

MINUTES

STRATEGIC PLANNING & ENVIRONMENT OVERVIEW & SCRUTINY

23 SEPTEMBER 2020

Councillors: Barrett
Beauchamp
Bhinder
Birnie (Chairman)
P Hearn
Hobson
McDowell
Ransley
Riddick
Silwal (Vice-
Chairman)
Stevens
Taylor
Timmis

Officers: James Doe Assistant Director - Planning, Development
and Regeneration
Katie Mogan Corporate and Democratic Support Lead
Officer
Alex Robinson

Also in Attendance:

Councillor Alan Anderson
Councillor Rick Freedman
Councillor Graham Sutton
Councillor Liz Uttley
Councillor Andrew Williams
Councillor Nicky Woolner

The meeting began at 6.30 pm

114 MINUTES

The minutes of the meeting of 28 July 2020 were agreed by members.

115 APOLOGIES FOR ABSENCE

Apologies for absence were received from Councillor Rogers. Councillor Bhinder was substituting on his behalf.

116 DECLARATIONS OF INTEREST

There were no declarations of interest.

The chair notified the committee that there were four members of public registered to speak on the Local Plan item and that the public participation section would be moved so the speakers could make their statements directly before the relevant item.

**117 CONSIDERATION OF ANY MATTER REFERRED TO THE
COMMITTEE IN RELATION TO CALL-IN**

None

118 WHITE PAPER CONSULTATION RESPONSE

The Chairman announced that in view of the complexity of agenda Item 6, the expected length of the debate thereon, and the likely effect of government proposals in agenda Item 7 on the local plan, agenda Item 7 would be dealt with first.

J Doe introduced the item to members. There were two consultation documents with different deadlines for responses; one in early October and one late October. Officers have prepared a draft response which is included in the report and the final decision for content lies with Councillor G Sutton, the portfolio holder. He referred to the white paper and paragraph 2.2 which related to the three pillars to the proposals; pillar 1 new local plans system and the development management system and how to deal with proposals as they arise; pillar 2, design codes to allow for beautiful and sustainable places; pillar 3, infrastructure planning and funding. A key aspect of pillar 1 is that the new local plans are to be shorter, map based and online based. The proposals in local plans are to be split into three areas: growth, renewal and protected areas. The big issue in these documents is the government's methodology for calculating housing need in each area.

Councillor Timmis asked if the proposals to engage with the community be anything more than a tick box or will it allow for objection to plans? She also referred to green belt areas and that the government have made a commitment to protecting green belt areas, so she questioned why the council were going in the opposite direction and releasing areas to be developed.

Councillor Birnie said that the housing targets are to be adhered to and the numbers are determined nationally. Dacorum would find it impossible to meet their target unless they released green belt land.

J Doe said the planning proposal documents are overlapping with the Local Plan. There is a need for further housing delivery but the white paper leaves questions unanswered. There should be further guidance and legislation on the detail to the policy. At the moment, officers are not picking up a change from process to meet housing needs from greenbelt land. The government does expect the consultation process to be front loaded and have greater engagement at the Local Plan stage. Any sites in the Local Plan would benefit from outline planning permission and the principle of the development cannot be reopened.

A Robinson added that the government proposals do appear to shift public engagement back to the Local Plan stage instead of the decision making stage.

There are two stages of consultation within the Local Plan, at the beginning during the call for sites and the second stage where the plan is prepared and published. There is a new area being proposed, allowing local authorities to create design codes prepared alongside the Local Plan.

Councillor Birnie questioned the future of the Development Management Committee in view of the reduction in public participation at the planning application stage.

J Doe said it would be a council decision where to place development management powers. At the moment, 90% of applications are delegated to officer level. We will need to see finer detail once the white paper proposals have been put into legislation.

Councillor Birnie commented that the government normally issue a green paper prior to a white paper to allow for public consultation on proposals but this had not happened this time.

Councillor Timmis asked why the council were not challenging the government on the number of homes needing green belt release.

J Doe said the response in the appendix to the report has some commentary on how the government has set the numbers which are mandatory. He said this part of the response could be strengthened.

Councillor Ransley said she was concerned by the community engagement proposals. She asked about the right of town and parish councils to object.

J Doe said it would depend on the local design guides and the onus would be on the council to prepare and develop robust codes so developers would be properly steered. It wouldn't necessarily mean a blanket approval. It will be important for councils to control design as they wish to see it and get the codes right in the first place and this will be a new challenge.

Councillor Birnie asked for an example of a design code.

J Doe said they are a relatively new concept and design guides are heavily illustrated documents that set out requirements in a particular area.

A Robinson said the government is moving towards tighter and clearer standards for planning and it will make it more difficult for developers to move away from those requirements. Design codes are used across the country, they are quite prescriptive documents depicting building heights, density, sites used and planting requirements. There is lots of detail left to be filled in the consultation to determine what level of detailed control local authorities will be allowed.

Councillor Stevens commented that he felt the response to the government was too polite and it should make sure the strength of feeling is addressed. The general feeling across the country is that local authorities are not happy with the numbers of homes imposed on them irrespective of local land availability.

Councillor Barrett referred to the draft response to proposal six which suggested that the government want to explore whether some applications can be granted if not decided on in timely fashion. He asked why there was no response to that.

J Doe said that at the moment, most planning applications are not granted by default but applicants have the right of appeal against the council if there is a failure to make a decision in an agreed timescale. He was happy to strengthen this response if councillors wish.

Councillor McDowell said he would support the strongest possible response to these consultations. He questioned the growth areas and the low number of dwellings per hectare which could mean developers would be allowed to build more homes than stated in site allocations.

J Doe said his understanding was that proposals are not detailed. Design codes could deal with density. If developers wanted to increase the density, they would need to submit a new planning application.

Councillor Birnie said he had noticed that in the new method for calculating the housing requirement that affordability is a factor but does not mention how that affordability is weighted against other criteria.

A Robinson said affordability under the current system is a cap. Government have said in the white paper that other considerations go into finalising the housing figures. Some have been listed but it is not clear how constraints are weighted against need. The government policy ambition to build 300,000 homes is still mentioned in the consultations.

J Doe said Dacorum's figure is 922 homes a year. What is missing from the documents is the constraints that the government haven't defined. The calculation for affordability is under paragraph 29 in the second document and is the product of the median house prices and income.

Councillor Stevens said the affordability criteria is flawed and suggested that the ONS figures are planning in hindsight rather than forward planning.

Councillor G Sutton said he had been listening to the debate and appreciated the passion of members across parties. He said he would discuss the comments from members with officers and come up with another draft that will hopefully address the issues raised.

Councillor Birnie said he had distributed a response to the committee which was agreed by all members:

"Whilst the committee endorses the report made by Officers on the changes to planning and development proposed by central government, we consider that the Council's response is too mild in tone and encourage closer alignment with the objections raised by the leader of Wokingham Council and that the response should include the following proposals:-

- Homes should be built where they are needed and not determined centrally by a one size fits all formula
- Development should be led by plans set by local authorities with input from their residents
- The percentage of affordable homes should be set locally.

- Developers should be forced to build the houses they have planning permission for in a timely fashion
- The ability of developers to avoid obligations such as the percentage of affordable homes in a development on the grounds of viability should be removed
- Developer contributions to build agreed infrastructure should be provided at an early stage of development
- Changes to the planning system should require primary legislation
- The need to prove a five-year land supply should be scrapped”

Councillor G Sutton said that he would consider this and come back to the committee with a workable and acceptable draft as soon as possible.

119 PUBLIC PARTICIPATION

Under the public participation rules, the following people make a statement to the committee:

Tom Ritchie

Having been on both sides of this discussion over many years, as an elected Councillor from 2015 until 2019 and now as a resident, I know this argument quite well.

The earlier “consultation” was carried out in 2017 and, as far as I am aware, the results have never been finally published, as the current edition, now three years on, is still marked “draft” - how many of this Committee, especially newer Members, have gone through the over-700 pages? Without that knowledge, it will be difficult for them to make the correct decision now asked of them.

My disappointment is how little of the earlier consultation comments have been accepted and actioned. Many of the over 20,000 comments question the wisdom of focussing such large developments in the two Market towns, Berkhamsted and Tring. Under the new proposals, Berkhamsted would see a population increase of some 41% and Tring 67%!

There is no detail of how each town could successfully accommodate such numbers - in school places, especially at Secondary level, traffic, health provision etc. Such numbers would completely destroy the existing structures and lifestyles.

The view of the 2017 survey was that the bulk of the Borough’s new houses should be in Hemel Hempstead - the new Town. This has not been addressed.

I do not see how you can recommend the present scheme to Cabinet and you will do the whole community a service by sending Officers back to try again - however unpopular that decision would be to some

A Robinson responded to Tom Ritchie. He said the consultation finding document is on the website and has been published for some time. It is a large document with 700 pages. Since 2017, a lot has changed in government policy and this has had to

be taken into account, including revised housing projections. The current document is the document being consulted on under regulation 18, it is not the final version and can still be amended following consultation responses. In relation to apportionment of growth to settlements, the team has sought to accommodate as much growth as possible around Hemel Hempstead and the town takes 60% of all growth. The scale of growth means it is not possible to accommodate all of that without including development in Berkhamsted and Tring. There are no easy sites and officers feel that larger urban extensions to Berkhamsted and Tring will allow for delivery of the necessary infrastructure.

Rollo Prendergrast was unable to connect to the meeting so J Doe read his statement out on his behalf.

1. Is it the intention that a fully-supported traffic survey will be carried out to determine the feasibility of (especially) car journeys to and from Shootersway, Darrs Lane, Durrants Lane, Kingshill Way and Chesham Road, in the light of increased traffic density arising from the development of 1,680 new units to the South of Berkhamsted which require access and egress to and from Berkhamsted High Street, the A4251 and the A41. The Delivery Strategies paper talks loosely about 1,000 units. The roads leading down to the town centre are very narrow - in some cases with effective one-way systems. The development of Bearoc Park with some 170+ units over Phases 1 & 2 will be dwarfed by what is planned.
2. How will these plans, for development at the top of a hill, promote more pedestrian and cycle access down to the town centre?

Would it be possible to build a new parallel road, W-E running along the edge of the A41 - starting behind Rossway Farm and ending up behind the cemetery to join up with Chesham Rd. to provide access to and from the A41 bypass? This would help alleviate the already very high volumes of traffic along Shootersway and Kingshill Way which now threaten the lives and wellbeing of children walking to Ashlyns School.
3. Will a ribbon development alongside the A41 Bypass, which carries fast and heavy traffic, not suffer from unusual levels of particulate and noise pollution? Is it intended that acoustic paneling be installed?
4. Can you confirm that plans submitted for the construction of a Class C2 development at Hanburys, Shootersway (Ref 20/02021/MFA dated 21/07/20, currently with the Planning Officer) will not be supported since that development, with 4 storeys above ground level, will exceed the 2 storey limitation set out in 'Draft Emerging Strategy for Growth 2020-2038: Proposals And Sites, Growth Area Bk10: Hanburys'?

5. Where in the various reports is there mention of enlarging GP services, already deficient in Berkhamsted? I realise that this is beyond the remit of DBC but it is a vital element.
6. How will increasing development in Berkhamsted, an area of high land values, provide rational growth in affordable housing? Or is it, by flooding the area with housing, that the area becomes less desirable, and therefore land values will fall?
7. Why are there no plans to develop land between the North East of Berkhamsted, between Ivy House Lane and Little Heath; between Little Heath and Fields End/Warners End? (Adjoining Growth Area HH21, West Hemel Hempstead). This area is flat, has good access to main roads and public transport and could accommodate all the planned expansion of Berkhamsted.
8. With reference to Growth Area Bk02: British Film Institute. This part of the plan calls for 90 dwellings - more than is to be accommodated within Bearoc Park Phase 2.
Unless the BFI is going to level the storage silos, there is not the slightest chance of accommodating that number of dwellings on the BFI site, unless tower blocks are contemplated. I see nothing in the public record of the BFI to suggest they are contemplating destruction of the silos. Indeed, the 2014 Triennial Review of the BFI by the DCMS commends the sustainability of the operation.

J Doe responded to each point.

1. A transport study has been carried out for Berkhamsted which will be published shortly. If the council selects sites in Berkhamsted, developers will need to provide a detailed transport study
2. Berkhamsted is a valley town with steep slopes but there are plans for development to promote more pedestrian and cycle access.
3. There is a current application for the Hanbury site (LA4) under consideration so we cannot comment on it. The application will go to Development Management Committee.
4. The provision of GP services is something being discussed with the CCG and will feature in the infrastructure delivery plan which will be made available later in the year before the consultation document is published.
5. Affordable housing is a draft requirement in the draft Local Plan. There is an aim to get a spread of dwelling types, size and tenures. This will require detailed working out as plans develop on site.
6. Officers have looked in detail at the different sites put forward for development across the borough and commissioned a report which looked into the

pros and cons of different sites. The officer's recommendations in the Local Plan is to deliver best outcomes for the three main towns and surrounding villages.

7. The site of the British Film Institute on Shooterways has a notional figure and the plan is in draft form. He advised the speaker to make these points during the consultation.

Councillor Birnie said the transport study is yet to be published and was disappointed that the Local Plan constantly refers to reports that are yet to be published. He said this doesn't give outsiders and members of the public much confidence. He asked J Doe when this documents would be published.

J Doe said that the Local Plan has to be evidence based and he would take away members comments and give them some estimates on when the documents would be published as the final details were currently being put together.

Mike Ridley could not connect to the meeting so J Doe read out his statement on his behalf.

Sir David Attenborough in his recent program "Extinction, the facts" has highlighted the grave danger to our world due to the loss of biodiversity, not just the loss of iconic species in the natural world, but also the wholesale destruction of ecosystems upon which society depends.

Concerning bio-diversity in the Borough, I am very dismayed that the proposed local plan does not appear to specify particular wildlife sites. I can find no reference in the draft to Bunkers Park, Shrubhill Common or The Halsey Field local wildlife site, to name just 3 sites in Hemel Hempstead.

Referring specifically to The Halsey Field, I find this surprising, since a letter passed to us from Sir Mike Penning from Rebecca Williams confirms that the importance of Halsey Field is already recognised in the Site Allocations DPD, and that she expects this to be carried over into the new Local Plan.

I can assure you that frequent bio-surveys demonstrate that under the management of the Friends of Halsey Field, the wildlife and biodiversity have continued to increase. Gadebridge residents frequently thank us for all the work that we have done on the site and tell us how much they value it as a wildlife site and local amenity.

In particular, The Halsey Field boasts:

- An invertebrate fauna of over 2000 separate species;
- 24 species of butterfly, and 164 species of moths, some rare in Hertfordshire;
- A thriving population of protected Roman snails;
- Breeding pairs of 4 raptor species;
- Colourful displays of over 80 species of meadow flowers and shrubs, including 3 orchid species.

Consequently, I would be grateful if you could confirm that DBC have no intention of allowing development on the Halsey Field, or indeed other wildlife sites, and that this will be specifically written into the Local Plan.

J Doe said this referred to Halsey Fields north of Polehanger Lane and is designated Green Belt land. This area is not being proposed for development as part of the Local Plan. There are general policies for the protection of wildlife and it is not essential to list wildlife sites in the Local Plan because they already have that status. He suggested that an annex could be included in the plan that lists the wildlife sites across the borough.

Brian Kazar made his statement to the committee.

“Regarding policy SP23 "Delivering Growth in East Tring" and policy SP24 "Delivering growth at South East Tring", can you please provide and minute assurance that the SPDs proposed by these two policies will be in force before any planning applications for the areas concerned are considered?”

J Doe proposed that this area will have further planning guidance and the content of the SPDs will be a final decision for the borough council. SPDs come forward at a later stage than the Local Plan but developers submit plans at their own risk. An SPD will come back to council for approval before it is adopted to be used in the decision making process. They do not have the same weight as the Local Plan and are discretionary policies.

120 DACORUM LOCAL PLAN

A Robinson gave a brief presentation to the committee, running through the main highlights of the Local Plan.

Councillor McDowell referred to point DM2 and the affordable homes policy. The tenures expected only lists first homes and rentals. There is no shared ownership listed and said he felt that other tenures should be included in the policy.

A Robinson said this decision was reached with the Task and Finish group which decided that the priority should be on delivering genuinely affordable housing to help those on the lowest incomes. As such, the policy does not include shared ownership schemes.

Councillor McDowell referred to the density of homes that are being proposed especially in Tring Town Centre. DM11 states there will be a 30% increase within the town centre. He said the Development Management Committee have refused applications on grounds of density and said the burden of proof should be on the developer to prove they are not losing amenity space.

A Robinson said the plan reflects some of the key elements of reforms suggested by the government, particularly in reference to growth areas, renewal and protection. They have been brought into the plan as officers believe this is the direction of travel. Design codes are currently discretionary and the view of officers is that these should form part of the plan whether the government mandates it or not. There is a section in the plan devoted to design expectations with specific reference to two new design

guides. All proposals submitted will need to adhere to this requirement. In relation to the question on density, the proposals are to deliver minimum density requirements and this does not mean that local character considerations are completely removed from the judgement of the Development Management Committee.

Councillor Taylor referred to transport and asked why the council is proposing to build 2,000 homes in Berkhamsted without first having a transport system to cope with it. All roads in Berkhamsted lead to the centre of town and the main junction is often gridlocked.

A Robinson said the council have prepared technical studies alongside the county wide strategic transport Comet model, which looks at development across the county. Increasing growth will have a significant impact on road networks but there are a number of interventions made to accommodate growth. The team has commissioned a sustainable transport plan for Berkhamsted and Tring which is near completion and notes that there is a need to move to sustainable methods of transport but accepts that there needs to be interventions on the current highway network.

Councillor Taylor asked for more detail on the interventions.

A Robinson said there would be improvement to the cycle network and pedestrian pathways. There would need to be a passenger travel intervention scheme working with bus providers. More detail will come forward in the specific highway schemes and a lot of these will be set out in infrastructure delivery plan.

Councillor Birnie asked if there was an example of when the council has successfully formed a relationship with a bus company to create a new route.

J Doe said the most recent example was the LA3 development which is an 1100 unit scheme. There are proposals and payments for bus services to run through the site. Previous to this, there haven't been any bus routes because developments have been on a smaller scale. The LA3 site is at a scale where we can take contributions from developers and persuade bus companies to divert through these sites.

Councillor Taylor said he was struggling to see how interventions in the centre of Berkhamsted to accommodate the new developments at the edge of the town would improve the traffic situation in relation to the station.

A Robinson said the constraints in the high street are recognised, but the council is not able to support bypasses, for example, in Berkhamsted. The plan seeks to significantly increase the attractiveness of cycling and walking to new residents. What the Comet model is showing, is that the majority of new journeys arising from new developments are not directly into Berkhamsted but onto the A41 and further east towards Hemel Hempstead. He appreciated that there were limitations to this model but what it shows is that the majority of movements are not through the town centre in peak times.

Councillor Taylor said it would be difficult to encourage walking when the proposed development in Berkhamsted is placed at the top of a steep hill and people will continue to drive to the station. This committee is tasked with scrutinising the Local Plan but cannot do this without the transport study.

A Robinson said the Local Plan is still in draft form and it is not the council's position to publish evidence when it is in draft format. The consultation will begin in November by which time the evidence reports will be published.

Councillor Taylor asked when the committee would have a chance to scrutinise the transport plan.

J Doe said he would take the point away. This is a regulation 18 plan so does not need to have all the detail at the current time. All evidence will be fully appraised. It is useful to get views on issues of transport and travel across the borough and he will take points away to be noted. We need to keep the process moving as we are under pressure from government to get the plan through.

Councillor Stevens referred to DM2 and affordable homes. Dacorum needs 611 affordable homes a year and on the basis of 900 houses a year with a 40% share of affordable homes, he said he could not see how the borough could ever deliver enough affordable homes.

A Robinson said we cannot deliver that level of housing needs because the requirement of market housing would be enormous on 40%. Affordable housing is always going to be under delivered especially in the south east.

Councillor Stevens said this was a difficult situation and somehow we need to press for change in the national policy to be able to fund social housing at an adequate level to meet the need.

J Doe said there is never enough availability to meet the affordable housing requirement and this is not a new issue. There are other constraints such as green belt land and land supply that affect whether the number can be met.

Councillor Birnie asked why developers are allowed to make a payment rather than fulfill on site the affordable housing provision.

J Doe said there are some examples where payment is acceptable, for example, the redevelopment of the library in Berkhamsted into older people housing. It was difficult to get a registered provider of social housing engaged in building on the site. The payment from the developer helped deliver the Dacorum development at Swing Gate Lane.

Councillor Timmis felt that the Local Plan is a utopian vision and rather urban. The government's policy is to protect green belt land and the council is looking to comply with government requirements to build homes but should not be prepared to comply by using green belt land. She said she could not support this Local Plan and suggested the housing figures should be reduced to protect green belt land.

A Robinson said that government policy does place high regard on the protection of the green belt and it should only be used for development as a last resort and in exceptional circumstances. These factors across councils with a high proportion of green belt land include housing need and a lack of supply of brownfield land. Dacorum does not have the ability to deliver on the high housing target on already developed land.

Councillor Bhinder said there is a lot of talk about modal shift over the next 18 months and encouraging walking and cycling in Berkhamsted but he didn't think society was ready for this shift yet. He sought clarification around infrastructure provision; specifically water, sewage and drainage. He asked if the relevant studies have been undertaken to determine demand.

A Robinson said the infrastructure delivery plan will set out in considerable detail the infrastructure requirements. When the plan is published next year and submitted to the inspector for examination, officers will have been working for a year with a number of organisations to develop the plan, including Herts County Council on education, highways and social care. They have been consulted on a number of options and have provided responses. We are not recommending sites in the final plan that cannot be delivered because of infrastructure issues.

Councillor Bhinder commented that a lot of people are still using their cars for really short journeys and this isn't addressed in the plan.

Councillor Ransley appreciated the large amount of work that had gone into the plan but said there were some inconsistencies. She said climate change is mentioned in the report but there are two different dates; 2050 which is a government target and 2030 which is Dacorum's target.

A Robinson said that Dacorum do have a target date of 2030 and will look through the document again to make sure this is clear.

Councillor Ransley referred to the studies with the traveller community and stated there were no traveller sites except in Hemel Hempstead but then one is displayed in Tring and asked for this to be clarified.

A Robinson said the Local Plan was sent out to members two weeks before this committee meeting and it contained some typos including referring to a traveller site in Tring. When it was published on the website a week later, these typos had been corrected.

Councillor Ransley asked officers to confirm the position of the site in Hemel Hempstead.

J Doe said there is a site in the plans already on the LA3 site.

Councillor Ransley said she was struggling to accept the number of houses proposed in Tring. She accepted that the town needed to grow but was concerned that an increase of 50% will impact on the town. The circular development will mean pushing people further away from the town and they might be disengaged from the town, whereas we want Tring to be a community. She felt it was too much growth.

A Robinson accepted the reference to the growth in Tring and there were no easy choices in terms of sites selected. This has been done as part of an assessment in the growth strategy and settlements have been justified to deliver standalone infrastructure. By providing the level of growth suggested, Tring will receive a much greater proportion of infrastructure including a new secondary school. Existing schools are already at capacity and additional growth will require secondary school provision. The strategy isn't dictated on bases of existing settlement size and there are other factors to consider.

Councillor Ransley said the high street in Tring is very narrow and the plan is suggesting that an extra supermarket is placed in the high street instead of the other side of town. She felt some suggestions should be reviewed.

A Robinson said the proposals for Tring don't just include housing. They suggest an eastern extension of shops, sports pitches, schools and business areas. The supermarket proposal is additional to housing development and adds to employment and retail needs. The evidence shows a need for additional retail facilities. There is an alternative site at Dunsley Farm if this original site is not delivered.

J Doe said detailed plans for large areas include community facilities and local retail centres. Town centres were struggling even before the current pandemic and the government wants local authorities to do more for town centres and an additional food retailer would help reinvigorate the town centre and keep it competitive and active as a way of encouraging more people to the high street. The current establishment is over trading, strengthening the case for further food retailers.

Councillor Beauchamp asked if officers were engaging with the South East Water Forum initiative run by Affinity and Thames Water.

A Robinson said not specifically with the forum but have engaged with Affinity Water as the water provider throughout the process.

Councillor Beauchamp referred to parking standards. There was a statement in the plan about the need for reduced parking in town centres. He accepted that people can walk to local facilities in the town centre but existing public transport doesn't go where people need to go. Parking also then bleeds into other areas causing conflicts with residents. He thought the reduced parking standards for the town centre were misguided.

A Robinson said the town centre plus Two Waters is a key area of development with 3,000 homes being proposed. The need to minimise the use of green belt land means there needs to be some flexibility around parking standards in some locations. The most sustainable area is the town centre and Two Waters where it is justified to reduce standards and provide the inspector with enough confidence that we can get the level of development anticipated. If a high parking standard is imposed, there is a risk of undermining the strategy and could lead to objectors to the plan seeking additional green belt development.

Councillor McDowell referred again to the density of developments. The number of houses suggested in the plan he felt were inaccurate and not credible. He said the LA3 site was initially for 900 units but planning permission was granted for 1100 units which was a 22% increase.

A Robinson said the total amount of land released includes housing areas, roads etc and is used as a baseline for determining approximate numbers. The plan does seek to maximise land to an appropriate level. The calculations and sites referenced will have open space too. He said he was happy to take this point away and provide further information.

Councillor McDowell referred to BK06 and 07 in the plan, which lie in the parish of Northchurch and residents are concerned about the encroachment of Berkhamsted

into the village. He asked how many homes were proposed and the impact on the existing village.

A Robinson said the Local Plan treats the settlements of Berkhamsted and Northchurch as a continuous settlement.

J Doe appreciated that each settlement had its own characteristics and this will be picked up later through master planning documents to protect local distinctiveness.

Councillor Taylor said Dacorum was blessed with chalk streams which are drying out. He asked what work was being done to ensure the water supply is capable of supporting houses without damaging biodiversity.

A Robinson said they are working with the Environment Agency which has been involved in decisions and recommendations around some sites. Also, some policies have been included specifically looking at environmental protection. He said he would send the water cycle study to the full committee.

Councillor Hearn said concerns have been expressed in both the Task & Finish group and this committee tonight about housing numbers in Tring. She said she hoped that officers would take these comments on board as it is a concern for residents. She noted that the council would be unable to consult with the public as normal due to the pandemic and asked how the council would achieve a full consultation to make sure as many residents and organisations as possible submit their comments.

A Robinson said the team were conscious of the current circumstances and limitations on traditional consultation methods such as public meetings and roadshows. The team is doing a lot of work to look at options to undertake a series of virtual exhibitions where the public can log onto the website and access a range of materials and officers will be present to answer any questions. The consultation period is being extended from 6 weeks to 8 weeks to reflect that it runs over the Christmas period. We are exploring other ways to enable residents to access officers through social media and further thought needs to be given to ensure hard to reach groups and those without internet access can comment. The team are working with libraries and other council buildings so that hard copy documents can still be obtained in a covid secure way. We will report back to members with a full list of consultation methods.

Councillor Stevens referred to the document that mentioned Egerton Rothsay school. People are concerned with the south Berkhamsted land release and there was some controversy about the school relocating to land on the other side of the valley. He referred to Clause 23 about residential allocations and asked what this refers to.

A Robinson clarified this point and said the second reference to the site is recognising the existing consents on that site and forms part of commitments. It is not a new site, it is an existing commitment to development.

Councillor Stevens referred to the development in South Berkhamsted and said there was a concern about the access on Shootersway and asked if there were any plans for a second access road onto A41.

A Robinson said this hadn't been considered but was happy to relay this back to Herts County Council. The evidence shows that there are sufficient access point to the A41 to serve the developments.

Councillor Stevens asked that when the plan is published, a printer friendly version is made available so it is easy to download.

J Doe said there were some technical issues with the size of the document, but it is being investigated.

Councillor McDowell referred to the renewable energy areas suitable for wind turbines on page 112. He was concerned that this was in an Area of Outstanding Natural Beauty.

A Robinson said this was purely a theoretical illustration of where in the borough the technology would be suitable. Under point DM25, there are standalone renewable energy safeguards in place for the Chilterns Area of Outstanding Natural Beauty and national policy places high regard on nationally registered landscapes.

Councillor McDowell referred to DM49 and said there was no mention of water quality and biodiversity of the canal. This is a major water body and its protection is important.

A Robinson said DM33 deals with the protection and enhancement of the river corridor and DM35 deals with water quality and the specific guidelines.

Councillor McDowell referred to the Dunsley Farm growth area and said the plan still mentioned the inclusion of warehouses as suitable business development. There have been a lot of comments from residents that warehouses in that location do not provide great employment opportunities.

A Robinson referred to policy TR01 which is Dunsley Farm. The plan stipulates that the units will be of a smaller scale, of less than 450sqm and suitable for smaller operators. We are not looking to encourage large warehouse uses that are more appropriate in areas like Maylands in Hemel Hempstead.

Councillor McDowell referred to climate change mitigation policy SP10 and encouraging on site renewable and low carbon energy sources on development sites and questioned why this wasn't a requirement in the plan.

A Robinson said the renewable energy approach taken in the policy is to set out the outcomes we want and that is expressed in terms of a stepped approach to achieve net zero by 2030. We give developers a series of outputs and do not say that targets should be delivered in a specific way. Given the ambitious target, we need to incorporate a degree of onsite renewables.

Councillor McDowell said the Development Management Committee have refused schemes previously when it is clear that developers are splitting the site into smaller plots so they do not have to provide affordable housing or associated infrastructure and there doesn't seem to be a policy to stop it.

A Robinson said he could look to strengthen wording in those policies or look at additional requirements elsewhere to make it clear that the council will not accept any attempt to slice up land to avoid providing affordable housing. There are provision in

the planning act that allow local authorities to return planning applications if we feel there is a clear attempt to subdivide a site to avoid infrastructure contributions.

Councillor McDowell said there was a division of plot at Miswell. An application of nine houses was refused by DMC and then the application came back with the plot divided. Referring to TR04, and the extension of the industrial area with an application now for 15 homes. The developers are not delivering on the sites put forward.

A Robinson said land will change hands as time goes on and aspirations will change. The council's role is to deliver housing requirements by providing enough land.

Councillor McDowell said there is land owned by Tring Town council which hasn't been discussed and is land that DBC isn't prepared to develop.

J Doe said it wasn't too late to have a conversation with the town council. He said the team would soon be briefing town and parish councils on the Local Plan. There are no easy solutions and we are faced with the dilemma of the pressure for further retail provision. He said he visited the town council with Councillor G Sutton before lockdown and discussed a range of issues and said he would be happy to do the same again.

Councillor Birnie said some members have made submissions directly to the officers before the meeting and asked for officer reassurance that they will answer each question and circulate the information to the committee.

A Robinson confirmed that he would.

Councillor Birnie said he would like to suggest that the committee puts forward a submission to Cabinet but felt they weren't currently in the position to do so until the answers previously submitted were circulated. He suggested that the committee consider their response at the next meeting on 30th September.

J Doe said officers have already begun work on answering the questions provided by members.

Councillor Taylor said he would like to see the transport plan before finalising any comments.

J Doe said he would take the point away and see if that document could be distributed.

Councillor G Sutton thanked J Doe and A Robinson for their outstanding work in getting this Local Plan ready for consultation. There is still more work to do but he would like to stress to the committee that this is a draft version and he will make sure the Communications Team is involved to ensure everyone has the opportunity to view it. The council must come up with a workable Local Plan by the middle of next year and if not, it is likely that the council could have a plan forced upon them. He thanked the members of the committee for their contributions and questions.

The Chairman endorsed Councillor Sutton's comment about the amount of work done by the planning team.

Outcome: that the committee make their full submission to Cabinet after the meeting on 30th September.

The Meeting ended at 10.20 pm