

Table 2a: Main Issues raised - Part A – Context

Notes:	Nature of the Issue		Issue previously raised	
			New Issue	
		S	Significant New Issue	
	Nature of the Amendment	MC	Minor Change (excluding editorial changes here)	See Table 3
		SC	Significant Change	None recommended

The column headed – Nature of the Issue – is intended for internal use by Dacorum Council.

New issue - i.e. it has not been raised in any comparable form before.

Significant issue: i.e. one which substantively challenges the direction, meaning or intention of a policy or proposal in the Core Strategy.

The remaining information is important for the Examination into the Core Strategy.

Amendments are subdivided into minor and significant.

Significant change: i.e. a substantive change to the direction, intention or meaning of a policy in the Core Strategy: the clarification, correction or postponing of the detail of policy to a later stage have not been construed as being significant changes.

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
Foreword		The level of housing proposed will cause water supply issues.		No change. This issue is sufficiently covered by Policies CS29 and CS31.	
		The level of housing proposed will increase carbon emissions and air pollution.		No change to the Foreword. Policies CS28 to CS30 and CS32 seek to minimise these impacts. However a reference to carbon emission reductions in Objective 13 would be helpful.	MC Sec 6 (Obj 13)
		Loss of biodiversity through Green Belt development		No change. Biodiversity issues have been considered when choosing Local Allocations. Application of policies in Section 16 – Enhancing the natural environment will mitigate any impacts.	
		Lack of reference to renewable technologies.		No change. The issue of renewable technology is adequately covered in Sections 11 and 18.	
		Emphasise local food production and distribution, and the need for crops to be free from genetic modification.		No change to the Foreword. Reference to sourcing food locally is already included: a further reference will be added to the Borough Vision.	MC (B Vision)
1. Summary of the Strategy		The level of new homes proposed is not compatible with maintaining quality of life in small market towns.		No change. The Strategy maintains an appropriate balance between new development and protection of local character, through Policies CS1, 2 and 10-13 and the Place Strategies.	
		Give priority to one-off (smaller scale) development over mass development.		No change. Development opportunities may be smaller or larger. What will be appropriate varies according to location and scale of need. Design policies will help ensure development sits with local character, whatever its scale.	
		Complexity of the consultation processes and need for an independent inquiry where the interest of local people are properly represented.		No change. Council has followed national regulations, Government advice and consultation policy in its Statement	

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					of Community Involvement. The process of examination allows for independent review and different views to be considered.	
			The Borough Vision should be more ambitious.		No change. The Vision strikes a realistic balance between ambition and delivery.	
Text 1.1-22	1.2		The Plan does not sufficiently reflect 'sustainable development' as a key driver		No change. The principles of sustainable development are explained in Section 8 and sufficiently articulated throughout the Core Strategy.	
	1.4		A lower housing option should be included to avoid contradictions between housing level and other requirements of the strategy.		No change. The housing target and strategy as a whole strike an appropriate balance between social, economic and environmental considerations.	
			The proposed level of new homes is not considered sustainable.		No change. The housing target strikes an appropriate balance between social, economic and environmental considerations.	
			Water supply is not sufficient to support the proposed number of new homes.		No change. The Council is closely liaising with the water undertaker and advisers. The Infrastructure Delivery Plan will identify when and where new infrastructure upgrades will be provided to deal with demands. The IDP will be updated regularly. Policy CS29 will control water consumption arising from new development.	
			How will flows in chalk streams be improved?		No change. Improvements will be delivered through the application of Policies CS29 and CS31 and through the work of partner organisations.	
			Use brownfield land before Green Belt sites for housing.		No change. Policy CS2 gives priority to the use of brownfield land and greenfield sites which are not within the Green Belt.	
	1.10		There is no reference to the need for a heritage centre / museum for Hemel Hempstead		No change. Cultural facilities are appropriately referred to in Section 15 and Policy CS23.	
			Delete all proposals that would involve a redesignation of Green Belt land for housing. Specific concerns were raised in respect of the proposed local allocation at West Hemel Hempstead: <ul style="list-style-type: none"> • The extent of the proposed Green Belt release • The loss of a valuable 'green lung' for the town. • The impact on Shrubhill Common LNR • The impact on area's footpath network and informal recreational space. • Visual and landscape impact of development. • The potential for increased pressure for a northern bypass. • Poor performance against sustainability criteria in Sustainability Appraisal Report 		No change to this paragraph. Green Belt releases are required in order to provide for future local housing needs. Key development requirements for each of the local allocations are set out in the relevant Place Strategy. For West Hemel Hempstead this includes reference to creating a soft edge to the Green Belt; to the provision of additional open space; improving pedestrian linkages; new strategic landscaping to mitigate visual impact and the extension of Shrubhill Common Nature Reserve. Detailed design and layout issues will be considered through site master plans. Site boundaries will be defined in the Site Allocations DPD. Figure 20 will be amended to show Shrubhill Common LNR. Also see also response to LA3.	MC Fig 19
	1.11		Lack of reference to provision of basic community needs, especially places of worship.		No change. The paragraph refers generally to community facilities, which can include places of worship (as set out in Figure 14). Policy CS23 seeks both the retention of existing social infrastructure and the provision of new facilities.	
			Lack of reference to cultural facilities, especially any replacement for the Pavilion in Hemel Hempstead.		No change. The paragraph is intended as a summary of the strategy. Appropriate detail regarding new cultural and leisure facilities is covered in Section 15 and elsewhere.	

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		Provide further information on the range of facilities the proposed new sports ground will support.		No change. The precise nature of the new facility has yet to be established. Refer to background technical study for information about its potential size and nature.	
		Explain the meaning of 'General Hospital' and the need for this hospital to provide an appropriate range of services.		No change. The Council has used the official term provided by the local Hospital Trust. The range of services provided at the hospital is a matter for the Trust.	
		Refer to the findings of the Two Waters and Station Gateway studies.		No change. These are background technical studies that will be used to help guide detailed development / redevelopment proposals in the Two Waters area. The Core Strategy provides an appropriate planning framework to guide any such development.	
	1.13	The need for additional indoor sports facilities in Berkhamsted and especially Tring is not identified.		No change. The Place Strategies identify new needs rather than refurbishment or replacement. Known proposals and specific requirements will be identified in the Site Allocations DPD.	
		State the sports that will use the new playing pitches proposed for Berkhamsted.		No change. This will be a matter for the site owners and managers and will depend on particular need/demand which may vary over time.	
		New sports facilities at Tring School should be available for public use.		Policy CS23 promotes the dual use of new and existing facilities.	
		Reduce the level of new development proposed for Berkhamsted to between 750 and 1,000 and avoid: <ul style="list-style-type: none"> • undue pressure on local infrastructure (particularly water and sewerage) • adverse environmental impact due to loss of Green Belt; and • increased car usage and congestion. 		No change. The Council has taken a number of factors into consideration in reaching a balanced conclusion on the level of new housing for Berkhamsted. It has considered alternative levels against housing forecasts and the role of Berkhamsted in the settlement hierarchy in Dacorum. It has also considered the impact of development on the character of a relatively busy town and its infrastructure. Also see responses under paragraph 21.2.	
		The density of development proposed on Egerton Rothesay School site (SS1) is too high.		No change. It is important that effective use is made of land within the urban area, commensurate with its location and surroundings. The context is different from the Local Plan in that more homes are needed over a longer time period. The Council has considered a figure up to 240/250 (Emerging Core Strategy) and in the light of consultation and further consideration has reduced it. An increase of 80 homes on the Local Plan is considered reasonable: more open space will be provided. Also see response to Figure 23 (Berkhamsted Place Strategy) relating to urban design zones.	
		Delete reference to Hanburys (LA4).		No change. Local allocations are needed to meet the housing target. The inclusion of Hanburys is required to help meet local housing needs arising within Berkhamsted.	
	1.14	Does Markyate need more sports facilities?		No change. The level of growth at Markyate is modest. The level of facilities is generally appropriate to the village, but any specific needs can be considered further through Site Allocations DPD.	
	1.16	Refer to the need to conserve and enhance the natural beauty of the		Although no change is needed to this paragraph, the Council	MC

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			AONB.		acknowledges that it has a role to conserve and enhance the natural beauty of the AONB. Policy CS25 is aimed at achieving this. The role and responsibilities of the Council and the Chilterns Conservation Board will be explained in the glossary.	(glossary)
	1.20		Lack of reference to a cultural centre for the Borough		No change. Local objectives for Hemel Hempstead include reference to new cultural facilities in the town centre.	
			Protect historic buildings, such as Ashlyns School, in accordance with 1990 Planning (Listed Buildings and Conservation) Act.		No change. Existing policies accord this protection.	
	1.21		The Community infrastructure levy (CIL) and other developer contributions should be set at a realistic level and used to meet specific infrastructure needs.		No change. These matters will be fully considered when drawing up charging schedules, setting CIL and considering development costs and viability in general. Expenditure from financial contributions will be directed towards areas of greatest need.	
Key Diagram			Amend the key to refer to refer to 'Centre for Regeneration and Change' rather than 'Main Centre for Development and Change'; and distinguish between large and small market towns.	S	No change. The proposed terminology accurately reflects the future role of the Borough's three towns. The supporting text provides appropriate explanation.	
			Amend the Green Belt boundary, showing the removal of the local allocations.		No change. Green Belt boundaries will be amended through the Site Allocations DPD to reflect the approach set out in Policies CS2 and CS3.	
Part A - Context		-				
2. Introduction		-				
Text: 2.1-13	2.1		Is the policy approach consistent with current national policy?		No change. The Council applies national policy to Dacorum, taking into account local circumstances. The Examination into the Core Strategy will consider the soundness of the Council's policies and their relationship to national policy.	
	2.2		The level of new homes is too high and should be reduced to 9,835 and LA4 (Hanburys) removed		No change. The housing target strikes an appropriate balance between social, economic and environmental considerations. Local allocations are needed to meet the housing target. The inclusion of Hanburys is required to help meet local housing needs arising within Berkhamsted.	
Figures 1 & 2		-				
3. Borough Portrait			Para 3 of the vision is too restrictive in terms of housing provision at Hemel Hempstead.		No change. The level of new homes proposed for the town is appropriate when considered in the context of the settlement hierarchy, land availability, housing needs and demands and delivery of community benefits.	
Text: 3.1-22	3.5		Refer to the Chilterns AONB.		No change. The extent of the AONB is adequately covered in paragraph 3.21 of the Borough Portrait and elsewhere (e.g. Map 1).	
	3.12		Reference to 'self containment' should be elaborated to reflect a high level of out-commuting (to work) from Berkhamsted.		No change. This is a Borough Portrait and the current text adequately summarises the borough-level picture.	
	3.22		Remove the reference to white clawed crayfish as these are now extinct within the county.		Agree.	MC
			Amend text to include reference to: <ul style="list-style-type: none"> Chilterns Beechwoods Special Area of Conservation; 8 SSSIs; over 200 Wildlife Sites; 		A reference will be made to sites of wildlife interest in the borough. Further reference to Berkhamsted Castle is more appropriately made in the Berkhamsted Place Strategy.	MC MC 21.6 MC 21.12

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		<ul style="list-style-type: none"> Berkhamsted Castle 			
Figures 3 - 6	-				
4. Challenges	-				
Challenge 1	4.2	<p>Include an explicit commitment to provide better social infrastructure.</p> <p>Refer to meeting the needs generated within the Borough in Challenge 1, and others only as identified by the other challenges</p>		<p>No change. Social infrastructure is covered in Challenge 4.</p> <p>No change. The level of development proposed in the Core Strategy addresses all the challenges specified. It does not, nor should not, automatically mean that every one is met in full. In-migration must be recognised as a challenge, even if the housing demands it brings cannot reasonably be met for environmental and other factors.</p>	
Challenge 2					
Challenge 3	4.5	Refer to culture and the need for a strategic plan for the centre of Hemel Hempstead.		No change. Culture is referred to in Challenge 4. A town centre master plan is being prepared in accordance with the framework set out in the Hemel Hempstead Place Strategy.	
Challenge 4	4.6	Include measurable targets for social, leisure and cultural facilities and be aspirational.		No change. Targets relating to social infrastructure are included under Policy CS23. Detailed standards for provision are more appropriate to supporting policy.	
Challenge 5	4.7	Emphasise careful land management that is supportive of traditional farming, forestry and food production and refer to the fact that the sources of challenge are greater than climate change and population growth		No change to the challenge regarding land management, which provides an appropriate summary of the issue. However, add reference to the impact of development pressure. Land management is elaborated elsewhere (especially in Sections 16 and 26).	MC
		Refer to water supply.		No change. Water is covered by the reference to natural resources.	
Challenge 6	4.8	Refer to mitigation and adaptation in the context of climate change. Also refer to the other benefits of sustainable design and construction in Section 18.		Agree in part: refer to adaptation as well as mitigation. Other, suggested cross-references are not necessary.	MC
5. Borough Vision	-				
Text: 5.1-2	5.1	Lack of reference to the global context for sustainable development.		No change. This is adequately covered in the introduction to the Sustainable Development Strategy in Section 8.	
		Include reference to local food production in the vision.		Agree.	MC (vision)
		How can the vision be delivered if the Council does not have responsibility for all of the areas referred to?		No change. The importance of joint working with partner organisations is recognised throughout the strategy.	
		Lack of reference to the need for new social and community infrastructure.		No change. Adequate reference is made to this issue within the vision and reflected throughout the strategy.	
Vision		<p>Does the vision appropriately cover the relative roles of the three towns -</p> <ol style="list-style-type: none"> Hemel Hempstead meeting both need and demand for new homes; the sustainability of Green Belt releases at Hemel Hempstead; the role of Berkhamsted as a location for locating strategic growth; the need for greater differentiation between the roles of Berkhamsted and Tring? 		No change. The vision clearly reflects the settlement hierarchy set out in Table 1. This is considered to appropriately reflect the size, character, capacity and constraints of the Borough's towns. Also see the responses to issues raised under Table 1 and Policy CS1.	
6. Strategic Objectives		Lack of a specific objective relating to local food production.		No change. The strategic objectives are appropriate. Local food production is effectively covered by a number of strategic objectives – for example, by reference to rural	

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				enterprise, function of the countryside and leisure facilities. There are also references elsewhere to the specific principles of growing, processing and selling (food) locally.	
		The Strategic Objectives do not meet the vision set out for Berkhamsted as the level of planned new homes is insufficient.	S	No change. Strategic Objectives support the Borough Vision as written. The role of Berkhamsted supports that.	
Text: 6.1-2	-				
Objective 1	-				
Objective 2		Refer to: <ul style="list-style-type: none"> - reduction of greenhouse gas emissions; - reducing pressure on the environment, protecting biodiversity and reducing water stress; - mitigation of and adaptation to the impacts of climate change. 	S	No change to Objective 2. Reference to carbon emission reduction is appropriate under Objective 13. When the strategic objectives are then read as a whole, all of the issues raised are covered.	MC
Objective 3	-				
Objective 4	-				
Objective 5	-				
Objective 6	-				
Objective 7	-				
Objective 8	-				
Objective 9		Replace 'vibrant' with <i>sustainable</i> (and prosperous economy).		No change. Seeking a vibrant economy is not incompatible with the principles of sustainability.	
		Balance the pursuit of economic objectives with quality of life objectives.		Agree. The strategy aims to strike an appropriate balance between social, economic and environmental objectives.	
		Replace 'maintain' with <i>extend</i> (commercial enterprise and employment opportunities in market towns and large villages).		No change. Existing wording appropriately reflects strategy. Whilst some intensification and small scale expansion of these activities is possible in the market towns and large villages, the majority of growth is expected to be at Hemel Hempstead.	
Objective 10		Amend in order to acknowledge and meet the shortfall in housing provision: i.e. <i>to provide sufficient housing to meet the future needs of the Borough.</i>		No change. The existing wording appropriately reflects the vision and strategy.	
Objective 11	-				
Objective 12		Reword to refer to the need to 'conserve and enhance'		No change. The strategic objective relates to wider issues than the AONB. However, the Council acknowledges that it and other organisations have a role and responsibility to conserve and enhance the natural beauty of the AONB. Also see response to paragraph 1.16, proposing a minor change to the glossary.	MC (glossary)
Objective 13	-				
Objective 14	-				
Objective 15		Wording needs to be strengthened to refer to a reduction in both the absolute levels of pollution and its effects on people and the environment.		No change. The wording sufficiently covers both impacts.	
Objective 16	-				
Objective 17	-				
7. Other Plans					
Text: 7.1-4	7.4	Lack of reference to tourism within the wider document.		No change. Tourism is adequately referred to elsewhere, with the detail more appropriate to supplementary policies.	

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Figures 7		Refer to the Hertfordshire Green Infrastructure Plan and Dacorum Borough Green Infrastructure Plan		The former is an appropriate additional reference. Policy CS26 refers to such additional guidance being adopted.	MC
Figure 8		Add Policy CS23 to the list of relevant Core Strategy policies influencing crime reduction.		Agree.	MC

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Table 2a: Main Issues raised - Part B
- Sustainable Development Strategy

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
Part B – The Strategy	-				
The Sustainable Development Strategy	-				
Strategic Objectives		Add strategic objective to ensure sufficient housing is developed to meet the borough’s housing requirement.		No change. The appropriate strategic objectives are included and the principles of sustainable development introduced in paragraphs 8.1-8.6. The strategic objectives give the direction for the policies that follow. A strategic housing objective (rather than a sustainable development objective) is included under ‘Providing Homes and Community Services’.	
8. Promoting sustainable development	-				
Text: 8.1-6	8.6	Does the consideration of sustainability concentrate too much on carbon emission reductions and climate change mitigation to the detriment of other matters, such as the protection and enhancement of ecosystems?		No change. Paragraphs 8.1-8.6 introduce sustainability in the round. The approach is expanded throughout the Core Strategy and ecology/biodiversity is covered extensively, including in Section 16 and in Section 18 (and further minor changes have been made there).	
Figures 8 & 9	-				
Distribution of Development: 8.7-12	8.7	Should settlements be allowed to adapt and grow?		No change. In general, new investment should be allowed to provide for the needs of the borough and individual settlements. This means new community facilities, services, homes and workplaces. Declining average household size implies a need for new dwellings to maintain population and provide the lifeblood for communities. Quality of life is in part related to prosperity. As new businesses grow they need more space. Shops and facilities close without sufficient custom. The Council considers that the real issue is not about adaptation and growth but the scale and pace of change. Policy CS1 and Table 1 in particular provide a strategic overview of that change, and they guide development to the more appropriate places. In reality the developed area or building footprint of all towns and villages grows a little.	
Table 1		Define Hemel Hempstead as a centre for <i>Regeneration</i> and Change.	S	No change. Hemel Hempstead is appropriately defined. The term, ‘Development and Change’, which the Council has used, derives from the Regional Spatial Strategy. Hemel Hempstead is the focus for new development in the borough: this can be clarified by a minor wording change in Policy CS1. It is also acknowledged that the regeneration of two key areas in the town is an important policy ambition. The role of Hemel Hempstead as a New Town dominates the settlement hierarchy. In comparison, all other settlements in the borough have grown organically and, being smaller, are more obviously set in countryside.	MC CS1
		Facilitate mixed use at Hemel Hempstead.		No change. The table is appropriately worded. Mixed use	

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				can be appropriate anywhere.	
		Should there be greater differentiation between Berkhamsted (large market town) and Tring (small market town)? [Berkhamsted would be a location for housing/employment growth and regeneration, with a strategic new development to the south of the town.]		No change. Berkhamsted and Tring are both towns, located within the Green Belt and adjoined by the Chilterns AONB. They are of different sizes, and will naturally accommodate different levels of development. There are constraints on outward expansion because of local infrastructure, character of the towns and their surroundings. In terms of a broad hierarchy the difference in scale between each market town is not that large. The opportunity for general development is more limited in these places compared to Hemel Hempstead.	
		Should there be greater differentiation between the market towns (areas of moderate growth) and large villages (areas of modest growth)?		No change. The large villages are surrounded by Green Belt and/or the Chilterns AONB. The large villages are different in size to the market towns, and will naturally accommodate different levels of development to them. There are constraints on outward expansion because of local infrastructure, character of the towns and their surroundings. In terms of a broad hierarchy the difference in scale between the large villages and market towns is not that large. The opportunity for general development is more limited in all these places compared to Hemel Hempstead.	
		Alternatively, should all market towns and large villages accommodate their own natural growth, plus that for the rural settlements they serve?	S	No change. All these settlements have planning constraints: it would be inappropriate to provide for the significantly higher rates of development which accommodation of natural growth would imply. Also see above responses.	
		Refer to the strategic site at Berkhamsted.		No change. The table is appropriately worded and the strategic sites referred to sufficiently in the Core Strategy – in particular Sections 14 (Housing) and 21 (Berkhamsted Place Strategy).	
		Refer to the small villages as the least sustainable locations <i>for new development</i> (i.e. other than local needs).		No change. In the context of accommodating general development, which is what the table and Policy CS1 guide, the small villages are the least sustainable locations.	
Policy CS1		Should Berkhamsted be identified as an area of strategic development opportunity (allowing the town to meet its own development needs and expand to the south)?		No change. The scale of development suggested through representations about land south of Berkhamsted is considered excessive and with significant impacts (for example on a large area of the town's Green Belt hinterland). The scale of development is not needed at Berkhamsted and not needed to meet the Core Strategy housing target.	
		Should the scale of development at Tring be increased (from 4%) to 10% of the housing target?	S	No change. The scale of development suggested is not needed at Tring and not needed to meet the Core Strategy housing target.	
		Should Berkhamsted and Tring be more clearly distinguished, and/or the market towns be more clearly distinguished from the large villages?		No change. Berkhamsted and Tring are both towns, located within the Green Belt and adjoined by the Chilterns AONB. They are of different sizes, and will naturally accommodate different levels of development. The large villages are surrounded by Green Belt and/or the Chilterns AONB. The large villages are different in size to the market towns, and will naturally accommodate different levels of development to	

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				them. There are constraints on outward expansion of all these settlements because of local infrastructure, their character and their surroundings. In terms of a broad hierarchy the difference in scale between the large villages and market towns is not that large. The opportunity for general development is more limited in all these places compared to Hemel Hempstead, and given the clear focus on Hemel Hempstead there is no reason why the general approach to the market towns and large villages should not be similar.	
		Add criterion to Hemel Hempstead to encourage mixed use.		No change. The policy is appropriately worded. Mixed use can be appropriate anywhere. Mixed use is generally referred to in Policy CS4.	
		Define neighbourhood concept (criterion i).		It is defined in the Glossary. No change.	
		Refer to <i>necessary</i> infrastructure (criterion ii).		No change. Development should provide or contribute to the provision of its own infrastructure needs. A minor wording change can make that clear. The word, necessary, would be superfluous. Contributions to infrastructure will be guided by Policy CS35 and subordinate guidance, itself according with Government advice.	MC
		Amend criterion (a) for market towns and large villages: each should accommodate the natural growth of its town population and those of the surrounding settlement(s) each serves.	S	No change. The amended wording would have the effect of increasing the level of development at many settlements, contrary to the preferred settlement hierarchy and long standing policy (whereby development is focused at Hemel Hempstead).	
		Amend criterion (d) for market towns and large villages: refer to the Chilterns Area of Outstanding Natural Beauty.		No change. The AONB is covered by criterion (c) relating to the character of the adjoining countryside. Criterion (d) refers to the uses and functions controlled by Green Belt and Rural Area policy.	
		Does the policy prevent the development of a small site for housing at: <ul style="list-style-type: none"> - Kings Langley; or - Chipperfield? 		General development is inappropriate in the Green Belt, and so the policy discourages this. However, it would be reasonable to consider the appropriateness of development of small sites through the Site Allocations DPD.	
Monitoring/Delivery	-				
Location & Management of Devt: 8.13-16	8.14	Changes to settlement boundaries involving Green Belt land should not be supported.		No change. Some is necessary to meet the Core Strategy's housing target.	
Policy CS2		Should the policy be deleted or amended to give greater flexibility and emphasis to meeting housing demand?		No change. The policy is relevant whether the housing target is higher or lower. The policy provides a logical approach for selection of development sites in accordance with sustainability principles. The current Local Plan includes a similar approach for a lower annual housing target.	
		Should the policy be more flexibly worded to allow Green Belt sites (B in the policy) to come forward earlier than sites in settlements (A), or stronger to ensure Green Belt sites are the last resort?		No change. The policy is appropriately worded. The supply of development sites includes greenfield land within settlements (A in the policy). It is only the local allocations – hitherto Green Belt land - that are being held back to help manage the housing supply and ensure housing is provided together with relevant infrastructure. The local allocations will be defined through the Site Allocations DPD and are not	

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				needed to come forward at present. The Council also wishes to ensure that sufficient encouragement is given to regeneration opportunities.	
		Should any sequencing be removed or limited to greenfield sites around Hemel Hempstead?	S	No change. See above responses.	
		More than one local allocation can be justified at Tring.		No change. Tring is a constrained location, for which the Council has carefully balanced considerations of housing need against various impacts. A second local allocation is not needed to meet the town's housing objective or borough housing target. Also see responses under Tring Place Strategy.	
		Allow changes to the Green Belt boundary, if minor changes would create a more rational defensible boundary.		No change to policy. The Council acknowledges this may be possible through the Site Allocations DPD. The possibility of minor changes, in addition to local allocations, is referred to in paragraph 8.28.	
		Should criterion (c) refer to: <ul style="list-style-type: none"> - Use of land which meets local needs and is responsive to household growth: or - The choice of land enabling Green Belt to remain for future generations? 	S	No change. Both factors are relevant in considering levels of development, choice of sites, use of land and permanence of the Green Belt. However the criterion itself needs no qualification.	
		Add criterion to encourage mixed use schemes.		No change. The policy covers the selection of development sites (whatever the use) and is appropriately worded.	
Policy CS3		Delete the policy or amend it to be more flexible and governed by housing market conditions. [Representations also relate to objections to the overall level of housing supply and any prospective deferral of delivery.]		No change. The approach helps to manage housing supply (in particular) over a long period. This is important in a borough constrained by Green Belt and Chilterns AONB, and avoids unnecessary release of Green Belt land and assists regeneration. There are a number of criteria which will help guide the release of the local allocations. Housing market conditions will be relevant because they will guide the type and rate of delivery, which will be monitored through policy CS17. It may be decided that there are circumstances warranting release of local allocations earlier than specified in the Site Allocations DPD.	
		Local allocations at Berkhamsted and Tring should come forward in the short term.		No change. The allocations are not needed in the short term to meet local housing objectives or the borough housing target. Also see above response.	
		More than one local allocation can be justified at Tring.		No change. Tring is a constrained location, for which the Council has carefully balanced considerations of housing need against various impacts. A second local allocation is not needed to meet the town's housing objective or borough housing target. Also see responses under Tring Place Strategy.	
		Site Allocations need to consider lead in times and give certainty.		No change to policy. The principle is however accepted.	
		Criterion (a): refer to <i>existing or proposed</i> infrastructure.		No change. The criterion appropriately addresses the issue of the availability of infrastructure when it is needed. It is consistent with Policy CS35. The additional words are unnecessary and potentially misleading.	
		Criterion (b): add reference to need being based on natural population	S	No change. The criterion is appropriate. The need is not	

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			growth.		simply related to population growth. It could concern the accommodation of affordable housing, for example, and how that supply is coming forward across the borough. In the same context, it could also refer to other uses which are needed.	
			Criterion (c): refer to specific types of benefit (e.g. social infrastructure).		No change. The criterion is appropriate. The addition is unnecessary.	
			Insert criterion referring to the housing land supply.		No change. The criteria in the policy cover the relevant factors. Housing supply is a consideration lying behind the release date to be decided in the Site Allocations DPD. It is also relevant to criterion (b). Policy CS17 covers the management of the housing supply. If housing supply falls short, the Council will take remedial action. This could involve the early release of a local allocation, but not necessarily.	
Monitoring/Delivery		-				
Towns & Large Villages: 8.17-20		-				
Policy CS4			Should the policy refer to urban extensions at Hemel Hempstead and Berkhamsted or local allocations?		No. Policy CS4 is concerned with what happens <i>within</i> towns and large villages – land use and broad settlement character. Unlike Policies CS2 and 3 it is deliberately not concerned with urban extensions. When the local allocations are delineated in the Site Allocations and the Green Belt boundary is formally redrawn, local allocations will become part of the urban area. Each local allocation will be a specific proposal and completed. After the local allocations are completed, Policy CS4 will apply to any future planning applications, as it does to other land within towns and large villages.	
			The policy does not sufficiently accommodate natural population and household growth.		No change. See responses under Policy CS17.	
			Refer to the character of the residential area (to amplify reference to compatibility of non-residential development with its surroundings).		No change. The policy is appropriately worded. Urban design and residential character are covered in Section 10.	
			Take a more positive stance to the accommodation of residential, retail and business uses in town centres, particularly at Hemel Hempstead.		No change. Policy CS4 encourages a range and mix of uses. More detailed, subordinate policies will help ensure a variety is achieved. That will involve some control of uses: for example, to encourage ground floor shopping and commercial uses in a shopping area; to ensure there are opportunities for appropriate community uses; to ensure the retail shopping hierarchy is maintained.	
Monitoring/Delivery		-				
The Countryside: 8.21-26	8.23		Refer to the setting of Berkhamsted Castle.		No change to this paragraph, which appropriately refers to the main role of the Green Belt and countryside on the edge of towns and large villages. However further reference to the castle can be made under Berkhamsted Place Strategy.	MC 21.6
	8.24		Ensure there is a clear boundary between the town and the A41.		The principle of a green swathe between the town and the A41 is accepted. It is effectively proposed in the Core Strategy already. Amend text in Berkhamsted Place Strategy accordingly.	MC 21.6

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
- Green Belt: 8.27-32	8.28		Do not amend the Green Belt boundary at Berkhamsted.		No change. The paragraph is appropriately worded. The housing target proposed requires some release of Green Belt land.	
	8.29		Amend the reference to inappropriate development, which should only be accepted under very special circumstances.		Amend sentence to explain that development in the Green Belt will only be permitted in limited circumstances.	MC
	8.31		Should criterion (d) refer to community benefits as well?		Paragraphs 8.30-32 can be simplified. Social benefits may be a reason in support of redevelopment or infilling.	MC MC MC
Table 2		-				
Policy CS5			Release all local allocations now, amending the key diagram to illustrate the amended Green Belt boundaries.		No change. All local allocations will be released from the Green Belt and development permitted. Delineation of sites and detailed policy principles will follow through the Site Allocations DPD. The key diagram cannot delineate sites. Phasing of development in conjunction with infrastructure needs and maintenance of a sensible housing land supply is an important consideration. The housing land supply is varied: there is some greenfield land already identified, which can come forward now. The Council's approach on the release of Green Belt land is reasonable.	
			Should the policy refer to local allocations being released from the Green Belt?		No change. The policy appropriately does this.	
			Review the Green Belt boundary: a) generally to allow for more housing; or b) specifically to release additional sites for development: - at Lock Field, Northchurch - south of Berkhamsted - adjoining Longbridge Close, Tring (Waterside Way) - at East Hemel Hempstead. [At East Hemel Hempstead, the issue could be referred to the Area Action Plan.]		No change. There is no need for any further general review of the Green Belt boundary. Sufficient land is provided to meet appropriate development needs, with the local allocations indicated on the key diagram and in Table 9, Section 14. The Council has considered a number of alternatives, including other suggestions raised in objections to Table 9. The Council is satisfied that the level of housing and selection of local allocations proposed are reasonable. The plan period has 18 years to run and it is not necessary to release more land from the Green Belt than currently proposed. In the longer term, the first, logical option to meet development needs would be at Wood End Farm, East Hemel Hempstead – see also response at paragraph 20.17.	
			Should land release imply development now or safeguarding until some point in the future?		No change. There is no need for further review of the Green Belt and release of land beyond the local allocations. See response above also.	
			Allow for the infill development area at Kings Langley School to be reviewed.		The school is acknowledged as a major developed site. The infill boundary will be reviewed in the Site Allocations DPD.	
			Does Policy CS5 unnecessarily change national Green Belt policy or provide a justified local policy? Does reference to national policy create inherent contradictions for local interpretation? Detailed points include: - Under (a): are appropriate facilities for appropriate uses acceptable? - Under (b): should replacement <i>buildings</i> be permitted? Can they be <i>materially</i> larger, rather than 'like for like'? - Under (c): should reference be made to the original building and	S	The Green Belt is a very important planning area first defined in the 1950s in Dacorum (and Hertfordshire). Local policy has continued to amplify Government policy, and it is appropriate that this approach is continued. Draft CS5 proposed to continue Green Belt policy in the adopted Local Plan. To substantially change that will undermine the long term approach towards the planning and management of the Metropolitan Green Belt (and South Bedfordshire Green Belt) in Dacorum. The Council acknowledges that further	MC

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
		<p>to proportionate extensions being acceptable?</p> <ul style="list-style-type: none"> - Under ii: what is the purpose of the phrase, 'maintenance of the wider countryside' and 'if relevant'? - Final sentence: should <i>previously developed sites (excluding temporary buildings)</i> be referred to instead of major developed sites? 		<p>harmonisation with the main principles of the National Planning Policy Framework would be appropriate: this is why a minor change is proposed to cover the main classes of development regarded as appropriate in any green belt. "Appropriate development" should rationally be subject to other criteria which are pertinent to the area, hence reference to the impact on the countryside. The point of accepting new development is that it should individually and collectively help towards the maintenance of communities, land and open uses in the countryside and the enjoyment of the countryside itself – what the Council terms the maintenance of a living countryside. Further guidance is and will be added to Policy CS5, particularly on replacements, extensions, existing developed sites and changes of use. Saved Local Plan policy also applies. The NPPF defines 'original building'.</p>	
		Should planning applications be determined on their own merits with regard to very special circumstances?		Planning applications should be determined in accordance with stated policy and other material considerations.	
		Should the uses in Policy CS7: Rural Area (e.g. farming, forestry, countryside recreation) be covered by Policy CS5?		No change. They are, as uses defined as appropriate in the Green Belt in national policy. Paragraph 8.22 covers the countryside in general, both the designated Green Belt and the Rural area beyond it.	
Monitoring/Delivery		Do not refer to the Countryside Management Service, if not funded by the Council.		The CMS is currently not core-funded by the Council. That may well change over the plan period. The efforts of the CMS can still help to deliver countryside initiatives and in principle this is supported. A very minor change is suggested.	MC
- Selected small villages (GB):8.33-34	8.33	How would a facility identified in a village appraisal or neighbourhood plan be delivered? [Council land could be provided and market housing help fund a facility.]		No change. It depends on the facility and what is justified. The Infrastructure Delivery Plan will pick up key issues. The delivery of a new facility is possible through a variety of means, including local community fund raising and tapping in to grant aid.	
	8.34	Is the definition of where infilling can take place too restrictive? [Market housing can help to deliver affordable housing in new developments and through financial contributions to off-site development.]		No. The paragraph text provides appropriate advice as a guide to what infilling means in the context of a village constrained by Green Belt designation. The Countryside Place Strategy includes a local housing objective, to which a small amount of development at the Green Belt villages will contribute. Policy CS6, as a continuation of Local Plan policy, is intended to help support local needs. It is not intended to provide large amounts of development whether for affordable housing or not. The approach is to limit development in the Green Belt. The policy identifies locations where least harm will be done and most benefit can occur. The definition provided is considered necessary in the light of experience. The Council considers market housing normally to be inappropriate in the Green Belt.	
		Should the matter [definition of infilling] be left to individual planning applications?		No change. To a degree this will always be the case. The paragraph text provides some guidance.	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
Policy CS6		Should infilling be restricted to satisfying local needs (i.e. affordable housing for local people) or should it include market housing? (Item (b))		No change. Market housing is inappropriate development in the Green Belt. A general policy encouraging market housing will raise expectations of value: it will not necessarily bring forth any more affordable housing to address local needs and may actually inhibit it. The Council has the options of identifying specific schemes through the Site Allocations DPD or on an exceptions basis working with the local parish councils, where necessary.	
		Should a new item be added: - residential development for sale on the open market, where this will help to deliver affordable housing or other facilities for which there is a proven local need?	S	No. The Countryside Place Strategy includes a local housing objective, to which a small amount of development at the Green Belt villages will contribute. Policy CS6, as a continuation of Local Plan policy, is intended to help support local needs. It is not intended to provide large amounts of development whether for affordable housing or not. The approach is to limit development in the Green Belt. The policy identifies locations where least harm will be done and most benefit can occur. The definition provided is considered necessary in the light of experience. The Council considers market housing normally to be inappropriate in the Green Belt. Also see above response. Local facilities do not need to be provided through market housing in the way suggested.	
		If too many conversions of large dwelling houses into flats are carried out, there could be a strain on local infrastructure. (Item (c))		No change. This is highly unlikely. However monitoring will observe trends and liaison with infrastructure providers will be maintained. Policy will be kept under review through Annual Monitoring Reports.	
		Refer to the Chilterns AONB in criterion ii.		No change. This is not necessary. Policy CS24 will apply to the design of any development within the AONB. The presence of the AONB may be another reason for maintaining tight control of development. Paragraph 8.21 already refers to the AONB.	
Monitoring/Delivery	-				
- Rural Area:8.35-36	-				
Policy CS7		Is housing precluded from the Rural Area?		No, but it is directed towards selected villages. Reuse of buildings may involve residential use: saved Local Plan policy applies. No change.	
		Allow limited market housing to help: - fund affordable housing or new community facilities; - bring forward a vacant site.	S	Housing should normally be directed to the selected villages, not the open countryside. There may be circumstances where housing is an appropriate use in conjunction with mixed use, reuse or appropriate redevelopment outside villages (as well as inside): these will be limited. Opportunities can be taken to support rural businesses.	MC
		Should item (g) refer to all rural businesses?	S	No. The policy encourages businesses which help to support the countryside and its open, intrinsic character. However, the types of small scale development can more logically be similar to those in the Green Belt. Saved Local Plan policy supports rural businesses through the reuse of buildings. Like new housing, new businesses (employment development) are encouraged at the selected villages.	MC

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
			Should the criteria (i and ii) in Policy CS5 also apply to development in the Rural Area? Should it also refer to village character?		The last paragraph of Policy CS1 applies. However it may also be helpful to relate the clauses in Policy CS5 which relate to the open countryside to Policy CS7 in addition. Development at the villages is adequately managed by Policy CS1.	MC
			Cross refer to Policy CS24: The Chilterns Area of Outstanding Natural Beauty.		No change. This would be unnecessary. The Core Strategy should be read as a whole, and paragraph 8.21 already refers to the AONB.	
Monitoring/Delivery		-				
9. Enabling convenient access		-				
Text: 9.1-11	9.3		Refer to the control of parking spaces in order to minimise problems of unregulated roadway parking and verge and pavement parking (including work vehicles).		No change. The policy approach is appropriately framed and need not refer to these particular problems. The Council and County Council do however recognise there are issues, the solution to which is difficult. It rests with influencing behaviour and journey mode, and the availability of space management and enforcement. The approach to car parking is and will be covered in much more depth through the local transport framework and other, planning policy advice.	
	9.11		Should more detail on local transport planning, in particular Berkhamsted Urban Transport Plan and the issues it should tackle, be provided?		No change. It is the function of the local transport framework to provide the detail on integrated transport strategy, works and investment. The local planning framework will be complementary	
Table 3		-				
Policy CS8			Commit to cheap, frequent, safe and secure bus services and the transfer of vehicles to cleaner fuels.		No change. In principle this is the position now. What can be achieved is constrained by resources and the amount of available subsidy.	
			Reduce parking at new development.	S	No change. Parking standards were based on survey work commissioned by the County Council and included in the Local Plan. They can be reviewed through the Development Management DPD. The broad approach is currently to accommodate car parking at residential developments (limited at the most accessible locations) and constrain car parking at destinations to affect journey mode choices. Restricting off street residential parking tends to encourage on street parking.	
			Qualify the last paragraph: <ul style="list-style-type: none"> - Contribute to the Local Transport Plan and Urban Transport Plan where possible; or - Demonstrate improvements to the local transport network. 	S	No change to Policy CS8. The local transport planning framework will be subject to consultation and evolve: a minor change to paragraph 9.11 will clarify. However, the qualifications suggested unnecessarily weaken the policy approach and are inappropriate. It is important that the planning and transport framework dovetail. The Council is guided by the local highway authority (and other infrastructure providers) on infrastructure needs and provision. The Council advises infrastructure providers on the level and location of development. The Infrastructure Delivery Plan will take its lead from the local highway authority on most transport infrastructure matters. The	MC

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
				Community infrastructure Levy will incorporate an element relating to transport. Development proposals will therefore contribute to the delivery of local transport plans.	
Policy CS9		What are small scale road improvements?		This phrasing is a continuation of Local Plan policy agreed with the local highway authority. Small scale improvements would normally be prioritised through the local transport planning process. Junction improvements would be typical. A recent example, delivered through development, is a short link road in central Apsley and closure of the Storey Street junction with London Road.	
		Delete reference to the north eastern relief road.	S	No change. This proposal has been agreed with the local highway authority. It has been tested through the Hemel Hempstead Transportation Study and Plan (1990s) and included in the Local Plan. It has been considered by the recent Hemel Hempstead traffic model and is expected as part of the transport improvement to accommodate new development at East Hemel Hempstead. The route runs around Maylands Business Park (not the town) and requires completion.	
		Favour new development which can deliver new road infrastructure.	S	No change. The policy is appropriately phrased. Alternatives for new development have been assessed against a variety of criteria. The delivery of infrastructure could be a benefit if it was needed in the first place. Invariably a new road would be a condition of the development itself.	
Monitoring/Delivery	-				
10. Securing quality design	-				
Text: 10.1-5	10.4	Add the impact of light pollution on natural environments to the list of examples.		No change. The list covers sufficient examples. Saved policies cover the subject. A reference in Policy CS32 will be the hook for updating the saved policies through the Development Management DPD.	
Successful urban design: 10.6-9	-				
Figures 11-13	-				
Quality of the built environment: 10.10-14	-				
Policy CS10		Refer to stepping stones and other ecological linkages ((criterion (g)).		No change. The criterion is appropriately phrased. Wildlife corridors are identified on the vision diagrams. More is said about biodiversity in Section 18. Changes there help to reinforce the importance of biodiversity and ecological links.	MC MC
		Add criterion to protect the historic street pattern and legibility of the settlement.		No change. The policy is appropriately worded. All development should follow the three step approach to urban design. Understanding character and urban design are essential to Policies CS10-12 and CS13. Figure 11 includes street pattern as a consideration. The character identified and its significance are the basis for decisions. Historic street pattern is specifically protected where most important through Policy CS27.	
Policy CS11		Amend criterion (a): <i>conform</i> to the typical density <i>and</i> <i>graining</i> .		No change. The criterion is appropriately phrased. Density – i.e. the number of dwellings per hectare - is an imperfect measure, but is used as a guide. Spacing between buildings	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
				and general character (e.g. building scale and coverage) are more important and are also covered in the criterion.	
		Refer to Character Area Assessments in addition to the SPD on Urban Design.		No change. The Council intends that the (residential) Character Area Assessments prepared in the 1990s will be updated, as necessary, and absorbed into the Urban Design SPD. The settlement vision diagrams, which are derived from Urban Design Assessments, provide a basis for this.	
		Add criterion to make a positive contribution to the character of the historic environment.		No change. This is not a separate consideration, but integral to the understanding of urban design. Age and history are facets of character. Also see response to Policy CS10.	
Policy CS12		Include a criterion that relates to ecological issues		No change to Policy CS12. However a suitable criterion will be included in Policy CS29.	MC
		Amend criterion (d) to refer to suitable numbers and locations and benefit to ecological connectivity.		No change. The level of detail suggested is unnecessary. Minor changes to Section 18 will cover the main concerns.	MC 18.22 MC CS29
		Amend criterion (e) to refer to appropriate species and locations and benefit to biodiversity and ecological connectivity.		No change. The level of detail suggested is unnecessary. Minor changes to Section 18 will cover the main concerns.	MC 18.22 MC CS29
		Alternatively, amend criterion (e) to assimilate development into its setting and improve appearance at the settlement edge.		Agree in part. Assimilating rather than screening development is more appropriate within settlements. The relationship of settlements with the countryside suggests there should be a soft edge, continuing current Local Plan policy.	MC
Quality of the public realm: 10.15-20	-				
Policy CS13		Should criterion (f) be extended to refer to: - brown/green roofs: and/or - wildlife value and ecological connectivity?		No change. The level of detail suggested is unnecessary. Minor changes to Section 18 will cover the main concerns.	MC 18.22 MC CS29
Monitoring/Delivery	-				

- Strengthening Economic Prosperity

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
Strengthening Economic Prosperity		-				
Strategic Objectives			Strategic objectives should include encouraging tourism and employment generation through heritage initiatives and projects.		No change. The principles are covered in Objectives 9, 11 and 12.	
11. Creating jobs and full employment		-				
Text: 11.1-9		-				
Table 4			Refer to the role of sustainable tourism and heritage projects for Dacorum.		No change. Table 4 sets out the economic development strategy objectives contained in the published Economic Development Strategies for Hertfordshire and Dacorum.	
Low Carbon Economy: 11.10-13	11.11		Refer to the planning system giving preferential treatment to repair and servicing enterprises.		No change. The Use Classes Order does not allow the planning system to give preferential treatment to repair and servicing enterprises and there is no overriding economic reason to single out these particular uses.	
Maylands Business Park: 11.14		-				
Supporting tourism: 11.15-17			Refer to Hemel Hempstead's industrial paper making heritage and organisations such as the Paper Trail Trust.		No change to paragraph text. However, further reference to the paper making heritage is proposed in the Hemel Hempstead Place Strategy.	MC (HH Place Strategy para. 20.7)
	11.15		Provide a creative vision for the role of tourism and/or coherent tourism policy.		No change. The level of existing coverage is considered accurate and appropriate for the Core Strategy. The Council will provide further detail in a tourism policy statement.	
	11.16		Give more weight to sustainable tourism, with good access by public transport and measures to reduce car traffic.		No change. Paragraph 11.16 already deals adequately with this point.	
Policy CS14			Waste management facilities are appropriate in General Employment Areas with general industry and storage and distribution uses.		Agree. Amend text in Section 18 on waste management accordingly.	MC 18.39
			Promote a sustainable economy that supports renewable technology and local production.		No change. The policy already supports the transition to a low carbon economy and more detailed guidance on sustainability is provided in Policies CS28-30. It is not possible to use planning policies to require local production, though the policies within the plan seeking to encourage a strong local economy enable this.	
			State that employment will be well paid, with full workers' rights and recognition of trade unions.		No change. The points raised are covered by national legislation and are not planning matters.	
			Give support for setting up co-operatives and a mixture of manufacturing, farming, allotments and services.		No change. The Core Strategy encourages a variety of businesses, not any one particular model. Rural enterprise is generally encouraged. However, setting up co-operatives is not a planning matter. Schemes involving a mixture of manufacturing, farming, allotments and services may require Green Belt sites: such schemes would need to comply with Green Belt policy.	
			State that a flexible approach to economic development will be taken where there is no demand for office floorspace.		No change. Technical evidence indicates that the demand for office space will increase during the plan period and provision has been made to accommodate this whilst also allowing flexibility to reflect changing market conditions. Detailed requirements regarding the types of employment	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
				uses permissible in different General Employment Areas will be determined through the Site Allocations DPD.	
		Is the target of 10,000 additional jobs between 2006 and 2031 realistic?	S	No change. The policy refers to approximately 10,000 jobs. Paragraph 11.2 explains that this figure was recommended by the Council's employment consultants, whilst paragraph 11.3 stresses that the forecast growth in jobs is an estimate, not a precise target. The Council will monitor take-up, market conditions and economic prospects and review the target in a few years time.	
		Refer to engagement with landowners and developers to ascertain what is possible.		No change. Partnership working with organisations that represent landowner and developer interests is already referred to.	
		Should working hours be reduced in order to achieve nil unemployment?		No change. This is a matter for employers. The points raised are not planning matters.	
Monitoring/Delivery		Refer to potential funding from the Council, third parties and Government.		No change. The principle of partnership working is already covered. This can include access to funding.	
		Explain how the Council might use financial contributions from development (S106 obligations and community infrastructure levy) to encourage new business initiatives and investment.		No change. The approach to developer contributions is set out in Section 28. Further detail will follow in supplementary guidance including the CIL charging schedule.	
		Amend monitoring indicator 3, because B classes alone cannot provide all the economic development and jobs needed.		No change. Monitoring floorspace change in the B classes is essential. Paragraphs 12.5 and 12.13 already imply that well over half the 2006-2031 job growth is expected to be in non-B jobs. There are two other indicators, which refer to jobs and unemployment.	
12. Providing for offices, industry, etc	-				
Text: 12.1-4	12.1	Remove reference to the Hicks Road site in Markyate as a General Employment Area (GEA) and allow redevelopment of the site to be guided by the Hicks Road Masterplan and the site specific policy in Strategic Site Allocation SS2.	S	The reference to Hicks Road GEA is correct, and some employment land will remain. However, the principal GEAs are located in the three towns.	MC
Offices: 12.5-10	-				
Industry, storage etc: 12.11-13	-				
Policy CS15		Is there an over-supply of office accommodation in relation to demand?		No change. The response to issues at Policy CS14 above refers to the technical evidence that the demand for office space will increase. Paragraphs 12.3 and 12.4 give appropriate flexibility for non-B classes on GEAs where appropriate.	
		Acknowledge that the protection of B-class uses on GEAs may include waste management facilities: this would be compatible in areas with B2 and B8 (industry and storage) uses.		Amend text in Section 18 to state that waste management is appropriate in compatible GEAs.	MC
		A more flexible approach is needed, so that employment sites no longer suitable for such use or not viable for B-class development can be developed for other uses.		No change. The response to issues regarding Policy CS14 refers to the technical evidence that the demand for office space will increase. Paragraphs 12.3 and 12.4 give appropriate flexibility for non-B classes in GEAs where appropriate.	
		Amend the policy to state that mixed uses will be encouraged in GEAs, especially where residential development could make a scheme viable and deliverable.		No change. Specific GEAs can be reviewed through the Site Allocations DPD. Mixed use (with residential) and redevelopment is appropriate in some circumstances (for	

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
					example in the Heart of Maylands, live work units). However, residential is not necessarily a suitable use in a GEA for reasons of amenity and traffic/parking generation. A blanket approach to encouraging residential use also runs the risk of undermining the supply of employment/commercial land in the short and long term. The Council's consultants, Roger Tym, have reviewed Local Plan allocations for employment use: their advice is that the amount of land and sites is needed. The Council will take a flexible approach to employment development depending on economic circumstances. This will involve the Council in monitoring take-up (of sites, premises and development opportunities), market conditions and economic prospects and potential review of floorspace targets in a few years time.	
			Amend final paragraph to state that: "New office uses and other employment uses (where necessary) will be allowed in core office locations and Hemel Hempstead town centre subject to high standards of design."	S	No change. A high standard of design is expected in all locations. Town centres are locations where a broad range of uses is encouraged, including the prime retail/commercial function. Specific GEAs can be reviewed through the Site Allocations DPD. Directing new offices to particular locations does not rule out compatible uses, but it does help set the 'tone' for that area. The Council will take a flexible approach to employment development depending on economic circumstances.	
Monitoring/Delivery			Refer to potential funding from the Council, third parties and Government.		No change. The principle of partnership working is already covered. This can include access to funding.	
			Explain how the Council might use financial contributions from development (S106 obligations and community infrastructure levy) to encourage new business initiatives and investment.		No change. The approach to developer contributions is set out in Section 28. Further detail will follow in supplementary guidance including the CIL charging schedule.	
13. Supporting retailing and commerce		-				
Text: 13.1		-				
Retail hierarchy: 13.2-4	13.3		Emphasise the importance of local centres with a neighbourhood shopping function and stress the essential nature of the shops, services and facilities provided.		Add a sentence to underline the importance of accessible shops and services, stating that the Council will support their provision and retention where it can.	MC
Table 5			Jarman Fields should be deleted from Table 6 and identified in Table 5 as a local centre with a district shopping function.		No change. Jarman Fields clearly functions as an out of centre retail and leisure location, rather than as a local centre with a neighbourhood shopping function.	
			Include South Berkhamsted as a "Local Centre with a neighbourhood shopping function."	S	No change. The Core Strategy proposes that the South Berkhamsted remains in the Green Belt, so there is no need for a new local centre.	
Shopping areas: 13.5-6	13.5		Add: "The Main Shopping Frontages of the town centre equate to the Primary Shopping Area as defined by PPS4."		No change. Main shopping frontages are the primary frontages referred to in current and previous Government policy and mixed frontages, the secondary frontages. The terms used by the Council are straightforward and maintain continuity of policy.	
Out of centre retail development: 13.7-12	13.7		Delete text stating that new retail development will not be allowed in out of centre locations. Instead, state that any proposals for new retail development must comply with the tests of PPS4	S	No change. The paragraph does not rule out all out of centre retail development - it says that <i>significant</i> new retail development will not be allowed. This wording, together with paragraph 3 in Policy CS16, is considered appropriate given	

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
					paragraphs 23-27 in the National Planning Policy Framework (NPPF), which has replaced PPS4.	
	13.9		The sequential approach should require new retail development to be delivered to primary shopping areas within defined centres first. Therefore point 1 should refer to "Locations within the main shopping frontages of existing town centres and within the centre boundaries of the smaller district and local centres."		Amend the sequence to refer to shopping areas in (town and local) centres first, followed by other locations in centres and edge of centre locations.	MC
Table 6			Jarman Fields should be deleted from Table 6 and identified in Table 5 as a local centre with a district shopping function.		No change. Jarman Fields clearly functions as an out of centre retail and leisure location, rather than as a local centre with a neighbourhood shopping function.	
			Consider the provision of sustainable out of centre retail and leisure locations outside Hemel Hempstead.	S	No change. It is considered that future significant retail and leisure developments should be sited in sustainable locations in existing centres.	
Policy CS16			Identify the PPS4 thresholds for new retail developments being considered against the sequential approach and impact assessments (2,500 sq metres and above).	S	No change. The Council will consider location, scale and impact for all retail development. No size threshold has been set for requiring a retail impact assessment. The Council will consider this matter further in the context of adding detail to its Core Strategy policies.	
			State that the floorspace figures quoted are neither absolute nor maximum figures. [Proposals above these figures could be accepted where compatible with tests in PPS4 and Government policy.]		No change. The policy provides a broad indication of potential future demand. The figures will be used to guide the scale of land allocations for retail development in the Site Allocations DPD.	
			Delete sentence 1 in paragraph 1 and all of paragraph 3. Replace by "New retail development will be assessed in accordance with national policy, as set out in PPS4. It will be required to satisfy the key policy tests of the sequential approach and impact, where necessary."	S	No change. The existing wording is considered appropriate in the context of paragraphs 23-27 in the National Planning Policy Framework, which has replaced PPS4.	
			Meeting growth projections between 2009 and 2021 is the priority; long term projections to 2031 should be treated with caution and should be subject to monitoring and review.		Amend paragraph 13.2 to state that the level of new development may reach the demand forecasts in Policy CS16 and that these forecasts will be more reliable for the shorter term (i.e. to 2021).	MC
Monitoring/Delivery		-				

- Providing Homes and Community Services

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
Providing Homes and Community Services		-				
Strategic Objectives			Refer to priority being given to previously developed sites for housing.		No change. The Core Strategy needs to be read as a whole. It gives priority to previously developed land under the Strategic Objectives (Section 6) and Sustainable Development Strategy (Section 8 and Policy CS2).	
14. Providing homes			Refer to the flexible use of s106 contributions to take account of scheme viability and delivery.		No change. The Core Strategy acknowledges the issue, for example under Policy CS19 and Section 28 (paragraphs 28.9 - 28.11). The setting of charges - for affordable housing contributions, community infrastructure levy and/or any other contribution – is guided by Government advice. All charges will be set in subordinate documents. The CIL charging schedule will be subject to specific Examination (like the Core Strategy). The Council will approach the issue of charging on a reasonable basis and avoid setting charges at a rate which hinders or prevents development. Charging will be related to needs.	
Text: 14.1-8	14.7		Housing need and demand are overestimated.		No change. The Core Strategy has taken a balanced view of a range of factors in setting the housing target, and not just the extent of unmet housing need. Unmet need is significant. The Council is reviewing the housing register and undertaking a local housing needs and market demand survey (effectively updating the Strategic Housing Market Assessment).	
Housing supply: 14.9-23	14.9		Reduce the housing target to 9,835 new homes and delete the local allocations in Table 9.		No change. See responses under Policy CS17 and Table 9 below.	
	14.16		Housing need and demand are overestimated.		No change. See response under paragraph 14.7.	
			The increase in home extensions (which reduces garden space) justifies a reduction in the allocation of new greenfield sites.		No change. Home extensions meet the needs of existing households. They do not meet the needs of new household. Forecasts take account of the rate of household formation.	
			Preserve the existing Green Belt boundaries.		No change. While the Council is concerned to maintain the character of the Green Belt that is retained, it cannot meet the housing target without some release of land from the currently defined Green Belt.	
	14.17		Refer to the Development Management DPD when determining major new proposals which are not in the Core Strategy.		No change. Any new proposal will be judged against all the relevant policies set out in the Local Planning Framework, including the Development Management DPD.	
	14.19		Using greenfield land in urban areas will undermine biodiversity and local character.		No change. The paragraph refers to sites that are already planned for within the housing supply e.g. local allocations, sites with planning permissions, existing local plan housing proposals etc. If new sites were to come forward then they would rightly need to be assessed against their contribution to local biodiversity and character.	
			Adopt a lower housing option to avoid development in the Green Belt.		No change. See responses under Policy CS17 below.	
			Building in the Green Belt decreases biodiversity.		No change. The Core Strategy has taken into account a	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
				range of factors in judging the suitability of land to be released from the Green Belt, including biodiversity (in particular the Assessment of Local Allocations and Strategic Sites (May 2011) and Sustainability Assessments). Not all land in the Green Belt is necessarily of high biodiversity value.	
		Amend paragraph: local allocations <i>may</i> (not will) require small-scale Green Belt boundary changes.	S	No change. The text is accurate. The Green Belt boundary will be changed through the Site allocations DPD. The timing of development is covered by Policy CS3.	
		The proposed growth in housing, including windfalls, will place unacceptable pressure on existing infrastructure and risks changing the character of towns such as Berkhamsted and Tring.		No change. No absolute infrastructure constraints have been identified (in respect of the development proposed in the Core Strategy). Nevertheless, new development will address its impact on infrastructure and will invariably be required to provide physical or financial contributions (Policies CS23 and CS35). The scale of housing has been considered carefully and should not present undue impacts.	
		Do not include housing in the Green Belt land in the housing objective/projections for Berkhamsted.		No change. The housing supply involves a significant contribution from within its settlement boundaries including some greenfield land. In order to ensure a longer term supply, the Council considers a small release of Green Belt land is justified (Proposal LA4).	
		The housing projections for Berkhamsted have resulted in too high a density for Strategic Site SS1.		No change. The Council is concerned that land is effectively used and has weighed up relevant issues. See responses under Berkhamsted Place Strategy SS1.	
	14.20	The allocation for Berkhamsted is not sufficient to meet local needs and should be increased.		No change. The allocation of housing to Berkhamsted reflects a balanced view of a number of factors, including its size, its role in the settlement hierarchy relative to other places, its character, local housing need, availability of sites, and previous completion rates in the town. The figure proposed in the Core Strategy is considered reasonable.	
Table 7		-			
Table 8		Should the total requirement or target be reduced to 9,835 dwellings, removing the need for local allocations?		No change. The overall target is sufficient to meet need and demand in the Borough taking a balanced view of relevant factors (summarised in paragraph 14.16 for example). Simply relying on an urban capacity approach would significantly fall short of the level of growth signalled by population and household projections. Judicious use of local allocations will help to provide a steady and sufficient supply of housing over the plan period and to address housing needs. It is acknowledged that there are environmental consequences and infrastructure threshold issues within individual settlements. Local allocations do therefore need to be restricted. See also responses to Policy CS17.	
		Alternatively, should the total requirement be increased to 13,500 or 14,000 dwellings to accord with household projections?		No change. See above response and responses to Policy CS17.	
		Increase the number of dwellings distributed to Hemel Hempstead to 11,070, identifying a new local allocation at Shendish.		No change. The overall housing target and share to Hemel Hempstead do not need to be increased. The overall target is sufficient to meet need and demand in the Borough taking	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
				a balanced view of relevant factors (summarised in paragraph 14.16 for example). The focus on Hemel Hempstead is appropriate: it includes a significant level of local allocations (Table 9). Land at Shendish is neither needed nor considered a good choice for a local allocation.	
		Should Hemel Hempstead's share of the housing requirement increase in the light of the concentration of houses and jobs there?		No change. The overall housing target and share to Hemel Hempstead do not need to be increased. The overall target is sufficient to meet demand and local need in the Borough taking a balanced view of relevant factors (summarised in paragraph 14.16 for example). The focus on Hemel Hempstead is appropriate: it includes a significant level of local allocations (Table 9).	
		The number of houses allocated to Berkhamsted should be reduced to 750 in order to ensure population stability and locally generated needs.		No change. The distribution of housing is indicative and reflects a balanced view on a number of factors, including Berkhamsted's size, its role in the settlement hierarchy, the role and character of Berkhamsted and other places, infrastructure capacity, housing need, availability of sites and previous completion rates - not just household growth. Also see response below.	
		Alternatively, the level of housing for Berkhamsted should be 1,990, with an additional 881 being accommodated at Hemel Hempstead. [Table 8 (giving a prospective distribution of housing) is opposed along with Table 9 and Policy CS17. Reasons and linked concerns are set out more fully under a similar representation to Policy CS17.]		No change. The Council has taken a number of factors into consideration in reaching a balanced conclusion on the level of new housing for Berkhamsted. It has considered alternative levels against housing forecasts and the role of Berkhamsted in the settlement hierarchy in Dacorum. It has also considered the impact of development on the character of a relatively busy town and its infrastructure. The impact on the Green Belt and green swathe between the town and the A41 from proposals within the Core Strategy would be relatively modest: the impact of a new neighbourhood would be substantial. The Council has assessed various sites and opportunities over the plan period, and has taken account of consultation. Ultimately the amount of development selected happens to approximate to past average delivery rates and is considered reasonable. Also see above response.	
		Increase the number of dwellings distributed to Tring to: <ul style="list-style-type: none"> • at least 630 by increasing the capacity of local allocation LA5; • a minimum of 939 dwellings by identifying additional sites (including land at Waterside Way, Tring); and/or • enable housing needs being met. 		No change. The Council has taken a number of factors into consideration in reaching a balanced conclusion on the level of new housing for Tring. It has considered alternative levels against housing forecasts and the role of Tring in the settlement hierarchy in Dacorum. It has also considered the impact of development on the character of the town, its infrastructure and its surroundings. The Council has assessed various sites and opportunities over the plan period, and has taken account of consultation. Ultimately the amount of development selected approximates to maintaining the population level and is considered reasonable. Alternative sites have been assessed. On balance the Council prefers LA5, and concludes it is sufficient. Also see responses relating to the growth of the	

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
					town under Tring Place Strategy and LA5.	
	14.21		Increase the number of dwellings to be delivered in Berkhamsted through site allocations, including land at Lock Field, New Road.		No change. The indicative level of growth (Table 8) is reasonable to meet the objectives of the town given a number of factors including the character of Berkhamsted, the availability of housing sites, and pressure on school places. Alternative sites have been assessed and on balance LA4 is preferred. Additional sites are not needed. See detailed responses raised to growth of the town and the need for an additional housing allocation (including that at Lock Fields, New Road) in the Berkhamsted Place Strategy.	
	14.22		New development can <i>help</i> address shortfall rather than finance existing infrastructure deficits.		No change. The paragraph is appropriately worded.	
Table 9			Delete all local allocations (and set the housing target at 9,835 dwellings).		No change. Judicious use of local allocations will help to provide a steady and sufficient supply of housing over the plan period and to address housing needs. See related response under Policy CS17.	
			The local allocations raise potential technical concerns over access.		No change. Selection of local allocations has considered this issue. Joint discussion with the local highways authority will resolve any detailed matters, particularly through a master planning process.	
			Identify more local allocations at Hemel Hempstead.		No change. The overall housing target and share to Hemel Hempstead do not need to be increased. The overall target is sufficient to meet need and demand in the Borough taking a balanced view of relevant factors (summarised in paragraph 14.16 for example). The focus on Hemel Hempstead is appropriate: it includes a significant level of local allocations (in Table 9).	
			Identify a new local allocation on land at Shendish (for 900 units): <ul style="list-style-type: none"> • there are insufficient allocations to accommodate the housing requirement; and • local allocation LA3 is unsuitable. 		No change. The housing target is sufficient to meet need and demand across the borough and in Hemel Hempstead taking a balanced view of relevant factors and local strategic objectives (Hemel Hempstead Place Strategy). The focus on Hemel Hempstead is appropriate as is. Land at West Hemel Hempstead is a logical development, can be delivered, and has active landowner interest behind it. Alternative housing sites have been assessed and on balance the Council prefers LA3 (together with LA1 and LA2). The Council considers the impacts of developing a new neighbourhood here to be unnecessarily damaging on the Green Belt and Apsley.	
			Designate a new local allocation at Lower Road, Nash Mills to provide additional dwellings and deliver more affordable housing.		No change. See above two responses. The Council considers the impacts of developing here to be unnecessarily damaging, particularly on the role of the Green Belt and functioning of the town.	
			Identify land at the Paper Trail, London Road, Apsley as a local allocation for housing.		No change. Local allocations are by their nature sensitive Green Belt sites. The suitability of this urban land for housing is more appropriately dealt with through the Site Allocations DPD. It is not needed to meet the housing target, but if considered appropriate it could contribute.	

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		The description of local allocation LA3 should allow for a greater number of units, by deleting <i>up to</i> (900).		No change. The impact of the proposed development needs to be controlled. Also see response to LA3 in the Hemel Hempstead Place Strategy.	
		Delete local allocation LA4 and reduce the capacity of strategic site SS1. [The housing figure for Berkhamsted is excessive to maintain population stability.]		No change. The local allocation is required to meet the local housing objective and help continue supply in the longer term. SS1 is excluded from the Green Belt, should be effectively used and is also needed to meet the local housing objective. Also see fuller responses under LA4 and SS1 in the Berkhamsted Place Strategy.	
		Designate a new local allocation on land south of Berkhamsted (for 800 dwellings). [Table 9 (listing strategic sites and local allocations) is opposed along with Table 8 and Policy CS17. Reasons and linked concerns are set out under a similar representation to Policy CS17.]		No change. The Council has taken a number of factors into consideration in reaching a balanced conclusion on the level of new housing for Berkhamsted. It has considered alternative levels against housing forecasts and the role of Berkhamsted in the settlement hierarchy in Dacorum. It has also considered the impact of development on the character of a relatively busy town and its infrastructure. The impact on the Green Belt and green swathe between the town and the A41 from proposals within the Core Strategy would be relatively modest: the impact of a new neighbourhood at south Berkhamsted would be substantial. The Council has assessed various sites and opportunities over the plan period, and has taken account of consultation. This particular development suggestion is not needed; it would approximately double the level of development to come (to 2031). The pace of change would be damaging to the town's character – its traffic movement and central area, its green hinterland, its form and even options for growth beyond the plan period.	
		Designate land at Home Farm, Pea Lane, Berkhamsted as a local allocation.	S	No change. See above responses for a general commentary on the level of housing at Berkhamsted. This particular site is unsuitable for housing given its setting within the Chilterns Area of Outstanding Natural Beauty.	
		Local infrastructure is insufficient to support Strategic Allocation SS1.		No change. The infrastructure providers advise there are no absolute constraints to the delivery of proposed development. There are issues of course to address, and the Council continues to work closely with infrastructure providers. See detailed responses in the Berkhamsted Place Strategy and to SS1.	
		Include The Old Orchard in the site description of LA4 and increase the capacity to 65-75.		No change. The dwellings capacity is approximate and can be more precisely defined in the light of further assessment and master planning connected with the Site Allocations DPD.	
		Designate land at Station Road as an additional local allocation(s). [Note that representations on the Core Strategy have been made to land both south and north of Station Road. The housing supply in Tring is too reliant on local allocation LA5 and windfall sites.]	S	No change. The Council acknowledges that levels of completions in the town are likely to vary over the lifetime of the Plan. However, the housing supply in Tring is robust and not overly reliant on windfalls (some contribution is reasonable). LA5 can be readily delivered and has active landowner interest behind it. The character of Tring and its	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
				surroundings and the capacity of local infrastructure are sensitive to the level of development. The Council has assessed various sites and opportunities over the plan period, and has taken account of consultation. Ultimately the amount of development selected approximates to maintaining the population level and is considered reasonable. Various sites have been assessed. On balance the Council prefers LA5, and concludes it is sufficient. Using this particular location would extend the town significantly eastwards. Also see responses relating to the growth of the town under Tring Place Strategy and LA5.	
		Designate land at Land at Dunsley Farm, Tring as a local allocation instead of or in addition to local allocation LA5.		No change. See above response. This location and its farming activity is considered very important to the character of the town. Identifying future Green Belt boundaries and the logical extent of development would be problematic.	
		Designate land at Waterside Way Land at Waterside Way, Tring (300 dwellings) as an additional local allocation.		No change. See above two responses. This particular location would breach a very significant Green Belt boundary. Identifying the future boundary and logical extent of development would be problematic	
		Increase the capacity of local allocation LA5 at Tring to make better use of potential land available and better meet housing needs.		No change. The ultimate capacity of the potential built area may be greater than 150 new homes <i>plus</i> employment land, cemetery extension, play space and other facilities. It is also accepted that an effective use of land should be achieved. This will entail further consideration of height of buildings and density together with sensitive landscape design and assimilation into the landscape. Timing of development will be particularly important in terms of school infrastructure capacity. The dwellings capacity of LA5 is set at what is reasonable for the plan period. The Council wants to collaborate on more detailed investigations with the landowners: this may affect current conclusions.	
		Designate land at Bovingdon Airfield as a local allocation.	S	No change. The Council has taken a number of factors into consideration in reaching a balanced conclusion on the level of new housing for Bovingdon. It has considered alternative levels against housing forecasts and the role of Bovingdon and other places in the settlement hierarchy in Dacorum. It has also considered the impact of development on the character of the village, its constrained infrastructure and its surroundings. The overall target is sufficient to meet need and demand in the Borough taking a balanced view of relevant factors (summarised in paragraph 14.16 for example) and local objectives (Bovingdon Place Strategy). The Council has assessed various sites and opportunities over the plan period, and has taken account of consultation. Alternatives have been assessed and on balance LA6 is preferred: the impact on the Green Belt would be relatively modest. The new suggestion would be larger in scale, further from village services (than LA6) and have a more	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
Policy CS17		<p>Should the housing target be:</p> <p>a) reduced to 9,835 dwellings: or</p> <p>b) increased to between 12,084 and 15,750 dwellings (at a rate of 500-630 dwellings per annum?)</p> <p>Reasons given for reducing the target:</p> <ul style="list-style-type: none"> • give priority to empty properties; • give priority to previously developed land/brownfield sites; • prevent housing being built in the Green Belt. <p>Reasons given for increasing the target:</p> <ul style="list-style-type: none"> • to enable Dacorum to fulfil a sub-regional role, meet projected levels of need and to deliver the economic aspirations of the plan and a larger workforce; • to support jobs growth, given an ageing population and reducing household size; • to meet projected requirements, in-migration and to take account of sites not coming forward; • to properly reflect the evidence base (e.g. the SHMA); • to overcome deficiencies in the evidence base and properly relate decisions on sites against PPG3 [PPS3] • to meet housing need, provide new infrastructure, and to provide greater flexibility in supply; • to ensure the aims and objectives of the Core Strategy are achieved; • to exclude an allowance for windfalls contrary to PPS3 • to justify increased capacity within individual settlements / identified sites or to justify new allocations; • to accompany a local review of the Green Belt. 	S	<p>significant impact on the Green Belt</p> <p>No change. Housing growth should not be met at any cost. The housing target has been set to ensure objectively assessed demand and local need are met as fully as is possible taking a balanced view of competing factors, including household growth and supporting new jobs. Higher levels of growth are more difficult to accommodate satisfactorily and have implications, particularly environmental impacts and growing pressure on infrastructure (e.g. school places). The housing target meets an appropriate level of demand, and can help deliver reasonable levels of new infrastructure and assist with regeneration. The Employment Land Update (July 2011) demonstrates that there is a good balance between jobs and the level of new homes, also bearing in mind the sub-regional role of the Maylands Business Park. The methodology behind the jobs growth figure is provided in the Employment Land Update (July 2011). The Council accepts that the current recession will tend to dampen jobs growth in the short term, irrespective of the level of housing set. The Council accepts that there could be an element of net outward migration of households, but this would be justified given Green Belt and other environmental constraints. The housing supply is robust and sites have been tested through the SHLAA process, against developer interest and in a number of cases with landowners. It is regularly updated through the Annual Monitoring Report process, but inevitably there will be fluctuations in housing supply over time. The Council can take action to ensure supply is maintained (see response below to delivery mechanism). It is appropriate to take account of long term windfalls given past rates of contributions. If full account is taken of windfalls they can increase the overall level of supply (Table 8). Some Green Belt release is necessary. Local allocations will help ensure a steady and sufficient supply of housing over the plan period and to address local housing needs within individual settlements. This has involved significant small-scale changes to the Green Belt but not a major strategic review of boundaries. The Core Strategy has sought to minimise the extent of releases and to protect the remaining Green Belt from further housing development (Policy CS5). A major review of the Green Belt is not justified. The level of vacant homes is very low in the borough (particularly within Council housing stock). They would contribute little to the overall housing supply nor dramatically offset the need for local allocations. The existing mix of urban capacity sites, strategic sites, and local allocation is sufficient to enable reasonable opportunities to deliver a mix of housing.</p>	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
				Detailed arguments as to how the target was selected will be set out in a Housing Background Paper (May 2012). Also see separate comments for responses to housing at individual settlements, allocations and suggested new sites.	
		Identify additional housing locations: a) at Station Road, Tring; b) at Shendish, Hemel Hempstead; c) at Grange Farm, Bovington.	S	No change. For locations a) and b) see responses under Table 9 above. For location c) at Grange Farm, Bovington, see response under Bovington Airfield in Table 9. In all cases local allocations help to meet the housing target and local housing objectives. The selected local allocations have all been assessed against alternatives and are preferred. Grange Farm is an open greenfield site and a future defensible green Belt boundary would be difficult to define	
		Identify the strategic sites in the policy.		No change. Identifying such sites in the policy is not needed to ensure their support or delivery. Policy CS17 seeks only to provide an overview of housing land supply and not to detail individual allocations. Strategic sites are already identified within the relevant Place Strategy.	
		Refer to the release of local allocations and/or the identification of additional sites over and above those already included in the Core Strategy to ensure housing delivery across the plan period is maintained.	S	No change. The Core Strategy supports the release of identified local allocations subject to definition in the Site Allocations DPD and timing. Although the Council does not expect to release any additional local allocations, monitoring could theoretically identify a need. In those unlikely circumstances, the Council would then use Policies CS2, CS3 and CS17 to allow appropriate sites to come forward in order to maintain delivery.	
		Refer to opportunities to exceed the housing target over the lifetime of the plan.		No change. If the full supply of housing is taken into account, there is leeway to exceed the target (see paragraph 14.12 and Table 8). However, the target is not open ended and that supply and should be managed effectively, taking account of environmental and infrastructure constraints.	
		Should the review mechanism be: a) amended to: - provide sufficient clarity as to the mechanism and manner of the "action" to be taken; - refer to ensuring a five year supply of housing land; - clarify that there is still an obligation to ensure a five year housing supply; and - provide greater flexibility; or b) deleted because it operates against the effective and early delivery of housing supply?	S	No change to the policy. The policy is appropriately framed. It sets a clear threshold as to when the Council should intervene in the housing programme and underlines the importance of maintaining a five year housing land supply. The Council is committed to maintaining a rolling supply of housing land (see paragraph 14.14 of the Core Strategy) and this will be regularly monitored through the Annual Monitoring Reports. The Council is committed to bringing housing sites forward at the appropriate time and in taking positive steps to support housing delivery. There may be much the Council can do to stimulate the local housing market in terms of its own landownership, working closely with developers, landowners and other partners, to be more flexible in relation to viability / contributions, and to help overcome blockages. Releasing local allocations is another option, not necessarily the first choice.	
		Should the policy be reworded to give greater clarity to Policy CS3 and the specific actions will be taken to increase housing supply?		No change to the policy - see above response. However some further clarification in the paragraph text to explain	MC 14.13 MC 14.14

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
					possible actions and the reasons for managing and phasing land supply would be helpful.	MC 14.15
			How limited are the Council's powers to influence the delivery of housing?		No change. The Council recognises its influence will vary across individual sites. However, it does have planning, estates and housing powers it can use in appropriate circumstances to influence delivery.	
			Some scenario testing is essential to ensure the Council has explored "worst case" scenarios for housing supply and has a delivery mechanism in place to respond.		No change. The Council has adequately tested a number of scenarios in setting its housing target (see housing background paper (May 2012)). It is satisfied it has a robust delivery mechanism in place to respond to changes. Also see responses above.	
			There is no evidence that adjoining authorities, including Dacorum and Aylesbury Vale, have liaised with each other, as required under the duty to cooperate.		No change. The Localism Act places a new "Duty to Co-operate" and requires a statement setting out how the Council has worked with adjoining authorities. The statement will be provided as part of the Submission documents. It will explain cross-boundary working, collaboration with a variety of partners and areas of continuing discussion.	
			Greater clarity is required between the policy and the Housing Land Availability Paper (July 2011).		No change. The Housing Land Availability Paper (July 2011) seeks only to explain the housing land supply position in relation to meeting a variety of housing scenarios. It does not aim to set the details of the policy.	
			All new housing should have renewable technology and be energy efficient.	S	No change. The principle is broadly accepted, although there are issues about the timing of change in respect of Government policy, development costs and viability to consider. Policies CS28 and 29 address the issue..	
Monitoring/Delivery			Refer to implementation through a Development Management DPD.		No change. All proposals will be judged against all the relevant policies set out in the Local Planning Framework, including the Development Management DPD.	
Housing mix: 14.24-30		-				
Policy CS18			The mix of housing on a site should also be guided by its viability.		No change. Agree. The policy needs to be read in conjunction with Policy CS19. This specifically refers to viability as an important factor in considering the level and mix of affordable housing.	
			The release of more land from the Green Belt will help deliver a more varied mix of housing types and tenures than previously developed land.		No change. The housing programme identifies a contribution from a range of sizes of sites from both greenfield and previously developed land. This includes a proportion of proposed Green Belt releases (i.e. local allocations). The diversity of sites provides adequate opportunity to support a mix of housing types over the plan period without additional Green Belt releases.	
Monitoring/Delivery		-				
Affordable housing: 14.31-38	14.32		The section would benefit from additional information on past rates of affordable housing delivery.		No change. The section is chiefly concerned with future requirements rather than previous delivery rates. This information is already reported on an annual basis through the Council's Annual Monitoring Report.	
			The policy is an aspiration built on very weak foundations.		No change. The policy is realistic and robust and reflects a balanced approach to delivering affordable housing taking into account the Core Strategy evidence base.	

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		The proposed 35% target on qualifying sites is insufficient to meet a reasonable level of need.		No change. The target is reasonable given evidence in the Affordable Housing and Section 106 Viability Study (November 2009), balanced against the need to deliver on housing over the plan period.	
Policy CS19		Setting a lower housing target would remove the need for development in the Green Belt, including affordable housing.		No change. This would not sufficiently address the need for affordable homes. Also see response under Policy CS17 to the size of the housing target.	
		Alternatively, increasing the area of land released from the Green Belt, particularly around Hemel Hempstead, would better meet the affordable housing requirement.		No change. The housing programme already identifies a contribution from a range of sizes of sites on both greenfield and previously developed land. The former also includes a proportion of proposed Green Belt releases (i.e. local allocations). This diversity of sites provides adequate opportunities to support sufficient levels of affordable housing over the plan period without additional Green Belt releases.	
		The 35% contribution to affordable housing should be an aspiration rather than mandatory.		No change. The policy sets out the Council's general expectation. However, the policy makes clear that there is flexibility in its application as the level of contribution will be judged against a range of criteria.	
		No thresholds are needed. Only a formal viability assessment is required to determine appropriate levels of affordable housing/contributions.		No change. It is important that the Core Strategy provides developers with clarity as to how the policy will be applied and what the general expectation will be. Levels of on-site or off-site affordable housing will be subject to viability in all cases.	
		A financial contribution toward social housing and infrastructure is not justified or effective for urban schemes of less than 10 dwellings or less than 3 dwellings in rural areas.	S	No change. This is an appropriate approach given the scale of unmet need and the cumulative impact of small schemes on infrastructure. The threshold on balance is generous. It is reasonable for smaller development to contribute proportionately and the Affordable Housing and Section 106 Viability Study (November 2009) points to smaller schemes being generally viable. The Council is intending to operate a sliding discount for affordable housing contributions on smaller sites which will lessen the impact on viability. The methodology will be detailed in the Affordable Housing SPD.	
		The policy threshold should only apply to sites of 0.3ha or 10 dwellings or more: a financial contribution should be sought on sites below these thresholds.	S	No change. See above response.	
		Social housing projects of 10 dwellings or more containing shared ownership housing should contribute pro rata to local and strategic infrastructure.		No change. Social housing schemes will need to contribute to infrastructure in accordance with Government policy.	
		Include a 35% mix of market housing in larger social housing schemes.	S	No change. It is important that opportunities for affordable housing are maximised where they arise, given previous undersupply and recognised scale of need. Market housing schemes will still continue to make a significant contribution to overall supply. The majority of housing schemes will directly or indirectly provide a mix of tenure and opportunity.	
		The minimum 75% affordable rent requirement should be reworded so that this is a target and not an absolute.		No change. The policy sets out the Council's general expectation. However, the policy makes clear that there is	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
				flexibility in its application as mix will be judged against a range of criteria.	
		The policy must be underpinned by investment in additional infrastructure/ public realm improvements from smaller housing schemes.		No change. The Core Strategy (e.g. Policies CS23 and CS35) seeks to ensure that all development, including affordable housing schemes, proportionately meets its demands either directly or financially towards infra in accordance with Government policy.	
		Remove reference to higher levels of affordable housing being sought on sites which are specified in a development plan document.		It is important that opportunities for affordable housing are maximised when they arise, given past undersupply and the recognised scale of need. There are circumstances where higher levels are justified in viability and planning terms, particularly through the release of a large greenfield site. The Council intends that in this circumstance, it will be specified in the development plan. Not all large sites however will suit a level of affordable housing in excess of 35%. A minor change will help clarify the Council's intentions.	MC
		Include details of how levels of contributions will be calculated.		No change. Core Strategy policies should be kept concise. This level of detail will be dealt with in a supporting planning document –i.e. through the Affordable Housing SPD.	
		The requirement that on rural sites the development should be 100% affordable is unnecessarily restrictive, particularly in that it would encourage more greenfield development.		The policy reflects the Core Strategy's normal expectation as to the type of development encouraged and fits with Policies CS5-7 (relating to Green Belt and the Rural Area). It would not preclude a minor element of market housing if circumstances justified it – but this is not the norm. A minor qualification is considered reasonable, allowing particular sites to be identified in the Site Allocations DPD if appropriate. The policy would not necessarily exclude opportunities on previously developed land, but it is recognised that opportunities in rural areas are more likely to stem from edge of settlement greenfield sites.	MC
		Refer to neighbourhood plans and other delivery mechanisms to reflect the requirements of the Localism Act.		No change. Neighbourhood plans are covered in Sections 2 and 19.	
		The policy should be redrafted to reflect an up to date viability assessment for different parts of the borough and different types of sites.		No change. Viability work is ongoing and takes account of matters other than affordable housing – for example potential charges from the community infrastructure levy. Within the policy, there is sufficient flexibility to respond to current economic circumstances and the potential difficulties of delivering previously developed sites. The policy allows for judgements to be made taking into account the specific circumstances of a site. The thresholds are more generous than those recommended in the Affordable Housing and S106 Viability Study (AHSVS) and do broadly reflect opportunities across the borough. The AHSVS reflects the longer term upward trend in house prices and not simply the impacts of the credit crunch (para. 6.30-6.33). The Affordable Housing SPD will also be able to reflect current land values in relation to viability testing/commuted sums for different types of sites, and aims to introduce a sliding scale	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
				of contributions. These factors should ensure delivery on smaller and previously developed sites is not stifled.	
Policy CS20	-				
Monitoring/Delivery	-	Refer to the flexible and pro-active use of s106 contributions to reflect viability of schemes and to ensure delivery is achieved.		No change. Policy 19 and Section 28 in particular acknowledges the issue of viability. All charges will be set in subordinate documents. The community infrastructure levy charging schedule will be subject to specific Examination (like the Core Strategy). The Council will approach the issue of charging on a reasonable basis and avoid setting charges at a rate which hinders or prevents development. Charging will be related to needs.	
Travelling communities: 14.39-46	-				
Table 10	-				
Policy CS21	-				
Policy CS22		The policy should contain the number of plots/pitches to be delivered and over what time scale.		<p>No change.</p> <p>The Council's approach to provision for Gypsies and travellers has been carefully developed in the light of assessments and consultation with the local Gypsy community, local residents, key stakeholders and other parties. The policy has been the subject of targeted consultation with the local Gypsy community.</p> <p>The paragraph text and monitoring section clearly indicate targets, although it is acknowledged they could vary in the light of any new assessment. The targets are to be delivered within the plan period, just as other targets are. New pitches are expected to be provided alongside large-scale planned developments, such as the local allocations. The timing and identification of sites will be progressed as part of the Site Allocations DPD process. This will not preclude other sites being identified in the Site Allocations DPD and/or coming forward through the development management process.</p>	
		How will working arrangements across Hertfordshire deliver transit pitches and accommodation for travelling showpeople?		No change. This is not simply a matter for the Core Strategy. Policy CS22 includes criteria to assess a potential transit site or pitches. It is more generally an issue to be discussed with other Hertfordshire authorities. There is no identified demand either in the Borough for travelling showpeople or in south and west Hertfordshire, hence the absence of specific details on delivering new accommodation for this group.	
		Delete criterion (a).	S	No change. This sets out the Council's general expectation for accommodating new sites and will help integration. It is important that sites are dispersed to ensure need is met across the borough and to avoid placing undue pressure on individual settlements and their infrastructure. Consultation with the travelling community has also identified that they favour some form of dispersal of new sites, as does the settled community. The policy does not preclude an	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
				exception being made in the case of smaller sites if circumstances justified.	
		Amend criterion (b) to refer to sites being reasonably accessible to facilities.		No change. The existing wording is a reasonable interpretation of guidance provided in Planning Policy for Traveller Sites (March 2012), paragraph 54 of Circular 01/06 and paragraph 3.2 of the Designing Gypsy and Traveller Sites Good Practice Guide.	
		Delete criterion (d).	S	No change. The policy seeks to ensure that when sites come forward that their full potential is realised and properly planned for over time. This is logical and reasonable given the difficulties of securing new sites. It would allow sites to grow, for example, to accommodate the future needs of families and residents.	
		Amend criterion (e) because it is too prescriptive.		No change. The wording is a reasonable interpretation of guidance set out in the Planning Policy for Traveller Sites (March 2012) and the Designing Gypsy and Traveller Sites Good Practice Guide. It is reasonable for a new site to be designed to a high standard, sensitively delivered and fit in with its surroundings, particularly if located as part of a larger residential development	
		New sites should not be provided in the Green Belt.		No change. No realistic brownfield opportunities for new sites have been identified: hence the focus is on greenfield sites on the edge of settlements. Evidence is provided in the Stage Two South West Hertfordshire Identification of potential Gypsy and Traveller sites (September 2006). The Council recognises that future sites will have to be fully justified in terms of their impact. If exceptional circumstances are evident, pitches can be permitted in the Green Belt, particularly through a boundary change, or as an a rural exceptions site.	
		Proposals should be judged on a similar basis to mainstream housing and against the policy criteria and not with reference to the Proposals Map or need.		No change. The policy reflects the reality of delivering sites. It is reasonable and logical to ensure that need is directed to sites which are actually being identified and planned for. This helps provide certainty. Need is an important factor in justifying future provision, especially in Green Belt locations because new sites are recognised as inappropriate development. New sites are likely to have to be justified against need as an exception to normal restraint policies applying in the countryside, given the lack of available urban sites.	
		Will Policy CS22 be used to assess proposals for travelling showpeople?		No change. Any proposal for a new site would be judged against relevant criteria in the Core Strategy and national policies.	
Monitoring/Delivery	-				
15. Meeting community needs		Refer to the need to update the 2008 Open Space Study in the light of shortfalls in facilities and increased levels of participation in Tring.		No change. See response under paragraph 15.18.	
		The length of the document obscures its key themes and involves		The Core Strategy is of an appropriate length given its	

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
			repetition.		coverage of topics and achieving a reasonable balance between detail and conciseness.	
Figure 14			There should be greater consistency over the use of the terms social, leisure, cultural and community facilities. [An all-embracing definition of community facilities is recommended as an alternative.]		Social infrastructure is the term used by the Council to describe the range of facilities and services covered in Figure 14 and in this section. A series of minor amendments is proposed to aid consistency and adhere to the Council's intended definition in Figure 14.	MC 15.1 MC 15.2 MC 15.3 MC 15.4 MC Fig 14 MC Head MC 15.24 MC 15.25
Delivering community services: 15.1-17	15.7		The identification of the Education Zones is contrary to national policy and should be deleted.	S	No change. Government policy requires authorities to plan positively for schools. There are exceptional circumstances, particularly in Berkhamsted, where a departure from standard Green Belt policy is necessary to give greater certainty to and flexibility in school planning. The approach responds to an identified growth in school places highlighted by the Local Education Authority. Policy CS23 balances control with flexibility to respond to proven education needs.	
	15.8		Refer to the need to update the 2008 Open Space Study in the light of shortfalls in facilities and increased levels of participation in Tring.		No change to paragraph 15.8. See response under paragraph 15.18.	
	15.12		Greater clarity of policy on healthcare provision is required.		No change. The responsibility of health care provision lies with the relevant health agencies. The role of the Core Strategy is not to determine health care policy itself, but to reflect and respond to it in spatial planning and land use terms.	
Delivering leisure facilities: 15.18-25	15.18		Refer to the need to update the 2008 Open Space Study in the light of shortfalls in facilities and increased levels of participation in Tring.		No change to paragraph 15.18. It is acknowledged that the studies were completed at particular points in time, and some review or updating will be appropriate from time to time. The Council considers it is important that sporting issues are fairly reflected both across Dacorum and at Tring. The Core Strategy includes the relevant strategic objective and policy (CS23). Specific issues at Tring are addressed under 22. Tring Place Strategy. See the response there and the minor changes proposed.	
	15.21		Refer to the Green Belt and countryside policies in the case of new schools being proposed outside of existing settlements. [It is assumed that indoor sports facilities would be included.]		No change. The Core Strategy should be read as a whole. Such facilities would normally need to comply with countryside/ Green Belt policies and standards. Some school sites benefit from designation as a major developed site in the Green Belt (Policy CS5/Table 2) which would allow flexibility to accommodate some development. Two education zones are currently proposed at Berkhamsted.	
	15.22		Refer to the need for the Council and the Cultural Forum to support tourism.		No change. The Core Strategy already makes clear how it will support development opportunities for tourism and how it will also work with the public and private sectors to promote tourism. This does not preclude working with other community organisations. The Council is also developing a tourism policy statement.	

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
			Refer to tourism being strongly linked to the cultural assets of Dacorum and its people.		No change. The Core Strategy already sets out that tourism and culture are interlinked.	
	15.23		Refer to increasing awareness and participation in countryside activities, local food production provision and opportunities for cultural celebrations.		Agree.	MC
	15.24		The Council should set out a clearer role as to how it will support cultural activities.		No change. The Core Strategy explains how it will support cultural activities through development and land use policies. The details of any role can reasonably be pursued outside of the Core Strategy in conjunction with the public, business and community sectors.	
			Refer to the provision of a new performing arts venue.		No change. A generalised reference to cultural activities can include performing arts. However, the Council can only seek to accommodate what is realistic in terms of resources and opportunity. Current efforts are focussing on improvements to the Old Town Hall, not a new purpose built theatre, and the production of various forms of entertainment across Hemel Hempstead.	
Policy CS23			The underlying evidence base in relation to sports facilities is not sufficiently robust to justify the proposals in the policy and should either be: <ul style="list-style-type: none"> • updated; or • the Core Strategy amended to refer to a formal commitment to prepare a revised assessment within an agreed timescale. 		No change. Current technical information is considered to be adequate to support the Core Strategy. In addition, in Hemel Hempstead, a more up to date audit was carried out of indoor and outdoor sports facilities through the Town Stadium Study (2009). A facilities improvement strategy is also due for completion. The Council will consider when to update the sports facilities studies to support future planning documents, and will explore whether CIL monies could be directed towards new sports provision.	
			Should any new school be built on brownfield sites, or can Green Belt land be used?		No change. Government policy requires authorities to plan positively for schools. There are exceptional circumstances, particularly in Berkhamsted, where a departure from standard Green Belt policy is necessary to give greater certainty to and flexibility in school planning. The approach responds to an identified growth in school places highlighted by the Local Education Authority. Policy CS23 balances control with flexibility to respond to proven education needs. In most cases school places can be accommodated on school sites within the urban area. However, in some settlements demand can only be met on schools sites within the Green Belt given the location of the catchment area, and the restricted number and nature of existing sites within the urban area. See response under paragraph 15.7 also.	
			Should reference to education zones be removed?	S	No. The identification of the zones reflects close and recent working with the County Council as to how best current identified demand can be met within existing school sites in the Green Belt. It would not rule out other sites being brought forward with the support of the County Council if there is clear evidence of need and if circumstances justify.	
			Should planning constraints on schools in the Green Belt be any less robust than those for housing?		No change. See responses above. There are controls on the extension and development of schools in the Green Belt (and elsewhere). Any development within the Green Belt,	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
				including in the education zones or on major developed sites will be subject to normal planning considerations in terms of design, layout and access.	
		The need for children to travel greater distances to school will increase because of the level of housing provided.		No change. See responses to Policy CS17 for arguments regarding the level of housing growth. Travel will not necessarily increase. School planning is the responsibility of the County Council. The Council is working closely with them as to how new school places can be provided in relation to housing growth over the plan period. The role of the Core Strategy is to plan positively, and to relate education infrastructure provision with demand.	
		Multiple use of a performing arts venue should not undermine its ability to provide facilities for major touring companies.		No change. See response to paragraph 15.24 above.	
		The policy is unduly prescriptive by requiring multifunctional use of space and the dual use of new and existing facilities.		No change. This is a reasonable approach to planning for new social infrastructure. The policy encourages effective use of community space, particularly larger scale premises, for a variety of activities. The policy reflects the demand for and the difficulties of securing this type of facility. It seeks to encourage multipurpose and dual use of buildings; it is not mandatory; and individual circumstances need to be considered. The Council understands, for example, that dual use of some places of worship is not practical.	
		Any financial contributions under the policy should be subject to viability and deliverability of the development and independent verification.		No change. An appropriate level of contribution to help provide social (or other) infrastructure is reasonable. The setting of charges - for affordable housing contributions, community infrastructure levy and/or any other contribution – is guided by Government advice. All charges will be set in subordinate documents. The community infrastructure levy charging schedule will be subject to specific Examination (like the Core Strategy).	
		Refer to the need of West Herts College to deliver a new facility within the town centre.		No change. Policy CS23 and Section 15 adequately introduce and cover social infrastructure. Greater detail on specific development opportunities is and will be provided elsewhere in the local planning framework. West Herts College campus is covered in the Hemel Hempstead Place Strategy.	
		A more flexible approach is needed to alternative use and redevelopment of surplus or redundant land, including the importance of providing other uses as enabling development.		No change. Development should normally contribute towards social infrastructure. This may, for example, be through the community infrastructure levy (or similar) or by retention of a facility in a mixed use scheme. The ability to deliver social infrastructure will vary across schemes: each will be judged individually.	
Monitoring/Delivery	-				

- Looking After the Environment

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
Looking after the Environment		-				
Strategic Objectives			Refer to maintenance and suitable management.		No change. The objective and supporting strategy provide the right direction.	
16. Enhancing the natural environment		-				
Text: 16.1		-				
Protecting/improving the landscape: 16.2-8	16.2		Use correct name for the Chilterns character area		Agree.	MC
	16.3		Recognise the Chilterns Area of Outstanding Natural Beauty (AONB) as an asset of green infrastructure (GI)		No change. The AONB is appropriately identified.	
	16.5		Refer to Landscape Character Assessment (LCA)		Agree.	MC
			Refer to landscape assessment and mitigation.		No change. This is adequately covered elsewhere, including through the use of the LCA.	
Map 2			Select consistent landscape descriptions.		No change. Descriptions are appropriate to Dacorum	
			Correct map and show Aldbury Nowers as a scarp slope.	S	Agree.	MC
Green infrastructure: 16.9-16	16.10		Is biodiversity adequately reflected in the description of GI?		Yes. See paragraph 16.17 for example. No change.	
	16.13		Add farming and forestry to the list of GI support systems.		No change. Detail is more appropriate to supporting policy.	
			Extend definition of wildlife corridors.		No change. Detail is more appropriate to supporting policy.	
			High level and local GI links should mesh.		The planning framework as a whole will aim to do this.	
	16.14		Discuss levels of GI deprivation or standards for accessible natural greenspace.		No change. Adequately covered in evidence such as the Urban Nature Conservation Study.	
			Refer to the management of GI sites.		No change. Careful land management is a key principle already. Supporting policy and future guidance will elaborate.	
	16.16		Refer to the local food initiative.		No change. Adequate reference is made to the principle of local food production elsewhere.	
Map 3			Correct inconsistencies between map and key.		Agree.	MC
			More accurately depict the Tring – Wendover GI link.		Agree	MC
			Add GI south of Berkhamsted, which would be provided as a result of a new housing development.		No change. The map has sufficient detail. Furthermore, housing is not proposed by the Core Strategy.	
			Include the AONB.		No change. The AONB is appropriately identified in other maps and diagrams. The map shows GI, including aspects of the AONB, at a district scale.	
			Include long distance paths.		No change to Map 3. However all relevant paths, including Icknield Way, will be shown in Figure 28.	MC
			Include Hemel GI heritage project		No change. This will be a significant project, together with others covered in supplementary guidance (ref Policy CS26)	
			Are local wildlife corridors at Tring appropriately covered?		Yes. Selected corridors are shown on Map 3 as a link with strategic corridors and areas of biodiversity opportunity. Figure 24 has local detail. More will be said in supplementary guidance (ref Policy CS26).	
			Should a strategic wildlife corridor be identified at Gaddesden Row (north of Hemel)?		Yes. Evidence is provided in the Urban Nature Conservation Study prepared by the Council's ecological adviser. Hence, no change.	
			Discuss Chilterns Beechwoods and SSSIs further.		No change to Map. However reference will be made to the most important of the recommendations from the Habitats	MC MC y

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
					Regulations Assessment (2010) and the principles to be applied when considering impacts on wildlife sites. Also refer to both in the Glossary. Saved policies in the Local Plan are also relevant.	MC MC z
Biodiversity/geological conservation:16.17- 24	16.17		Should geology be considered outside GI, or are biodiversity and geology essential components of GI?		Agree latter principle.	MC
	16.18		There is no overlap between Wildlife Sites and SSSIs any more.		Amend text accordingly.	MC
	16.19		Can the wording be improved?		Some change is appropriate. Refer to Figure 15 designations and to streams suffering from over-abstraction.	MC
	16.20		Are the stated locations of the main habitat fragmentation accurate?		Amend reference. The east of the Borough and Hemel Hempstead are the most affected areas.	MC
			Mention the Living Landscapes Project (which encourages broader scale land management).		It is appropriate to refer to broad scale initiatives, both current and potential.	MC x
			Doubt expressed about water supply and the health of the chalk streams. Hence restrict development until new supplies are provided.		No change. The aims and approach of the Core Strategy are appropriate. They have been derived from consultation and collaboration with the water utilities and advisers.	
	16.21		Extend reference to key biodiversity areas to encompass a variety of current and potential large scale biodiversity initiatives.		Agree. Refer to broad scale initiatives, both current and future action, and how these might be taken forward.	MC x MC y
	16.22		The Sustainability Offset Fund should be used for a variety of habitat improvements.		A general reference to habitats is appropriate.	MC
	16.23		Refer to a wider range of large scale biodiversity initiatives.	S	Agree.	MC x
	16.24		More research on geology is available: two additional sites of geological importance (RIGGSs) have been identified.		Amend text to reflect updating. Also amend the Countryside Vision diagram to show the appropriate RIGGSs.	MC MC
Figure 15			Should the designations be simplified into three tiers, and/or should local informal descriptions, such as wildlife corridor, be included?		The figure refers to the appropriate, specific designations. However minor modification would be helpful.	MC
Policy CS24			Add "and enhanced" to the first sentence.		Although no change to the policy is needed, the Council acknowledges it has a role to conserve and enhance the natural beauty of the AONB. Policy is aimed to achieve this. The role and responsibilities of the Council and Chilterns Conservation Board will be included in the Glossary.	MC
Policy CS25			Can development be expected to conserve and enhance the landscape? Or should it be seeking to limit harmful impacts?	S	No change. The first sentence of the policy is an important strategic statement. The location, design and management of development can and should be approached positively. Even the consideration of impacts can be considered constructively.	
Policy CS26			Include biodiversity in the title.		This is not necessary. No change.	
			The policy should state it supports monitoring and updating of the biological record.		No change. This is effectively supported by monitoring and delivery actions with the policies.	
			Insert clause preventing harm to geological conservation.		No change. There are four RIGGSs. Their conservation is adequately covered by the policy and through supporting policies, e.g. the saved Local Plan and future supplementary guidance. Policies CS24 and 25 are also important because they relate to landform.	
			Refer to the strategic GI status of the Chilterns AONB (here or elsewhere).		No change. The AONB is appropriately covered by Policy CS24 and through other policies of the Core Strategy.	
Monitoring/Delivery			Monitor the condition of wildlife sites, especially statutory sites, as well as their extent.		No change. Monitoring indicators are necessarily selective. They have been agreed with the Council's ecological	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
				adviser, reflecting what is reasonable to assess the success of Policies CS24-26 and what is likely to be available.	
17. Conserving the historic environment	-				
Text: 17.1-17	17.5	Refer to poorly designed buildings (instead of characterless).		No change. The current reference is appropriate.	
Policy CS27		Refer to heritage (rather than historic) assets.		Amend in the Policy and paragraph text and define the term in the Glossary in accordance with Government advice.	MC MC MC MC MC
		Refer to ongoing appraisals informing future designations and management plans. Features in the New Town are cited as an example.		Agree in principle. Changes are more appropriate to the text and delivery paragraphs rather than the policy. The approach would apply district-wide, including the New Town.	MC MC
		Does the policy adequately cover undesignated heritage assets with archaeological interest?		Yes, as a strategic policy. The Local Plan also contains relevant saved policies which will be reviewed and updated.	
		Do not give undesignated heritage assets blanket protection.	S	No change. The policy does not give blanket protection to all historic/heritage features. However, conservation of assets, which are features of particular value, is favoured.	
		Should development be considered as a positive force or simply not be negative?		No change. The Council considers the general attitude and approach should be positive.	
		Should development be capable of conserving and enhancing conservation areas, or are the two mutually exclusive?		No change. This is a strategic policy and in general development should perform both functions. An individual development could achieve either or both: the two are not mutually exclusive.	
		Does the policy give sufficient guidance to the possibility of different design approaches?		No change. The policy is appropriate and refers to further guidance being provided. There are also relevant saved policies in the Local Plan.	
Monitoring/Delivery	-				
18. Using resources efficiently	-				
Text: 18.1-11	-				
Figure 16	-				
Renewable energy: 18.12-18	18.13	Also refer to the Chilterns Area of Outstanding Natural Beauty (AONB) and constraints on the harnessing of wind power.		Amend accordingly.	MC
Map 4	-				
Table 11		Table 11 introduces a "local building byelaw". Is the rate of progress to achieve zero carbon buildings appropriate? Would the increased rate overburden housebuilders?		Retain Table 11. The Council is under a responsibility to promote sustainable development. It must assess its draft policies to ensure that its policies are as sustainable as they can reasonably be. Some modification to refer to stages of change towards the achievement of zero carbon buildings would however be appropriate. Further explanation of the stages of change and the way the Council will interpret its approach towards zero carbon buildings would be beneficial. There should also be clearer reference to supplementary advice.	MC 18.11 MC 18.11 MC 18.11 MC T11 MC 18.25 MC CS29
		Should the additional 5% reduction requirement for carbon emissions on large developments be removed?		No. See response to Policy CS29.	
		Is the concept of district heating opportunity areas sound?		Yes, in locations suggested by the evidence of the Low and Zero Carbon Study (see Map 4). Further advice will be	

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
					necessary to fully implement the policy approach.	
Sustainable design/construction:18.19-26	18.19		Design housing with living areas most used upstairs.		No change. This level of detail is not appropriate to the Core Strategy. Architects can however consider the option as part of their designs, e.g. in meeting policy CS29.	
	18.23		Is there an overemphasis on carbon emissions compliance? Refer to sustainability statements covering a range of issues, including habitats and ecosystems.		The reduction of carbon emissions is an important issue. Paragraphs 18.19-18.23 are all relevant to what is covered in a sustainability statement. However, elaboration of the text would help. The criteria in Policy CS29 cover a range of matters. A criterion relating to biodiversity would be a relevant addition.	MC MC
			Do not require small developments to provide a sustainability statement and carbon compliance check.		No change.	
			Use the sustainability offset fund for a range of sustainability improvements, including enhancing biodiversity.		No change. Policy CS29 explains when payments in to the Sustainability Offset Fund will be sought. Policy CS30 guides the use of the Fund. It is appropriate that any payments should be used for the reason they were raised. It is accepted that new tree planting, for example, should be in appropriate places.	
	18.24		Is there an overemphasis on carbon emissions compliance?		No. See responses above.	
	18.25		Is there an overemphasis on carbon emissions compliance?		No. See responses above.	
	18.26		Correct reference to sustainability offset fund.		Amend paragraph 18.25 accordingly.	MC
Policy CS28			Should the policy refer to viability considerations and testing?		No change. This is appropriately covered by Policy CS29.	
			Avoid stifling economic development. For example, if development at Maylands Business Park is not freed from additional financial burdens, the area will become uncompetitive with other office locations.		Agree in principle. See response to Policy CS29.	MC
			Is the rate of progress to achieve zero carbon buildings appropriate? Would the increased rate overburden housebuilders?		The range of change is appropriate in Dacorum. Monitoring of applications is in place as a check. There are safeguards in the policy to ensure development is viable.	
			Should the additional 5% reduction requirement for carbon emissions on large developments be removed?		No. See response to Policy CS29.	
Policy CS29			Is the Core Strategy sufficiently flexible? Should timescales for the introduction of new standards (as in Table 11) be given?		The Council is under a responsibility to promote sustainable development. While it is reasonable to progress at a faster than minimum pace to zero carbon buildings, the exact timetable set by the Government (which the Council will use as a prompt) may vary compared to that currently expected. The Government's intentions towards the achievement of carbon neutral development will be clarified and evolve over the lifetime of the plan. The Core Strategy must be sufficiently flexible to deal with that. The Council is required to assess its draft policies to ensure they are as sustainable as they can reasonably be. Some modification to refer to stages of change towards the achievement of zero carbon buildings would be appropriate. Further explanation of the stages of change and the way the Council will interpret its approach towards zero carbon buildings would be beneficial. There should also be clearer reference to supplementary advice.	MC 18.11 MC 18.11 MC 18.11 MC T11 MC 18.25 MC CS29

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
		Should the policy refer to viability considerations and testing? If so, how? Would costs be excessive?		The policy refers to viability. Minor changes to clarify the test in the policy and to ensure a sensitive approach to viability would be beneficial.	MC 18.11 MC CS29
		Will community infrastructure levy be additional to sustainability payments?		This will be determined through the preparation of further guidance. The Council's intention is not inhibit development, but to ensure it is of the highest standard and provides the appropriate contribution towards infrastructure. The Council's approach to viability is to take account of all additional costs and financial contributions, and the character of the development.	
		Is the rate of progress to achieve zero carbon buildings appropriate? Would the increased rate overburden housebuilders?		The range of change is appropriate in Dacorum. Monitoring of applications is in place as a check. There are safeguards in the policy to ensure development is viable.	
		Avoid stifling economic development. For example, if development at Maylands Business Park is not freed from additional financial burdens, the area will become uncompetitive with other office locations.		The principle is accepted. A change to the paragraph text would be appropriate.	MC 18.11
		Should the additional 5% reduction requirement for carbon emissions on large developments be removed?		No. This is a modest target which experience has so far shown can be met.	
		Should any or all of the criteria (a) to (k) be deleted?	S	No. The criteria are all important considerations in assessing development proposals and their contribution to sustainability.	
		Should reference to Table 11 be deleted?		The reference can be deleted. However, what the Council intends by minimising carbon emissions can be better explained in Table 11 and the text in paragraphs 18.11 – 18.18.	MC 18.11 MC 18.11 MC 18.11 MC 18.25 MC CS29
		Should a site waste management plan (or similar) be referred to?		Yes. Also see response under paragraph 18.39.	MC 18.20
		Use the Building Regulations for fabric insulation and water usage?		No change. While the Building Regulations are highly pertinent, they are not the sole reference.	
		Should all reference to applicants explaining how their proposal has been 'future-proofed', including reference to life time of the building, recycling of materials and retrofitting to enable higher future standards to be met, be deleted?	S	No. The policy is long term and it is reasonable that applicants think about the impact of their proposals. New development should potentially be able to cope with newer practices. If not, designs will be obsolete very quickly and development will fail to deliver all the potential sustainability benefits.	
		Should the policy refer to possible connection to a decentralised heating system?	S	Yes. The policy is long term and must be able to cope with newer development and practices: more decentralised heating systems are envisaged in the future and good use should be made of them.	
		Is relaxing the principles of the policy technically feasible?		Yes. It may be necessary in order to allow development.	
		Do not pay into the sustainability offset fund if scheme is unviable.		This may be a logical outcome. The need for offset payments should be considered before the question of viability. Payments could then be set aside if they rendered a scheme unviable. A change in policy wording would help understanding.	MC
		Should Policy CS29 (and CS28) take precedence over urban design and historic environment policies?	S	No. The policies should be weighed up together.	

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
Policy CS30			Is the Core Strategy sufficiently flexible? Should timescales for the introduction of new standards (as in Table 11) be given?		No change to Policy CS30. See response to Policy CS29 above.	
			Use the sustainability offset fund for a range of sustainability improvements, including enhancing biodiversity.		No change. Policy CS29 explains when payments in to the Sustainability Offset Fund will be sought. Policy CS30 guides the use of the Fund. It is appropriate that any payments should be used for the reason they were raised. It is accepted that new tree planting, for example, should be in appropriate places.	
Monitoring/Delivery			Correct reference to the waste strategy.		Agree.	MC
Sustainable resource management:18.27-41	18.29		Need out-of-area water supply.		No change. The responsibility for new supplies rest with Veolia. Other measures affecting the water environment can help – for example water efficiencies in new development, reduction of leakage and retention of rainfall within the local, natural environment. It is therefore important that the Council continues to work closely with the water utilities and advisers.	
	18.34		How will water supply and sewerage cope with additional development?		No change. The aims and approach of the Core Strategy are appropriate. They have been derived from consultation and collaboration with the water utilities and advisers. Additional infrastructure will be needed and will be planned with the relevant providers. Water efficiency in new development and other measures will help.	
	18.35		Refer to sewerage network investigations in other parts of “the study area” (i.e. south/west Herts).		Agree.	MC
	18.37		Address existing water cycle issues.		No change. The paragraph does not refer to development but the aims of actions to be taken with other agencies. It is highly relevant.	
	18.38		Refer to light zones and other guidance in the Core Strategy, or refer to supplementary guidance on the control of light pollution.		No change. Saved policies cover the subject fully. The reference in CS32 will be the hook for updating the saved policies through the Development Management DPD.	
	18.39		Refer to site waste management plans.		Amend text under sustainable design and construction accordingly.	MC
	18.40		Correct waste planning references.		Agree.	MC
Policy CS31			Will new development undermine the policy?		No change. The policy is concerned with the water environment and how water is managed in that environment. It will be relevant whether development targets are higher or lower. The first part of the policy is strategic and sets out the agreed ambitions of the authorities involved in the water environment, particularly the Environment Agency. The second part will help assess the effects of new development and limit its impact.	
			Amplify criterion (a).		No change. The policy is appropriately worded.	
Policy CS32			It will be relevant whether development targets are higher or lower. Will new development undermine the policy?		No. The policy will help assess the effects of new development and avoid pollution. It will be relevant whether development targets are higher or lower.	
			Add detail on light pollution.		No change. Saved policies cover the subject fully. The reference in CS32 will be the hook for updating the saved	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
				policies through the Development Management DPD.	
Monitoring/Delivery	-				

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- Place Strategies

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
Place Strategies		-				
19. Introduction to Place Strategies		-				
Text	19.7		Delete reference to the local allocations.		No change. They are a significant element of particular place strategies.	
Common Local Objectives			Fifth objective: conserve, not maintain, and enhance the various assets listed.		No change. The objective is broad based and appropriately worded.	MC
			Eighth objective: refer to horse riders and carriage drivers.		No change to objective which is appropriately worded. However the principle of equine/equestrian activities deserves fuller mention in the Countryside Place Strategy.	MC
20. Hemel Hempstead			Provide more cultural facilities and revitalise the town centre.		No change. These are aims of the Council and are being pursued. What is deliverable will depend on resources available to the Council and other parties, and economic circumstance.	
			Refer to the Council's evidence base, in particular the retail study update.		No change. The evidence base helps to justify the policies and does not need to be repeated in the Core Strategy.	
			Reallocate Frogmore Road (Apsley) for housing.		No change. This can be considered through the Site Allocations DPD.	
			Provide space for more than one primary school in the town.		This is being planned for, and is referenced under the Local Objectives. No change to the Core Strategy is needed.	
			Draft a new policy for Apsley, promoting Apsley Mills as a mixed use area.	S	No change. It is not necessary for a new policy for Apsley. Apsley Mills can be considered through the Site Allocations DPD.	
			Give more weight to the heritage of paper making and the canal at Apsley.		Include reference to the paper making heritage in the strategy for the town. Otherwise sufficient reference is made in the Core Strategy to both.	MC
			Support housing/business expansion into St Albans (particularly east of Spencers Park and Maylands Business Park): this should not have been dismissed as an alternative due to lack of co-operation between Dacorum and St Albans Councils.		No change. See response under paragraph 20.17.	
			Should the principle of Dacorum's development needs being met in St Albans be agreed through the Core Strategy?		No change. See response under paragraph 20.17.	
Context:20.1-5	20.4		Mention noteworthy features of the New Town which can contribute to regeneration.		No change. The Council's regeneration ambitions are covered appropriately.	
	20.5		Add references to historic/architectural distinctiveness.		No change. The Council's regeneration ambitions are covered in appropriate detail.	
The Visions			Do not refer to more development because local infrastructure cannot cope.		No change. The vision sets out how things should be.	
			Meet borough housing requirements and plan for the growth of the town centre.		No change. The town vision is appropriately expressed. It should tackle housing and economic challenges rather than simply meet borough housing requirements. There is a more detailed vision for the town centre.	
			Refer to a transport assessment being made of the North East Hemel Hempstead relief road.		No change to vision, which is appropriate in intent and level of detail. However amend text concerning East Hemel Hempstead to cover the principle raised: refine paragraph text in Section 9 which covers transport assessments. Also	MC MC

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
					see response under Policy CS34.	
Local Objectives		-				
Delivering the town strategy: 20.6-11	20.6		Change the level and proportion of new homes.	S	No change. The Council is not proposing any higher development figure at Hemel Hempstead.	
	20.9		Reinstate bus service connecting Old Town with the main station and town centre.		No change. This is a matter for the urban transport plan.	
Delivering the town centre: 20.12-13	20.13		Refer to zones contributing different values and complementing each other: ensure development in one zone is sensitive to the adjacent zone(s).		Agree.	MC
			Insert statement on archaeology – the presence of heritage assets being a constraint in two zones.		No change. Policy CS27 and Section 17 cover heritage assets, the historic environment and archaeology across the borough. The Local Plan also contains relevant saved policies which will be reviewed and updated. The Town Centre Master Plan can include suitable reference . This is sufficient.	
Figure 17			Old Town Zone: add text on the public realm and sensitive improvements.		Agree in principle.	MC
			Original Old Marlowes Zone: add text, particularly noting its role as a link between the old and new town.		Agree in principle.	MC
			Jellicoe Water Gardens Zone: emphasise the significance of this public space and its sensitivity to large scale development.		Agree in principle.	MC
			Gade Zone: broaden the range of uses permissible in the zone to enable delivery of a new college.		While the town centre is a mixed use area, it is large and serves a number of different purposes. The policy quite reasonably gives some guidance on opportunities for particular types of use and character of development. More detailed policy and action will come through the Town Centre Master Plan. The appropriate range of primary uses is given for the Gade Zone.	
Delivering East Hemel: 20.14-19	20.14		Insert statement on archaeology – the presence of heritage assets being a constraint in some zones.		No change. Policy CS27 and Section 17 cover heritage assets, the historic environment and archaeology across the borough. The Local Plan also contains relevant saved policies which will be reviewed and updated. The Action Plan can include suitable reference. This is sufficient.	
	20.17		Support housing/business expansion into St Albans (particularly east of Spencers Park and Maylands Business Park): this should not have been dismissed as an alternative due to lack of co-operation between Dacorum and St Albans Councils.	S	No change. The development needs identified in the Core Strategy can be met within Dacorum. The Council is working with St Albans Council over the planning of East Hemel Hempstead. It agrees with that authority that there is no good reason at present to roll the Green Belt boundary back to the M1. The issues that need to be resolved using land in St Albans are mostly compatible with Green Belt designation. The Council considers that what is planned to 2031 should allow for possible future extension of the town in the Wood End Farm area. If and when Hemel Hempstead is required to expand, this area would be the Council's first choice. To that extent it agrees with the objector.	
			Should the principle of Dacorum's development needs being met in St Albans be agreed through the Core Strategy?	S	No change. The Council is doing this with St Albans Council.	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
Figure 18		How far will the principles in Figure 18 restrict development?		No change. See response under Policy CS34.	
		Is the Maylands Master Plan preferable to Figure 18?		No change. See response under Policy CS34.	
		Allow greater flexibility for B1(c), B2 and B8 (industry and storage) uses in the Face of Maylands.		No change. See response under Policy CS34.	
		Allow offices in Service Centre (Boundary Way East near Buncefield)		No change. The character of this area is broadly set in Figure 18. While Maylands Master Plan adds detail and allows for office redevelopment, the character of the area will be guided by the normally predominant use – storage, distribution and warehousing..	
		Refer to park and ride facilities being subject to transport assessment.		No change to Figure 18, which is appropriate in intent and level of detail. However amend text concerning East Hemel Hempstead to cover the principle raised: refine paragraph text in Section 9 which covers transport assessments. Also see response under Policy CS34.	MC MC
Policy CS33		Refer to a performing arts venue.		No change. The generalised reference to cultural facilities could include a performing arts venue. However, the Council can only seek to accommodate what is realistic in terms of resources and opportunity. Current efforts are focussing on improvements to the Old Town Hall, not a new purpose built theatre.	
		Add text referring to heritage assets.		No change. The policy covers use, movement and design in sufficient detail already. This detail is more appropriate to the Town Centre Master Plan.	
		Add a movement criterion: enhance public transport links between the town centre, main station and Maylands.		No change. This is one of the local objectives. Securing public transport facilities in the town centre and at Maylands will contribute towards the achievement of that objective.	
		Reinstate the reference to the provision of a bus station.	S	No change. Criterion (a) is appropriate. A purpose built bus station is not necessarily required.	
		Undertake additional traffic modelling to assess the impact of proposals in the town centre.		An access and movement study is being carried out as part of the work on the Town Centre Master Plan.	
		Is the policy sufficiently flexible to respond to development opportunities?		Yes. While the town centre is a mixed use area, it is large and serves a number of different purposes. The policy quite reasonably gives some guidance on opportunities for particular types of use and character of development. More detailed policy and action will come through the Town Centre Master Plan.	
Policy CS34		How far will the principles in Figure 18 restrict development? Is designation of the Maylands as a green business park too restrictive?		The Council will take a considerate approach to the needs of business. The purpose of policy is to give some guidance on opportunities for particular types of use and character of development. It is important to set the principles for key areas. The badging of Maylands as a green business park sets a character and ethos which is intended both to encourage business and set the Council's intention to pursue sustainable economic development. This will be interpreted sensitively and tempered by the need to secure jobs. The alternative is 'laissez faire' which would be difficult to manage, and can have unpredictable effects. No change to the Core Strategy is necessary.	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
		Should the policy adapt to the continuing needs of business?		No change to Policy CS34. Policy is intended to be broad based and flexible to different economic circumstances – propriety as well as recession. Supporting the delivery of infrastructure and new housing (at Spencers Park and the Heart of Maylands for example) will ultimately help businesses. Also see response above.	
		Is the Maylands Master Plan preferable to Figure 18?		No change. The Master Plan provides additional guidance for the time being and is not an alternative.	
		Allow greater flexibility for B1(c), B2 and B8 (industry and storage) uses in the Face of Maylands.		No change. This is not precluded and is a possibility particular in less prominent areas, including the northern end of Maylands Avenue. The Master Plan provides additional guidance for the time being.	
		Diversify employment uses in the Gateway.		While it is important to give a general direction in Policy CS34, the Council will respond positively to this matter through revisions to the Gateway development brief. A minor change to Figure 18 will allow further flexibility.	MC Fig 18
		Allow vacant office floorspace to be converted to housing in appropriate locations.		No change to Policy CS34. The more practical opportunities are likely to fall within the main centres. Some diversification is encouraged in Maylands, particularly around the 'Heart of Maylands', and areas closer to existing residential areas.	
		Should criterion (c) on district heating/renewable energy technologies be retained? Will they impact on the viability of proposals hindering economic development?		No change to Policy CS34. However the issue of viability is an important one. It is referred to in Policy CS29 and amendments to that policy and text in Section 18 will underline the importance of a sensitive approach which does not undermine development.	MC 18.11 MC CS29
		Add a movement criterion: enhance public transport links between the town centre, main station and Maylands.		No change. This is one of the local objectives. Securing public transport facilities in the town centre and at Maylands will contribute towards the achievement of that objective.	
		Refer to the impact of the extra jobs on the primary road network (M1/A414) being subject to transport assessment.		No change to Policy CS34, which is appropriate in its coverage. However amend text concerning East Hemel Hempstead to cover the principle raised. Also refine paragraph text in Section 9 which covers transport assessments. The issues can be considered further in the context of the East Hemel Hempstead Action Area Plan. Modelling work undertaken by both the local highway authority and Highways Agency can help in this regard. The Council agrees it is important to plan East Hemel Hempstead up to 2031 and beyond. Park and ride and additional lorry facilities are intended to manage existing traffic rather than attract extra. The North East Hemel Hempstead relief road is a long standing proposal that is being taken forward from the current Local Plan, and will be delivered alongside the development of Spencers Park.	
Monitoring/Delivery	-				
Proposal LA1		Delete the local allocation : various general reasons are put forward - examples: - Impact on the Green Belt - Impact on the Gade Valley		No change. Local allocations are needed to meet the housing target. This location was recommended by the Planning Inspector who conducted the inquiry on the Local Plan. The definition of the site, the scale and siting of	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
		- Loss of the separation of the town from Piccotts End.		development and the quality of the accompanying landscape strategy will help to limit the impacts.	
		Delete the local allocation: various detailed reasons are put forward – examples: <ul style="list-style-type: none"> - Height of buildings - Effect on the landscape and need for more tree planting - Impact on a historic park/garden - Effect of vehicular access into Grovehill. 		No change to development principles. The matters listed and other potential impacts will be assessed and mitigated as the proposal is taken forward through the Site Allocations DPD and planning application(s). These matters will all be subject to consultation.	
Proposal LA2		Delete the local allocation : various general reasons are put forward - examples: <ul style="list-style-type: none"> - Impact on the Green Belt and Gade Valley - Loss of the separation of the town from Piccotts End - Loss of leisure/green space - Impact on the Old Town conservation area. 		No change. Local allocations are needed to meet the housing target. This site is likely to be the lowest priority of the three at Hemel Hempstead. The scale and siting of development and the quality of the accompanying landscape strategy will help to limit the impacts.	
		Defer consideration of LA2 until the Site Allocations DPD.		The Core Strategy is the appropriate place to reach the initial decision. Detailed consideration will then be made at the Site allocations stage.	
		Delete the local allocation: various detailed reasons are put forward – examples: <ul style="list-style-type: none"> - Height of buildings - Control over the type and character of building - Effect on the landscape and need for more tree planting - Effect of traffic on the historic High Street - Effect on the gateway to the Old Town - Flood risk from run-off - Potential for archaeological finds - Effect on residential amenity. 		No change to development principles. The matters listed and other potential impacts will be assessed and mitigated as the proposal is taken forward through the Site Allocations DPD and planning application(s). These matters will all be subject to consultation.	
Proposal LA3		Delete the local allocation because of the impact on the Green Belt, for example.		No change. Local allocations are needed to meet the housing target. The definition of the site, the scale and siting of development and the quality of the accompanying landscape strategy will help to limit the impacts.	
		Is the housing target appropriately expressed? Should it be lower?		No change. The level is appropriate to the area and has the scale to create a new neighbourhood. It is however important there is a limit because there are issues to address in order to assimilate the new development.	
		Refer to the proximity of the Chilterns AONB.		No change. This is unnecessary.	
		Avoid three storey building in the north west field.		Agree. This will be covered in more detailed guidance with the Site Allocations DPD.	
		Insert criterion seeking a transport assessment of the impact of development on Junction 20, M25.	S	No change to LA3. This is a detailed and possibly unreasonable request: it can however be considered further through the Site Allocations DPD. A change to Section 9 will cover the issue of transport assessments more generally and apply to all development sites as relevant.	MC
		Reduce the affordable housing provision to about 35%.		No change. It is important that the largest sites deliver appropriate levels of affordable housing.	
		Ensure educational provision is proportionate to the development.		No change. This will be assessed at a later stage. The County Council currently advises that a two form entry school will be needed.	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
Figure 19: vision - built		Identify Jarman Fields as a local centre with a district shopping function.	S	No change. Jarman Fields is, in fact, an out of centre retail and leisure location, which the Core Strategy recognises.	
		Add new local allocations – Nash Mills and Shendish.	S	No change. These are not proposed in the Core Strategy. They are not needed to meet the housing target.	
		Show the boundary of the Chilterns Area of Outstanding Natural Beauty.		No change. The addition of new open space does not justify the proposed development. The boundary is on the key diagram – the strategy for the whole district. It is not appropriate here.	
Figure 20: vision - natural		Show the boundary of the Chilterns Area of Outstanding Natural Beauty.		No change. The boundary is on the key diagram – the strategy for the whole district. It is not appropriate here.	
		Remove Open Land designation from land at Woodhall Lane.		No change to the diagram. Open Land is a long standing policy introduced in the Local Plan (adopted in 1995) and subject to consultation. The issue raised is a detailed point and should be considered through the Site Allocations DPD.	
		Include listed buildings and areas with archaeological potential (and retitle the diagram accordingly).		No change. The level of detail is inappropriate to a diagram, which combined with Figure 19 describes urban design for the town. The Proposals Map shows archaeological sites.	
		Include Shrub Hill Common LNR.		Agree – an element of urban green infrastructure.	MC
		Correct the boundary of pingos on Boxmoor (a RIGGS)		Agree - a linked element of urban green infrastructure.	MC
Figure 21: the town centre		Include the area around Two Waters Way as part of the town centre.	S	No change. The extension of the town centre would elongate the centre further and is not justified.	
Figure 22: East Hemel		Refer to land shown in St Albans as an indicative study area or similar, and explain what should be covered.		Amend diagram and paragraph text to address these points.	MC MC
		Extend the boundary eastwards to the M1.	S	No change. The level of development proposed does not warrant rolling back the Green Belt in this way. See response to paragraph 20.17.	
21. Berkhamsted		Defer any further housing development until new water sources are provided, the chalk stream (River Bulbourne) is restored, flows in the stream and Canal are protected and water in them is of a good quality.		No change. Although some variation of flow in the Bulbourne is inevitable, this is recognised as an issue. The aims and approach of the Core Strategy are appropriate, both generally and in respect of Berkhamsted. They have been derived from consultation and collaboration with the water utilities and advisers. The responsibility for new water supplies rest with Veolia and the natural water environment with the Environment Agency. the implementation of measures affecting the water environment can help – for example water efficiencies in new development, reduction of leakage and retention of rainfall within the local, natural environment. It is therefore important that the Council continues to work closely with the water utilities and advisers. If additional water infrastructure is needed at Berkhamsted, it will be planned with the relevant providers.	
		Designate the potential extension of a housing site in Bank Mill Lane for housing (the extension is in the Green Belt).		No change. This will be considered through the Site Allocations DPD.	
		Designate Lock Field, New Road, Northchurch for housing – the merits of this site having been overlooked by the Council.		No change. The site is not needed to meet the housing objective for Berkhamsted. The Council considered the merits of the site and its impacts through different stages of the Core Strategy.	

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
Context: 21.1			Mention Northchurch as a separate entity.		The town being planned for is Berkhamsted. Northchurch is a separate parish, both in the urban area and in the countryside. It has a small local centre within the town. Northchurch is referred to where appropriate.	
The Vision			Too many new homes will place burdens on roads and other local infrastructure: the condition of the public realm is worsening.		No change. The Council is working with the infrastructure providers to support new provision and investment in maintenance. Investment will be needed whether or not the number of new homes increases. The Council is proposing a modest level of growth. See response under paragraph 21.2 about the number of new homes.	
Local Objectives			Amend first objective to provide around 750 or 2,871 new homes.	S	No change. See response under paragraph 21.2.	
			Insert a new objective promoting an urban extension south of Berkhamsted.	S	No change. This is neither desired nor proposed in the Core Strategy.	
			Amend third objective to refer to a new primary school delivered with an urban extension south of Berkhamsted.		No change. The amendment is inappropriate as it relates to an urban extension which is not part of the Core Strategy.	
			Amend last objective to increase employment provision with jobs appropriate for and accessible to the local population		No change to Berkhamsted Local Objectives. As there is no new employment area proposed, it is considered that the objective is appropriately framed.	
			Insert new objective supporting local food production and consumption.		No change to Berkhamsted Local Objectives. This is a detailed point, yet could apply more widely. The strategic and common local objectives are appropriately framed. Though not explicitly stated, they embrace the principle of local food production and consumption as far as considered practical. Strategic objectives 1, 9, 11 and 12 are relevant. A change to the Borough Vision is sufficient.	MC
Delivering the Vision: 21.2-14	21.2		<p>Is the proposed dwellings level of 1,180 reasonable:</p> <ul style="list-style-type: none"> • or too high (hence amend to 750 dwellings); • or too low (hence amend to 2,871 dwellings)? <p>Various reasons are advanced for the differing objections, mainly</p> <ul style="list-style-type: none"> • the impact on the character of the town and Green Belt; or • insufficient housing for a town of Berkhamsted's size. <p>To a large degree, these objections relate to the inclusion of sites SS1 and LA4 in the Core Strategy and the proposal for a new neighbourhood south of the town</p>	S	No change. The Council has taken a number of factors into consideration in reaching a balanced conclusion on the level of new housing for Berkhamsted. It has considered alternative levels against housing forecasts and the role of Berkhamsted in the settlement hierarchy in Dacorum. It has also considered the impact of development on the character of a relatively busy town and its infrastructure. The impact on the Green Belt and green swathe between the town and the A41 is relatively modest. The Council has inevitably assessed various sites and opportunities over the plan period, and has taken account of consultation. Ultimately the amount of development selected happens to approximate to past average delivery rates and is considered reasonable.	
	21.3		Remove LA4.		No change. The local allocation is required to meet the local housing objective and help continue supply in the longer term. Also see response under LA4.	
			Reduce the number of dwellings on SS1.		No change. The site is excluded from the Green Belt and is needed to meet the local housing objective. Also see response under SS1.	
			Undertake a full transport assessment before SS1 can be considered.		No change. The development will be subject to a transport assessment and agreement with the local highway authority on necessary highway works and contributions to transport infrastructure.	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
		Identify land south of Berkhamsted as a local allocation to meet housing need/demand and provide social and transport infrastructure for the town. [A description of a 'new' local allocation is given together with amendments and additions to text under Delivering the Vision.]		No change. The impact of a development of this scale is unwarranted. It is not needed to meet the local housing objective – also see response to paragraph 21.2. The provision of social and transport does not justify the level of development proposed.	
	21.4	Remove education zones from the Green Belt.	S	No change. Also see response to paragraph 21.5.	
		Refer to the development of land south of Berkhamsted providing a new primary school.		No change. The provision of a primary school does not justify the proposed housing development.	
		Oppose the location of a new primary school in the education zone to the north west of the town.		No change. See response to paragraph 21.5 below.	
	21.5	Take into account a review of the town's education system – more places and a possible change from the current three tier system to two tier (which exists in most of the county).		The Council has discussed the options with the County Council. The Core Strategy policy framework allows for the necessary investment in school infrastructure whatever the outcome of the review of the town's education system. It is important that the identified education zones in the Green Belt are retained, because there are no practical options for a new school within the town. Although two local schools could be expanded in situ, there are constraints and the County Council has indicated its first priority as a new 'primary school' to the north west of the town.	
		Explain the delivery of new school facilities more fully.		No change. The County Council has provided sufficient information to justify the statements in the Core Strategy. No further text is necessary. The actual delivery of new school places and its timing will evolve over the plan period: it will be shown in the Council's infrastructure delivery plan.	
		Provide more school places before the delivery of more housing, particularly SS1.		No change. The Council will be guided by the County Council on the timing of school facilities in relation to housing development. The provision of new school places will be necessary to support SS1.	
	21.6	Refer to archaeology being a potential constraint on the extent and/or design of development.		No change. Historic character is referred to here, and the detail requested is unnecessary. Section 17 and saved Local Plan policies more than adequately cover archaeological issues.	
		Retain the existing playing field at SS1.		No change. See response below. New space will be provided in accordance with the Council's planning policies, for example on lighting and ancillary building. Overall there will be more space publicly accessible.	
	21.7	Reverse the decision to remove land/school playing field from the Green Belt at SS1.		No change. There are no exceptional circumstances justifying the reinstatement of land removed from the Green Belt. The playing fields were identified as an appropriate location for housing through the previous Local Plan Inquiry.	
		Refer to public open space being increased.		No change. Paragraph 21.7 is accurate and appropriately expressed. It is however agreed that there will also be more space publicly accessible.	
		Identify development south of Berkhamsted as securing improvements to green infrastructure and around 24ha of publicly accessible open space.		No change. The addition of new open space does not justify the proposed development.	
	21.8	Should the last sentence, referring to protection of the historic character of the canal including wharfage, be more positively expressed?		No change. The intention is appropriately expressed.	

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
	21.9		Identify the former Royal Mail sorting office as a development opportunity (for commercial use and shoppers' car parking).		No change. This can be considered through the Site Allocations DPD and/or planning application.	
			Will the development of SS1 be detrimental to the town?		It is difficult to see why this would be detrimental to the functioning of the town centre. The effects would be relatively small – some additional traffic and trade, and possibly employment. No change to paragraph.	
			Identify a new local centre to be provided as part of the development of south Berkhamsted.	S	No change. It is not needed, because the Core Strategy does not propose housing development here.	
	21.10		Refer to increased employment opportunities in the town and on SS1		No change. Sections 11-13 consider employment matters, together with different aspects of the Berkhamsted Place Strategy. This provides sufficient detail. There will be some employment on the SS1 site – construction, maintenance and the school in particular.	
	21.12		Make further reference to Berkhamsted Castle.		Additional reference to this historical asset and its landscape setting can be made.	MC MC
	21.13		Make parking at the stations cheaper.		No change. This is a matter for the operator that can be raised when considering the Urban Transport Plan.	
			Does the proposed development of SS1 contradict statements on sustainable travel?		No change. Objections to SS1 do not undermine the statement in paragraph 21.13.	
			How will sustainable travel options (including bus travel for SS1) be delivered?		No change. This is an important issue which is continually addressed by the County Council as local highway authority, and will be a matter for the Urban Transport Plan. What can be achieved in the short term will be different to the longer term. Modal shift (encouraging less car usage) will take time. Development sites will make financial contributions to sustainable transport measures and will also be designed to accommodate appropriate physical measures.	
			Refer to the potential provision of a new link road to the south of the town as part of a South Berkhamsted development.	S	No change. It is not needed, because the Core Strategy does not propose housing development here.	
	21.14		Complete the road link between Springfield Road and New Road: provision could be linked to low cost housing on Lock Field, with no vehicular crossing of the canal bridge.		No change. The Council has given full opportunity for the issues to be aired. It commissioned work through the County Council to help reach a conclusion on whether a road link should be provided. The potential development of Lock Field was considered both separately from this issue and together with it. The road link is not considered necessary by the highway authority in traffic terms nor needed to improve air quality in Northchurch High Street.	
Strategic Site SS1			Delete the strategic site if possible		No change. There are no exceptional circumstances justifying the reinstatement of land removed from the Green Belt. The school and playing fields were identified as an appropriate location for housing through the previous Local Plan Inquiry. This area has been accepted as an urban site.	
			Object to the strategic site : various general reasons are put forward - examples: <ul style="list-style-type: none"> - The impact on the Green Belt and Bulbourne Valley - Consider 'alternative' sites at New Lodge and Hilltop Road - Impact on the character of the town - Environmental impact 		No change. See above response. Alternative locations have been appraised. None is free from issues. New Lodge is identified already as a housing proposal site in the Local Plan and is part of the committed housing supply. The more important need for Hilltop Road is education use. Design, layout and landscape strategy will mitigate the impact of	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
		<ul style="list-style-type: none"> - Accessibility of site in relation to travel and proximity to the town centre and other facilities - Insufficient school places and availability of other infrastructure. 		development on this site. A substantial area of additional genuinely public space will be provided together with appropriate links through the site.	
		<p>Object to the strategic site: various detailed reasons are put forward – examples:</p> <ul style="list-style-type: none"> - Flood risk from run-off - Loss of public amenity space - There would be more car travel because of the location: cycling and walking into town would be inhibited because of the valley side slopes - There is no transport assessment and no site travel plan: plan to reduce car journeys - Effect of traffic on the town centre, including availability of parking. - Maximum use of new open space will entail floodlighting and light pollution/impact. - Sewerage is inadequate - Water supply upgrade may be needed 		Some matters will be dealt with through detailed design (e.g. run-off) and others through more detailed discussion with infrastructure providers at the planning application stage: also see response to infrastructure issues below. The effects on the town centre will be relatively small and probably balanced – some additional traffic and trade, and possibly employment. The approach to sustainable transport affects the site (and what it can reasonably contribute) and the rest of the town as well: the urban transport plan will address this matter across the whole town. An aim of this plan could be to secure more managed parking space in the town centre. Minor amendments to some of the principles will also help.	MC
		<p>Should the proposal refer to 180 new homes – or from 100 upwards to around 180?</p> <p>Various reasons are put forward for a reduced figure. The issues raised above broadly apply. Consistency with the density of neighbouring housing is also referred to.</p>		No change to the proposal. It is important that effective use is made of land within the urban area, commensurate with its location and surroundings. The context is different from the Local Plan in that more homes are needed over a longer time period. The Council has considered a figure up to 240/250 (Emerging Core Strategy) and in the light of consultation and further consideration has reduced it. An increase of 80 homes on the Local Plan is considered reasonable: more open space will be provided. Also see response to Figure 23 relating to urban design zones.	
		Should delivery of the site be delayed in order to let the infrastructure issues raised be resolved and new urban transport plan be completed?		No change to SS1 delivery section. Infrastructure issues will continue to be discussed with the providers and landowners. No irresolvable issues are evident. The development will meet the requirements of the infrastructure providers. While the timescale of delivery of the housing is considered realistic, it is possible that timescales could slip as a result. The delivery of housing is not dependent on the urban transport plan. The highway authority is fully aware of SS1 and the earlier Local Plan proposal.	
		Amend principle 1 such that the 40% affordable housing requirement is <i>subject to viability</i> .		No change. Policy CS18 covers the point for all housing development proposals.	MC
		Should principle 4 on transport and highway works clear be the same as for LA4? (The transport principle with SS1 does not refer to the possible need to take land at LA4 in order to improve the Kingshill Way junction)		The principle can be presented along similar lines to principle 4 in LA4. The junction design at Kingshill Way and need to contribute to other minor junction works will be agreed with the local highway authority. See also response to LA4.	MC
		Should principle 4 be replaced with a criterion for there to be a net positive effect on the environment? (This would mean that average per capita greenhouse gas emissions should be reduced.)		No change. Existing principle 4, as amended (see above), is both necessary and appropriate. The new principle suggested is not capable of effective monitoring although the Council will be undertaking most of the assessment	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
				requested – firstly through sustainability appraisal on the Core Strategy and secondly through a sustainability statement and carbon compliance check in accordance with Policy CS29.	
		Should principle 8 be revised removing the generation of funds for school refurbishment?		Agree in part. Development should be planned to enable refurbishment of the school.	MC
		Refer to the proximity and sensitivity of the Chilterns AONB.		No change. While landscape issues are relevant, the AONB is a significant distance away.	
		Refer to liaison with Sport England and safety of people crossing Durrants Lane.		Agree with points, which will be covered in the master plan. Hence no change to the principles.	
		Should 2.5 storey buildings be accepted?		No change to proposal. Some part of the site could accommodate an element of building at this scale without detriment. It is more appropriately covered in the master plan.	
		Amend delivery point 3: issues - delete “generating funds for the school” - deliver school playing fields alongside the first phase of housing.		This can be suitably rephrased.	MC
Proposal LA4		Delete the local allocation : various reasons are put forward - examples: - Impact on the Green Belt - Impact on the valley landscape, views and habitats - Impact on local neighbourhoods.		No change. Local allocations are needed to meet the housing target. The location of the site and the scale of development will help to limit the impacts. Alternatives have been assessed and on balance this location is preferred.	
		Include The Old Orchard in the site description.		No change. A general description is most appropriate at this stage. A site will be delineated and more precisely defined through the Site Allocations DPD: the Council accepts The Old Orchard is a small area and can reasonably be included in the <i>definition</i> of the site then. The Council is currently discussing planning issues with the landowners concerned.	
		Increase the dwellings capacity to 65-75		No change. The dwellings capacity is approximate and can be more precisely defined in the light of further assessment and master planning connected with the Site Allocations DPD.	
		Is principle 4 on transport and highway works clear? Should it be the same as for SS1? (The transport principle with SS1 does not refer to the possible need to take land at LA4 in order to improve the Kingshill Way junction)		The principle can be presented better and along similar lines to principle 4 in SS1. The junction design at Kingshill Way will be agreed with the local highway authority. Specific reference to land take will be removed. It is not necessary on highway grounds for LA4 to be brought forward.	MC
		Should principle 4 be replaced with a criterion for there to be a net positive effect on the environment? (This would mean that average per capita greenhouse gas emissions should be reduced.)	S	No change. Existing principle 4, as amended (see above), is both necessary and appropriate. The new principle suggested is not capable of effective monitoring although the Council will be undertaking most of the assessment requested – firstly through sustainability appraisal on the Core Strategy and secondly through a sustainability statement and carbon compliance check in accordance with Policy CS29.	
		Delete principle 5 – no access from Shootersway.		No change. This is the only logical access accepted in principle by the local highway authority.	
		Programme development to enable the Kingshill Way junction improvement to precede or accompany the development of SS1		No change. It is not necessary on highway grounds for LA4 to be brought forward.	

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Vision Diagram (Fig 23)		Reclassify SS1 from semi-urban to peripheral urban design zone.		No change. Design zones should reflect what is proposed and not necessarily maintain the character of past development. Although the upper slopes are more sensitive in longer distance views, the lower land occupied by the school can more readily take higher building density. Detailed planning for the site will look more closely at this issue. The reduction of the dwelling capacity from 240/250 in the Emerging Core Strategy to 180 will help.	
		Show Berkhamsted Castle.		No change. This is unnecessary to what is effectively an urban design diagram.	
		Show the boundary of the Chilterns Area of Outstanding Natural Beauty		No change. The boundary is on the key diagram – the strategy for the whole district. It is not appropriate here.	
		Show a new local allocation for land south of Berkhamsted.	S	No change. The Core Strategy does not include this proposal.	
22. Tring		Plan infrastructure carefully: pressure from additional development affects the ability to obtain school places and doctors' appointments', adds to local congestion, pressure on class sizes and water supply and affects parking availability in the town centre.		No change. Linking infrastructure provision and development is a principle the Council supports. The level of development at Tring has been considered against infrastructure constraints. The modest level of change proposed is consistent with maintaining a stable population. The Council has been collaborating with infrastructure providers, including the education and highway authorities, the Primary Care Trust and water undertakers. While there are issues, particularly the capacity of Tring School, there are no overriding problems.	
		Give greater emphasis to provision for sporting facilities in Tring. This requires the following changes: <ul style="list-style-type: none"> - Refer to the town supporting a thriving sporting community (paragraph 22.2); - Refer to demand from the local community and schools for sports facilities being met (Vision); - Delete reference to playing fields at LA5 (paragraph 22.3 and LA5); - Insert new paragraphs seeking replacement of Tring Sports Centre and new playing fields. 	S	It is important that sporting issues are fairly reflected both across Dacorum and at Tring. The Core Strategy includes the relevant strategic objective and policy (CS23). The vision for Tring is appropriately expressed. Some simplification of Tring Objective 2 will broaden its extent and cover open space. The reference to playing fields under LA5 should remain, although other space can be provided elsewhere. Dual use of any new education playing fields may be relevant. A new paragraph can better cover the Council's approach to Tring and give greater emphasis to the local sports community and its wishes.	MC Vision MC 22.3 MC 22.4 MC new MC 1.13
		No housing in the Green Belt (or on greenfield sites).		No change. It would not be possible to accommodate the housing target without some greenfield land take.	
		Insert statement on archaeology – the potential presence of heritage assets and their protection		No change. Policy CS27 and Section 17 cover heritage assets, the historic environment and archaeology across the borough. The Local Plan also contains relevant saved policies which will be reviewed and updated. This is sufficient.	
Context: 22.1-2	-				
The Vision		Recognise the farming heritage of the countryside around Tring.		In this case a minor change would be appropriate and would take account of the issues and debate over new development at Tring. Much of the land is in the Chilterns AONB. Tring's agricultural heritage includes a farmers market, apple festival and former livestock market.	MC

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			Conserve (not retain) built and natural heritage, and refer to the proximity of the Chilterns Area of Outstanding Natural Beauty.		No change. Proximity of the AONB is adequately covered in this section.	
Local Objectives			Qualify 3 rd objective relating to Tring School: make provision if required.		Simplify objective.	MC
			Amend 5 th objective: increase the level of employment provision.		No change to Tring Local Objectives. As there is no general population growth proposed at Tring, it is considered that the objective is appropriately framed.	
			Add objective: provide new/improved sports and leisure facilities.		Simplify 2 nd objective to refer to open space which is the key issue. The common local objectives otherwise apply.	MC
Delivering the Vision: 22.3-9	22.3		Should the housing objective be reduced from 480: <ul style="list-style-type: none"> - In order to eliminate any development in the Green Belt (and therefore LA5); and - because services will not be able to cope? <p>[Note - also see LA5. If the capacity of LA5 were increased, so presumably should the figure for the housing objective.]</p>		No change. The Council has taken a number of factors into consideration in reaching a balanced conclusion on the level of new housing for Tring. It has considered alternative levels against housing forecasts and the role of Tring in the settlement hierarchy in Dacorum. It has also considered the impact of development on the character of the town, its infrastructure and its surroundings. The impact on the Green Belt is relatively modest. The Council has assessed various sites and opportunities over the plan period, and has taken account of consultation. Ultimately the amount of development selected approximates to maintaining the population level and is considered reasonable. Also see responses to LA5.	
			Should additional facilities be provided to cope with the new housing? Examples given: <ul style="list-style-type: none"> - another supermarket - extra school places - another doctors' surgery - increased leisure facilities for young people. 		No change. While some new infrastructure will be appropriate (e.g. more open space, school places and other community facilities), this issue should be kept in proportion with the level of development proposed over 25 years. Retail studies show shopping floor space requirements in Tring to be low. See responses under paragraphs 22.4 and 22.9 for schooling and health respectively.	
			Is land at Dunsley Farm (north of London Road) a better alternative for development than LA5? Or suitable, if additional land is required?		No change. The character of Tring and its surroundings and the capacity of local infrastructure are sensitive to the level of development. Additional local allocations are not needed at Tring to meet the Core Strategy housing target or local housing objective. Alternatives to LA5 have been assessed, considered and subject to consultation. On balance the Council prefers LA5.	
			Is land north of Station Road a better alternative for development than LA5?	S	No. Alternatives to LA5 have been assessed, considered and subject to consultation. On balance the Council prefers LA5.	
			Is the delivery of new housing sufficiently explained?		No change. The Core Strategy contains sufficient explanation. Evidence is presented in other documents – particularly those on housing land availability.	
			Refer to the maintenance of viable farming around the town.		Agree - amend paragraph 22.5 appropriately. Also see response to the Vision above.	MC
			Refer to the Chilterns Area of Outstanding Natural Beauty being conserved and enhanced, with no housing or employment development proposed in the AONB as part of LA5, and in general locate development so that it has minimal impact on the AONB.		No change to Tring Place Strategy. These principles are embraced by the Core Strategy. There is no intention or proposal to build in the AONB west of Tring through the local allocation. Some development will inevitable occur at places within the AONB and will be visible from the AONB (even if	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
				located outside). Where development is necessary, the Council will follow the principles in Policy CS24, and consider the layout and design very carefully, e.g. using the Chilterns Buildings Design Guide.	
	22.4	Does the paragraph wording adequately reflect the County Council's approach to education?		The Core Strategy has resulted from careful liaison with the County Council. Minor changes can better reflect the overall approach to open space and flexibility needed for education planning at Tring. The Council agrees with HCC that contributions to education infrastructure will be secured through all appropriate development schemes, including LA5.	MC MC 1.13
		Will the level of housing proposed cause problems for school capacity and provision?		The level of housing development and its timing are important matters for school infrastructure. The level of housing proposed for Tring reflects discussions with the County Council as a service provider. Local allocations are intended for development later in the plan period in order to help ensure that existing infrastructure can adapt and provide the necessary capacity. Policy CS35 supports the close linking of infrastructure provision with new development: in some cases it may be necessary to delay development. The more significant issue is for Tring School: however, there is no intention that Tring children should be expected to travel to Berkhamsted to school. Also see response above.	
		Will the provision of detached playing fields be a workable policy for Tring School?		Yes. This is proposed by the County Council as necessary. Any detached playing fields would add to space retained for this purpose on the existing site. The School should be able to plan the use of detached playing fields to suit its curriculum demands and timetabling.	
		Should a new primary school be provided?		No change. Liaison with the County Council suggests extra places, but no need for a new school at the scale and timing of development proposed in the Core Strategy.	
	22.8	Remove traffic from and 'traffic calm' Miswell Lane.		No change. Access to and from the local allocation will be the subject of further consideration, although the local highway authority has advised there are no particular problems. All appropriate development (including LA5) will contribute towards sustainable transport measures. The urban transport plan for Tring can address any relevant concerns about Miswell Lane.	
	22.9	Provide new health care facilities (or relocate LA5 to where there is spare capacity).		No change. Additional or different infrastructure can be provided by the usual agencies. However, there is understood to be sufficient capacity for doctors at Tring, and so no particular need.	
Proposal LA5		Should the local allocation be deleted, because, for example, of the <ul style="list-style-type: none"> - impact on the Green Belt; - impact on the landscape and views from the Chilterns scarp; - effect on infrastructure; or because - there are alternatives 		No change. The local allocation is needed to meet the local housing objective and housing target in the Core Strategy. The scale of development is reasonable for the size of the town: it will be limited in extent and therefore help to maintain the compactness of the town. Alternatives to LA5 have been	

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		- the compactness of Tring would be lost?		assessed, considered and subject to consultation. On balance the Council prefers LA5. The scale, design and layout of development coupled with a landscape strategy will help the extension blend in with the town and its landscape setting: the built area will not be within the AONB. The Council has been collaborating with infrastructure providers, including the education and highway authorities, the Primary Care Trust and water undertakers. While there are issues, there are no overriding problems.	
		Should the local allocation be deleted for other more detailed reasons? Examples: - dangerous/difficult access and effect of traffic on Miswell Lane - impact on wildlife - impact on footpath across area - loss of green area - visual and landscape character impact on areas outside Dacorum - effect on school capacity.		No change. More detailed consideration of the site through the Site Allocations DPD will address all these matters. All are capable of mitigation or resolution. See response above also.	
		Should the dwellings capacity be reduced, increased or retained? Should the dwellings density be set at 30-40 dwellings per hectare?	S	No change. The ultimate capacity of the potential built area may be greater than 150 new homes <i>plus</i> employment land, cemetery extension, play space and other facilities. It is also accepted that an effective use of land should be achieved. This will entail further consideration of height of buildings and density together with sensitive landscape design and assimilation into the landscape. Timing of development will be particularly important in terms of school infrastructure capacity. The dwellings capacity of LA5 is set at what is reasonable for the plan period. The Council wants to collaborate on more detailed investigations with the landowners: this may affect current conclusions. A dwellings density of 30-40 dwellings across the built area would be insensitive.	
		Should employment land be retained as part of the proposal?		Yes. This will allow for relocation out of the town into more suitable premises as well as opportunities for new business. It was recommended through the Employment Space Study. Employment provision should be available in the long term.	
		Refer to potential provision of detached playing fields in principle 2.		The contribution to education facilities can include both buildings and space: both are probably required.	MC
		Refer to a more natural transition from the town to the AONB in principle 4.		Building is not proposed within the AONB. The Site Allocations DPD will define a defensible Green Belt boundary. A soft edge and transition from built area to AONB is intended.	MC
		Insert new principle: the development details and transport strategy will be agreed by Dacorum, Aylesbury Vale and Buckinghamshire Councils before the Site Allocations DPD.		No change. The Council understands issues have been raised in connection with visual impact on the 'Wendover Foothills' and traffic on the A41/B488 and B4089 junction. While the Council will talk through these issues with the other Councils mentioned, and indeed other relevant organisations (such as the local highway authority, Herts County Council), the principle suggested is both	

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					inappropriate and unnecessary for the Core Strategy. It is a matter of detailed process.	
			Should development start and/or be limited to the field adjoining Aylesbury Road?		No change. Site access and visual impact (relating to a future landscape strategy) should be considered further in the Site Allocations DPD.	
Vision Diagram (Fig 24)			Show the boundary of the Chilterns Area of Outstanding Natural Beauty		No change. The boundary is on the key diagram – the strategy for the whole district. It is not appropriate here.	
			Should an alternative or additional local allocation at Dunsley Farm be shown?		No change. The character of Tring and its surroundings and the capacity of local infrastructure are sensitive to the level of development. Additional local allocations are not needed at Tring to meet the Core Strategy housing target or local housing objective. Alternatives to LA5 have been assessed, considered and subject to consultation. On balance the Council prefers LA5.	
23. Kings Langley			Refer to the potential need for a transport assessment with development in the village, because of the possible impact of traffic on Junction 20 of the M25.		No change to Kings Markyate Place Strategy. Development at Kings Langley in Dacorum is highly constrained and will mostly be small scale. Further reference under this Place Strategy is unnecessary. However, a change to Section 9 will cover the issue of transport assessments more generally and apply to all development sites as relevant.	MC
			Indicate the infrastructure that will accompany new development in Kings Langley.		No change. The Core Strategy states what is known. An Infrastructure Delivery Plan has been published and will be updated: it may include more information about Kings Langley.	
Context: 23.1		-				
The Vision			Refer to the farming heritage.		No change. The vision is appropriately expressed.	
Local Objectives			Amend objective 2 to refer to: <ul style="list-style-type: none"> - sport and leisure provision at Kings Langley School - primary school facilities. 		No change. The objective addresses the key issue for the village. The provision of a primary school in Hemel Hempstead which could affect the catchment of Kings Langley Primary School is covered in the Hemel Place Strategy. Policy CS23 addresses education and explains the Council's approach. This allows for new facilities at the primary school. It also encourages dual use of sports facilities at (senior) schools. Guidance on the 'Major Developed Area' at the secondary school will reassessed through the Site Allocations DPD.	
Delivering the Vision: 23.2-6	23.3		Insert statement on archaeology – scheduled sites, the potential for finds and protection of heritage assets.		No change. Policy CS27 and Section 17 cover heritage assets, the historic environment and archaeology across the borough. The Local Plan also contains relevant saved policies which will be reviewed and updated. This is sufficient.	
Vision Diagram (Fig 25)		-				
24. Bovingdon			The level of housing provision is low and does not accommodate the needs of neighbouring rural communities.		No change. The Council has taken a number of factors into consideration in reaching a balanced conclusion on the level of new housing for Bovingdon. It has considered alternative levels against housing forecasts and the role of Bovingdon and other places in the settlement hierarchy in Dacorum. It has also considered the impact of development on the	

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				character of the village, its constrained infrastructure and its surroundings. The impact on the Green Belt is relatively modest. The Council has assessed various sites and opportunities over the plan period, and has taken account of consultation. Ultimately the amount of development selected approximates to maintaining population level and is considered reasonable.	
		Are alternative sites to Chesham Road (LA6) preferable – land at Duck Hall Farm or Grange Farm?		No change. LA6 is modest in size and appropriate to the size of the village. The site is well contained within the Green Belt and reasonably accessible to the local centre. Alternatives have been assessed and this location is preferred.	
Context: 24.1	-				
The Vision		Give a stronger emphasis to open space, without reference to new housing development		No change. The reference to the provision of some open space on local allocation, LA6, is appropriate. A minor change to the objective will clarify that local allocation LA6 need not be the only location for future open space.	MC
		How will local allocation, LA6, encourage sustainable transport?		No change. The issue is common to any development site. All sites will be asked to contribute to sustainable transport measures through financial contribution and through site layout and design (e.g. by location of direct footpath routes). The County Council, as local highway authority, will consider what measures can and should be taken in respect of the local highway.	
		LA6 is too small to accommodate all proposed uses.		No change. The local allocation is appropriate for the uses identified.	
Local Objectives		The level of housing proposed is too high.		No change. Local allocations are needed to meet the housing target. This local allocation is modest in size and appropriate to the size of the village. It will enable the housing objective for Bovington to be met. Also see response above.	
		130 new houses will exacerbate a problem of overcapacity at the primary school.		No change. Potential impacts will be assessed and mitigated as the proposal is taken forward through the Site Allocations DPD and planning application(s). Timing of development will be relevant to infrastructure capacity, particularly the primary school. The Council is liaising with the County Council on infrastructure delivery.	
		New housing will add to traffic and parking issues within the village		No change. Potential parking issues will be assessed and mitigated as the proposal is taken forward through the Site Allocations DPD and planning application(s). All these matters will be subject to consultation.	
		There are insufficient employment opportunities locally (in relation to new housing).		No change. The level of housing is not expected to cause any significant population change. Important employment uses will be safeguarded. They will provide employment opportunities locally, although it is acknowledged that people inevitably travel because that gives greater choice.	
		Provide new open space, but not necessarily as part of LA6: concerns listed - The site runs parallel with a green/biodiversity corridor which is		There is no loss of public open space, only a potential gain. The wildlife corridor will be accommodated in the development layout. A minor change to the objective will	MC

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
			<p>an integral key part of the wildlife corridor.</p> <ul style="list-style-type: none"> - Loss of local amenity/ recreation space and need to reflect the Green Space Strategy. 		clarify that local allocation LA6 need not be the only location for future open space.	
Delivering the Vision: 24.2-5	24.2		<p>Object to local allocation, LA6, because of open space impacts:</p> <p>a) Open space</p> <ul style="list-style-type: none"> - The site runs parallel with a green/biodiversity corridor which is an integral key part of the wildlife corridor. - Loss of local amenity/ recreation space and need to reflect the Green Space Strategy. - Use the site for open space and/or allotments. <p>b) Land at Duck Hall Farm would be more suitable for housing development on grounds of Green Belt and supporting biodiversity.</p>		No change. There is no loss of public open space, only a potential gain. The wildlife corridor will be accommodated in the development layout. The Council will rely on the Urban Nature Conservation Study and supplementary advice from the Herts Biological Records Centre. A minor change to the objective will clarify that local allocation LA6 need not be the only location for future open space. LA6 was never intended to accommodate allotments: open space and allotments are appropriate Green Belt uses. Various alternatives for the local allocation have been assessed and LA6 is preferred. LA6 is well contained within the Green Belt and reasonably accessible to the local centre. It was part of Bovingdon Airfield and was originally intended as a second phase of housing for prison officers.	
			Object to local allocation, LA6, because of increased parking and traffic problems within the village		No change. Potential parking and traffic issues affecting the site will be assessed and mitigated as the proposal is taken forward through the Site Allocations DPD and planning application(s). All these matters will be subject to consultation. For other parking and traffic issues, see responses under paragraph 24.5.	
			LA6 is of insufficient size to accommodate the proposed uses. It is unsuitable to accommodate a residential care home.		Various alternatives have been assessed and this location is preferred. The site has is considered to be of sufficient size to accommodate the uses identified. This does not include a residential care home, though the use would be appropriate to a residential area. A minor change to the local objectives will help to clarify that the Council will consider the location of a care home (if needed).	MC
			Development of LA6 would exacerbate water runoff and increase flood risk.		No change. Flood risk and drainage infrastructure will be examined further in the context of master planning for the site and the Site Allocations DPD.	
	24.3		Development on the Chesham Road will "extend" the village and give the appearance of sprawl. New housing on this site will be out of character with area.		No change. Local allocations, such as the site at Chesham Road, are needed to meet the housing target. This local allocation is modest in size and appropriate to the size of the village. It will enable the housing objective for Bovingdon to be met. The design of development should follow design policies in the Urban Design Assessment for Bovingdon and will not be out of character.	
			Refer to the potential for heritage assets of archaeological interest from the Roman and Medieval periods.		No change. Any heritage assets of archaeological interest will be investigated and any development impacts mitigated through Policy CS27 and saved Local Plan policy. Specific issues will be considered as appropriate in the Site Allocations DPD and relevant planning applications.	
	24.4		The development of LA6 is not an effective way of maintaining the village centre, particularly with the proposed building of a new Tesco store.		No change. The paragraph is concerned with the role of the local centre, taking account of the new store opening. This affects the whole of the village and is not simply linked to	

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				one housing proposal.	
		Bovingdon Brickworks and The Mount Prison do not rely on the local population to fill vacancies.		No change. They provide employment opportunities locally.	
	24.5	New housing will add to traffic and parking issues within the village		No change. Bovingdon is a compact village and central facilities are reasonably accessible. The level of development proposed is relatively low so the level of any extra demand will be low. There are issues affecting the village centre, and no agreement on how to tackle them. The Council has concluded from consultation that village centre parking has a calming effect on traffic and that low key sustainable transport measures are generally felt to be the best way forward. Also see response below.	
		There is no evidence of ways to encourage sustainable transport in the Core Strategy, particularly relating to cycling and cycling spaces. Pedestrian infrastructure needs to be improved.		No change. All development sites will be asked to contribute to sustainable transport measures through financial contribution and through site layout and design (e.g. by location of direct footpath routes). The County Council, as local highway authority, will consider what measures can and should be taken in respect of the local highway. Their transport policies will apply to the whole of the area.	
Proposal LA6		Delete LA6 as a matter of principle: <ul style="list-style-type: none"> - it is in the Green Belt; - it should be used for allotments. 		No change. Local allocations are needed to meet the housing target. This local allocation is modest in size and appropriate to the size of the village. It will enable the housing objective for Bovingdon to be met. Further consideration will be given to the provision of allotments (ref paragraph 24.2).	
		Delete LA6 for detailed reasons given when commenting on the text of the Place Strategy: examples <ul style="list-style-type: none"> - effect on the character of the village - dwelling capacity is too high - effect on wildlife - loss of public open space - strain on the primary school - strain on the High Street from extra traffic and parking on the High Street. 		No change. There is no loss of public open space, only a potential gain. Other matters listed and other potential impacts will be assessed and mitigated as the proposal is taken forward through the Site Allocations DPD and planning application(s). All these matters will be subject to consultation. The design and layout of the site will help to limit the impacts. Timing of development will be relevant to infrastructure capacity, particularly the primary school.	
		Delete LA6 in favour of an alternative: alternatives LA suggested include <ul style="list-style-type: none"> - Land at Duck Hall Farm - Land at Grange Farm (LA6 is less accessible, more constrained, of doubtful viability and should be accorded lower priority than the alternatives. The alternatives can also accommodate more development/uses.)		No change. Various alternatives have been assessed and this location is preferred. The site is well contained within the Green Belt and reasonably accessible to the local centre. It was part of Bovingdon Airfield and was originally intended as a second phase of housing for prison officers. The Council and landowners consider the site is deliverable. LA6 was never intended to accommodate allotments and a residential care home (if needed), as well as housing. Open space and allotments are appropriate Green Belt uses. A residential care home will be considered as a possibility through the Site Allocations DPD.	
		Add a principle to address the drainage issue.		No change to the principles at this stage. The issue will be examined further in the context of master planning for the site and the Site Allocations DPD.	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
Vision Diagram (Fig 26)	-				
25. Markyate		Refer to the potential need for a transport assessment with development in the village, because of the possible impact of traffic on the A5.		No change to Markyate Place Strategy. Development at Markyate is highly constrained and will mostly be small scale. The exceptions, Manor Farm in the Local Plan and SS1, are specifically covered. Further reference under this Place Strategy is unnecessary. However, a change to Section 9 will cover the issue of transport assessments more generally and apply to all development sites as relevant.	MC
		Insert statement on archaeology – Watling Street, the potential for finds and protection of heritage assets.		No change. Policy CS27 and Section 17 cover heritage assets, the historic environment and archaeology across the borough. The Local Plan also contains relevant saved policies which will be reviewed and updated. This is sufficient.	
Context: 25.1-4	-				
The Vision		Should the reference to the village setting be elaborated, referring to farmland and the Chilterns Ares of outstanding Natural Beauty?		No change. The vision is appropriately expressed, and the AONB is mentioned in paragraph 25.2.	
Local Objectives		Insert new objective: provide new sport and leisure facilities.		No change. The principle is appropriately covered through the strategic objective, common local objectives and Policy CS23. No further detail is necessary.	
Delivering the Vision: 25.5-10	25.8	Refer to the Chilterns AONB as part of the setting.		No change. The AONB is mentioned in paragraph 25.2 and repetition is unnecessary.	
Strategic Site SS2		Should the reference to the retention of existing business tenants in principle 3 be deleted or strengthened?		No change. The reference is fair and appropriate.	
		Add 3 storey houses to principle 5.		No change. The current principle is the appropriate test. While it may be appropriate through high quality design to include an element of 3 storeys, this must be justified through planning applications.	
		Refer to the AONB around Markyate in principle 9.		No change. The AONB is mentioned in paragraph 25.2 and repetition is unnecessary.	
		Deculvert (<i>part of</i>) the River Ver (<i>the extent to be agreed with the Environment Agency.</i>)		No change. The principle is the appropriate test.	
		Delete reference to a planning performance agreement (delivery point 3).		Agree.	MC
		Refer to a sequential test having been agreed (delivery point 8).		The criterion can be simplified. It is not necessary to refer to the sequential test.	MC
Vision Diagram (Fig 27)		Extend the centre zone into SS1 to include the central focus		Agree.	MC
		Show the boundary of the Chilterns AONB.		No change. The boundary is on the key diagram – the strategy for the whole district. It is not appropriate here.	
26. Countryside		Insert statement on archaeology – the potential for finds, the existence of known areas of importance and the importance of protection, even from certain agricultural practices.	S	Policy CS27 and Section 17 cover heritage assets, the historic environment and archaeology across the borough. The Local Plan also contains relevant saved policies which will be reviewed and updated. Normally all these references are sufficient. However, the countryside is an extensive area and some reference to archaeological heritage, its protection and land management is on balance reasonable.	MC
		Extend Wilstone village westwards to include a potential housing site.	S	No change. The village boundary and potential housing site are matters for the Site Allocations DPD to consider.	
Context: 26.1-3	-				

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
The Vision		-				
Local Objectives			Extend objective 5 to evaluate equine activities and their needs and balance their impact on the landscape.		No change to objective, which is appropriately phrased in the context of local issues. However, improving the bridleway network is an important intention and can usefully be mentioned in paragraph 26.15	MC
Delivering the Vision: 26.4-18	26.11		Insert policy statement supporting recreational mooring basins and lay-bys.	S	The Council does not support new mooring basins/lay-bys in open countryside nor has evidence of need for them. Local Plan policies are saved and remain relevant. A minor change to the paragraph will suffice.	MC
	26.18		Include further reference/measures on reducing light pollution.		Insert new text.	MC
Table 12			Add Dip Slope to Plateau/Ridge landscape type.		No change. The reference from the Chilterns Buildings Design Guide in the Core Strategy is correct.	
Vision Diagram (Fig 28)			Add Shrubhill Common and Millhoppers nature reserves.		Add the missing countryside nature reserve – Millhoppers. (Shrubhill Common is covered by Figure 20).	MC

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Table 2a: Main Issues raised - Parts C and D and Proposals Map

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
Part C – Implementation and Delivery		-				
Strategic Objectives		-				
27. Delivery		-				
Text: 27.1-4		-				
Partnership Working: 27.5-8		-				
Key Projects: 27.9-10		-				
Flexibility & contingency: 27.11-14		-				
28. Infrastructure		-				
Text: 28.1-2		-				
Infrastructure requirements: 28.3-6	28.3		Will aspirations to maintain water flows in the chalk streams be realised?		This is the aim. It has been agreed with the water utilities and advisers. The concerns of low flow are acknowledged and will be addressed as far as possible over the plan period. See also responses to paragraphs 18.29 and 18.34.	
	28.5		Does the Core Strategy ignore the abstraction of water from the aquifer as a barrier to development?		No. Water supply is an important issue being addressed with the water utilities/advisers. The responsibility for supply and new sources of supply rests with Veolia. Other measures affecting the water environment can help – for example water efficiencies in new development, reduction of leakage and retention of rainfall within the local, natural environment. It is therefore important that the Council continues to work closely with the water utilities and advisers with the aim of restoring water levels and flows in the natural environment.	
Developer contributions: 28.7-11		-				
Policy CS35			Should the Core Strategy include detailed, costed infrastructure requirements?	S	Linking infrastructure provision and development is a principle the Council supports, and Policy CS35 sets the overall approach, not the detail. Providing costed infrastructure requirements is the role of a separate Infrastructure Delivery Plan: it has been prepared and is being updated in conjunction with infrastructure providers. The IDP will also be updated regularly in the future. Infrastructure will be delivered at various times over the plan period, and information will be refined and detail added over time.	
			Does the policy impose unreasonable financial burdens on development?		No. The setting of charges - for affordable housing contributions, community infrastructure levy and/or any other contribution – is guided by Government advice. All charges will be set in subordinate documents. The CIL charging schedule will be subject to specific Examination (like the Core Strategy). The Council will approach the issue of charging on a reasonable basis and avoid setting charges at a rate which hinders or prevents development. Charging will be related to needs.	
			Should smaller housing projects be exempt from contributing to infrastructure?	S	No, not as a matter of general principle. All development contributes to infrastructure needs cumulatively. The Council must accord with regulations and advice, and will take	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
				viability fully into account. This may well mean that charges for smaller developments will be proportionately less.	
		Require a delivery timeframe for infrastructure before development can commence.	S	No change. This is a matter for the Infrastructure Delivery Plan. The policy will not allow critical infrastructure capacity limits to be breached. The Council will be guided by the relevant infrastructure provider about capacity limits. Infrastructure providers have responsibilities to provide the necessary infrastructure, but timing and funding of investment can be crucial, and a development could be delayed.	
		Relate the need for developer contributions (to infrastructure) to direct impact mitigation.		No change. Broadly this will happen. The setting of charges - for affordable housing contributions, community infrastructure levy and/or any other contribution – is guided by Government advice. All charges will be set in subordinate documents. The CIL charging schedule will be subject to specific Examination (like the Core Strategy).	
		Qualify the policy so that it is: <ul style="list-style-type: none"> - subject to viability and deliverability, and independent verification; - justified against Government policy; and takes into account - other exceptional costs. 		No change. The policy is appropriately framed and deals with the provision of infrastructure in relation to development. Also see above response.	
		Require further discussion with relevant stakeholders, e.g. Highways Agency, to ensure that infrastructure capacity and timing of development is related.		No change. This will happen in discussions on the IDP, other planning documents and development proposals.	
Monitoring/Delivery	-				
29. Monitoring	-				
Text	-				
Part D - Appendices	-				
1. Superseded Policies	-				
2. Housing Trajectory		Is the housing trajectory overoptimistic and therefore inadequate?		No change. A Strategic Housing Land Availability Assessment has been agreed with developer interests, and housing land availability information emanating from that assessment is updated annually. Policy CS17 states the housing target, for which there is sufficient land available and opportunity to meet it. The Council acknowledges there will be fluctuations in short term demand and supply, but Policy CS17 is sufficiently robust to deal with this.	
3. Delivery Mechanisms		Should reference be made to a Dacorum Local Food Initiative?		No change. The Dacorum Local Food Initiative is not an existing delivery mechanism. Even if it was, adequate reference is made to local food production elsewhere in the Core Strategy (including a minor change to the Borough Vision).	
4. Glossary		Evidence Base - should the definition include reference to information provided by organisations other than the Council?		No change. The evidence base is that used by the Council. Information has been drawn from a variety of sources.	
		Include a definition of Sites of Special Scientific Interest.		Agree.	MC
		Wildlife Site – remove FWAG from the list of organisations in the Wildlife Sites Partnership in Hertfordshire.		Agree.	MC

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
Proposals Map	-				
General (including omissions)	-				
SS1: Shootersway	-				
SS2: Hicks Road	-				
Hemel Hempstead Town Centre	-				
East Hemel Hempstead Area Action Plan	-				
Conservation Areas	-				
Trunk Roads	-				

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