

Annex 4

Minor Modifications – Summary of Key Issues Raised and Proposed Response

Minor Modification	Section	Policy / Paragraph	Number of Objections	Issue	Response
mc2	Summary of the Strategy	1.5	1	The following wording should be reinstated: “to ensure they are only brought forward if required”. Local Allocations are Green Belt land and should only be used if absolutely required.	<p>No change. Issue of the treatment and phasing of Local Allocations previously considered in Report of Representations on the Pre-Submission Core Strategy (June 2012) and the Report of Representations on the Main Modifications (April 2013), with regard to main Modifications MM2 and MM3.</p> <p>Wording change in mc2 is required to ensure the Council’s approach to Local Allocations is clearly and consistently articulated. MM3 (amended paragraph 8.16) states that <i>“Local allocations will be held back to encourage urban sites to come forward earlier, to retain countryside for longer and to ensure an appropriate contribution to land supply in the later part of the plan period.”</i></p>
mc3	Summary of the Strategy	1.10	1	The following wording should be reinstated: “a performing arts venue”.	<p>No change. Cultural facilities are appropriately referred to in Section 15 and Policy CS23. Issue of whether or not to include a direct reference to a new performing arts venue was previously considered in Report of Representations on the Pre-Submission Core Strategy (June 2012). This responses stated: <i>“No change. The generalised reference [in</i></p>

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					Policy CS33] 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 focusing on improvements to the Old Town Hall, not a new purpose built theatre.”
mc4	Summary of the Strategy	1.13	2	The level of housing growth (only 4%) allocated to Tring is disproportionate and should be increased. It should be reviewed as part of the wider review of the Borough’s housing provision strategy and Green Belt review.	No change. The issue of housing provision at Tring was considered through the Examination. It is quite reasonable for the growth of Tring to be at a lower rate than for Hemel Hempstead. However, Main Modification MM28 covers the partial review recommended by the Planning Inspector, the last sentence of which states: “ <i>The outcome of the review cannot be prejudged.</i> ”
				The current housing provision target proposed for Tring includes an overreliance on windfall sites to meet identified housing needs and is considered inappropriate. Assumptions in relation to urban capacity must be supported by an up-to-date, comprehensive Strategy Housing Land Availability Assessment.	No change. Evidence about the housing programme was provided to the Examination and taken into account. There are local housing objectives for all places within the borough, while Policy CS17 sets the borough-wide housing target. Housing land availability information will continue to be monitored and updated (see text in paragraph 14.14 of the Core Strategy, Main Modification MM12, for example).
				Clarification needs to be given to say that policies will be put in place which would facilitate the extension of Tring School, rather than it meaning that the school will definitely be extended.	No change required. The amended text is a simplification of previous wording and recognises that the school may need to be extended in the future, and if so, that will be supported. This is appropriate as a summary

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					statement. Further detail is provided within the Tring Place Strategy.
mc9	Part A – Context. Borough Portrait	3.22	1	Add unregistered historic parks and gardens which are on the Local List of Historic Park and Gardens in Dacorum. The list at present contains 30 sites and these should be accorded the same considerations in planning terms as locally listed buildings (NPPF p139).	No change required. The Borough Portrait provides an overview of the main characteristics of the Borough, rather than setting out the policy approach towards historic assets. This is set out in Section 17: Conserving the Historic Environment and Policy CS27: Quality of the Historic Environment. This is compliant with the approach set out in the NPPF.
mc18	Part A – Context. Other Plans	Figure 7	1	Reference to the DCLG Guidance on implementing the EU Waste Framework Directive (Dec 2012) should be made.	No change required. Figure 7 provides a list key document and strategies: it is not intended to be exhaustive. Relevant EU Directives and DCLG guidance will be taken into account when determining planning applications. The issue of Dacorum’s responsibilities regarding waste management are summarised in section 18 of the Core Strategy. Policy CS29: Sustainable Design and Construction includes criteria relating to provision of on-site recycling facilities for waste and the recycling and reduction of construction waste.
mc27	Part B - The Strategy. Promoting Sustainable Development	Policy CS2	2	Policy CS2 Priority B should allow for the limited expansion of settlements, such as Kings Langley, where this would provide a more defensible and rational Green Belt boundary to that settlement. Since the previous Local Plan Inquiry in 1991 the context of the Love Lane site has	No change required. This objection does not relate to mc27, but raises a wider objection to the policy approach. The Inspector has considered the settlement hierarchy and proposed distribution of housing at the Examination and supports this.

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				<p>changed. The site is now adjoined by existing development on three sides, such that the character of the area now has a suburban residential feel. Therefore this site is not required to be kept open.</p>	<p>The Green Belt boundary will be subject to comprehensive re-assessment as part of the early partial review process.</p> <p>The particular site referred to at Love Lane, Kings Langley was explicitly considered at the Examination and the Inspector has not recommended its inclusion as an additional Local Allocation.</p>
				<p>Insert after “within defined settlements the words “provided that there is evidence to demonstrate it is deliverable and it is not of high environmental value”; delete “3. Other land”; delete the words “(i.e. local allocations, see Policy CS3)”.</p>	<p>No change required. This objection does not relate to mc27, but suggests changes to the policy approach, apparently to enable the identification of more land for development in the Green Belt. The additional wording (at point A 1. In the Policy) is neither necessary nor appropriate. The Inspector has not recommended any changes to the Council’s approach to the settlement hierarchy or the selection of development sites. The environmental value of land will be considered through other Core Strategy and Dacorum Borough Local Plan policies, as indicated in the Policy itself.</p>
<p>mc30</p>	<p>Part B - The Strategy. Promoting Sustainable Development</p>	<p>8.28</p>	<p>5</p>	<p>The comprehensive Green Belt review should involve a review of all potential Green Belt locations to include in draft Local Allocations.</p>	<p>No change required. Objections to the timing and need for a Green Belt review and early partial review of the Core Strategy were considered in the Report of Representations relating to the Main Modifications (April 2013).</p> <p>Mc30 provides explanatory text in support of</p>

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				<p>Object to the failure to review the Green Belt boundary until a later date. Given the permanence of Green Belt boundaries when reviewed correctly as part of the Core Strategy there should be no need to leave the matter open through the Site Allocations DPD for minor changes to be made later when considering individual sites, as suggested. The Council need to identify a housing target that closely reflects identified need; thoroughly review the Green Belt boundary; and co-operate more fully with neighbouring local planning authorities to meet the housing needs of Dacorum and adjoining Boroughs. The paragraph should remain as previously worded</p> <p>Object to partial review of the Core Strategy and any Green Belt review.</p> <p>Proposal for a partial review commencing in 2013 should be deleted.</p>	<p>a policy approach that has been agreed and recommended by the Inspector. The wording accurately reflects the Council's approach to the assessment and allocation of Green Belt land for development. The Inspector has required reference to an early partial review, to include a comprehensive Green Belt assessment in MM28: this is correctly cross-referred to in mc30.</p> <p>Work on Stage 1 of the Green Belt Review has commenced and includes consideration of all Green Belt (and Rural Area) within the Borough. The study also covers St Albans and Welwyn Hatfield to ensure a comprehensive and consistent approach across borough boundaries.</p>
mc42	Part B – The Strategy. Enabling Convenient Access	9.11	5	Concerns are raised regarding the quality of the Urban Transport Plan for Berkhamsted and the proposals it contains for addressing transport issues within the town.	No change required. This issue does not relate to mc42, but is a wider comment on the quality of the Urban Transport Plan. The Urban Transport Plan is a document prepared by the County Council (as local Highway Authority), and reflects their professional assessment of local highway issues and appropriate solutions. It has been subject to public consultation and taken account of the views expressed.

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mc54	Part B – The Strategy. Providing for offices, industry, etc.	12.13	1	Representations were made regarding the intention to improve public transport between Hemel Hempstead town centre, Maylands Business Park and the main train station. Accept an explicit reference is not required in this section of the plan provided that developers are clear of the Council’s requirements regarding improving links.	No change required. This issue does not relate to mc54, but is a wider comment on public transport within Hemel Hempstead. Section 9 of the Core Strategy sets out the Council’s expectations regarding enabling convenient access between homes, jobs and facilities. Policy CS8: Sustainable Transport requires all new development to contribute to a well connected and accessible transport system. This policy includes explicit reference to the need to strengthen links between key facilities (bus and rail stations, hospitals, main employers and town centres). The Council will continue to work closely with developers and the County Council’s Passengers Transport Unit to deliver these policy objectives.
mc57	Part B – The Strategy. Supporting retailing and commerce	13.3	1	Delete the new sentence “The availability of such accessible shops and services is vital, and the Council will support their provision and retention where it can” as this adds nothing to the paragraph and could be misinterpreted by prospective developers.	No change required. The additional wording should be retained. It was introduced following consideration of representations in the Report of Representations on the Pre-Submission Core Strategy (June 2012). The sentence underlines the importance of accessible shops and services and states that the Council will support their provision and retention where it can.
mc62	Part B – The Strategy. Providing Homes	14.13	4	Delete the final sentence “Local Allocations will be delivered from 2021”. The reason for this is that the currently proposed housing provision does not meet	No change required. This issue was considered through the Core Strategy Examination process. This modification needs to be considered in conjunction with

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				<p>the full, objectively assessed needs of the area, and in this context, the Local Allocations should be brought forward prior to 2021 to augment the supply of housing.</p> <p>Concern that the proposed wording seeks to shift delivery of the Local Allocations towards the end of the plan period, unless they are required in order to maintain a 5 year supply of land for housing. No other triggers are considered and no other reference is given to other circumstances under which it might be desirable to release a Local Allocation. The Core Strategy should be amended to make it clear that the release of Local Allocations will be managed such that an appropriate supply of housing is maintained in the Borough, and according to local circumstances as need arises.</p>	<p>MM2, MM3, MM12 and MM14 and is consistent with these modifications and provides further clarification regarding the Council's approach towards the release of Local Allocations. This approach, and the Main Modifications which refer to it, are supported by the Inspector.</p> <p>Policy CS3: Managing Selected Development Sites (as amended) sets out a number of criteria that will be used to set the specific release date for development of Local Allocations. This includes the relative need for the development at the particular settlement within which it is located and the benefits it would bring to that settlement. The policy also states that <i>"The release date of any local allocation may be brought forward in order to maintain a five year housing land supply."</i></p>
mc65	Part B – The Strategy. Providing Homes	14.19	2	The words "small scale" should be re-instated.	No change required. The precise area of land that will need to be released from the Green Belt will be considered through the Site Allocations DPD and informed by the current masterplanning work. Not all changes are necessarily small-scale.
mc171	Part B – Place Strategies. Hemel Hempstead	Policy CS34	1	Whilst supporting the identification of Maylands Avenue as a key regeneration area and a focus for new economic development, the principles guiding development in respect of use are	No change required. The new reference to 'other, complementary uses' provides an appropriate level of flexibility. Issue previously considered in Report of Representations on the Pre-Submission Core

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				<p>considered to be too prescriptive.</p> <p>Provision should be included within the Policy for the Council to positively consider alternative, land uses that constitute economic development with the Maylands Gateway.</p> <p>In accordance with the latest national guidance contained within the NPPF, greater flexibility should be incorporated within the specific policies outlining the preferred lands uses for the Maylands Gateway. Flexibility is included within other policies within the Core Strategy and this should continued through the Plan in the interests of consistency to enable non-Class B uses to deliver economic growth and job creation within the Borough.</p> <p>The policy should be amended as follows: "Secure HQ offices and other complimentary uses in an open land setting in Maylands Avenue." The Council should also consider alternative land uses that deliver economic growth and job creation within the Borough that such lands uses accord with other policies with the Core Strategy.</p>	<p>Strategy (June 2012). This response stated: <i>"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."</i></p> <p>Detailed requirements for Maylands Gateway are set out in an adopted Development Brief.</p>
mc179	Part B – Place Strategies.	21.6	5	The accuracy of new wording relating to a "green swathe between the town of	No change required. The statement accurately reflects the predominant character

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	Berkhamsted			<p>Berkhamsted and the A41” is questioned, because the land comprises built development for education and recreational uses. The landholdings’ future role should be considered within the Green Belt review (which forms part of the CS partial review) and in the context of considering and assessing the full and objectively assessed housing needs of the town (and borough).</p> <p>It is important to protect the swathe of Green Belt land between the existing southern boundary of Berkhamsted and the A41. To develop on this land would cause severe pressure on the infrastructure traffic flow and appearance of the town. Berkhamsted would become too overdeveloped.</p> <p>To further strengthen the paragraph suggest after “including the landscape setting of the castle” the phrase “and other heritage sites” is added.</p>	<p>of this area. Reference to the historic heritage of the town is already included within paragraph: an additional reference to heritage assets is unnecessary.</p> <p>It is acknowledged that the future role of this and other areas of Green Belt will be considered through technical work to inform the early partial review (ref Main Modification MM28).</p>
mc180	Part B – Place Strategies. Berkhamsted	Strategic Site SS1 Principles	12	The proposal should refer to a development of ‘around’ 180 dwellings. This enables a flexible approach to be applied in preparing the subsequent detailed scheme design. The “principles” should refer to a scheme for a mix of storey heights, including up to two and a half storeys where such heights are demonstrated to enhance the overall	<p>No change required. Issues raised have already been considered as part of the Core Strategy Examination process.</p> <p>Amended wording appropriately reflects local context and circumstances.</p> <p>The issue of reference to 180 new homes was considered in the Report of</p>

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				scheme design and provide for enclosure of public and private spaces as appropriate.	Representations on the Pre-Submission Core Strategy (June 2012). This concluded: <i>“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 of 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....”</i>
				The requirement for 40% affordable homes should be subject to a caveat relating to viability.	No change required. The affordable housing requirement is already covered by a caveat regarding viability through Policy CS19: Affordable Housing. This states that <i>“35% of the new dwellings should be affordable homes. Higher levels may be sought on sites which are specified by the Council in development plan documents, provided development would be viable and need is evident.”</i>

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				Suggestion of amending wording to recognise that there will need to be a first phase of housing development in order to generate the funds necessary to deliver the playing fields.	No change required. Delivery of the scheme will be considered in the context of the adopted master plan. Any change to the trigger points for the delivery of the playing fields will need to be justified as part of the planning application process.
				Oppose the deletion of “the development is in a sensitive ridge top and edge of town location, adjacent to existing housing”.	No change required. The reference is descriptive rather than setting out a clear planning requirement i.e. it says where the site is located, rather than specifying anything that the new development must provide or meet. It is therefore not appropriate for inclusion as a development principle. Reference to the sensitivity of the ridge top location remains in the master plan as it is an important local issue that needs to be taken into account. It will therefore be given appropriate consideration when dealing with any planning application on the site.

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				<p>Principle of funding improvements to the Shootersway/Kingshall Way and Durrants Lane/High Street junctions is supported, but concerns are raised that the current Urban Transport Plan does not offer satisfactory solutions. Until an adequate solution is proven then SS1 and any development along Shooterwsay should be held back.</p>	<p>No change required. The issues of traffic and access in Berkhamsted were considered through the Examination process and the Inspector was aware of local concerns regarding road infrastructure capacity.</p> <p>The junction improvements specified within the master plan relating to the SS1 site are included on the advice of the Highway Authority (Hertfordshire County Council) and are considered to be appropriate and satisfactory for the scale of development proposed.</p> <p>The issue of highway improvements has previously considered in Report of Representations on the Pre-Submission Core Strategy (June 2012). Responses stated: “No change. It is not necessary on highway grounds for LA4 to be brought forward,” and “The junction design at Kingshill Way will be agreed with the local highway authority.”</p> <p>The Berkhamsted and Tring Urban Transport Plan has been developed by the Highway Authority, and takes account of feedback from stakeholders, including the Borough Council. The junction improvements and other travel initiatives it contains are reasonable and appropriate bearing in mind the level of development proposed for</p>

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					<p>Berkhamsted and the limited scope for any more significant highway improvements within the town.</p>
			2	<p>The word “funded” has been deleted after “measures” and it should be re-instated and the following words added “No development will take place until appropriate improvements have been made to Shootersway/Kingshill Way junction”.</p>	<p>No change required. Reference to funding of highway improvements remains within the list of site principles and has not been deleted. The additional sentence is not required. The precise timing of the junction improvements (in relation to the housing development) is a matter for the master plan and the planning application. It will be based on advice from the Highway Authority.</p>
mc181	Part B – Place Strategies. Berkhamsted	Strategic Site SS1 Delivery		<p>The proposal should refer to a development of ‘around’ 180 dwellings. The “principles” should refer to a scheme for a mix of storey heights. Suggest the following additional wording “around 40% affordable homes subject to detailed viability assessment”. Wording should be amended to read “there will be a priority to deliver school playing fields alongside the first phase of housing development.</p> <p>The word “first” should not be struck out of the sentence “The priority is to deliver the school playing fields”.</p>	<p>No change required. Concerns regarding the wording of the SS1 proposal were raised and considered as part of the Core Strategy Examination process.</p> <p>The amended wording is considered to appropriately reflect local context and circumstances.</p> <p>The delivery section of SS1 already refers to <i>‘Housing will be phased to allow the playing fields to be relocated first.’</i> The precise timing of different phases of the development is a matter for the site master plan and the planning application.</p> <p>The word ‘first’ is superfluous. The reference to the playing fields being the priority remains</p>

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					within the text.
mc182	Part B – Place Strategies. Berkhamsted	Proposal LA4 Principles	2	Object to inclusion of LA4 within the Core Strategy.	<p>No change required. The comment relates to the wider issue of the choice of Local Allocations, rather than to the wording of mc182.</p> <p>The issue of whether to include LA4 within the Core Strategy has been previously considered in Report of Representations on the Pre-Submission Core Strategy (June 2012). This responses stated: <i>“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...”</i></p>
				<p>Question why the word “funding” has been struck out. It should be made clear that no development can take place until appropriate improvements have been made to Shootersway/Kingshill Way junction.</p> <p>Consider that the current UTP is promoting an inappropriate solution.</p>	<p>No change required. The wording relating to transport and highway work has been amended to ensure consistency with the equivalent principle for SS1. The appropriate phasing of highway works will be considered through the site master plan and follow advice from the Highway Authority.</p>

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					<p>No change required. This issue does not relate to mc42, but is a wider comment on the content of the Urban Transport Plan. The Urban Transport Plan is a document prepared by the County Council (as local highway authority), and reflects their professional assessment of local highway issues and appropriate solutions. It has been subject to public consultation and taken account of the views expressed. The content of the UTP with regard to the Shootersway / Kingshill Way junction reflects specific and consistent advice provided by the Highway Authority with regard to junction improvements required to support delivery of LA4 and SS1.</p>
<p>mc186</p>	<p>Part B – Place Strategies. Tring</p>	<p>22.3</p>	<p>1</p>	<p>Aylesbury Vale District Council (AVDC) objects to 150 homes provided on Site LA5 until it is satisfied by the Site Allocations work and Developer’s next Landscape and Visual Impact Assessment and master plan that this quantum of development can take place without detriment to the landscape character and sensitivity (including AONB). AVDC notes the changes that are proposed in the</p>	<p>See response below.</p>

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				Modifications to criteria for Site LA5, but do not consider these change the potential landscape and visual adverse impacts set out in our representation to the Core Strategy.	
mc190	Part B – Place Strategies. Tring	Proposal LA5 Principles	2	<p>Aylesbury Vale District Council (AVDC) objects to 150 homes provided on Site LA5 until it is satisfied by the Site Allocations work and Developer’s next Landscape and Visual Impact Assessment and master plan that this quantum of development can take place without detriment to the landscape character and sensitivity (including AONB). AVDC notes the changes that are proposed in the Modifications to criteria for Site LA5, but do not consider these change the potential landscape and visual adverse impacts set out in our representation to the Core Strategy.</p> <p>Concern that whilst the Core Strategy states its support for protecting the greenfield environment, it is promoting the development of a greenfield site (LA5). This is contradictory and misleading.</p>	<p>No change required. Concerns raised and considered as part of the Core Strategy Examination process. Sufficient evidence has been provided to demonstrate that the proposal is sound. It is however accepted that a further iteration of the landscape appraisal will be necessary as the master plan is prepared.</p> <p>Representatives from AVDC are part of an internal working group (comprising Officers, landowners and developers) looking at how best to progress this site. This includes consideration of master plan principles and any additional technical work to support this master plan.</p> <p>No objections have been raised to the site by the Chilterns Conservation Board to the principle of developing this site for the number of homes proposed.</p> <p>No change required. This issue relates to the overall development strategy rather than to mc190.</p> <p>The issue of overall housing need, the</p>

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					<p>suitability of the identified Local Allocations and the balance between greenfield and brownfield sites was considered through the Examination process. The key issue for the Inspector was whether sufficient land was identified to meet housing needs, rather than whether Local Allocations should be deleted from the plan.</p> <p>Whilst the Core Strategy proposes a limited number of Green Belt releases, the remainder of the Green Belt and wider Rural Area continues to be accorded strong protection against development by a range of policies e.g. Policies CS2, CS5, CS7, CS24, CS25 and CS26.</p>
mc192	Part B – Place Strategies. Bovingdon	Local Objectives	3	<p>Concerns that site LA6 in Bovingdon does not conform to the issues raised within the Core Strategy (i.e. with regard to provision of local homes and associated facilities) causing implications upon the revocation of the Regional Strategy.</p> <p>The first bullet point in mc192 should be amended to read either: “Provide around 130 new homes (including 60 on Molyneux Avenue/Chesham Road site) between 2006 and 2031” or “Provide around 130 new homes (including 60 on the LA6 site) between 2006 and 2013” in order to provide clarity that the housing requirements in the village will be met via</p>	<p>No change required. The issues were considered through the Core Strategy Examination process. The requirements for LA6 and the content of the Bovingdon Place Strategy were supported by the Inspector. This included consideration of the capacity of site LA6 and the potential for windfall development within the village.</p> <p>The Ministry of Justice supports the release of its land (LA6) for development and has confirmed that it is not required to enable future prison expansion.</p> <p>Additional open space (not provided as part</p>

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				<p>a site-specific allocation together with windfall provision.</p> <p>Amend the wording relating to open space provision to say: "Provide new open space, a proportion of which may be delivered as part of the development of the local allocation (Molyneux Avenue/Chesham Road".</p> <p>Concerns are raised with regard to compliance of the Bovingdon Place Strategy with the NPPF due to questions regarding the ability of the local allocation to accommodate the number of dwellings required by the Core Strategy.</p> <p>Suggestion that the land should be safeguarded for future use by the Prison due to significant transport and parking issues exist on the site at present.</p>	<p>of LA6) can be considered through the application of existing planning policies.</p>
mc203	Part C – Implementation and Delivery.	27.12	1	Delete the reference to holding Local Allocations in reserve. The reason for this is that the proposed housing provision does not meet the full, objectively assessed needs of the area. The Local Allocations can assist in better meeting these needs and should not be held in reserve.	No change required. The issue of the timing of release of the Local Allocations was considered through the Core Strategy Examination process. The amended wording set out in mm203 is required to support the text changes set out in Main Modification MM3, which has been agreed and recommended by the Planning Inspector. Also see response to mc62.
mc204	Part C – Implementation and Delivery.	27.14	2	First bullet point: delete the word 'particularly' from 'particularly low'. Delete second bullet point. The reason for this is	No change required. The wording of the first bullet point relating to the delivery of housing land has not be amended through the

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	Delivery			<p>that the proposed housing provision does not meet the full, objectively assessed needs of the area. The Local Allocations can assist in better meeting these needs and should not be held in reserve.</p> <p>Concern regarding the inference that Local Allocations may be used before 2021. Make it clear that this is not the case. Object to the word 'site' being replaced with 'Local Allocation'.</p>	<p>modifications and remains as set out in the Pre-Submission Core Strategy. It accurately reflects the approach the Council will take to ensure housing delivery and accords with Main Modification MM3.</p> <p>The use of the term 'local allocation' rather than 'site' is appropriate and accurate.</p>
mc205	Part C – Implementation and Delivery. Infrastructure	28.4	1	The commitment to annual review of the IDP is welcomed, and HCC officers will look forward to working in constructive partnership.	No change required. Comment noted and welcomed.
General Comments			2	<p>Concerns regarding the capacity of the town's road system and other local infrastructure to accommodate any further housing development</p> <p>Concerns regarding site SS1 (Egerton Rothesay school site) with regards to:</p> <ul style="list-style-type: none"> • the principle of its allocation as a housing site; • the specified site capacity; and • access arrangements. <p>Land at Pea Lane Berkhamsted should be used for development, as this is low grade arable land we suggest that it should be allowed for low cost housing or for a self-build scheme. The houses already existing are low grade properties. Additionally the</p>	<p>No change required.</p> <p>The issue of infrastructure capacity and the relative merits of particular housing sites within Berkhamsted were considered through the Core Strategy Examination process: the strategy for the town is supported by the Inspector.</p> <p>The Report of Representations on the Pre-Submission Core Strategy addresses objectors' concerns regarding site SS1. It notes that <i>"SS1 is excluded from the Green Belt, should be effectively used and is also needed to meet the local housing objective."</i> See also responses to mc180 and mc184 above.</p>

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				site is not subject to flooding as many Councils will allow buildings next to rivers.	The Pea Lane site has been promoted during the Core Strategy process. The Council's response to a request for its inclusion at the Pre-Submission stage noted that, <i>"This particular site is unsuitable for housing given its setting within the Chilterns Area of Outstanding Natural Beauty."</i>