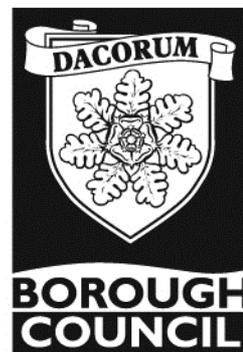


# APPENDIX 4

Date: 17 March 2015  
Your Ref:  
Our Ref:  
Contact: James Doe  
Email: [James.Doe@dacorum.gov.uk](mailto:James.Doe@dacorum.gov.uk)  
Directline: 01442 228583  
Fax:



Ms Tracy Harvey  
Head of Planning  
St Albans City and District Council,  
Civic Centre,  
St Peters Street,  
St Albans,  
Hertfordshire,  
AL1 3JE.

Civic Centre  
Marlowes  
Hemel Hempstead  
Hertfordshire  
HP1 1HH

Telephone: 01442 228000  
[www.dacorum.gov.uk](http://www.dacorum.gov.uk)  
DX 8804 Hemel Hempstead  
D/deaf callers, Text Relay:  
18001 + 01442 228000

Dear Tracy,

## South West Hertfordshire Strategic Housing Market Assessment and Economy Study

I am writing on behalf of Dacorum, Three Rivers, Watford and Hertsmere Councils regarding the above technical work that is being carried out to inform our plan reviews.

As you are aware, the first stage of the work being carried out by consultants G L Hearn and Regeneris is to define appropriate Housing Market Area(s) (HMA) and Functional Economic Market Area(s) (FEMA). The initial conclusions for each were outlined at the Project Advisory Group meeting held on 6 February 2015, attended by your colleague Manpreet Kanda. Following this meeting, the consultants have looked again at their conclusions in the light of issues raised – including reassessing the issue of house prices as requested by your authority. However, the consultants have now confirmed that their initial recommendations remain i.e. that the appropriate HMA and FEMA for the both studies includes all of St Albans City and District Council's administrative area.

We are aware that St Albans Council previously advised that it did not wish to join the other four south west Hertfordshire authorities in commissioning new housing and employment technical work for the following reasons:

*“St Albans Council has already undertaken a recent SHMA and will be updating it in due course. We are happy to support a ‘reference group’ for your joint SHMA and I offer myself as a contact in the first instance. For the Economy/ Economic Development/ Employment work, the district has already undertaken some work and will be doing more in due course in this area. Again we are happy to support a ‘reference group’ for your joint work in this area and I offer myself as a contact in the first instance.”*

(Email sent by Chris Briggs, Spatial Planning Manager, St Albans City and District Council, to Richard Blackburn, Senior Planning Officer, Hertsmere Borough Council on on 7/8/14).



We understand your reasons. However in the light of our consultants' findings on the HMA and FEMA, we would like to give you the opportunity to reconsider the nature of your involvement in this work.

Paragraph 159 of the National Planning Policy Framework (NPPF) sets out the need to prepare a Strategic Housing Market Assessment to assess full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. Various local plan examinations have emphasised the need for the assessment to cover the relevant "Housing Market Area." Similarly Paragraph 160 sets out the need for Local Planning Authorities to have a clear understanding of business needs within the economic markets operating in and across their area. This should be understood through working together with county and neighbouring authorities and with Local Enterprise Partnerships to prepare and maintain a robust evidence base to understand both existing business needs and likely changes in the market.

The extent of both these strands of work is set out in the Planning Practice Guidance (PPG) for Housing and Economic Development Needs Assessment. This states that:

*"local planning authorities should assess their development needs working with the other local authorities in the relevant housing market area or functional economic market area in line with the duty to cooperate. This is because such needs are rarely constrained precisely by local authority administrative boundaries."*

Based on evidence of journeys to work, migration, house prices and other factors, our consultants strongly advise that the HMA extends beyond the commissioning authorities and includes St Albans. Likewise they recommend the FEMA covers the commissioning authorities and St Albans. By collaborating in this work, the four commissioning authorities have set out a clear co-operation strategy. However the evidence points to the need for the five authorities to co-operate – i.e. for the current four commissioning authorities to work with St Albans because it falls within the HMA and FEMA.

The Planning Practice Guidance outlines that:

*"Where Local Plans are at different stages of production, local planning authorities can build upon the existing evidence base of partner local authorities in their housing market area but should co-ordinate future housing reviews so they take place at the same time."*

We consider that an understanding of dynamics in St Albans is necessary in order to draw sensible conclusions within the technical work. Ultimately, in respect of both housing and employment issues, we consider that the evidence base must pick up the links to/with St Albans.

The need to co-operate with St Albans will extend beyond the evidence itself. The NPPF sets out that local authorities have a Duty to Cooperate on strategic planning issues with local authorities in the relevant housing market and economic areas. As you are aware, this duty does not require agreement, but it does require local authorities to positively engage and to have sustained joint working with concrete actions and outcomes. Inspectors testing compliance with the duty at examination will also assess the outcomes of co-operation and not just whether local planning authorities have approached others.

In respect of housing and employment, the relevant issues include:

- What the housing and employment land needs are across the HMA/ FEMA;
- How housing and employment land has been distributed across these areas; and
- Any issues of unmet needs and how these have been collectively dealt with.

The section of the PPG dealing with the Duty to Cooperate is clear that when Local Plans are not being brought forward at the same time, the use of formal agreements between local planning authorities is to be encouraged – demonstrating long-term commitment to a jointly agreed strategy on cross-boundary matters. The PPG outlines that such agreements should be as specific as possible, for example about the quantity, location and timing of unmet need that one authority is prepared to accept from another authority to help it deliver its planning strategy.

The PPG also sets out that prior to submitting a Local Plan the LPAs should have explored all available options for delivering the planning strategy within their own planning area. They should also have formally approached other authorities with whom it would be sensible to seek to work to deliver the planning strategy.

We consider that cross-boundary joint working (including with St Albans) will be important to demonstrate the commitment between local planning authorities to produce effective strategic planning policies, and it will be helpful for Inspectors to see such agreements at the examination as part of the evidence to demonstrate compliance with the Duty.

For these reasons we would like to ask St Albans to reconsider its previous response and become a commissioning partner for the South West Hertfordshire SHMA and Economy Studies.

If St Albans does not want to participate on a full joint basis on these studies, the treatment of St Albans within the technical work needs to be carefully considered – ensuring that robust evidence can be presented which will support the commissioning authorities and withstand scrutiny at local plan examinations.

Whilst your full involvement (with both studies) is obviously our preferred approach, if this remains an option that you cannot pursue, we would be grateful if you could confirm that you are willing to co-operate with G L Hearn and Regeneris in terms of accessing appropriate information and data sources. I know that this process has already commenced with the purchase of IDBR data and accessing monitoring data for St Albans from the Smart Herts system.

If you would like to discuss any of the above further, please contact either Laura Wood (Project Manager for the SHMA) on 01442 228661 or [laura.wood@dacorum.gov.uk](mailto:laura.wood@dacorum.gov.uk) or Sarah Barker (Project Manager for the Economy Study) on 0208 207 7567 [sarah.barker@hertsmere.gov.uk](mailto:sarah.barker@hertsmere.gov.uk).

Your early response would be appreciated as it is obviously important that both studies continue to progress as close to timetable as possible.

Yours sincerely



**James Doe**  
**Assistant Director, Planning, Development and Regeneration**  
**Dacorum Borough Council**

**On behalf of Dacorum Borough Council, Hertsmere Borough Council, Three Rivers District Council and Watford Borough Council.**

Encs.

- Presentation on HMA, GL Hearn, 06.02.2015
- Presentation on FEMA, Regeneris, 06.02.2015