



Strategic Planning & Environment Overview and Scrutiny Committee

Report for:	Strategic Planning and Environment Overview and Scrutiny Committee
Title of report:	New Local Plan – Revised Strategy for Growth 2024-2040 – Consultation Report
Date:	06/03/2024
Report on behalf of:	Councillor Sheron Wilkie, Portfolio Holder for Place
Part:	I
If Part II, reason:	N/A
Appendices:	Appendix 1 – Local Plan 2024-2040 Revised Strategy for Growth Consultation Report Appendix 2 - RSG 2023 Community Impact Assessment
Background papers:	Revised Strategy for Growth Consultation: https://letstalk.dacorum.gov.uk/hub-page/localplan2023 Report of all responses: https://letstalk.dacorum.gov.uk/survey_localplan2023 Statement of Community Involvement 2019: https://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/statement-of-community-involvement Local Development Scheme 2023: https://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/local-development-scheme
Glossary of acronyms and any other abbreviations used in this report:	DPD – Development Planning Document GFRA – Grove Fields Residents Association LDS – Local Development Scheme LPA – Local Planning Authority ‘Pre-submission version’ – The finalised version of the emerging Local Plan that the Local Authority intends to submit to the Secretary of State for examination. Regulation 18 – Town and Country Planning (Local Development) (England) Regulations 2012, Regulation 18 Preparation of a local plan Regulation 19 - Town and Country Planning (Local Development) (England) Regulations 2012, Regulation 19 Publication of a local plan SCI – Statement of Community Involvement SLT – Strategic Leadership Team SLT-PH – Strategic Leadership Team – Portfolio Holders

Responsible Officer: Sara Whelan, Assistant Director – Planning

Report Authors: James Wrathall, Corporate Graduate; Keeley Mitchell, Strategic Planning & Regeneration Officer



sara.whelan@dacorum.gov.uk / 01442 228590 (ext. 2590)

Corporate Priorities	The Dacorum Local Plan 2024-2040 promotes the achievement of all the corporate priorities as set out below: <ul style="list-style-type: none">• A clean, safe and enjoyable environment• Building strong and vibrant communities• Ensuring economic growth and prosperity• Providing good quality affordable homes, in particular for those most in need• Ensuring efficient, effective and modern service delivery• Climate and ecological emergency
Wards affected	All wards
Purpose of the report:	1. To present the results of the Regulation 18 consultation on Dacorum’s Revised Strategy for Growth for consideration.
Recommendation(s) to the decision maker (s):	1. That the committee notes this report.
Period for post policy/project review:	This document sets out a summary of the responses received to the Regulation 18 consultation on the Dacorum Local Plan (2024-2040) Revised Strategy for Growth, undertaken in 2023. This will be used to inform further discussions as the final Regulation 19 ‘Pre-Submission’ version of the Local Plan is published later in 2024, in line with the adopted Local Development Scheme. Once the final Local Plan is adopted, a review will be undertaken at least every 5 years, subject to the introduction of new Planning reforms.

1) Introduction/Background:

- 1.1 Local Planning Authorities are legally required to develop and implement a Local Plan to control and plan development, protect important areas and set a vision for communities within their administrative area over at least 15 years. The new Local Plan, once adopted, will replace the Core Strategy (2013), the Site Allocations DPD (2017) and the 'saved' policies from the 2004 Local Plan.
- 1.2 According to Regulation 18, when preparing a Local Plan, the LPA must invite consultation bodies and the wider community to make representations, and take any representation made to them into account, before formally publishing the pre-submission version of the Local Plan under Regulation 19.
- 1.3 An initial 'Issues & Options' Regulation 18 consultation was held in 2017, followed by a second on 'the Emerging Strategy for Growth' full draft Local Plan, in 2020/21. Following consideration of the responses to these consultations, a third Regulation 18 consultation was held from 12pm on Monday 30th October 2023 until 11:59pm on Monday 11th December. This consultation was referred to as the 'Revised Strategy for Growth', and focussed on changes the Council proposed to make to the draft site allocations in the emerging Local Plan.
- 1.4 This consultation received 1,356 responses from residents, businesses, organisations and national bodies.
- 1.5 The Local Plan 2024-2040 Revised Strategy for Growth Consultation Report (Appendix 1) has been prepared to set out the consultation methods and levels of engagement, and to summarise the responses. The responses have been published in full¹, Appendix 1 has been designed to aid in the interpretation of these.
- 1.6 Appendix 1 does not contain the Council's response to the responses received at this stage, as these will be fully considered by Members and officers whilst preparing the 'pre-submission' version of the Local Plan. When the Pre-Submission Local Plan is formally published (expected October 2024 – subject to approval by Members) it will be accompanied by a full 'statement of consultation', setting out the Council's response to comments received to the past consultations, and how the document has been modified to reflect these.
- 1.7 The purpose of this report is to provide the Committee with an initial set of findings and to set out next steps to move the local plan forward. Officers have produced a Consultation Summary Report (Appendix 1) which summarises the main issues arising from the consultation.

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

- 2.1 Full details of the engagement methods used by the Council during the Revised Strategy for Growth consultation are set out in section 2.2 of Appendix 1.

¹ The full report of responses can be downloaded from this website:
https://letstalk.dacorum.gov.uk/survey_localplan2023

Appendix 1: Revised Strategy for Growth Consultation Report Structure

2.2 The Consultation Summary Report is structured as follows:

- **Section 1. Introduction:** Introduces the report and explains its structure in greater detail.
- **Section 2. Consultation Report:** Provides an overview of how the Council carried out the consultation in line with the prescribed regulations and the adopted SCI. It sets out the background to the consultation and Local Plan before detailing engagement methods and how representations were received. It also includes a summary of key issues raised by responses.
- **Section 3. Analysis of Responses:** Provides a summary of the main issues that were raised. This is structured by responses to the main survey by settlement area, followed by a brief overview of the optional additional questions. Officers have grouped the issues raised by key organisations and the wider community.
- **Section 4. Next Steps:** Sets out the Council's proposed approach to progressing to the next stage of Local Plan preparation and the timeline for this.
- **Appendix A: Supporting Information:** Contains copies of the consultation material used by the Council to engage with the public.
- **Appendix B: Full Text of Responses:** Contains information on how to access the full text of the responses received.

Level of Response

2.3 1,356 representations were submitted with 1,315 (97%) of these via the new online consultation portal, Engagement HQ, and 41 (3%) by post.

Demographics

2.4 Unlike in previous consultations, use of Engagement HQ granted greater freedom in the gathering of specific information, and so demographic data could be collected from willing respondents. The following statistics are calculated out of those who provided the information to the relevant question:

- **Decade of birth:** More than half of respondents were born before 1970, and 11% were between 1930 and 1949. In contrast just over 5% of respondents were born on or after 1990, with only 0.7% born on or after 2000. This suggests low youth engagement, despite sharing the consultation with schools and attending face-to-face events at youth council meetings and Christmas fairs during the consultation period.
- **Gender:** Slightly more men (50.6%) responded than women (48.1%) with only 0.5% reporting as non-binary or transgender.

- Ethnicity: 89.1% of respondents reported as “White English, Welsh, Scottish, Northern Irish or British”. 5.4% reported as “Other White”, with all other groups between 0 and 0.3%.
- Disability: around 87% of individuals reported no disability, with just under 10% reporting that they did. The majority of individuals with a disability stated that this affected their ability to carry out day to day activities a little, or that it did not affect them at all.

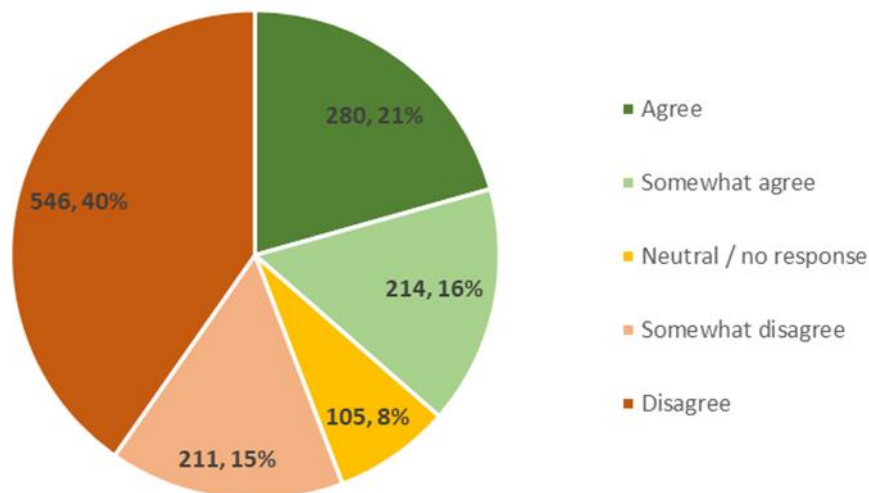
Key Results

2.5 Respondents were able to select which settlement(s) their response related to:

- Whole of Dacorum (243, 17.9% of total responses).
- Hemel Hempstead (562, 41.5%).
- Berkhamsted (488, 36%).
- Tring (292, 21.5%).
- Bovingdon (43, 3.2%).
- Kings Langley (64, 4.7%).
- Markyate (24, 1.8%).
- Dacorum’s Countryside (221, 16.3%).
- Other (44, 3.2%)

2.6 Respondents were then asked to select how far they agreed or disagreed with the revised strategy for their selected area(s):

Overall Feedback to the Revised Strategy for Growth



2.7 37% of respondents expressed a positive sentiment towards the proposed changes to the strategy for the Local Plan, which is high when compared to previous consultations. The areas of Tring and Kings Langley had a majority in favour of the Revised Strategy for Growth, with just under half of those responding for the whole Borough disagreeing.

2.8 Tring respondents were the most in favour of the Revised Strategy (73.7%), while Hemel Hempstead saw the strongest objections (71.7%).

Infrastructure Priorities

2.9 Question 5 of the survey offered respondents the chance to rank their priorities for infrastructure in the Borough. 402 (29.6%) responded to this question, including 12 postal responses.

2.10 The top five priorities overall were:

- Healthcare (290, 21.4%)
- Green space and play facilities (251, 18.5%)
- The road network (209, 15.4%)
- Public transport (172, 12.7%)
- Community facilities (163, 12%)

2.11 Broken down by settlement, Healthcare remained the priority in each area, with green space and play facilities in second place in all but Markyate, where public transport came second.

2.12 Beyond this, priorities became more varied with each settlement/area. The road network was a third priority for Hemel Hempstead, Kings Langley, the Countryside, and for those that selected 'the whole of Dacorum'. Community facilities was a third priority for Berkhamsted and Markyate, as was public transport for Tring, Bovingdon and the whole of Dacorum.

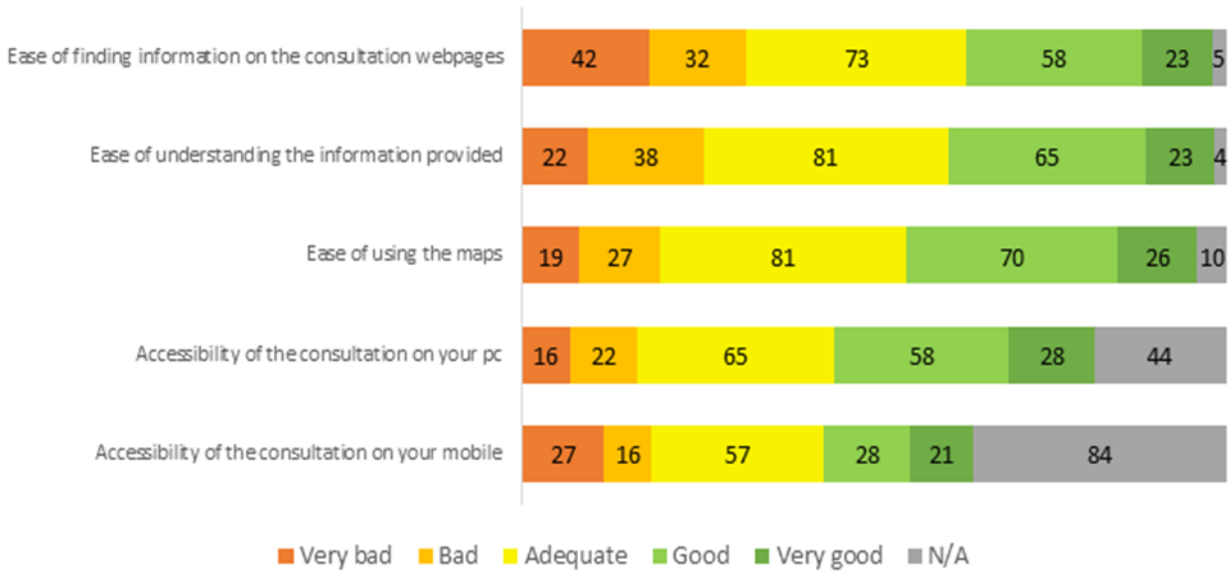
Feedback on the Consultation Process

2.13 Respondents were also asked to submit their feedback on the consultation process. 233 people (17.2% of total respondents) responded to this section.

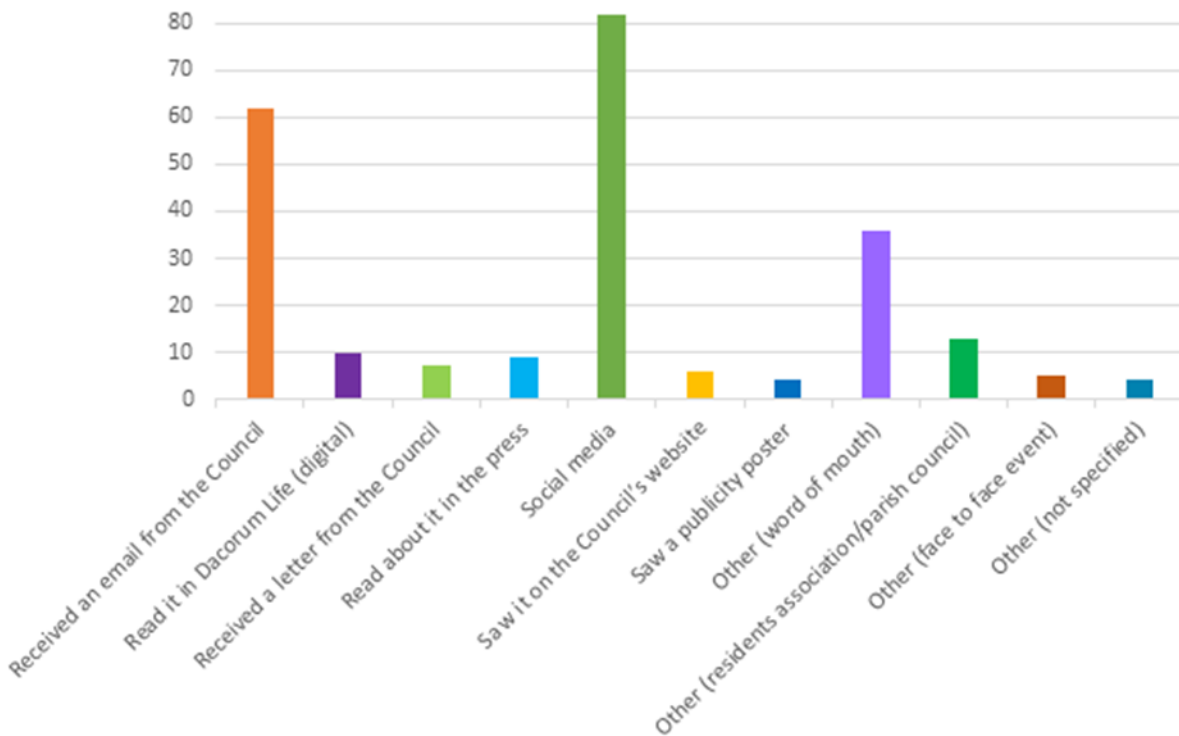
- a) The most positive response was regarding the ease of using the maps, with 11.2% reporting a very good experience, and 41.2% reporting either a good or very good experience. 34.8% found the maps adequate.
- b) The most negative response was regarding the ease of finding information on the webpages, with 31.7% reporting either a poor or very poor experience. Nevertheless, 35.9% reported either a good or very good experience.
- c) 37.8% of respondents had a good or very good experience understanding information on the consultation webpages.
- d) Regarding accessibility on PC (Personal Computer), 36.9% had a good or very good experience.
- e) Regarding accessibility on mobile, 21% had a good or very good experience.

2.14 It should be noted 17.6% reported not using PC and 35.2% reported not using mobile, so among those who did use each medium, the proportion of approval will be larger.

2.15 Issues raised by respondents who required assistance with the consultation platform mainly revolved around not being able to submit more than one response per person. There were also concerns raised that the survey was too simple in comparison to previous exercises.



2.16 Respondents were also asked how they heard about the consultation. 223 responded (17% of respondents) of which over a third (36%) reported hearing about the consultation on social media, with almost a quarter (24%) responding after receiving a notification email from DBC.



Overview of Key Themes and Issues

- 2.17 The consultation attracted a large number of views from individuals, statutory bodies, developers and other interest groups. A diverse range of views were expressed from those strongly objecting to the Plan to others strongly supporting it.
- 2.18 The following sets out some of the general themes that emerged through the consultation, in no particular order.
- a) Over a third of respondents supported the Revised Strategy for Growth, while a little over half objected. Support was highest in Tring and Kings Langley, where reductions of homes proposed were greatest, and objections were highest in Hemel Hempstead which has received the only increase in allocations.
 - b) Respondents were most concerned about losing green spaces in the Borough and the ability of infrastructure (particularly healthcare and traffic) to cope with the increased housing.
 - c) A large number of respondents welcomed the overall reduction in proposed Green Belt site allocations, however respondents continued to express concern regarding the remaining proposed Green Belt development.
 - d) Conflicting issues were raised between residents of the borough's market towns welcoming the renewed focus on Hemel Hempstead for growth, and residents of Hemel Hempstead requesting that the strategy adopt a more proportionate approach to growth in the Borough.
 - e) Additionally, a number of respondents raised concerns with the development of brownfield sites within Hemel Hempstead and the impacts this would have on existing infrastructure pressures and historic sensitivities in the areas of focus.
 - f) Many residents questioned the ability of infrastructure to accommodate the proposed growth, particularly healthcare, roads and education provision, and requested more certainty into the mechanisms for delivering infrastructure.
 - g) A substantial number of responses made by housing and planning professionals raised concerns with the soundness of the revised strategy and questioned how the council was justifying a reduced target for housing growth against the standard methodology target set by the government.
 - h) Detailed representations were made to the Council from organisations, infrastructure providers, landowners and developers, on sites included in the consultation and also of sites that were not included in the consultation. These representations raise a number of conflicting issues and further evidence gathering may be required to examine the issues raised.
 - i) Please refer to Section 3 and Appendix 1 of the main Consultation Report for the wider analysis of responses, structured by settlement.

Comparison to previous consultations

Number of comments received

	Responses	Respondents
Issues and Options (2017)	22,708	2,376
Emerging Strategy for Growth (2020)	16,237	4,109
Revised Strategy for Growth (2023)	1,356	1,356

2.19 The number of responses to the 2023 consultation were significantly lower as the online platform recorded the completion of the whole survey as one response, whereas the previous consultation software (used in 2020 and 2017) recorded the answer to each question as a response. Respondent numbers overall were also lower than previous consultations, however when applied to each area the following conclusions can be made:

- More respondents commented in relation to Hemel Hempstead in 2023 than in 2020.
- Fewer individuals made comments in relation to Berkhamsted, Tring and the three large villages in 2023 than in 2020.
- The number of individuals commenting about Dacorum’s countryside increased in 2023, despite that there were very few changes proposed to the Countryside delivery strategy, and all of the proposals and sites included within the Emerging Strategy remained ‘under review’

Comparison of respondent numbers by settlement (2020 and 2023)

Area	Emerging Strategy for Growth Number of respondents ²	Revised Strategy for Growth Number of respondents
Hemel Hempstead	387	562
Berkhamsted	1,494 (including Thakeham campaign)	488
Tring	1,667 (including GFRA petition)	292
Kings Langley	165	64
Bovingdon	109	43
Markyate	83	24
Countryside	160	221
Other	N/A	44
Whole Borough	N/A	243

Area	Emerging Strategy for Growth % of total respondents	Revised Strategy for Growth % of total respondents
Hemel Hempstead	9%	42%
Berkhamsted	36%	36%
Tring	41%	22%
Kings Langley	4%	5%
Bovingdon	3%	3%
Markyate	2%	2%
Countryside	4%	16%

² The data for the Emerging Strategy for Growth has been worked out by creating a total of all responses made to both the relevant Delivery Strategy and for the relevant Proposals and Sites section for each settlement, before being filtered to remove duplicate respondent IDs, in order to create a total of unique respondents per area.

2.20 Although all Local Plans have unique circumstances and challenges, the number of responses received is broadly comparable to other Regulation 18 consultations undertaken within neighbouring and other South West Hertfordshire LPAs

LPA	Regulation 18 Consultation Type	Year	Respondents	% of LPA's 2021 population (respondents)
Dacorum	Issues and Options	2017	2376	1.5%
	Draft Local Plan	2020	4109	2.6%
	Revised Strategy	2023	1356	0.9%
Buckinghamshire	Issues and Options	2022	3439	0.6%
Central Bedfordshire (Adopted 2021)	Issues and Options	2016	785	0.3%
	Draft Local Plan	2017	6828	2.3%
Hertsmere	Proposed Allocations	2018	2100	1.9%
	Draft Local Plan	2021	c. 6200	c. 5.8%
St. Albans	Draft Local Plan	2023	890	0.6%
Three Rivers (results unclear for 2017 issues and options / 2018 & early 2023 allocations)	Draft Local Plan	2021	'Over 2,500'	c. 2.7%
	Revised Strategy	2023	'Over 1000'	c. 1.1%
Watford (Adopted 2022)	Issues and Options	2018	481	0.5%
	Draft Local Plan	2019	890	0.9%

3) Consultation

3.1 This report was considered by the Council's SLT at the meeting on 7 February 2024 and by SLT-PH on 22 February 2024, and any suggested amendments have been taken into account.

4) Financial and value for money implications:

4.1 There are no financial implications arising as a result of this report.

5) Legal Implications

5.1 There are no legal implications arising as a result of this report.

5.2 Regulation 18 of the Town and Country Planning (Local Development) (England) Regulations 2012 places a statutory obligation on the council to consider all representations made during the consultation and take these into account.

6) Risk implications:

- 6.1 As the report is presenting an objective summary of the key issues raised through the recent consultation, officers do not consider there to be any risks arising as a result of this.
- 6.2 The Local Plan has its own detailed risk assessment and this is contained in the adopted Local Development Scheme (2023). This is regularly monitored in accordance with the Council's programme management procedures.

7) Equalities, Community Impact and Human Rights:

- 7.1 A Community Impact Assessment (CIA) was prepared to support the preparation and consultation of the Emerging Strategy for Growth, and was entered into the CIA database prior to the Cabinet meeting on the 20th October 2020. This document was reviewed prior to undertaking the consultation on the Revised Strategy for Growth in 2023, and it was deemed that no major changes were required. The CIA is appended to this report (Appendix 2).
- 7.2 There are no Human Rights Implications arising from this report.

8) Sustainability implications (including climate change, health and wellbeing, community safety):

- 8.1. There are no sustainability implications arising from this report.

9) Council infrastructure (including Health and Safety, HR/OD, assets and other resources:

- 9.1. There are no implications to Council infrastructure arising from this report.

10) Conclusions and Next Steps:

- 10.1 Following the consideration and approval of this report by Scrutiny and its publication, officers will undertake the following tasks:
 - a) Consider further the key issues raised and put in place actions and learning points, where appropriate, to address them;
 - b) Consider if further changes need to be made to the revised strategy in light of comments received, taking account of updated evidence on housing, employment, and other identified needs for the Borough;
 - c) Update its wider evidence base as appropriate to the key issues raised and consider if any additional evidence is needed to inform the pre-submission version of the Local Plan;
 - d) Review and update the suite of policies that were consulted on in through the Emerging Strategy for Growth consultation held in 2020/21, taking account of relevant feedback received at that time as well as through the Revised Strategy for Growth;

- e) Engage with infrastructure providers to clearly define the requirements needed to support growth across the borough, to inform an updated Infrastructure Delivery Plan; and
- f) Engage with Members through the “Task and Finish” group, first meeting scheduled later in March 2024, on the key issues raised and how these will inform the pre-submission version of the Local Plan.

10.2 In line with the LDS (adopted October 2023) the ‘pre-submission’ version of the Local Plan will be published in accordance with Regulation 19 in October 2024, where the community, organisations and statutory consultees will be invited to make representations on the plan. This will be accompanied by the Council’s response to key issues raised and how this has informed the final version of the Local Plan.

10.3 The Local Plan and representations received will then be submitted to the Planning Inspectorate in February 2025, ahead of the June 2025 deadline set by the Government, with a target adoption date of February 2026.