes required to SCI.</p> <p>Add BRAG to JSP consultation database.</p>

	rather than the planning body being proactive and actually engaging with the local organisations. The planning body should engage with local organisation and not leave it up to the organisations to do all the work.		
<b>Central Bedfordshire Council</b> (Christine McGoldrick)	<p>Welcome the opportunity to respond this consultation and look forward to continuing the good working relations with the five substantive authorities involved as the Joint Strategic Plan progresses.</p> <p>Supports the delivery of the South-West Hertfordshire Joint Strategic Plan (JSP) to support sustainable growth to 2050 in a comprehensive manner across the area.</p> <p>CBC recognises that the SCI is specific to the production of the JSP and that the individual Local Planning Authorities (LPAs) also have their own individual SCIs relating to their individual Local Plans and any Neighbourhood Plans in their areas, and that therefore CBC will continue to engage with them on an individual basis as well as part of the South-West as a whole.</p> <p>Supports the approach taken in drawing up the SCI which will ensure that all interested parties will be able to influence and feed into the evolution of the Strategic Plan. Also supports the provision of more detailed engagement strategies to supplement the SCI.</p> <p>Note at paragraph 1.18 that how the SW Herts authorities are working together under the Duty</p>	<p>Support for the JSP welcomed, as is recognition that Central Bedfordshire Council will need to continue to engage districts and Town / Parish councils on Local Plans and Neighbourhood Plans respectively.</p> <p>It is agree that clarification about the extent of the Duty to co-operate would be helpful in para 1.18, including a general reference to the preparation of Statements of Common Ground being considered with adjoining authorities as the JSP progresses. It is also recommend that the Duty to co-operate bodies specified in the regulation are also added to Appendix 1 of the SCI, as they are statutorily prescribed consultees.</p> <p>It is not considered appropriate for the SCI to confirm whether Statements of Common Ground will be prepared with specific adjoining councils, as the need for such document swill depend upon the content of the JSP, any cross boundary issues arising as a result, and any comments received from those authorities on the plan. However, the general principle can be added to the document.</p>	<p>Yes.</p> <p>Add additional text to para 1.18 to refer to the preparation of Statements of Common Ground with adjoining authorities.</p> <p>Add list of duty to co-operate bodies to Appendix 1 of the SCI.</p>

	<p>to Cooperate to complete the JSP will be set out in a South West Hertfordshire-wide Statement of Common Ground that will be published shortly. However, the Duty to Cooperate extends beyond just the five local authorities that make up the area of the South-West Hertfordshire Joint Strategic Plan. Although it is noted that neighbouring authorities are listed in Appendix 1, this section could make it clearer that the Duty to Cooperate extends beyond the boundaries of the plan and will involve the neighbouring authorities listed, including Central Bedfordshire Council.</p> <p>Confirmation on whether Statements of Common Ground will be sought between the South West Hertfordshire area and neighbouring authorities would be welcomed.</p>		
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