

CABINET AGENDA



**TUESDAY 27 JULY 2021 AT 7.30 PM
COUNCIL CHAMBER, THE FORUM**

The Councillors listed below are requested to attend the above meeting, on the day and at the time and place stated, to consider the business set out in this agenda.

Membership

Councillor Williams (Leader)	Councillor Anderson
Councillor Griffiths (Deputy Leader)	Councillor Banks
Councillor Elliot	Councillor Barrett

For further information, please contact Corporate and Democratic Support or 01442 228209

AGENDA

1. MINUTES (Pages 3 - 5)

To confirm the minutes of the meeting held on 22 June 2021

2. APOLOGIES FOR ABSENCE

To receive any apologies for absence.

3. DECLARATIONS OF INTEREST

To receive any declarations of interest

A member with a disclosable pecuniary interest or a personal interest in a matter who attends a meeting of the authority at which the matter is considered -

(i) must disclose the interest at the start of the meeting or when the interest becomes apparent

and, if the interest is a disclosable pecuniary interest, or a personal interest which is also prejudicial

(ii) may not participate in any discussion or vote on the matter (and must withdraw to the public seating area) unless they have been granted a dispensation.

A member who discloses at a meeting a disclosable pecuniary interest which is not registered in the Members' Register of Interests, or is not the subject of a pending notification, must notify the Monitoring Officer of the interest within 28 days of the disclosure.

Disclosable pecuniary interests, personal and prejudicial interests are defined in Part 2 of the Code of Conduct for Members

[If a member is in any doubt as to whether they have an interest which should be declared they should seek the advice of the Monitoring Officer before the start of the meeting]

4. PUBLIC PARTICIPATION

An opportunity for members of the public to make statements and ask questions in accordance with the rules as to Public Participation.

5. REFERRALS TO CABINET

There were no referrals to Cabinet

6. CABINET FORWARD PLAN (Pages 6 - 7)

7. DACORUM BOROUGH LOCAL PLAN (Pages 8 - 178)

8. THE ELMS CONTRACT (Pages 179 - 198)

9. SYRIAN RESETTLEMENT PROGRAMME 1 (Pages 199 - 210)

10. EXCLUSION OF THE PUBLIC

To consider passing a resolution in the following terms:

That, under s.100A (4) of the Local Government Act 1972 Schedule 12A Part 1 as amended by the Local Government (Access to Information) (Variation) Order 2006 the public be excluded during the items in Part 2 of the Agenda for this meeting, because it is likely, in view of the nature of the business to be transacted, that, if members of the public were present during those items, there would be disclosure to them of exempt information relating to the financial and business affairs of the Council and third party companies/organisations.

Local Government Act 1972, Schedule 12A, Part 1, paragraph 3.

MINUTES

CABINET

22 JUNE 2021

Present:

Members:

Councillors: Williams (Leader)
Griffiths (Deputy
Leader)
Elliot
Anderson
Banks
Barrett
Tindall

Officers:	Claire Hamilton	Chief Executive
	Mark Brookes	Assistant Director - Corporate and Contracted Services
	James Deane	Corporate Director - Finance and Operations
	Oliver Jackson	Group Manager - Supported Housing
	Linda Roberts	Assistant Director - Performance, People and Innovation
	Fiona Williamson	Assistant Director - Housing

Also Attendance: M Kange (minutes)

The meeting began at 7.30 pm

CA/31/21 MINUTES

Minutes of the meeting held on 20 April 2021 were agreed by Members present and signed by the Chair.

CA/32/21 APOLOGIES FOR ABSENCE

There were no apologies for absence.

CA/33/21 DECLARATIONS OF INTEREST

There were no declarations of interest.

CA/34/21 PUBLIC PARTICIPATION

There was no public participation.

CA/35/21 REFERRALS TO CABINET

There were no referrals to Cabinet.

CA/36/21 CABINET FORWARD PLAN

Cllr Anderson requested that the Gadebridge Park Improvements be added to the September meeting.

This was noted by the Committee.

Cllr Williams stated that the order of the items on the Agenda was not appropriate and should not include Part II items amongst Part I items. Item 11 would therefore be discussed before Items 9 and 10.

CA/37/21 TRANSFORMATION PHASE 2 BUSINESS CASE

Cllr Tindall stated that he had not seen the sight of any consultation with Ward Councillors and wondered whether this had been missed.

LR stated that they would be included as part of Stakeholders along with residents.

Cllr Griffiths stated that this was an exciting project and was right for continuing along the path. There has been staff engagement throughout and without it the project would fall over. Cllr Griffiths asked for confirmation of staff feedback.

LR – Yes there has been formally and informally and the staff have been very engaged and the consultants have expressed how interesting it has been being allowed to contribute. Comms has been incredibly important at keeping people informed.

Recommendations Agreed.

CA/38/21 EXCLUSION OF THE PUBLIC

There were no members of the Public to exclude

CA/39/21 LEISURE CONTRACT

This item is restricted, please see Part 2 Minutes for full details.

CA/40/21 WATER CHARGES

This item is restricted, please see Part 2 Minutes for details.

CA/41/21 PROVISIONAL FINANCIAL OUTTURN

Cllr Elliot stated that we have been very engaged and proactive with our businesses and it was probably the best to expect given the past year or so.

JD – There has been a lot of pressure and uncertainty over Covid. We keep monitoring the situation going forward but as a starting point it is as good as we could get it, given the circumstances.

Cllr Griffiths wanted to congratulate and thank the staff for being alert and keeping up the good work and being able to put the right amount aside.

Cllr Williams stated that we have had challenges throughout the pandemic but have remained strong in financially challenging situations. It has cost us a significant chunk of our reserves to get through the last year and Council are still not operating on full cylinders in terms of income and have continued to face pressures. Looking at this outturn for 2021, it has been an exceptionally good result overall given Covid but we must not take our eye off the fact that there are still challenges ahead.

JD – The reason we have got as close as we have is because of input from all services and this will give ourselves the best opportunities going forward.

The Meeting ended at 8.02 pm

CABINET FORWARD PLAN

DATE	MATTERS FOR CONSIDERATION	Decision Making Processes	Reports to Monitoring Officer/ S.151 Officer	CONTACT DETAILS	BACKGROUND INFORMATION
21/09/21	Appointment of Consultant to Undertake the Design for Refurbishment Works to Pelham Court Flats		02/09/21	Fiona Williamson, Assistant Director of Housing 01442 228855 Fiona.williamson@dacorum.gov.uk	Refurbishment works to the tower block at Pelham Court to include new roof, windows and railings.
21/09/21	Land Assembly for Housing Development		02/09/21	Fiona Williamson, Assistant Director of Housing 01442 228855 Fiona.williamson@dacorum.gov.uk David Barrett, Group Manager Housing Development 01442 228252 David.barrett@dacorum.gov.uk	Appropriation by the Housing Revenue Account of General Fund land and land purchase for housing development purposes) •Land purchase at Bulbourne Road, Tring, HP23 5QE •Appropriation of land at Marchmont Farm, Hemel Hempstead, HP2 6JH •Appropriation of land at Paradise Depot, Hemel Hempstead, HP2 4TF PART 2
21/09/21	Appointment of Contractors for housing development		02/09/21	Fiona Williamson, Assistant Director of Housing 01442 228855 Fiona.williamson@dacorum.gov.uk David Barrett, Group Manager Housing Development 01442 228252 David.barrett@dacorum.gov.uk	•Mountbatten View •Randalls Ride •Demolition of garage sites •Marchmont PART 2
21/09/21	South West Herts Joint Strategic Plan Statement of Common Ground and Statement of Community Involvement		02/09/21	James Doe, Assistant Director of Planning, Development and Regeneration 01442 228583 james.doe@dacorum.gov.uk	To be provided
21/09/21	Garage Strategy		02/09/21	James Deane, Corporate Director Finance & Operations 01442 228278 james.deane@dacorum.gov.uk	To update on the progress of the Garage Strategy Project
21/09/21	New SLT Structure		02/09/21	Matt Rawdon, Group Manager, People 01442 222513 Matt.Rawdon@dacorum.gov.uk	To be provided PART 2
21/09/21	Medium Term Financial Strategy		02/09/21	James Deane, Corporate Director Finance & Operations 01442 228278 james.deane@dacorum.gov.uk	To review and approve the updated Medium Term Financial Strategy.
19/10/21	Financial Regulations		23/09/21	Nigel Howcutt, Assistant Director Finance & Resources 01442 228662 Nigel.howcutt@dacorum.gov.uk	To approve the updated Financial Regulations.

	DATE	MATTERS FOR CONSIDERATION	Decision Making Processes	Reports to Monitoring Officer/ S.151 Officer	CONTACT DETAILS	BACKGROUND INFORMATION
	19/10/21	River Gade Restoration and Improvements to Gadebridge Park Project		23/09/21	Bill Buckley, Interim Assistant Director (Neighbourhood Delivery) 01442 228441 Bill.buckley@dacorum.gov.uk	To be provided
	23/11/21	Appointment of Contractors for housing development		04/11/21	Fiona Williamson, Assistant Director of Housing 01442 228855 Fiona.williamson@dacorum.gov.uk David Barrett, Group Manager Housing Development 01442 228252 David.barrett@dacorum.gov.uk	•Wilstone •Garage Project A29 PART 2
	23/11/21	Climate & Ecology Emergency Strategy and Action Plan		04/11/21	Mark Gaynor, Corporate Director Housing & Regeneration 01442 228575 Mark.Gaynor@dacorum.gov.uk	To be provided

Agenda Item 7



Report for:	Cabinet
Date of meeting:	20 July 2021
Part:	1
If Part II, reason:	

Title of report:	
Contact:	<p>Cllr Alan Anderson, Portfolio Holder for Planning and Infrastructure</p> <p>Author/Responsible Officers James Doe - Assistant Director, Planning, Development & Regeneration Alex Robinson - Strategic Planning Manager Ronan Leydon - Team Leader – Strategic Planning</p>
Purpose of report:	To seek Cabinet's agreement on the next steps for progressing the Local Plan.
Recommendations	<ol style="list-style-type: none"> 1. That Cabinet notes the responses received to the recent Emerging Strategy for Growth consultation as set out in Appendix 1. 2. That Cabinet notes the views of Strategic Planning and Environment Overview and Scrutiny Committee (Appendix 3) 3. That Cabinet agrees to defer the Publication of the Local Plan (under Regulation 19) and to undertake further work on the Local Plan as set out in section 8 of this report.
Period for post policy/project review	The Local Plan includes provisions that would trigger a review. In addition, national guidance requires that the adopted Local Plan is reviewed every five years to determine whether an update is required.

Corporate objectives:	<p>The Council's Local Plan helps support all 6 corporate objectives:</p> <ul style="list-style-type: none"> • Safe and clean environment: e.g. contains policies relating to the design and layout of new developments that promote security and safe access; • Community Capacity: e.g. provides a framework for local communities to prepare area-specific guidance such as Neighbourhood Plans, Town / Village Plans etc; • Affordable housing: e.g. sets the Borough's overall housing target and the proportion of new homes that must be affordable; • Dacorum delivers: e.g. provides a clear framework upon which planning decisions can be made; and • Regeneration: e.g. sets the planning framework for key regeneration projects, such as Hemel Hempstead Town centre, Two Waters, Hemel Hempstead and the Maylands Business Park • The Climate and Ecological Emergency: e.g. sets out the planning framework for sustainability and decarbonisation of development supported in due course by a Supplementary Planning Document.
<p>Implications:</p> <p>'Value for money' implications</p>	<p><u>Financial</u></p> <p>Funding to prepare the new Dacorum Local Plan is provided from existing base budgets. The previously agreed budget for 2021/22 is sufficient to ensure the completion of the necessary technical evidence and to support the South East Hemel Opportunity Area work but a further drawdown from the Local Development Framework (LDF) reserve may be required in future years depending on the requirement for additional evidence gathering, further public consultations and the timing and complexity of the Local Plan Examination. Any expenditure over the base budget position in 2021/22 and 2022/23 will be reviewed and budget approval agreed.</p> <p><u>Value for money</u></p> <p>Where possible, evidence base work is undertaken jointly with other authorities to ensure cost is optimised (through economies of scale). Collaborative working with landowner consultants will continue to help extend the resources available to the Council and avoid the duplication of site specific technical information.</p>
Risk implications	<p>The Local Plan has its own detailed risk assessment and this is contained in the adopted Local Development Scheme (July 2020). This is regularly monitored in accordance with the Council's programme management procedures.</p> <p>The key risk is that the new Local Plan is found 'unsound' by an Inspector at Public Examination. To avoid this, the Council must ensure that the Plan complies with Government policy and is founded on robust evidence, particularly on infrastructure, and</p>

	<p>follows all statutory and local requirements, including on public consultation.</p> <p>The Local Plan is also critical to evidencing there is a five-year supply of housing land which is important to ensure that Council is able to control development appropriately, that planning decisions are plan-led and to assist in meeting the requirements of the Government's Housing Delivery Test. If the Council does not have an up to date Plan in place it may find it more difficult to defend, at planning appeal, its decisions to refuse planning permission.</p> <p>Following adoption of the Local Plan by the Council, the key risk is that the Plan does not deliver as planned. At that stage, continued close working with local communities, developers and infrastructure providers, along with consistent decision making, helps to ensure sustainable development takes place in a timely fashion.</p>
Community Impact Assessment	<p>A full Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) is being carried out on the Local Plan which looks at social, environmental and economic impacts in detail and is scrutinised at the Local Plan examination by an independent inspector. A Community Impact Assessment (CIA) has been prepared to support the Local Plan and will be regularly reviewed.</p>
Health and safety Implications	<p>No implications as a result of this report.</p>
Monitoring Officer/ Deputy S.151 Officer Comments	<p>In order for the Local Plan to meet the test of being 'sound' it will need to be supported by the most up to date evidence base. There have been a number of national guidance changes and national issues which require re-consideration before the plan is developed further. It is therefore reasonable to defer the publication of the Local Plan under regulation 19 until that work has been completed.</p> <p>The recommendation to defer the publication of the Local Plan will require additional financial resources over the medium term from 2022/23 onwards. The projected financial cost of delaying the final submission and publication of the local plan by 2 years and the additional requirements to review the current proposals is projected to cost circa £600k.</p> <p>There is no projected financial pressure in this financial year as a result of this recommendation but the impact on future years will require further detailed assessment and will require approval as part of the 2022/23 budget setting process and 2021 Medium Term Financial Strategy.</p>
Consultees:	<p>Mark Gaynor (Corporate Director for Housing and Regeneration)</p>

	The views of Strategic Planning and Environment Overview and Scrutiny Committee are set out in Appendix 3.
Background papers:	<ol style="list-style-type: none"> 1. Appendix 1: Emerging Strategy Consultation Summary Report 2. Appendix 2: Adopted Local Development Scheme (July 2020) 3. Appendix 3: Strategic Planning and Environment Overview and Scrutiny Recommendations to Cabinet
Glossary of acronyms and any other abbreviations used in this report:	AA: Appropriate Assessment under the Conservation of Habitats and Species Regulations 2017 (as amended) CAONB: Chilterns Area of Outstanding Natural Beauty CCB: Chilterns Conservation Board HRA: Habitats Regulation Assessment IDP: Infrastructure Delivery Plan LDS: Local Development Scheme MHCLG: Ministry of Housing, Communities & Local Government NPPF: National Planning Policy Framework PDR: Permitted Development Rights PPG: Planning Practice Guidance RAMSAR: A site protected under the RAMSAR Convention SA/SEA: Sustainability Appraisal / Strategic Environmental Assessment SAC: Special Area of Conservation SCI: Statement of Community Involvement SoCG: Statement of Common Ground SPA: Species Protection Area SSSI: Site of Special Scientific Interest

1. Background

- 1.1 Dacorum Borough Council is preparing a new Local Plan which will replace the Site Allocations Development Plan Document (adopted July 2017), the Core Strategy Development Plan Document (adopted September 2013) and those 'saved' parts of the Dacorum Borough Local Plan (adopted April 2004).
- 1.2 The Council recently consulted on the Emerging Strategy for Growth (2020 – 2038) which is a key stage in preparing the Plan. This was approved for consultation by Full Council in November 2020.
- 1.3 The consultation ran for a total of 13 weeks, more than twice the statutory requirement. A total of 3,445 individuals and organisations responded to the consultation producing over 15,573 separate responses. In addition, a further 549 individuals wrote in support of the Grove Fields Residents Association response. During the consultation the Local Plan pages of the website were visited 40,852 times and the Council's dedicated 24/7 virtual exhibition attracted 4,674 users visiting the exhibition 5,867 times.
- 1.4 Officers have produced a Consultation Summary Report (Appendix 1) which summarises the main issues arising from the consultation. The Consultation Summary Report is structured as follows:

- Section 2 – This is an overview of how the Council carried out the consultation in line with prescribed regulations and the Council’s adopted Statement of Community Involvement.
 - Section 3 – Provides a summary of the main issues that were raised. Officers have grouped the issues raised by key organisations, residents and developers.
 - Appendix 1 – contains copies of the consultation material used by the Council to engage with the public.
 - Appendix 2 – contains full details of all responses received. These have been attached as a separate appendix to the Emerging Strategy Consultation Summary report.
- 1.5 The purpose of this report is to provide an overview of the main issues raised in the consultation, to update Members on the latest position in relation to wider planning reforms and to recommend to Members the next steps for the Local Plan.

2. Main Themes arising from the Consultation

- 2.1 Appendix 1 of this report details the responses to the consultation. The consultation attracted a large number of views from individuals, statutory bodies, developers and other interest groups. A diverse range of views were expressed from those strongly objecting to the Plan to others strongly supporting it.
- 2.2 The following sets out some of the general themes emerging, in no particular order. This is not an exhaustive list. Please refer to Appendix 1 for more details.
- A substantial number of objections were received to the overall level of growth in the Borough with many feeling that the Standard Method for calculating housing need was flawed because it was based on outdated 2014-based Household projections and not the more recent 2018 figures.
 - A large number of residents opposed the overall level of growth earmarked for Tring and Berkhamsted, in particular on the basis that this level growth would be disproportionate to these settlements.
 - A number of residents felt that the Council should be looking to justify lower numbers based on the constraints in the Borough including the Green Belt, the Chilterns Area of Outstanding Natural Beauty (AONB) and the presence of the Chilterns Beechwoods Special Area of Conservation (SAC).
 - A substantial number of people felt that the Council had not maximised urban capacity in the Borough before releasing land in the Green Belt.
 - A large number of people felt that Covid-19 had fundamentally altered how people will live and work and considered that opportunities for further conversions of offices, retail and other employment spaces to housing should be re-examined.
 - Many residents questioned the ability of infrastructure to accommodate the proposed growth.
 - Detailed representations were made to the Council from those landowners/developers included in the consultation and from those sites that were not included in the consultation. These representations raise a number of conflicting issues and further evidence gathering may be required to examine the issues raised.

3 Government Policy: Update on Planning Reform

- 3.1 During the lead up to the consultation launch, Government published two significant policy papers. The first was 'Changes to the Current Planning System (<https://www.gov.uk/government/consultations/changes-to-the-current-planning-system>)' which, amongst other things, set out possible revisions to the Standard Methodology for calculating housing needs. The changes proposed in the consultation would have reduced Dacorum's housing requirement from 1,023 homes every year to 922 homes every year. The second was 'Planning for the Future' and this consultation tabled numerous potential reforms to the planning system, many of which would fundamentally change the present system and have substantial implications for Local Plans (<https://www.gov.uk/government/consultations/planning-for-the-future>). One proposal is for a new nationally determined, binding housing requirement that local planning authorities would have to deliver through their Local Plans. It was proposed that this would factor in land constraints, including the Green Belt, and would be consistent with the aspirations of creating a housing market that is capable of delivering 300,000 homes annually, and one million homes over this Parliament.
- 3.2 The consultation period on these documents ran from August 2020 to October 2020. Members will recall that the Council proceeded with its Local Plan consultation on the reduced housing requirement of 922 homes every year on the basis that Government's intention, as detailed in the Planning for the Future White Paper, was that the housing number for localities would take into account other constraints such as the Green Belt and other designated areas of environmental and heritage value.
- 3.3 On 16 December 2020, during the Council's consultation on the Emerging Strategy for Growth (2020 – 2038), Government published its response to the 'Changes to the Current Planning System' consultation (<https://www.gov.uk/government/consultations/changes-to-the-current-planning-system/outcome/government-response-to-the-local-housing-need-proposals-in-changes-to-the-current-planning-system>). Amongst other things, Government decided **not** to proceed with the proposed changes to the Standard Methodology for Dacorum meaning that the housing requirement for Dacorum returned to the previous figure of 1,023 homes every year, now revised to 1,020 following the publication of recent ONS data. However, in the same response, Government also provided some further clarification on how Local Authorities should apply the Standard Methodology in Plan making. Government outlined that meeting housing need should never be a reason to cause unacceptable harm to protected landscapes and the Green Belt. The response follows on to say that the standard method does not represent a 'target' in plan making, but instead provides a starting point for determining the level of need for the area and, it is only after consideration of this, alongside the constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made. The response goes on to say that it is for local authorities to determine precisely how many homes should be planned for and where those homes should be located. Government indicates that in order to make this position as clear as possible it will explore what changes it can make to national planning policy.

3.4 At the time of writing, Government has not provided a detailed response to the 'Planning for the Future' consultation and so it is unclear which proposals from the Planning White Paper, if any, are to be taken forward.

4 Other Government Announcements and Parliamentary activity

4.1 Since the launch of the consultation there have been a number of announcements and clarifications issued by Government. These are summarised below:

December 2020 – Letter to all MPs in England from the Housing Minister

4.2 In a letter to all MPs in England in December 2020 the Housing Minister introduced the revised standard method for assessing housing need. The letter stated that this was the first stage for Local Authorities in identifying housing need in a local area. It went on to make clear that local housing need does not set a target for the number of homes to be built – local planning authorities take into account land supply considerations and environmental considerations before determining the number of homes likely to be delivered in the area. Nor does local housing need dictate where those homes are built – the location of new homes is also determined by the local planning authority.

4.3 The letter reaffirmed that the Standard method will, as now, remain a starting point for plan making. This recognises that not everywhere will be able to meet their housing need in full – for example, where available land is constrained due to the Green Belt and an area therefore has to plan for fewer homes.

19 January 2021 – Letter to all Council Leaders in England from the Housing Minister

4.4 In a further letter to all Council Leaders in England on 19 January 2021 the Housing Minister wrote to remind Council Leaders of the continued importance of maintaining progress on producing up-to-date Local Plans. The letter continued by reaffirming that the country needs more, better and greener homes in the right places and the Government's ambition to deliver 300,000 homes per year by the mid-2020s and one million homes over this Parliament. Increasing the number of up-to-date Local Plans across England is central to achieving that goal.

4.5 The letter also reminded Council leaders that Government set a deadline of December 2023 for all authorities to have up-to-date Local Plans in place and that it was critical that work should continue to progress Local Plans through to adoption by the end of 2023 to help ensure that the economy can rebound strongly from the COVID-19 emergency. Progressing Local Plans will help to ensure that we can build back better and continue to deliver the homes that are needed across England. As such, a Written Ministerial Statement was made that day reminding all local planning authorities of the importance of maintaining progress to get up-to-date plans in place.

26 January 2021 – Letter from Housing Minister to Leader of the Council

4.6 On 26 January 2021 the Council received a response to its earlier letter to the Secretary of State in relation to Council Motion 5a tabled at Full Council on 18 November 2020. The response pointed out that the 2014-household projections should be used but reiterated that the standard method is only the starting point in the process of planning for new homes. The letter went on to say that the standard

method provides a minimum number of homes, not a maximum, and does not provide a target. Authorities should make a realistic assessment of the number of homes their communities need as the starting point in the process. Once this has been established, planning to meet that need will require consideration of land availability and relevant constraints such as Green Belt. It is expected that where the need cannot be met through brownfield land and land in sustainable locations near to transport interchanges then the authority should seek opportunities within neighbouring areas.

4.7 The letter continued by stating that, if an authority feels that their circumstances warrant an alternative approach to the standard method, then they should set the reasons for this out as part of the plan-making process. There is an expectation that the standard method will be used, and that any other method will be used only in exceptional circumstances.

11 May 2021 - Proposed New Planning Bill

4.8 Although Government has not provided any further clarity on the outcome of the recent 'Planning for the Future' White Paper consultation, on 11 May 2021, Her Majesty delivered a speech to Parliament setting out the Government's priorities which included a new Planning Bill. Details of the Bill can be found at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/986770/Queen_s_Speech_2021_-_Background_Briefing_Notes..pdf.

4.9 The Bill will include '*laws to modernise the planning system, so that more homes can be built.*' and proposes the following:

- The creation of a simpler, faster and more modern planning system to replace the current one that dates back to 1947, and ensuring we no longer remain tied to procedures designed for the last century.
- Ensuring homes and infrastructure – like schools and hospitals – can be delivered more quickly across England.
- Transforming our planning system from a slow document-based one to a more efficient, and easier to use, digital and map-based service, allowing more active public engagement in the development of their local area.
- Helping deliver vital infrastructure whilst helping to protect and enhance the environment by introducing quicker, simpler frameworks for the funding of infrastructure and assessing environmental impacts and opportunities.

4.10 The main benefits of the Bill would be:

- Providing more certainty for communities and developers, particularly smaller developers, about what is permitted where, through clear land allocations in local plans and stronger rules on design.
- Simpler, faster procedures for producing local development plans, approving major schemes, assessing environmental impacts and negotiating affordable housing and infrastructure contributions from development.
- Establishing a framework which focuses on positive outcomes, such as environmental opportunities and better designed places.
- Digitising a system to make it more visual and easier for local people to meaningfully engage with.

4.11 The main elements of the Bill are:

- Changing local plans so that they provide more certainty over the type, scale and design of development permitted on different categories of land.
- Significantly decreasing the time it takes for developments to go through the planning system.
- Replacing the existing systems for funding affordable housing and infrastructure from development with a new more predictable and more transparent levy.
- Using post-Brexit freedoms to simplify and enhance the framework for environmental assessments for developments.
- Reforming the framework for locally led development corporations to ensure local areas have access to appropriate delivery vehicles to support growth and regeneration.

4.12 At the time of writing, no programme has been provided for the passage of the new legislation through Parliament, nor any details on when revised national planning policy will be updated to implement the new proposals.

10 June 2021 - The Housing, Communities and Local Government Committee report into 'Planning for the Future' White Paper

4.13 On 10 June 2021, The Housing, Communities and Local Government Committee published its first report of session 2021-22 looking into the future of the planning system in England. (<https://committees.parliament.uk/publications/6180/documents/68915/default/>).

The Committee makes a number of recommendations to Government as well as drawing out some of the detailed issues facing implementation. The Committee's main concerns / observations, in so far as they relate to Local Plans, were as follows:

- I. Concerned about the lack of detail in respect of the proposed reforms to the planning system making it very difficult to assess the possible practical implications of many of the reforms.
- II. A lack of detail on how the proposed 'Growth, Renew and Protect' designations will operate.
- III. Concerned about the proposed 30 month statutory timescales for Plan making.
- IV. Ensure that effective arrangements are in place for local authorities to co-operate effectively.
- V. Concerns on how community engagement may be impacted by the reforms.
- VI. Supports the use of a standard method for calculating housing need but believes the approach should be based on more up to date demographic modelling and there should be an opportunity for local authorities to prepare their own figures.
- VII. Requested further evidence behind the Government's overall housing target aspirations.

21 June 2021 - Parliamentary Debate on Planning Decisions: Local Involvement

4.14 On 21 June 2021, during a Parliamentary Debate on Planning Decisions and local involvement, the Housing Minister addressed questions pertaining to the Green Belt. The Minister restated the Government's commitment to continue to protect the Green Belt and explicitly stated that local authorities should not develop on the Green Belt, save for in exceptional circumstances, and local plan making

should recognise the Green Belt as a constraint on numbers. The Minister also pointed out that the Government would not be accepting the recommendation in the Housing, Communities and Local Government Committee's report (see para 4.13) for a wholesale review of the Green Belt.

Further changes to the Use Class Order and Permitted Development Rights

- 4.15 In addition to the above, Government has also implemented a number of other important reforms. The most significant change in recent months is the amalgamation of a number of existing uses into a single Use Class "E". This came into effect on 1 September 2020.
- 4.16 At the same time, Government introduced new permitted development rights (PDR) which allow vacant and redundant free-standing commercial and light industrial premises, and residential blocks of flats, to be demolished and replaced with new housing, subject to certain conditions being met.
- 4.17 More recently, Government laid regulations on 31 March 2021 to create a new permitted development right to enable the change of use from the new Use Class E to residential use to help support housing delivery and enable more homes to be created in town centres. This is again subject to certain conditions being met and the right will take effect from 1 August 2021.
- 4.18 Officers are considering the implications of these changes and whether additional steps are required to protect key areas, such as our town centres and strategic employment sites, in the future.
- 4.19 The uncertainty surrounding the details and timing of the proposed wider planning reforms poses challenges for Dacorum in preparing its Local Plan. Officers consider that there are advantages in developing our emerging Local Plan into a 'new style' Local Plan instead of risking adopting a Plan which is not fit for the new system. The Council requires more clarity on Government intentions so these can be incorporated into the emerging Local Plan.

5 Responding to the key issues raised in the consultation

- 5.1 This section of the Report considers some of the central issues coming out of the consultation, what current Government Policy says on the subject and any further clarifications/updates issued by Government since the consultation started and Officer recommendation(s) on the appropriate response.

Housing Growth (inc. Standard Methodology and role of constraints)

- 5.2 Paragraph 11 (The Presumption in Favour of Sustainable Development) of the National Planning Policy Framework (NPPF) states that:

- a) *'plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*
- b) *strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*

- i. *the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area⁶; or*
- ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

Footnote 6

The policies referred to are those in this Framework (rather than those in development plans) relating to: Habitats sites (and those sites listed in paragraph 176) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 63); and areas at risk of flooding or coastal change.'

5.3 Paragraph 35 (Examining Plans) of the NPPF provides several tests that Local Plans need to satisfy in order to be found 'sound'. This includes:

- a) **'Positively prepared** – *providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs⁽¹⁹⁾; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*

Footnote 19

Where this relates to housing, such needs should be assessed using a clear and justified method, as set out in paragraph 60 of this Framework'

5.4 Paragraph 60 (Delivering a sufficient supply of homes) of the NPPF states:

'To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.'

5.5 The use of the Standard Methodology is also backed up by the supporting National Planning Policy Guidance (PPG). Paragraph: 002 Reference ID: 2a-002-20190220 states:

'The National Planning Policy Framework expects strategic policy-making authorities to follow the standard method in this guidance for assessing local housing need.

The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply.

The standard method set out below identifies a minimum annual housing need figure. It does not produce a housing requirement figure.'

5.6 However, Paragraph: 003 Reference ID: 2a-003-20190220 of the PPG, in response to the question *'Is the use of the standard method for strategic policy making purposes mandatory?'* states:

'No, if it is felt that circumstances warrant an alternative approach but authorities can expect this to be scrutinised more closely at examination. There is an expectation that the standard method will be used and that any other method will be used only in exceptional circumstances.'

5.7 Paragraph: 015 Reference ID: 2a-015-20190220 of the PPG, in response to the question *'If authorities use a different method how will this be tested at examination?'* states:

'... Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination.

Any method which relies on using household projections more recently published than the 2014-based household projections will not be considered to be following the standard method as set out in paragraph 60 of the National Planning Policy Framework. As explained above, it is not considered that these projections provide an appropriate basis for use in the standard method.'

5.8 There are several steps in determining a housing figure for the Local Plan. The first is to identify the overall level of 'need'. This is often referred to as the 'unconstrained need' of an area. Once the 'need' has been established there are several steps involved in determining the 'housing requirement' for the Plan. On the issue of need, Government has made it clear that the Standard Methodology should be used and an alternative method should only be used in 'exceptional circumstances'. Officers do not see any evidence that that Dacorum would be impacted by any demographic abnormality that would justify a departure from the national method. This approach is endorsed by Government Agencies (such as Homes England) as well as our adjoining local authorities who all stated this in their

responses to the recent consultation. It should also be noted that the level of 'need' also has to take into account any unmet needs from adjoining local authorities.

5.9 As stated in para 5.1) the NPPF sets out that in some cases it may not be possible to meet the full needs. Dacorum is home to a number of the constraints set out in footnote six of paragraph 11. This includes:

PROTECTED AREAS	Area (Ha)
GREEN BELT	10,634.08
CHILTERN'S AONB	9,053.72
Sites of Special Scientific Interest	611.87
Special Areas of Conservation	455.63
Conservation Area	548.03
Scheduled Monuments	89.08
Flood Zone 2	466.78
Flood Zone 3	393.78
Total (taking account of overlapping constraints)	16,916.51
Versus total area of Dacorum	21,247.97
As a percentage of Dacorum's total area	79.6%

5.10 Some of these constraints overlap with one another, however, cumulatively they account for 16,916 hectares, representing 79.6% of the total area of the borough. The map below presents the combined covered of these constraints:

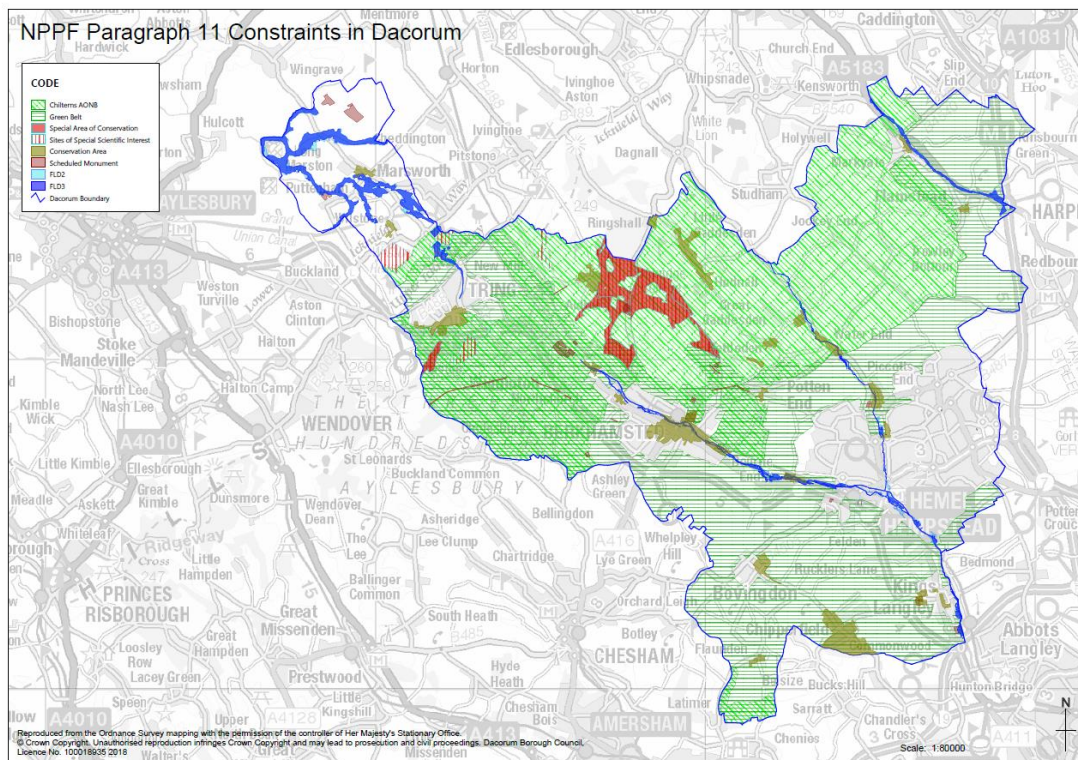


Figure 1: Map of Dacorum showing combined constraints

5.11 However, the presence of these constraints, either alone or in combination with one another, does not automatically mean Dacorum does not need to seek to meet

the housing need figure. This is clear in the NPPF, which requires a 'strong reason' to restrict the overall scale, type or distribution of development in the area.

Overall Assessment of harm undertaken to date

- 5.12 Members will be aware that the recent consultation proposed 922 homes per annum (16,596 homes between 2020 and 2038) and not the revised Standard Method figure. The consultation did not include any unmet needs arising from adjoining authorities based on there not being any at the time of publication. The Council's evidence and assessment of harm has been made against the 922 figure and not the increased figure. The Council will need to update its assessments in view of this.

Green Belt Justification

- 5.13 There is little evidence from Local Plan Examinations across England that Green Belt authorities are able to justify lower levels of growth, purely on the basis that the Green Belt is present in the area. However, there may be circumstances where, in a particular part of a local authority's area, the harm caused by a particular proposal could provide a 'strong reason' for that site not to be developed. The Council's published emerging evidence to date on the Green Belt did not conclude that the level of harm was such to justify lower numbers overall or that the potential harm caused by a specific site is such as to justify removing that site from the Plan. However, the Council recognises that its current evidence is not complete and further work is needed looking at the Green Belt harm, including whether exceptional circumstances exist on each site.

Other Constraints

- 5.14 The Council's assessment undertaken to date does not indicate that the harm caused by the overall level of growth or that arising from a specific development site to a designated Local Green Space, a National Park, heritage assets or areas at risk of flooding would justify a reduction in numbers or the removal of a specific site.
- 5.15 One aspect of the Local Plan where the evidence is continuing to be developed is the potential harm caused by the overall level of growth, or arising from a particular site, to the Chilterns Area of Outstanding Natural Beauty (CAONB) and its setting. This was a key matter arising from the consultation, particularly from the Chilterns Conservation Board (CCB) who have responsibility for managing the CAONB. A number of the proposed sites are in close proximity to the CAONB and the Council undertook an assessment of the landscape impacts of the proposals on the CAONB. Further work is proposed to assess the specific questions of whether the harm to the AONB arising from the overall level of growth, or that of specific sites, provides a 'strong reason' for reducing development overall or in that specific location. Officers will continue to work closely with the CCB and other bodies, as appropriate, on this matter.
- 5.16 Similarly, the Council's assessment to date cannot rule out the possibility of likely significant effects on the Chilterns Beechwoods Special Area of Conservation (SAC), the South West London Waterbodies Species Protection Area (SPA) and South West London Waterbodies RAMSAR arising from the growth proposed in the Local Plan. Given that likely significant effects cannot be ruled out, the Council is under a legal requirement under the Conservation of Habitats and Species Regulations (2017) as amended to undertake this assessment before finalising the

Local Plan. This assessment is referred to as an Appropriate Assessment (AA) and this will be completed prior to the Local Plan being finalised.

- 5.17 The Regulations state that the Plan can only progress if the integrity of the European Site is not adversely affected (having regard to any conditions or restrictions imposed as mitigation). The only other approach is if the local authority is satisfied that, there being no alternative solution, the Plan must be carried out for imperative reasons of overriding public interest.
- 5.18 The Council's AA is being developed in consultation with key stakeholders including Natural England, Hertfordshire County Council and the National Trust. The issues to be assessed as part of the AA include (but are not limited to):
- air quality (as parts of the Tring Woodlands SSSI and Ashridge Commons and Woods SSSI are within 200m of roads/junctions primarily the A41 and B4506);
 - hydrology (surface run off from development sites or groundwater level changes);
 - habitat loss and fragmentation (ensuring no loss of functionally linked habitat); and
 - public access and disturbance from increased visitor pressure and disturbance.
- 5.19 Some of the evidence gathering for the AA requires visitor, ecological and other survey work to be undertaken. This is currently underway but, in some cases, is seasonal and therefore requires multiple surveys. Initial outcomes are not expected to be delivered until later this year owing to the need to collect data across multiple seasons.
- 5.20 Once the AA is sufficiently progressed, the Council will be able to advise whether mitigation is required and/or whether other changes to the Local Plan are justified.

The Spatial Strategy and Locations for Growth

- 5.21 A substantial number of objections were received to the proposed distribution of growth across Dacorum. Specifically, the level of growth directed to the market towns of Tring and Berkhamsted was seen as being disproportionate and harmful to their character. The overall approach to Hemel Hempstead received fewer objections and was even supported by some groups and individuals. The emerging spatial strategy seeks to broadly maintain the relative settlement hierarchy in Dacorum but, given the overall level of growth required, both Tring and Berkhamsted would be required to accommodate substantially more development than in the Core Strategy.
- 5.22 Officers believe that a spatial development strategy that looks to accommodate growth at the main centre (Hemel Hempstead) and see both market towns grow is appropriate. However, officers recognise that there may be grounds to further recalibrate the role of Hemel Hempstead relative to the market towns, particularly given the wider initiatives underway to support the transformation of the town under the Hemel Place Strategy and Place Board. As such, Officers will undertake further work to review Hemel Hempstead's role in the settlement hierarchy and consider whether it is appropriate for it to be elevated further as a major growth centre for Dacorum. This will look at the role of unviable employment space, the long-term role of the Town Centre and consider whether a further step change in height and density should be pursued further.

The Impact of Covid-19

5.23 Since late 2019 the world has been impacted by the Covid-19 Pandemic. It is still unclear what the full impacts will be, but these could be substantial, and long-term and will impact a variety of areas. Specifically, it is unclear whether the short-term reductions in the demand for employment space and shops will be permanent. It is important that we provide the right policy response for these issues and ensure the Local Plan is fully responsive to wider changes.

5.24 The recent consultation was supported by a significant wealth of evidence covering a range of topics. However, many of the modelling assumptions incorporated within these studies predate the Covid-19 pandemic and these will need to be revisited. This principally relates to the Council's evidence on retailing and employment provision but also includes open space, recreation, and any revisions to movement patterns through revised transport assessments (such as those arising from increases in home working) as well as others.

5.25 Officers will review the evidence base and determine whether updates are required to take into account the impacts of Covid-19. We will also continue to monitor and review wider changes through our regular land monitoring routines.

Urban Capacity

5.26 The recent consultation set out that in the region of 600 dwellings per annum were to be delivered in our urban areas, equating to over 60% of the overall housing target. The Council's evidence justified significant increases through the intensification of existing brownfield allocations alongside new allocations, mainly focussed in Hemel Hempstead Town Centre, Two Waters/Apsley, and at Maylands.

5.27 However, the Council received a substantial number of comments questioning the assumptions on the number of homes to come forward within existing urban areas. This varied from those who felt that the Council were significantly overestimating the potential source of housing from this (particularly the allowance for 'windfall' development) to those considering the Council had not done enough to maximise supply.

5.28 In response Officers will be re-examining this work to determine whether additional homes could be provided on the urban sites already identified in the emerging Plan and whether sufficient evidence exists to include additional deliverable urban sites. Key steps for completing this work include:

- A new Call for Sites consultation focusing on brownfield sites and other sites in our urban areas.
- A detailed review of the town centres in the borough, having regard to the changing nature of retail, the impact that the Covid-19 pandemic has had in these locations and the impact of new/emerging permitted development rights.
- A review of opportunity areas such as at Two Waters / Apsley, and other urban areas including local and neighbourhood centres.
- A review of the windfall allowance for the borough.

Infrastructure Capacity and Delivery

- 5.29 Alongside the Emerging Strategy for Growth, officers prepared and consulted on a Draft Infrastructure Delivery Plan (IDP). This was developed through a process of engagement with infrastructure partners to help understand the current situation and any planned investment, and to identify future infrastructure needed to support the planned level of growth. The draft IDP includes a commentary by infrastructure type and settlement and is followed by schedules for each settlement and proposed site allocation that set out the infrastructure required to mitigate the impact of new growth and also meet policy requirements.
- 5.30 While good progress has been made in support of infrastructure evidence, further work is needed to develop the draft IDP into a fully comprehensive and complete document to accompany the next version of the Plan. This will include identifying specific projects and interventions, further development and apportionment of costs, and prioritisation and phasing of infrastructure delivery.
- 5.31 The next phase of work for the IDP will focus on the needs and requirements arising from growth in Hemel Hempstead to support the further work to be undertaken on urban capacity and the development of the Hemel Place Strategy detailed in 7 below.

Transport

- 5.32 The Council received a large number of responses suggesting that the level of growth would cause an unacceptable level of congestion across the Borough. To support the consultation the Council did publish the latest iteration of the Hertfordshire County Council wide transport modelling (referred to as the COMET model) as well as publishing sustainable transport strategies for both Berkhamsted and Tring. The Council also set out a strategic assessment of transport issues for Hemel Hempstead and this was included in a Transport Topic Paper.
- 5.33 The Council recognises that its transport evidence is not complete and further work is required to draw out and cost all the transport interventions needed to support growth. The situation in Hemel Hempstead is particularly complex and so the Council is undertaking a more detailed Sustainable Transport Strategy for the town. This work will be supported by the preparation of a detailed micro-simulation transport model for Hemel Hempstead (known as 'Paramics'). This will help inform the type of transport interventions needed to support growth in Hemel Hempstead and help inform growth sensitivity assessments. Finally, it will also help to identify those key pieces of transport infrastructure that are required to support growth and when they need to be delivered.
- 6.1 **Other Studies** – The Local Plan is supported by an extensive range of evidence studies all published on our website. Given the extensive responses received from landowners and developers, the Council will need to update these assessments to ensure they remain robust. In addition, given the changes taking place in the wider economy, including those resulting from Covid-19, the Council will need to review other evidence studies supporting the Local Plan, including, but not limited to, employment/economic needs assessment and retailing needs assessment.

6 Lessons from other Local Plans

- 6.2 Officers must also advise that the evidence from other Local Plans that have recently been through Examination, or currently undergoing Examination, clearly shows that local authorities are being pushed very hard to meet their full housing

need figures (as set out by the Standard Methodology) and any unmet need from adjoining areas.

6.3 At present, there have been 11 Local Plans submitted for examination after the transition period of the new NPPF (24 January 2019) and which have been found sound by an Inspector, subject to modifications. Six of these are not relevant to Dacorum because they were either in National Parks, in London, the Isles of Scilly or were partial reviews. For the remaining five, none of these have figures below the standard method. These include local authorities with substantial amounts of Green Belt and AONBs.

6.4 Of particular interest is the recent South Oxfordshire District Council Examination. Like Dacorum, it is significantly constrained by Green Belt and includes two designated Areas of Outstanding Natural Beauty (including the Chilterns). It also has four Special Areas of Conservation that are wholly or partially located within the district.

6.5 In this example the authority was providing for well in excess of its standard methodology requirement because it was meeting the unmet need of Oxford City. The Inspector concluded that it was appropriate to develop in the Green Belt on the basis that there was no other alternative and considered lower growth would have a detrimental impact on affordability, economic growth and commuting patterns. The Inspector felt that the existence of Green Belt did not lead to the conclusion that the housing requirement should be reduced. Moreover, it was felt that there was no reason why meeting the housing requirement should adversely affect the District's two AONBs.

7 Other updates

7.1 **Landowner Engagement** – The recent Local Plan consultation exercise was supported by extensive landowner engagement on site specific policy requirements. These discussions were informed by the infrastructure requirements identified in the emerging IDP. As the IDP develops, and further infrastructure requirements and their costs are clarified, the Council will continue to work closely with site promoters and developers to ensure these are fully reflected in emerging proposals. The recent consultation also set out that Masterplans are required to support the main Growth Areas, and these will need to be adopted as Supplementary Planning Documents.

7.2 In order to ensure that proposals for the main Growth Areas are sufficiently developed, Officers will continue to work with site promoters and developers to prepare Statements of Common Ground and to prepare other site-specific studies to support preferred allocations, as appropriate.

7.3 **The Hemel Place Strategy** - On 20 April 2020, Cabinet agreed to prepare the Hemel Place Strategy which will look at the long-term strategy to deal with the future development and transformation of Hemel Hempstead. It will develop a clear, ambitious yet realistic vision for the future of the town, and will be shaped through extensive engagement with the Council's partners, stakeholders and residents with it stretching beyond the Local Plan period. This is a considerable undertaking and will be overseen by a newly created multi-agency Hemel Place Board.

7.4 As an early priority of the strategy, Cabinet also agreed to prepare a comprehensive strategy for the physical, economic, social and environmental

development of the Town Centre, culminating in the preparation of the Town Centre Strategy. Similarly, the Council will be looking at further potential Opportunity Areas, including in South Hemel (which will be principally focused on Apsley) and to put in place a long-term strategy for the area. Both will be wide reaching strategies to create vibrant new mixed-use districts for Hemel Hempstead. The work will also help refine further opportunities for residential development in these areas.

7.5 There is considerable cross-over with this work and the Local Plan, particularly with the current Hemel Hempstead Delivery Strategy, but also specifically for future policies and proposals for the Town Centre and Apsley. It is important that the Place Strategy is fully embedded in the Local Plan and that the full implications of future policies and proposals are integrated into the Local Plan as it develops.

8 Local Plan Options and Associated Risks

8.1 The two broad options facing the Council following the recent Regulation 18 consultation are to, either press ahead with the Local Plan by moving to Regulation 19 (Publication) - this is the point where the Plan is fixed before being submitted to the Secretary of State for examination, or to undertake further work on the Local Plan.

8.2 Moving straight to Regulation 19 poses the following risks:

1. The current level of housing growth is below the figure derived by the Standard Methodology and this could pose a risk to the Plan without compelling evidence to justify the departure.
2. Key pieces of evidence are not yet complete, particularly the conclusions of the Appropriate Assessment. This could impact on the final site selection.
3. Some existing evidence studies reflect pre-pandemic modelling assumptions, (including retail and employment land calculations), which could be called into question at Examination.
4. It will be more difficult for this Local Plan to incorporate the requirements of the new planning system and will require Dacorum to review its Plan shortly after adoption.

8.3 Undertaking further work on the Local Plan and delaying the Publication under Regulation 19 poses the following risks:

1. The Council may be more susceptible to predatory planning applications and without a five-year supply of housing could find it more difficult to defend refusals, particularly on land that is previously developed.
2. Government has stated its desire for all Councils to have Plans in place by December 2023. There is a risk that Government decides to intervene and take control of Plan making in Dacorum.
3. The Council will not be able to provide certainty to developers and residents in the short term about the development strategy for the Borough and Dacorum's case to secure much needed infrastructure will be weaker.
4. Overall, a delay to the Plan poses risks to the Council's ability to manage development and change across the Borough which may undermine confidence.

8.4 In recent weeks a number of appeal decisions have been made elsewhere which, although based on their own particular circumstances, should be noted.

- 8.5 The Colney Heath appeal decision (reference APP/B1930/W/20/3265925; decision date 14 June 2021) appears to be one of the first in recent times where an Inspector has overturned the decision by St Albans and Welwyn Hatfield Councils and approve planning permission for a major development on greenfield land in the Green Belt. The Inspector recognises the ‘considerable and significant’ shortfalls in both authorities housing land supplies, and afforded very substantial weight to the provision of market housing as part of the consideration of very special circumstances. The Inspector also noted that both local authorities were relying on Local Plans that were significantly out of date.
- 8.6 On the matter of the AONB, a separate appeal has been allowed for a major development in South Oxfordshire District Council (reference: APP/Q3115/W/20/3265861; decision date 25 June 2021). The proposed scheme comprised of a hybrid application for a new community care village (C2 use) of up to 133 units on a green field site in the Chilterns AONB at Sonning Common. On landscape matters, the Inspector noted that while planning policy and statute gives equal protection to all parts of the AONB the AONB in this location contains a significant amount of built development which contrasts significantly with the deep, rural area of countryside within the AONB.
- 8.7 On the matter of housing supply, the Inspector concludes that despite the Local Plan being recently adopted, the extended time taken to get it to that stage has resulted in significant delays with a number of allocations and that the Council does not have a five-year supply of housing. While it is often assumed that development in the AONB is protected from the effects of a lack of housing supply (paragraph 11 of the NPPF), the Inspector here recognised that so long as the requirements of paragraph 172 (relating to major development in the AONB) are satisfied, then the tilted balance of paragraph 11 would apply.

9 Conclusions and Recommendations

- 9.1 Substantial progress has been made in the last 18 months to develop the new Local Plan for Dacorum. However, Officers note a marked change in Government advice since the launch of the recent consultation, particularly with regards to the application of constraints, such as the Green Belt, in determining the final housing figure for Local Plans. In addition, further work is needed to develop the Council’s evidence base before a Regulation 19 Local Plan can be produced. Officers also advise that further time is given to analysing and responding to the detailed comments raised during the consultation, including whether any further evidence is required. This particularly relates to those policies and proposals in the Plan that are more susceptible to changes arising following the Covid-19 pandemic.
- 9.2 Officers advise the following next steps for preparing the Local Plan:
1. Following the clarifications issued by MHCLG and the statements made by the Housing Minister in Parliament and elsewhere Officers will undertake further evidence gathering to determine whether it is appropriate for Dacorum to meet the full housing requirement as set out in the Standard Methodology. This will focus on assessing whether there are ‘strong reasons’ for Dacorum to propose a lower level of development in Dacorum, in accordance with paragraph 11b(i) of the NPPF.
 2. Officers will revisit the already extensive analysis of non-Green Belt development opportunities, particularly in the urban area, and will re-examine whether further opportunities exist for unviable retail units, employment space and offices to be converted to residential development, (whilst ensuring a sufficient supply of

employment and retail space is provided). Further potential for a step change in height and density to be provided in key locations within urban areas will also be examined. This work will feed into the development of Opportunity Areas across Hemel Hempstead, initially in South Hemel and the Town Centre. Officers will work closely with the Hemel Place Board on these.

3. Officers will continue to develop the evidence base supporting the Local Plan, particularly those studies outlined in section 5 of this report. Moreover, Officers will continue to progress with the detailed recreational, air and water quality surveys of the Chilterns Beechwoods SAC to ensure that the proposed level of growth, and the preferred sites, are the most appropriate. Officers will be producing interim guidance on this to inform stakeholders and the public.
4. Officers will undertake further work to review Hemel Hempstead's role in the settlement hierarchy and consider whether it is appropriate for it to be elevated further as a major growth centre for Dacorum. This will look at the role of unviable employment space, the long-term role of the Town Centre and consider whether a further step change in height and density should be pursued further.
5. Officers will continue to work proactively with landowners and developers to bring forward development on appropriate sites prior to the Local Plan being adopted, to ensure our ambitions to deliver much needed new affordable homes and new infrastructure are delivered.
6. Officers will continue at pace to ensure that a Regulation 19 Plan can be produced as soon as possible. Officers will work with Government to understand the extent and timetable for implementing the proposed planning reforms and ensure the new Local Plan responds to the proposed changes as to avoid abortive costs.

Appendix 1 – Emerging Strategy Consultation Summary Report

Appendix 2 – Adopted Local Development Scheme (July 2020)

<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/local-development-scheme>

Appendix 3 – Strategic Planning and Environment Overview and Scrutiny Recommendations to Cabinet

The committee noted that:-

1. The committee is sceptical about the housing targets imposed by government because the underlying evidential support is outdated.
2. The target imposed upon DBC is impossible to achieve without unacceptable erosion of the Green Belt.
3. The report considered by the committee shows that support for the proposed amount of development came largely from government bodies such as Homes England and from those who are commercially motivated, like developers. The vast majority of residents who responded were opposed to development that affected the Green Belt and the AONB and we must give more weight to the views of our resident and continue to do so in the future.
4. Critical supporting studies like AA, HRA and most importantly, the Dacorum IDP remain to be completed.

The committee therefore recommends that:-

1. Regulation 19 consultation be delayed and as a matter of urgency, work should be completed on:
 - items in 4 above
 - a detailed reappraisal of all non-Green Belt land available to the Borough for housing development
 - establishing a level of housing that can be supported without unacceptable erosion of the Green Belt.
2. To assist in planning future growth in Dacorum, a Members task and finish group be reinstated.



Consultation Summary Report

Dacorum Local Plan (2020 - 2038)

Emerging Strategy for Growth

June 2021

Introduction

1 Introduction	2
-----------------------------	----------

Consultation Report

2 Consultation Report	3
2.1 Background	3
2.2 Engagement Methods	3
2.3 Making Representations	5
2.4 Overview of Responses	6

Summary of Issues by Consultation Point

3 Summary of Issues by Consultation Point	7
3.1 Vision and Strategic Objectives	8
3.2 The Sustainable Development Strategy	14
3.3 Guiding Development	49
3.4 Settlements	76
3.5 Sustainability Appraisal	118
3.6 Evidence Base	121
3.7 National Policy	124
3.8 Any Other Comments	130

Appendix 1 - Supporting Documents

Supporting Documents	133
-----------------------------------	------------

Appendix 2 - Responses by Consultation Point

Responses by Consultation Point	144
--	------------

1 Introduction

The recent Emerging Strategy for Growth consultation attracted substantial interest, and we are grateful for the time you have spent engaging with the Local Plan process. We have now prepared a summary report which contains all responses received and draws out the key issues and themes emerging from the feedback. This document is structured as follows:

- Section 2 (**Consultation Report**) explains the how we engaged in accordance with our Statement of Community Involvement, including the methods we used, the overall level of response, and the key issues arising.
- Section 3 (**Summary of Issues by Consultation Point**) is where we expand on the points raised to each consultation point contained in the Plan. Given the level of response we have summarised the main themes and issues rather than summarising every individual comment.
- Appendix 1 (**Supporting Documents**) provides copies of the key material used to advertise the consultation. This includes copies of the notification for the consultation and the public notice. We have also provided images of the virtual exhibition which was hosted throughout the consultation.
- Appendix 2 (**Responses by Consultation Point**) contains full copies of all the individual responses made to the consultation. Alternatively, you can view all responses made on the consultation webpage, by visiting consult.dacorum.gov.uk/kse and selecting the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth Consultation section.

We will publish the Council's response to the key issues raised during this consultation alongside the next iteration of the Local Plan. This Plan will bring together changes as a result of the comments received as well as the further work on the impact of constraints.

2 Consultation Report

2.1 Background

The Emerging Strategy for Growth was the second formal consultation on the new Local Plan for Dacorum. This followed on from the Issues and Options consultation, which took place over a period of 6 weeks from 1st November 2017 to 13th December 2017. The Issues and Options stage set out to gain views on high level principles and issues facing Dacorum.

The Local Plan, when adopted, will cover the period 2020-2038 and replace the Saved Policies in the Dacorum Local Plan 1991-2011, the Core Strategy 2006-2031 and the Site Allocations DPD 2006-2031.

The Emerging Strategy for Growth was published for consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, and includes our proposed approach to accommodating growth in Dacorum, the sites that have been suggested and some of the specific planning policies that will deliver this.

The full Emerging Strategy for Growth Document can be found here: www.dacorum.gov.uk/localplan

2.2 Engagement Methods

The Emerging Strategy for Growth Consultation was carried out in accordance with the requirements set out in the [Statement of Community Involvement \(SCI\)](#).

The consultation was undertaken during the COVID-19 pandemic, and as a result an addendum to the SCI was adopted by the Council on the 20th October 2020. This established temporary measures that ensure the consultation could proceed despite the restrictions that were in place at the time to stop the spread of Covid-19.

The consultation ran for a period of 13 weeks (27 November 2020 until 28 February 2021) to take into account of the Christmas period and tightening Covid-19 restrictions that began to be imposed during the Autumn and Winter of 2020/21.

To help maximise engagement we ran a co-ordinated launch of the consultation across online and offline channels. Highlights included setting up a dedicated Local Plan webpage, producing a Local Plan Video, producing a printed/online Local Plan summary guide and launching a Local Plan Virtual Exhibition, which supported an opportunity for visitors to ask planning officers any questions they had about the consultation.

The Council sent e-mail or postal notifications of the consultation to all Town and Parish Councils in Dacorum along with neighbouring Town and Parish Councils, County and District/Borough Councils, and elected County Councillors for Dacorum. All Dacorum Council's elected members were informed of the consultation.

Statutory consultees were also notified of the consultation by email or post. Everyone who was on the Council's local planning consultation database were notified of the consultation by e-mail or by direct mail where no e-mail address was recorded. This includes individuals, businesses, interest groups and resident organisations.

We used a variety of engagement methods to allow as many people as possible to participate in the consultation. Full details of the methods and levels of engagement are listed below:

Website/Digital

New Dacorum Local Plan page	26,334 visits
-----------------------------	---------------

All Local Plan related pages including Evidence base, South West Herts Joint Strategic Plan, Issues and Options consultation 2017, Call for potential development sites and Hertfordshire Growth Board.	40,852 visits
Consultation Portal Page Views	1,082 Users 1,552 Visits
Consultation database - Consultation Notifications	5,573 online 2,165 postal (See full notification in Appendix 1)
DBC Residents' Consultation Panel - e-shot	890 residents
Hemel Hempstead Town Centre digital screen	Ways to engage promoted throughout consultation period.

Press/Media (print/online)

Media releases for local and regional press. Pre, during and post consultation to ensure maximum coverage.	Five media releases issued to 292 media contacts for wider circulation.
Public Notices in newspapers	Published in the Hemel Gazette on Wednesday 25th November 2020 and Wednesday 20th January 2021 (see full details in Appendix 1)

Publications (print/online)

Dacorum Digest residents' magazine (print) Full page spread promoting launch.	61,000 households
Digital Digest monthly e-newsletter(online) Promoted consultation before, during and after.	11,500 subscribers

Local Plan documents and summary guide (print/online)

Local Plan documents (print and online)	Documents online and printed copies available to loan via three local libraries and view at Council offices (by appointment during restrictions)
Local Plan summary document, 20 page summary covering key elements of Local Plan and how to get involved in consultation (print and online)	Shared on digital channels and Local Plan webpage Print copy delivered to households

Virtual exhibition (online)

Local Plan virtual exhibition - available to view 24/7 throughout consultation period (see images of exhibition in Appendix 1)	4,674 Users 5,867 Views
--	----------------------------

Social Media (online)

Posts added throughout consultation signposting to further on Local Plan and how to get involved.	38 posts added across all channels. Total reach 172.9K Individuals
DBC Facebook	9,218 followers
DBC Twitter	8,539 followers
DBC LinkedIn	3,236 followers
Shared via 20+ local community groups	Groups Included <ul style="list-style-type: none"> • Hemel Hempstead Community and Conversation: 42.7K Followers • Berkhamsted Life: 16.9K Followers • Everything Tring: 24.8K Followers

Local Plan Summary Video (online - YouTube)

Video available to view throughout consultation. Promoted extensively via social media and embedded on dedicated Local Plan webpage.	1.9K views
--	------------

Town and Parish Councils (print/online)

Electronic and hardcopies of Local Plan documents and summary guide made available to share with their networks.	16 Parish/Town Councils
--	-------------------------

Local businesses (online)

Businesses Bulletin e-newsletter	2,886 subscribers
Hemel Hempstead Business Ambassadors Event -presentation by DBC	

DBC Members (print/online)

Members News – weekly e-newsletter, updates at key stages of consultation	Emailed to all DBC elected members
Electronic print copies of Local Plan summary guide made available	

2.3 Making Representations

Feedback on the Emerging Strategy for Growth was invited in a number of ways:

- Comments could be made via our consultation portal. Access to the portal was via a hyperlink which was posted in a variety of locations, including the Local Plan webpage, on consultation notification letters and other advertisements for the consultation. The portal provided the option of providing detailed comments on every section of the Plan as well as supplementing that response with additional material.
- If it was not possible to make comments directly on the consultation portal we provided a downloadable version of the questionnaire which could be completed and returned to us. We also accepted responses sent via email or post.

2.4 Overview of Responses

Level of Response

The Emerging Strategy for Growth received a total of 15,574 comments from 3,446 consultees.

We also received comments from 549 individuals supporting the Grove Fields Residents Association (GFRA) response and a further 114 responses sent via Thakeham in relation to their site.

Overview of Key Themes

The detailed responses are summarised in Section 3 (Summary of Issues by Consultation Point) and a full list of responses made can be found in Appendix 2. The following provides a high level summary of the main themes and issues emerging from the comments as a whole, in no particular order:

- A substantial number of objections were received to the overall level of growth in the Borough with many feeling that the Standard Method for calculating housing need was flawed because it was based on outdated 2014-based household projections and not the more recent 2018 figures.
- A large number of residents opposed the overall level of growth earmarked for Tring and Berkhamsted in particular on the basis that this level growth would be disproportionate to these settlements.
- A number of residents felt that the Council should be looking to justify lower numbers based on the constraints in the Borough including the Green Belt, the Chilterns Area of Outstanding Natural Beauty and the presence of the Chilterns Beechwoods Special Area of Conservation (SAC).
- A substantial number of people felt that the Council had not maximised urban capacity in the Borough before releasing land in the Green Belt.
- A large number of people felt that COVID-19 had fundamentally altered how people will live and work and felt that opportunities for further conversions of offices, retail and other employment spaces to housing should be re-examined.
- Many residents questioned the ability of infrastructure to accommodate the proposed growth.
- Detailed representations were made to the Council from landowners/developers of sites included in the consultation and also of sites that were not included in the consultation. These representations raise a number of conflicting issues and further evidence gathering may be required to examine the issues raised.

It is important to note that the above issues are not exhaustive. Moreover, the absence of a particular point from the above list does not mean it is not considered to be a key issue for the Local Plan.

3 Summary of Issues by Consultation Point

This section of the document summarises the key themes emerging from each of the consultation points in the document. Broadly, the consultation points respond to the policies and proposals contained in the Plan.

We have grouped responses to reflect the structure of consultees in our Statement of Community Involvement (SCI):

- Statutory Bodies - also referred to as 'Specific Bodies' in the SCI, these are the bodies that we are bound to work together with by the Duty to Cooperate, the National Planning Policy Framework and also any locally prescribed bodies.
- General Bodies/Other Organisations - these include but are not limited to, voluntary organisations representing certain groups within the community, environmental groups, local residents associations, landowners and housebuilders.
- Wider Community - this category includes those who live, work or visit the Borough, who are making comments relating to their own personal views and are not responding on behalf of an organisation.

The Summary by Consultation Point reflects the Structure of the Emerging Strategy for Growth [Consultation Comments Form](#).

3.1 Vision and Strategic Objectives

There were 929 separate responses to this consultation point. The following themes/issues were raised:

Statutory Bodies

- Three Rivers District Council (TRDC) note it is important to consider the cross-boundary issues arising from growth in Dacorum and Three Rivers, including the potential for unmet housing need arising from Watford, but note that Three Rivers is unable to assist in accommodating any growth shortfall identified in Dacorum.
- St Albans City and District Council (SADC) is generally supportive of the Emerging Strategy for Growth at this stage. SADC note that their revised Plan is at a very early stage and look forward to working with the Council to assist in accurately reflecting SADC's Local Plan position.
- Watford Borough Council welcome the progress made towards identifying a strategic growth strategy and consider that further work on this has been done in a positive, collaborative manner and support the housing land supply evidence prepared which indicates further capacity for development.
- Redbourn Parish Council objects to the Emerging Strategy for Growth. Redbourn Parish note that extensive use of the Green Belt for development between Redbourn and Hemel Hempstead goes against the purposes of the Green Belt as described in the NPPF. Specifically, the Hemel Garden Communities project will see urban sprawl into the Green Belt and the narrowing of the gap between Redbourn and Hemel Hempstead.
- Berkhamsted Town Council is unconvinced that the growth proposed (nor the 1023 pa) should be adopted for the Plan Period given that ONS projections based on 2018 data indicates the annual need is around 350 dwellings pa. The growth at Berkhamsted equates to a substantial increase in the number of dwellings in Berkhamsted/Northchurch of around 24% and most of the sites are currently in the Green Belt and some distance from the town centre and station and at the top of steep valley sides.
- Flamstead Parish Council say that large scale developments all over the Borough will significantly reduce the quality of life for many people who have not chosen to live in an even more congested part of the country. Improvements to the infrastructure of the town centre such as Hemel Hempstead, use of brown field sites and development of run down areas are to be encouraged, however to increase the population of semi rural areas will have long term detrimental effects on the Borough as a whole.
- Bovingdon Parish Council recognises and supports the Vision for Dacorum's Places as it relates to Bovingdon but requires the Council to recognise that growth should be at a level that is wholly sustainable to the extent that any new development within the settlement will not place adverse burdens or overstrain existing services and infrastructure.
- Markyate Parish Council believe that the vision is not based on latest housing needs information and includes building on Green Belt land and adjacent to the Chilterns Area of Outstanding Natural Beauty. The vision needs to be more inclusive of the abutting rural areas in neighbouring counties, not just other regions of Hertfordshire.
- Great Gaddesden and Nettleden with Potten End Parish Councils strongly oppose the Emerging Strategy due to it being based on overstated and superseded housing demand figures, and an unnecessary material expansion into the Green Belt. Specifically, the development of 5,800 houses on the border of the AONB represents a negative transformational change in the nature of the area.
- Northchurch Parish Council states that there is no support for the Council's vision or strategic objectives. They outline that the housing target generated by both current and proposed standard housing methodologies ignores constraints and produces a figure well in excess of the Office of National Statistics projection of housing need based on the 2018 figures. They believe the village is ignored by the Local Plan and that the unique character and history of the Parish will be damaged by the proposals in the Plan and feel the vision fails to preserve the special character and community of Northchurch.
- Wigginton Parish Council, whilst agreeing with the principles behind the vision, have very serious concerns regarding the implementation of these. In particular are the proposals for Tring and the impact these will have on its distinctive identity and the damage these will have to the Chilterns AONB.

- The Dacorum Liberal Democrat Councillors do not support the vision stating that simply building more and more homes in Dacorum will not provide any noticeable depressive effect on house prices in the area, it will rather attract more people from London to buy here. This does nothing to reduce the numbers on the Dacorum housing list, and very little to address the specific housing needs of Dacorum. Also, much of the work done on the Local Plan was carried out before COVID-19 and the consideration of changes in lifestyle as a result of the pandemic and arising from it have not been included in arriving at this plan for how Dacorum will grow and change over the next 18 years. The Emerging Local Plan provides for too many houses overall, and insufficient social housing. The number of houses calculated by the Standard method is both out of step with the actual need for new homes in Dacorum, and sets a target so large that it risks large amounts of countryside, the amalgamation of settlements and fundamentally flies in the face of national climate change commitments.
- Hertfordshire Local Enterprise Partnership say the vision and objectives are entirely appropriate and they represent a dynamic approach which will signpost the way to the policy detail.
- Homes England state that in order for the Draft Plan to be found sound at Examination, the Council needs to increase its level of housing provision in line with the most recent Standard Method calculation to a minimum of 1,023dpa. Due to the historic undersupply of housing and worsening affordability, the Council must plan effectively to meet and exceed this requirement.
- Hertfordshire County Council (HCC) would welcome more detail, explanation and recognition that a move towards sustainable transport is the approach Dacorum supports to mitigate the impact of growth. The Plan should clearly set out the view and ambition of the LPA at an early stage and follow through with that in terms of broad and specific. HCC would welcome a review of the phrasing and approach when discussing transport, as the Draft Plan creates a general assumption that private vehicle trips are the only modes being supported. HCC state that the new Plan must seek to assist HCC in rebalancing the provision of the highway network, so it is efficient, accessible and attractive to make those short journeys by sustainable means. HCC's view is that to maintain the level of mobility required for the borough is a significant modal shift to sustainable transport is required.
- Hertfordshire County Council (HCC) continue to state that the traditional approach of predict and provide for transport will no longer work in supporting growth in the borough, we now must actively decide which transport modes best meet the needs of communities and allow sustainable trips to be real options, not relying on each resident of the borough to own a car to travel. There is a requirement for Dacorum to commit to act to address and deliver behavioural change with regard to transport movements.
- Sport England is supportive of the health and well-being element of the vision as this is consistent with the NPPF and Sport England's new strategy. In particular, the reference to encouraging and supporting an active lifestyle through the provision of open space, sport and recreation facilities is welcomed.
- Natural England advises that the vision and emerging development strategy should address impacts on and opportunities for the natural environment and set out the environmental ambition for the Plan area. The Plan should take a strategic approach to the protection and enhancement of the natural environment, including providing a net gain for biodiversity, considering opportunities to enhance and improve connectivity. Where relevant there should be linkages with the Biodiversity Action Plan, Local Nature Partnership, Area of Outstanding Natural Beauty Management Plans, Rights of Way Improvement Plans, Green Infrastructure Strategies and Nature Recovery Network.
- The Environment Agency are pleased that Dacorum acknowledges the challenges the borough faces due to climate change including flooding and identify that one of the most proactive approaches to this would be to steer all development away from flood zones. Overall the vision is supported but the need to be resilient to the effects of climate change needs to be fully embedded.
- The Chilterns Conservation Board are pleased with the references made to the natural beauty of the Chiltern Hills being enhanced and continued to be admired and cherished but is extremely disappointed that the same is not applied to the area's most sensitive habitat, the Chilterns Beechwoods SAC. The vision should surely anticipate that "the Chilterns Beechwoods SAC is a thriving habitat that is in a better condition than when it was designated, with nearby areas actively being restored to the same high environmental standard".

- For the most part the objectives appear to be consistent with achieving the Vision and are reasonable in themselves but highlight that meeting the housing requirement must refer to the requirement identified as representing sustainable development for the Borough and not to the (separate) centrally-determined assessment of local housing need from which the requirement is derived.
- The Canal & River Trust are pleased to note that the Grand Union Canal is recognised as a special feature playing an active part in the heritage of the borough and that the wider historic environment is valued and protected. We believe the canal can transform places and enriches peoples lives due to the role it plays.

General Bodies/Other Organisations

- Berkhamsted Citizens Association says that much of the Plan under consultation works directly against those aspirations, particularly for the two historic market towns of Berkhamsted and Tring and the area between Old Hemel, Piccotts End and Potten End.
- Berkhamsted Residents Action Group (BRAG) does not agree with the Vision for Berkhamsted, stating that the proposed growth is too much for the town. BRAG notes that the 2013 Core Strategy vision of “maintaining the strong valley and linear character of the settlement” has been dropped for the new Local Plan. BRAG believes the 2013 vision should be re-instated. BRAG finds it disturbing that the Council have shifted the position from planning within the constraints of the Borough, to one that makes no attempt to protect valuable assets of the Borough including large swathes of Green Belt. BRAG also believes that the Government is sending mixed messages to local authorities and residents. BRAG feels more should be done to argue that the growth target for Dacorum should be balanced against other constraints such as the Green Belt, AONB and the historic character and setting of towns and villages in Dacorum.
- The Chiltern Society objects to the strategy proposed in the Plan as it proposes an excessive number of new houses across the Borough and presents a significant threat to the Green Belt and the setting of the Chilterns AONB. The Council has ignored para 11 (6) which allows local authorities to restrict the scale of development due to other planning constraints including impact on the Green Belt and AONB. Furthermore, no mention is made of the possibility of the Chilterns AONB becoming a National Park - as per findings in the Glover Report.
- The Chiltern Countryside Group whilst welcoming the statements set out in this vision does not find these to be fulfilled by the proposals of the Local Plan. In particular, housing provision should be based upon need, rather than speculative demand.
- The Grove Fields Residents Association (GFRA) strongly dispute the scale of the target for housing in Dacorum, which there is no evidence for. The GFRA believe that there is enough non-Green Belt land to provide 5,950 houses. They agree with the Plan's approach to prioritise housing growth in Hemel Hempstead. The GFRA and its supporters strongly object to the proposal that Tring is required to “play a much greater role in delivering housing growth” within the Borough and point out that the level of growth proposed is a 55% increase and is disproportionate. The GFRA feel that the Council should look more at the potential impact that meeting the full housing figure will have on the Green Belt and other environmental and social objectives.
- Tring in Transition say the sentiments in the Plan are sound but it is disappointing that the Council appear unable or unwilling to use their legitimate power and available evidence to push back on the proposed dwelling numbers. More emphasis needs to be placed on the Council's Climate Emergency Declaration and zero carbon target of 2030. There is particular concern about the proposed large scale expansion to the East of Tring.
- CPRE Hertfordshire urges the Council to reconsider its strategy in the light of the responses to this consultation and the outcomes from the Government Planning White Paper consultation and legislative changes before deciding how to proceed, not only with this Local Plan, but also with Plans and projects being proposed for the wider area of South West Herts.
- Extinction Rebellion says that the Climate Change Emergency needs to be at the core of the Local Plan, particularly the aim to achieve net zero carbon emissions by 2030. The Plan must guarantee the protection of existing natural habitats and creation of new ones by rewilding.
- Tring Rugby Club say the strategy fails to take account the combined impacts of the pandemic and expanded permitted development rights.

- Tring Sports Forum believe that by working together with the various Local Authorities and other stakeholders on the Masterplan preparation for Tring, it believes that a better solution than that proposed here could be achieved. They believe that for many reasons the main sports hub area should be a combination of the two existing sports hubs, (i.e. The Pendley Sports Centre & the Tring Park Cricket Club/Tennis/Hockey Clubs area) linking the two with further playing fields in the north of the proposed Dunsley Farm site.
- A large number of responses were received from developers promoting their sites. The general feeling is that Dacorum should increase its housing provision to meet the revised standard methodology calculation of 1,023 homes per annum instead of the 922 figure consulted on. Beyond that almost all supported the overall vision and objectives of the Plan but then the support or object to the details of the Plan depending on whether their site is included or not. For those sites excluded from the Plan the general view is that the specific proposals will not deliver the vision.
- Landhold Capital considers that whilst overall the Vision and Strategic Objectives are generally adequate, the role that the three 'large villages' of Bovingdon, Kings Langley and Markyate could play in helping to meet the Borough's housing needs could be enhanced.
- L&Q Estates generally support the vision and the expansion of Tring to the East. They suggest that all settlements should be identified to 'grow' as the higher level of growth for Hemel Hempstead is proportionate to its size and status in the settlement hierarchy.
- Hertfordshire County Council (Property Team) welcome the acknowledgement that Tring is a sustainable settlement within the Borough, and supports the growth aspirations for Tring and the important contribution that Dunsley Farm site allocation will make towards this vision.
- CBRE believe that Kings Langley should be dealt with differently to Bovingdon and Markyate as neither of these have rail stations. They recognise the potential impact on the Chilterns SAC and recommend locations farthest from this site (such as Kings Langley) should be considered favourably for growth.
- Harrow Estates plc support the Council's strategy to ensure that each of the larger settlements, including Tring should play a greater role in delivering balanced growth to meet the development needs of Dacorum. Harrow strongly support the specific vision for Tring, in particular the aim to deliver a comprehensively planned new neighbourhood to the east of the town.
- Landhold Capital considers that the Council has failed to fully recognise the role the three 'large villages' of Bovingdon, Kings Langley and Markyate could play in helping to meet the Borough's housing needs. In order to achieve the proposed vision for the large villages, it will be necessary for significant market-led housing developments to be secured at these settlements in order to strengthen their role and secure those additional or improved local community facilities and other infrastructure as appropriate.
- D B Land and Planning believe the vision for Markyate should reflect the emphasis of market homes in addition to affordable in the village.
- Tesco Pension Fund believe that mixed use development (residential and commercial uses) should be supported on sustainable sites and intensification promoted having regard to appropriate local context.
- Hallam Land Management Ltd support the vision and objectives, including the focus for growth at Hemel Hempstead but point out that the spatial strategy only identifies 63% of the housing target to Hemel Hempstead despite it being the most sustainable settlement in the Borough. They raise questions over the proposed Green Belt release to the North and East of the town and raise significant concerns over the failure for all reasonable alternatives being considered including the ability of Hemel Hempstead to take a greater proportion of greenfield growth to optimise the delivery of development in the most sustainable location.
- Pigeon Hemel Hempstead Ltd support the overarching vision the significant role Hemel Garden Communities will have in transforming Hemel Hempstead and the commitment within the vision to deliver its identified housing requirement between 2020 and 2038.
- The Crown Estate support the vision since it clearly establishes the critical importance of Hemel Garden Community in delivering the transformation of the town through the provision of new housing, jobs and infrastructure plus the creation of new areas of open space.

- Whiteacre Ltd consider that the vision for Bovingdon should be strengthened and modified to include specific references to local community facilities, including schools and specialist elderly housing. Bovingdon is also prone to surface water flooding and therefore environmental, flood protection and mitigation objectives should be enhanced within the overarching vision for Bovingdon.
- Thakeham Homes state that it is critical that the Council's vision is clearly translated into the Local Plan policies to ensure its delivery and to meet the needs and aspirations of the local communities.
- W Lamb Ltd support the vision and agree that new housing should be provided in sustainable locations, such as Land at Shendish. The site can make on site provision for a primary school with pre-school nursery site to serve the new community, but also to serve an existing shortfall that has been identified in Kings Langley.
- Kitewood Strategic Land object to the Plan as drafted. They believe the Council should bring forward more land within the Garden Community before 2038 to satisfy this need. Kitewood is strongly supportive of the HGC vision.
- Croudace support the principles of the proposed vision including the allocation of Rossway Farm, West of Berkhamsted. Croudace support a proactive approach to delivering development in the Borough which has positive regard to balancing economic, environmental and social objectives as set out in the NPPF.

Wider Community

The main points raised by the wider community are as follows:

- The Council should look more at the potential impact that meeting the full housing figure will have on the Green Belt and other environmental and social objectives.
- The proposed number of houses to be built should be significantly lower than the target to reflect actual demonstrable need for housing and the high proportion of Green Belt and AONB land in Dacorum.
- The Plan proposes too much growth around Berkhamsted and Tring and this would have a significant impact on the character of these areas. In particular, it was felt that the growth of Tring was disproportionate when compared to the existing size of the town.
- The Council had not taken into consideration the flexibility provided in the NPPF to allow local authorities to reduce development due to other planning constraints including impact on the Green Belt and AONB. The consultation document made no mention of the possibility of the CAONB becoming a National Park.
- The amount of development proposed in the Green Belt was rejected, particularly by residents. It was felt that accommodating these levels will significantly damage the character of existing towns and villages and have an enormously negative and irreversible impact on our surrounding countryside.
- The Plan needs to place a greater emphasis on brownfield land instead of the Green Belt.
- The very large developments like those proposed will have an impact even if they are some distance from the actual AONB boundary. There will be severe effects on views out of the AONB and views of the AONB in respect of loss of tranquility from lighting, noise, traffic movements.
- The Plan is not explicit enough in terms of how Green Belt loss would be mitigated, and how the Plan would increase biodiversity and meet National and Hertfordshire's goals for climate change and carbon reduction.
- The Borough's infrastructure (eg roads, education, health care etc.) is already under considerable pressure from the existing population and increasing it by around 30% will put further excessive pressure on these.
- The COVID-19 Pandemic has changed the face of how we work, shop, play and travel and that this has not been fully taken into account. It was felt that the publication of the consultation was premature given the current health crisis.
- A higher proportion of the houses should be built on brownfield land, or established through conversions, in the existing urban areas of Hemel Hempstead, Tring, Berkhamsted and Kings Langley, and away from areas located in the Green Belt (which should only be used in exceptional circumstances) and the Chilterns AONB and its setting.

- The strategy to get to carbon zero is not ambitious enough and proposals in the Plan contradict that ambition.
- The level of growth proposed by the Plan is rejected by residents with many stating that the approach was flawed and outdated based on an inflated calculation of housing required that is well in excess of local needs.

3.2 The Sustainable Development Strategy

SP1 - Sustainable Development in Dacorum

There were 471 separate responses to this consultation point. The following themes/issues were raised:

Statutory Bodies

- Redbourn Parish Council object to the Plan on the basis that the extensive use of the Green Belt for development between Redbourn and Hemel Hempstead goes against the purposes of the Green Belt, will narrow the gap between Redbourn and Hemel Hempstead and will damage the local environment and ecology, adding to the problems of climate change.
- Bovingdon Parish Council would expect that the growth proposed for the settlement will be at a level that is wholly sustainable and will not be detrimental to the village in the future. The Parish Council acknowledges that Bovingdon should receive modest and appropriate levels of new development in order to support a range of development needs, infrastructure and community facilities within the village.
- Tring Town Council believe that the overarching policy statements of SP1 should apply as equally to Dacorum's plan-making, as to the operation of the development management service, especially due to the scale of housing development proposed.
- Berkhamsted Town Council do not support the policy given that it is based on the contentious growth numbers. The Town Council dispute that the substantial increase imposed on the Town will enhance the quality of life for residents current or future. Accordingly, they consider a stronger statement is required that ensures infrastructure provision is delivered ahead of the time when provision is regarded as overdue to meet the needs of the development.
- Flamstead Parish Council believe the Plan over estimates housing demand as these are based on the outdated Department for Communities and Local Government data, rather than the 2018 ONS projections.
- Nash Mills Parish Council support the need for additional affordable housing but support objections raised on how the housing requirement has been derived. They also suggest more work needs to be done to consider the likely impacts of the pandemic, particularly the future of unused office space.
- Hertfordshire Local Enterprise Partnership believe these sections provide a strong rationale behind the overall strategy.
- Homes England point out that following the consultation on changes to the standard methodology Government confirmed that councils should use an updated method which takes the original standard method. This means that the housing need figure for Dacorum will revert back to 1,023dpa. The increase from 922dpa to 1,023dpa results in a total requirement of 18,414 homes across the Plan or an increase of 1,818 homes above the 16,596 figure set out within the Draft. At present, the Draft Plan contains a supply of 16,899 homes over the Plan Period, only marginally above Dacorum's need when using the 922dpa figure. The Council will need to update the Plan and find additional sources of housing supply in order to accommodate the higher level of need. National guidance requires Dacorum to meet this need in full. There is a historic undersupply of housing in the area and the Council is currently unable to demonstrate a five-year supply of land for housing. The issue of worsening affordability shows an acute need for housing placing greater emphasis on the Council to exceed its housing requirement. As such, the Council should amend the Plan in order to meet in excess of 18,414 homes over the specified period.

General Bodies/Other Organisations

- Berkhamsted Citizens Association consider the housing numbers are based on flawed assumptions and believe the proposed release of Green Belt around Berkhamsted cannot be described as being "sustainably located close to passenger transport and other services, facilities and employment opportunities".
- Berkhamsted Residents Action Group state that whilst the principles of sustainable development are understood there is a fundamental dichotomy between the aggressive growth targets outlined in this Plan and the environmental role of the planning system in protecting and enhancing the natural, historic and built environment of the Borough. BRAG believe the growth targets are fundamentally flawed and the sites included in the Plan are fundamentally not "sustainable" sites.

- New Gospel Hall Trust object to Policy SP1 and the supporting text on the basis that it will introduce an element of confusion for decision-makers by attempting to replicate and duplicate the national presumption in favour of sustainable development. Furthermore, the supporting text at paragraph 4.2 appears to overlook the advice of Framework paragraph 9 which advises that the three overarching objectives for sustainable development are not criteria against which every decision can or should be judged.
- The Chiltern Society believe the strategy must include an objective to reduce land removed from the Green Belt to an absolute minimum and exceptional circumstances must be clearly demonstrated. The Society supports proposals to increase density and heights in urban areas to reduce impacts on the wider countryside. This could include significant developments of flats and starter homes, which require less land take, to reduce the need to expand Hemel Hempstead, Berkhamsted and Tring into the Green Belt. In the light of COVID-19 the strategy will need to consider whether there is scope for new uses of town centre buildings arising due to more people working from home and retail businesses closing.
- Dacorum Environmental Forum Waste Group identify that although biodiversity is frequently referred to not enough emphasis is placed on these policies being mandatory rather than aspirational.
- The Dacorum Liberal Democrat Councillors say the Plan contains very little about sustaining villages, does not address ensuring that our villages are self-sustaining communities, rather than car dependent dormitory settlements. The Plan does not address the Glover Review which proposes to make the AoNB into the Chilterns National Park. Some sites proposed will actively damage the AoNB. There has not been a full consideration of employment in the borough, particularly in light of recent changes, such as reduced office use, which may reduce commuting.
- CPRE Hertfordshire state that given 85% of Dacorum is rural, a rural strategy should be included which identifies and protects natural capital resources, including soils, and demonstrates how rural areas can contribute to climate change mitigation and the promotion of biodiversity across the whole area, and not just in conjunction with development.
- Tring in Transition state that the environmental component of sustainable development is not well defined in the Plan and are concerned that the Herts Sustainability Strategy and HCCSP priorities are not explicitly included.
- Extinction Rebellion state that there are no specific details of the measures proposed to meet the 2030 net zero target. By 2025 the borough needs to be more than halfway there, but without targets there is a high risk that we do not meet the 2030 net zero target.
- Tring Rugby Club say that nothing in this section can be remotely described as “fully evidenced and justified” as required by the NPPF to remove Green Belt designations. The growth proposed is neither sustainable nor respecting the environmental role of planning.
- Tring School state that the Ridgeway Learning Partnership would like to be involved in developing and implementing sustainable schools in the Tring area in the near future.
- Tring & District Local History & Museum Society state that in no sense can development on the scale proposed be considered sustainable. It will take a large acreage out of food production, degrade the land with pollution and road traffic and place undue strain on water resources.
- CBRE feel that the key principles make no reference to how the strategy responds to its ecological context. Also noting that survey data from the Chilterns Beechwoods Topic Paper (2020) states that the greatest recreation impact on the natural resources comes from Berkhamsted, the key principle for a step change at Berkhamsted is at odds with this. Kings Langley (being the settlement furthest away from the SSSI) should have a greater role in meeting needs. Finally, the Draft Plan should meet the requirements for 1,023pa as required by the Standard Methodology in ensuring the provision of a Plan that is positively prepared.
- Harrow Estates plc support the key principles of the sustainability strategy and agree that the most sustainable strategy to accommodate the growth required in Dacorum is to focus development in the larger settlements of Hemel Hempstead, Berkhamsted and Tring. Harrow state that while it is important to ensure that the most efficient use is made of land within the existing urban areas of those settlements a policy of urban intensification would be inappropriate if it were to detract from the existing character of those locations, particularly Berkhamsted and Tring.

- L&Q Estates support the policy as generally reflecting national policy but would like further clarification on when the presumption in favour of sustainable development would apply. This point was also made by Westmorland Ltd.
- The Crown Estate support the policy as this accords with the advice in the NPPF and NPPG.
- D B Land and Planning believe the key diagram is unclear and should be deleted.
- Aberdeen Standard Investments supports the policy and welcomes the proactive approach proposed by the Council.
- Tring Sports Forum support the policy approach and emphasise the role they play in delivering this.
- St William Homes LLP support the policy but note it is not entirely in accordance with the wording of the current NPPF and feel the presumption in favour of sustainable development should be stronger.
- Whiteacre Ltd believe all development should accord with the central presumption in favour of sustainable development and supports the general strategy contained in the Plan.
- Kitewood Strategic Land object to the Plan as drafted. They believe the housing numbers should be increased to meet the standard methodology (1,023 p.a. instead of 922) and that the Council should bring forward more land within the Garden Community before 2038 to satisfy this need. Kitewood is strongly supportive of the HGC vision. Looking at the growth allocations, proportionally more should be allocated to Hemel Hempstead and Kitewood maintain that their land can be brought forward and still be delivered in the Plan Period.
- Fairfax Strategic Land (Hemel) believe that further land is required to meet the standard methodology and their land is well placed to deliver that given it scores similarly to other Green Belt sites around Hemel Hempstead. They also believe that the need to address unmet needs from elsewhere and the deliverability issues on other sites mean their land should be considered favorably.

Wider Community

The main points raised by the wider community are as follows:

- The scale of the target for housing in Dacorum is a 25% increase in growth with no evidence to support this, particularly considering there is a 9% population growth forecast by the ONS.
- The growth proposed at Tring of a 55% increase in the size of the existing town is disproportionate. Many feel this would damage the intrinsic character of the town.
- There is enough non-Green Belt land identified within the Dacorum to provide 5,950 houses.
- Growth is being located too close to the AONB and the sustainability credentials of doing so is questioned.
- The Council should prioritise Hemel Hempstead for growth but the scale of growth elsewhere, particularly Tring and Berkhamsted, is not justified. Many feel the growth at Tring is disproportionate and the Plan fails to acknowledge the contribution that Bovingdon, Kings Langley and Markyate should provide towards the Local Plan Period.
- The potential air quality problems arising from growth and its link to mortality.
- It is unclear how the three roles of sustainable development (economic, social and environmental) will be weighted as it is currently felt that these are unequal.
- There is opportunity to place environmental initiatives at the heart of our economic and social activity.
- The sustainability credentials of a Plan as the high level of housing being proposed would involve the loss of green spaces and create a huge increase in the need for water and sewerage treatment. A large number of residents felt the Plan was unsustainable.
- The proposals would have a damaging impact on the character and quality of life in the market towns of Berkhamsted and Tring.
- Unused retail and offices could be repurposed for housing, particularly in Hemel Hempstead. A review of the empty space would highlight opportunities to develop sustainable mixed developments, with fewer cars easing pressures on available transport links and traffic.
- Sustainable development requires new infrastructure to support the new housing developments.
- There are major congestion issues in the towns of Berkhamsted and Tring.

- The Plan should be developed in an integrated way that puts climate change, biodiversity, well-being and social inclusion at its centre. Attention was drawn to the Council's climate emergency declaration but the Plan prioritises economic growth and greenfield land development over considerations for the climate emergency.
- There is acceptance that there is a need for housing but many felt the scale proposed was too much and were critical of the Government's approach to calculating need, favouring the latest ONS figures instead.
- A small number of residents did support new housing, suggesting that prices are far in excess of what is affordable to most people currently and that brownfield development can only go so far to meeting these needs. It was felt that increasing supply would help prices in the long term.

SP2 - Spatial Strategy for Growth

There were 1033 separate responses to this consultation point. The following themes/issues were raised:

Statutory Bodies

- Three Rivers District Council supports Policy SP2 in its aim to direct development towards the largest and most sustainable settlements of Hemel Hempstead, Berkhamsted and Tring and more modest growth in the smaller settlements of Bovingdon, Kings Langley and Markyate. It also supports the strategy of increasing densities in urban areas (subject to character and other site-specific factors) in order to protect greenfield sites, as far as possible, and to focus development in areas which generally have better access to services and transport.
- St Albans City and District Council considers that the Plan will need to be able to evidence that it has fully explored all reasonable options within the land beyond the Green Belt and the AONB in north west Dacorum given the extent of the Metropolitan Green Belt in the rest of South West Herts.
- Hertfordshire County Council (Growth Team) (HCC):
 - supports the approach in transport terms, regarding the avoidance of significant developments to the smaller villages and wider countryside. However, HCC are concerned in relation to the development sites proposed in south and west Berkhamsted considering them to be remote from existing bus services and query how adequate service improvements could come forward, but welcome further discussion on this matter;
 - point out that a number of the development sites also mention the need for pedestrian and cycle improvements, but not public transport improvements. They are seeking additional general wording stating the need for bus infrastructure and service improvements in order to ensure that it is clear that these will need to be delivered to make sites sustainable; and
 - welcomes that the majority of new growth and investment will be concentrated in sustainable locations, such as Hemel Hempstead, which will encourage the use of sustainable modes of transport. They would like to see more emphasis placed on sustainable transport enhancements and improvements to connectivity within and surrounding the town as this aligns with the policies in LTP4, and the text should be updated accordingly to reflect this.
- Berkhamsted Town Council object to excessive levels of growth, and state that the standard method does not constitute a housing target and that the Plan should fully take into account constraints, such as the Green Belt, rather than being driven by housing growth. They argue that the Plan should carry forward the existing approach to growth set out in the Core Strategy. They also query whether it is desirable to impose 20% plus growth on the locality that already has severe infrastructure limitations as well as being constrained by proximity to the AONB, Beechwoods SAC, etc. The Town Council welcome the approach set out in section 4 of policy SP2.
- Tring Town Council (TTC) objects to the overall strategy of directing so much growth to Tring and that other strategies have been insufficiently explored. They query the origin of the 16% of total growth figure directed at the town, and note that it is a considerable increase upon the equivalent figure of 4% within the Core Strategy. Furthermore, it is their view that other, less sensitive, locations in the Borough ought to be considered much more thoroughly as destinations for growth before allocating such major development in Tring. TTC argue that many other locations in the Borough are equally accessible (say Kings Langley, which has a rail station and is much closer to the M25), but although they may also be within the Green Belt, they are not close to the CAONB and other sensitive locations in relation to landscape impact.
- Northchurch Parish Council objects to the strategy on a number of grounds, particularly that the assumptions behind the level of growth are flawed and that it causes unacceptable harm to the Green Belt and to the River Bulbourne.
- Bovingdon Parish Council is supportive of the level of new development as a maximum for the village as a whole over the Plan period to 2038.

- Kings Langley Parish Council object to the Borough's current reliance on Green Belt development to achieve its targets, this approach runs counter to the Government's stated protection of the Green Belt, and that housing delivered in this way will do nothing to address the Borough's housing needs.
- Markyate Parish Council point out that any increase in the number of houses planned in the village is not sustainable as access to services and employment is limited. The Plan also fails to acknowledge the changing nature of Markyate, its overall sustainability, and the village's many constraints.
- Flamstead Parish Council is concerned that the Plan is considering the loss of green areas in and around the towns which are such valuable open spaces for the general population to enjoy. Eroding so many areas will have an undeniable influence on the character of the individual towns and villages. They are also worried that the Plan is considering areas which are clearly on flood plains, despite mitigating measures.
- Great Gaddesden and Nettleden with Potten End Parish Councils object to the spatial strategy for a number of reasons, particularly as the assumptions and approach are flawed, it runs contrary to national policy and the Plan does not fully explore the potential to make effective use of urban land, especially before considering the exceptional circumstances needed for releasing Green Belt land for housing purposes. They also object to the transport implications of growth at North Hemel (HH01 and HH02).
- Little Gaddesden Parish Council remain doubtful about the potential level of growth (e.g. Brexit impact, change of work patterns, immigration level changes, etc.) and suggest that c 700 homes pa / c. 11,000 over the Plan period would be sufficient to avoid to some extent the pressure for greenfield development.
- Redbourn Parish Council objects to housing growth at HH01 and HH02 as they believe it will lead to urban sprawl, narrow the gap between Redbourn and Hemel Hempstead, and result in harm to the local environment and ecology.
- Homes England (HE) point to the need for the Plan to take into account the higher Local Housing Need figure based on the latest standard methodology, historic local under-delivery, and worsening housing affordability. They argue that these factors place a greater emphasis on the Council to exceed its housing requirement and amend the Plan in order to meet in excess of 18,414 homes. In addition, HE also argue that there is no supporting evidence published to show the reasons for reducing capacity at Bv02, despite insufficient housing supply.
- Historic England urge the Council to review all their site specific policies to ensure that these general principles are applied to all relevant allocations.
- Buckinghamshire Council welcomes the Draft Plan's overall approach of meeting its development needs within its own boundary, albeit the Plan contains a small buffer of 300 homes and a high amount of windfall. This risks the need for the transfer of unmet need to other areas if suitable sites cannot be located in the Borough. Buckinghamshire Council area would be challenging given their high level of commitments and allocations around Aylesbury, and the significant level of housing need that will need to be accommodated in the forthcoming Buckinghamshire Local Plan.
- Highways England welcomes in principle that the strategy focuses growth in and around the most sustainable settlements in the Borough, chiefly the three towns. They acknowledge that the scale of growth for Hemel Hempstead will have an impact on the SRN, as will the proposals for Kings Langley due to the existing congestion towards the M25 J20. Highways England agree with the Council's need to review the housing requirement and recommend that the inputs to the COMET modelling are updated and the models re-run as appropriate, as/when the number/ location of houses (and jobs) is amended.
- Natural England (NE) want the final Local Plan to give greater weight to the protection of the Chilterns Beechwoods SAC. It notes that with a housing delivery target of 16,596 units by 2038, it is unlikely that a likely significant effect on the SAC can be ruled-out. They stress the potential adverse effects of planned development from the Borough and other adjoining authorities on the SAC in terms of both additional nitrogen emissions as a result of increased traffic generation and a growing recreational pressure. NE recommend site allocations should:
 - Retain existing habitats, woodland and hedgerows, and the creation of linkages of surrounding wildlife assets;
 - Provide an ecological management plan and subsequent ecological mitigation;

- Require the provision of a measurable net gain in biodiversity; and
- Make reference to the need for a project level Landscape and Visual Impacts Assessment (LVIA) to ensure development is in line with Policy DM27 where allocated sites are in close proximity to the AONB.
- The Environment Agency suggests the strategy should include minimising the requirement for development within the flood plain. The section should also mention avoiding directing significant development within the floodplain as this also causes multiple issues.
- Thames Water stress that it will be important for new development to be aligned with any necessary sewerage infrastructure upgrades required to support growth. They are keen to work closely with the Council to understand the location and phasing of development so that the impacts on sewerage infrastructure and the capacity of sewage treatment works can be understood, and any necessary upgrades can be planned for and delivered. While development in areas that drain to Maple Lodge STW are unlikely to result in any issues, development in the catchment of smaller STWs may require upgrades ahead of development being occupied. The latter may require housing allocations to be phased later in the Plan Period.
- The Chilterns Conservation Board (CCB) considers that meeting the identified development needs in full and locating a significant proportion of greenfield development required as a result in the setting of the AONB and in already narrow gaps between the main settlements and the AONB boundary represents a failure of the Council to fulfil its duty under section 85 of the Countryside and Rights of Way Act 2000 to have regard to protecting and enhancing the natural beauty of the AONB; as a result the Plan is not considered to be sound. They also comment as follows:
 - CCB have concerns as to whether the scale of growth is fully justified in terms of the exceptional circumstances needed to release land from the Green Belt and the protection, conservation and enhancement of the Chilterns AONB and its setting, the Chilterns Beechwoods SAC and the health of the area's chalk streams.
 - They commend and support encouragement for the redevelopment of brownfield sites and other forms of redevelopment within the Borough's existing built-up areas, including an emphasis on intensification.
 - CCB strongly objects to the direct translation of the "standard method" figure of 922 homes per annum into the Local Plan housing requirement for Dacorum.
 - The Plan has not justified why the main focus for development should be in the setting of the AONB, as preferable alternatives are available, and greater consideration is required in the spatial strategy to the setting of the AONB.
- Chilterns Conference Board also comment that the key diagram is very helpful, and they welcome the fact that it shows the Plan's key proposals in the context of the AONB beyond the borough boundaries. However, The Chilterns Beechwoods SAC areas should be shown on the key diagram, alongside the SAC's zone of influence, and the Borough's chalk streams.

General Bodies/Other Organisations

- The Rothschild House Group objects to the Plan. They are concerned about housing growth in Berkhamsted and Tring and the lack of associated provision for primary care. The Group stress that all three of their practices are very busy with zero ground space for surgery expansion. They urge reconsideration on the lack of provision for primary care as part of this Plan and welcome discussion on this point.
- The Berkhamsted Residents Action Group object to the strategy because:
 - Proposed sites in Berkhamsted are not well located in terms passenger transport and other services, facilities and employment opportunities.
 - There are no proposals for any growth of employment opportunities in Berkhamsted, thus promoting increased high-carbon travel for work.
 - Paragraph 5.5 offers some protection for the 'historic character' of the town but offers no protection for the town's setting.

- The housing figure in the Plan is not a strict target, cannot be used to take land out of Green Belt, and does not represent “exceptional circumstance” that are fully evidenced and justified.
- The Plan does not offer the full national protection of the Green Belt and the CAONB, and the Council has mis-understood its responsibilities.
- Windfall supply is grossly underestimated, especially following changes since the COVID-19 pandemic.
- Historically infrastructure investment in Berkhamsted has not matched housing growth.
- The town has exceeded current housing targets relative to Hemel Hempstead.
- Berkhamsted has reached its limits of capacity given its current size and topography and the strategy will not enhance the quality of life for current or future residents.
- The Dacorum Environmental Forum Waste Group consider that the documents and algorithms used to calculate Local Housing Need are out of date, and likely to be revised, so the public are asked to comment on proposals that are no longer justified.
- The Tring & District Local History & Museum Society are of the view that the proposed population growth of the town will detract from its character and will not enhance the town centre in any shape or form. Neither has account has been taken of pressure from growth of Tring and in Aylesbury/Buckinghamshire on local hospitals.
- Tring in Transition argue that the level of growth in Tring is not sustainable, and is by far the largest growth in Dacorum. The size of a village or town is not necessarily the only factor to be considered in determining how sensitive it is to substantial change. In addition, the Plan presents no evidence that development will enhance the town centre or strengthen its function as a key market town in the Borough. If other locations have poorer access and public transport, and/or a general lack of employment opportunities, supporting services or facilities, then arguably these are exactly the places that should see development and improvements.
- Grove Fields Resident Association (GFRA) object to the strategy as follows:
 - The Plan's target was prepared under the use of guidance out for consultation rather than established, with a notional intention to decrease or increase the housing supply number on the outcome of further consultation.
 - The target does not present a requirement in plan making, but instead provides a starting point for the determining the level of 'need' in an area.
 - The Plan has not properly considered the level of 'need' alongside the constraints of the Green Belt and it does not bring forward exceptional circumstances so as to allocate Green Belt for such housing.
 - No evidence has been provided by the Council to justify a different approach to the intensification of sites within Tring in comparison to Hemel Hempstead.
 - No assessments have been undertaken to assess the opportunities to intensify development within the existing settlement of Tring through redevelopment of brownfield sites or by way of consideration of increasing density of available sites.
 - There has been no assessment of the infrastructure impact the proposed allocation of land to the East of Tring would have on the area. It has not therefore been proven that the development could occur without substantial impact occurring to an existing infrastructure already stressed.
 - Policy SP2 seeks to protect existing office and retail space but fails to provide an up to date review of the suitability of the planned retention of such space and uses, given current market conditions and proposed permitted development rights providing substantial opportunity to convert office and retail space to residential units.
 - The Sustainable Transport Strategy for Tring has not been underpinned by a robust on the ground assessment and, therefore, an independent assessment of the road infrastructure requirements for Tring is required to avoid the town becoming gridlocked. GFRA are doubtful as to whether funds will be fully committed to transport initiatives.
- The Kings Langley Residents Association (KL&DRA) comment as follows:

- KL&DRA welcomes the work that the Borough Council has done so far with neighbouring authorities, and the initiative to prepare a South West Hertfordshire Joint Strategic Plan. As this will not be adopted for at least two years, KL&DRA considers that the timetable for the submission of the Dacorum Local Plan is premature, it needs to be revised and it is essential that the preparation of the two documents is run in parallel.
- They are concerned that there has been insufficient consideration of the role and function of Kings Langley which needs to be addressed.
- The Strategy does neither appreciate nor acknowledge fully the cross-boundary potential for development and a request should be made to Three Rivers District and St Albans Councils through the Duty to Cooperate, for any residential development to contribute towards the overall housing and employment needs of Dacorum Borough Council.
- While the strategy includes proposing a site (KL03) for employment uses at Sunderland's Yard, Church Lane, there is no specific reference to potential sites for employment and housing which are in Three Rivers but adjacent to the village.
- The Plan should be more cognisant of development to the east of Kings Langley, particularly in and around the Kings Langley Employment Area in Three Rivers District Council area. Conversion of many of these sites for housing would increase pressures on infrastructure and services, much of which would be felt in the Kings Langley area.
- The ONS has published successive forecasts, 2016-based and 2018-based, which are 'much lower than the previous forecasts produced by MCHLG, which have led to a reduction in housing needs figures.
- The main reason for falling household numbers is a lowering of migration rates into the country, plus an excess of deaths over births, and an ageing population profile and KL&DRA anticipates that these changes will continue into the future, heightened by the effects of Brexit and the fall-out from the COVID-19 pandemic. Consequently, they recommend a fundamental review of the Plan.
- KL&DRA welcomes the Council's intention of keeping the housing need figure under review.
- The Safer Gravel Path Action Group are of the view that the Plan uses outdated (2014) housing projections and should be based on the more up to date ONS data from 2018, that half of this number (or fewer) homes are needed, and that the Council must challenge the proposed housing numbers rather than just accept them. Furthermore, the Council has incorrectly taken the housing numbers from Government's Standard Methodology as a strict housing target which leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt.
- The Chandlers Cross Residents Association (CCRA) are of the view that the Plan is based on a flawed methodology contrary to the NPPF; it would lead to the loss of Green Belt, and be against the best interests both of Dacorum residents and those living in surrounding areas, by putting even greater strain on an already over- stretched infrastructure. They argue that the Council should challenge the arbitrary, unfair and undeliverable Government housing target.
- The Dacorum Liberal Democrat Councillors point out that SP2 identifies that there should be no net loss of office floorspace from 2025 onwards. Considering the likely move away from office space by businesses looking to reduce costs after the pandemic, and maximise their use of new technology for home and distance working, this does not appear to be a logical starting point.
- The Chiltern Society consider that the proposed housing target of 16,596 (922 per annum) is excessively high and, in particular, the increases in housing at Tring and Berkhamsted would have significant impacts on the character of those towns, as well as destroying significant areas of Green Belt and open space in and around the towns. The Council must seek to reduce these numbers bearing in mind that the majority of the area is designated as Green Belt or AONB and to be consistent with the Government's 'levelling up' agenda, reducing housing in the south east and increasing housing in the north. They urge reviewing additional retail floorspace growth as some of the sites could potentially be considered for housing in the urban areas.
- Berkhamsted and Tring Labour Party believe that the Plan must ensure adequate social housing, which is net zero in operation, allow for an increase in electrically powered transport, and roads must be designed to encourage walking and cycling.

- CPRE Hertfordshire objects to the strategy as follows:
 - Up to date evidence is not shown for the massive proposed growth of Hemel Hempstead, Berkhamsted and Tring, or to promote growth of villages set in the Green Belt, or that there is 'a requirement for development on Green Belt'.
 - Protected 'sites' are referred to, but these should include protected 'designations', not just sites.
 - There is insufficient evidence to justify 'significant uplift in growth' (paragraph 5.3), and for the statement that 'we know' growth cannot all be accommodated in the urban areas, when the amount of development has yet to be determined. They strongly oppose proposed extensions to Hemel Hempstead, Berkhamsted and Tring, and the farther north-eastward extension of Hemel Hempstead.
 - Any cross-boundary projects such as the Hemel Garden Communities should not be promoted ad hoc across local authority boundaries in separate development plans, but through an additional joint plan if both authorities can justify its promotion.
 - The claim that Berkhamsted and Tring cannot absorb any higher density development, resulting in expansion into the Green Belt (paragraph 5.5) is contrary to national planning policy, and needs to be reconsidered.
 - Windfall housing capacity is significantly underestimated.
 - Criterion 5 to Policy SP2 promotes even more development than proposed in the Draft Plan, through Neighbourhood Plans, and fails to dissuade development contrary to the Local Plan and national policy.
 - Specific delivery strategies cannot be supported due to the unevidenced scale and inappropriate locations of proposed development throughout the Strategy.
- The Dacorum Green Party consider that the new homes must be affordable. Building sustainable housing does not mean it becomes unaffordable. They welcome the commitment to genuinely affordable housing to be included in developments but believe 'affordable' needs to be properly defined in the Plan and must contain an adequate proportion of social housing. They call for the 40% minimum affordable homes objective to be enforced across the Borough.
- Chiltern Countryside Group are of the view that the Strategy is not fit for purpose and fully endorse the response of the Chiltern Society.
- Water End & Upper Gade Valley Conservation Society believe that the Plan plays lip service to sustainability, object to the proposed link road from Junction 8 of the M1 to the B440 Leighton Buzzard Road and point out that the Plan mistakenly refers to the B440 as the A4146 indicating it is a main arterial road.
- Berkhamsted Citizens Association (BCA) comment as follows:
 - BCA object to the level of growth as it results in substantial incursions into the Green Belt, and adverse impact on parts of the AONB.
 - The Strategy does not take into account the impact of COVID-19, which will mean that large numbers of shops and office premises will be asking for change of use to residential.
 - BCA consider that future development in Berkhamsted should be consistent with existing policies in the Core Strategy.
 - The Strategy conflicts with national advice and the Council has not taken into account guidance on the protection of the Green Belt and other constraints.
 - The Strategy fails to protect the town's historic character and setting.
 - The infrastructure of Berkhamsted is not fit for purpose in relation to current needs let alone any future housing development of the scale proposed by the Plan.
 - The Plan should take into account high local completion rates when assessing development numbers and site options going forward.
 - BCA question the capacity for Berkhamsted and Tring to absorb the growth sustainably. They consider that the phasing of HH02 should be brought forward to 2021 – 2038 in order to bring forward some 4,000 homes which will be better located for employment opportunities.

- Tring Rugby Club state that the Plan has incorrectly taken the housing numbers from Governments Standard Methodology as a strict housing target and leads to a growth strategy at unsustainable locations at the cost of swathes of Green Belt. The Club points out that the increase in housing and population proposed would actually be detrimental to the rugby club as the clubhouse, pitches and parking are too limited to enable expansion.
- The Crown Estate (TCE) supports Policy SP2 and delivery of Hemel Garden Community (HGC) as significant landowner of the proposals for the area.
- CBRE state that the Plan makes no reference to how the strategy responds to its ecological and environmental context. They acknowledge that a greater role could be played by Berkhamsted and Tring, but this has to be balanced against the recreational pressure that additional development in this location would place on the SSSI. Therefore, the strategy should reflect a greater role for Kings Langley (in being the settlement furthest away from the SSSI) as a location that can sustainably accommodate more housing and complement the growth arising from Hemel Hempstead. As previously noted in response to other questions, the Draft Plan should meet the requirements for 1,023pa as required by the Standard Methodology in ensuring the provision of a Plan that is positively prepared.
- The Berkhamsted Schools Group support growth in Berkhamsted which will lead to investment in infrastructure in the town particularly from the implementation of their allocations at Haslam Field, site Bk03, for housing and the provision of the enhanced sports facilities at Haresfoot, site Cy04.
- Millbank Land Ltd are seeking to justify an allocation of land at Bulbourne Park for new development. They comment as follows:
 - The housing need figure included in the Draft Local Plan equates to 922 dwellings per annum (dpa), rather than 1,023dpa as required by the standard method for calculating housing need set out by the Government which it should be seeking to meet i.e. at least 18,414 homes over the Plan Period (an additional 1,818 dwellings). As a consequence, Policy SP2 should be amended to meet this higher housing need figure and it will also need to identify further sites for housing allocations to meet this increased need.
 - The Plan should assist in meeting the unmet needs of adjoining authorities, including that of London.
 - Any housing target should be recognised as a minimum housing requirement, and the LPA should seek to identify land for more housing beyond this requirement, particularly when it is likely that there will be unmet need from neighbouring authorities.
 - The current buffer to the housing supply is marginal and a minimum a 10% buffer should be applied to the housing requirement, although any increase on this would ensure greater flexibility to meet housing needs.
 - Sufficient housing sites should be identified to ensure a five year housing supply can be met over the Plan Period.
 - Too much housing is focussed on large-scale developments in Hemel Hempstead and Tring which have long lead in times, are dependent on significant infrastructure, and can be subject to delay. As a consequence there should be a greater focus on small sized sites that can contribute to providing housing need including affordable housing, addressing issues with the housing trajectory, provide additional flexibility and bolster the supply in the early part of the Plan Period.
- D B Land and Planning (DBLP) broadly supports the Spatial Strategy, but consider the Plan should be bolder about the requirement to release Green Belt land. DBLP support the role of Large Villages and equally support the recognition that Markyate is a Large Village that provides a reasonable level of services and facilities. This would make it a suitable location for additional housing growth. However, they are concerned that the Plan's housing target set at a minimum of 16,596 homes over an 18-year Plan Period is not meeting the requirements of the revised Standard Method and whether the Plan is sound as a consequence.
- Vistry Homes raise a number of points:

- The Council have made an error in setting the housing requirement which has assumed a base housing requirement of 923 homes per year, instead of the correct figure of 1,023 homes per year (catering for a minimum of 16,595 homes instead of the required minimum of 18,414 homes up the year 2038). This equates to a shortfall of some 1,819 homes and will have to be rectified prior to publication of the next version of the Plan.
- New affordability ratios are due to be published in March 2021 which will need to be taken into account in the next iteration of the Local Plan which may have an impact of increasing the minimum housing need further for the Borough.
- Vistry Homes acknowledge that the Plan is seeking to meet the housing need within its administrative boundary, which is laudable. However, the Council must give consideration towards the need to meet unmet housing needs elsewhere, including from London, which could drive the housing requirement for the Borough up further.
- In addition to this shortfall of some 1,819 homes, the development strategy also builds in insufficient flexibility and contingency on the housing land supply side for the Plan to be considered robust. The current contingency is just 2% buffer in housing land supply (303 homes) which is viewed as wholly insufficient and should build in at least a 10% or 20% buffer. This represents a significant shortfall which can only be rectified by the additional sites being identified across the Borough.
- Vistry Homes stress the need to ensure that supply is not backloaded and that on adoption, the Council will be able to demonstrate a deliverable five-year supply of housing land is in place. This means that any additional sites need to be capable of delivery early in the Plan Period, favouring small to medium sized sites as opposed to large, strategic sites with long lead in times and significant infrastructure requirements.
- Aberdeen Standard Investments:
 - Support the Strategy's objective to provide a minimum of 16,596 homes throughout the Plan Period, the primary focus of strategic growth and investment in Hemel Hempstead, that the town is the most appropriate place across the Borough for intensification through increased heights and densities and the objective to ensure that development coming forward in the existing urban area should ensure that previously developed land is optimised.
 - Consider the achievement of 'no net loss of office floorspace from 2025 onwards' to be an unreasonable prescriptive target given the current pandemic and its lasting impacts. They argue for flexibility or an ability to allow controlled change as part of the planning balance and suggest the policy wording is amended to read 'an appropriate level of office floorspace in accordance with the latest demand figures'.
- Hertfordshire County Council (Property Team) supports concentrating the bulk of growth to deliver both new housing and employment within the three main towns and the greater role that Tring will play in delivering the necessary growth, but also recognising it has a number of constraints, most notably local character, landscape and ecological features, and the need to deliver key infrastructure to support it.
- Redington Capital supports the identification of Hemel Hempstead as the most sustainable settlement in the area, and the best placed to support an increased population. In addition, they query the origin of the criterion which sets out that the Plan will make provision for 'no net loss of office floorspace from 2025'.
- Rathbawn Properties Ltd respond as follows:
 - Agree that the Borough is highly constrained and that it is not possible for the Council to meet its identified need without some development in the Green Belt.
 - The lack of urban capacity and the high level of housing need means that the Council must look at Green Belt and other designated areas including Areas of Outstanding Natural Beauty (AONB) to deliver this housing.
 - Not all the Green Belt sites are appropriate for development, or will come forward in the Plan Period.
 - The Green Belt capacity figure has not been subject to a review of the contribution of each parcel towards the purposes of the Green Belt, as outlined in paragraph 134 of the NPPF.

- At this stage, it is not expressly clear how the promotion of sustainable patterns of development has been taken into consideration when determining whether many of these potential dwellings would be located in smaller settlements and whether this level of growth be in proportion to the size of the settlement.
- The Council should consider sites which may not have been actively promoted during the Call for Sites process.
- The site selection process does not take account of site specific contexts and does not adequately justify the discounting of all sites within the AONB for further consideration.
- In the Site Assessment Study, the AONB was immediately discounted at the outset, without considering how some sites located in the AONB could contribute less to the purposes of the Green Belt, as well as to the AONB and therefore could be acceptable sites for housing, subject to appropriate mitigation.
- Exceptional circumstances do exist for the release of sites from the Green Belt, but the Council should also consider suitable sites that may be located in the Chilterns AONB.
- The Trustees of Gaddesden Estate (Gaddesden Trust) comment as follows:
 - The proposed vision as set out above is broadly supported.
 - The Plan places a significant reliance on large allocations on the outskirts of the main settlements such as Hemel Hempstead with “support” being provided for town and villages to deliver sufficient growth to provide much needed investment.
 - It is unclear why the assessment of housing needs has not been updated to reflect the latest published housing need for Dacorum as published in the 2018 ONS.
 - It is important that the Council accounts for the change from office to homeworking as a result of the COVID-19 pandemic which is likely to result in a considerably reduced demand for office space within the Borough, meaning that additional brownfield sites are likely to become available for residential development within the key service centres within the Borough.
 - Growth is over-provided in Hemel Hempstead (further exacerbated by the proposed urban extension to the east of Hemel Hempstead, which is within St Albans City and District) and under-provided other key towns and villages and this is unlikely to provide choice and competition for land.
 - Insufficient consideration had been given to the allocation of small to medium sized sites, in order to meet the Council's housing requirements in the short to medium term which have the ability to deliver housing at a quicker rate due to the smaller infrastructure work/cost.
 - The Strategy is over-reliant on a very limited number of strategic sites, such as HH01 and HH02, which have extensive infrastructure costs associated with sites of this size, and there is a danger that the Plan is not able to meet their housing requirements, particularly within the early years of the Plan.
 - It is essential for the housing growth to be more balanced, with a reduced reliance on large strategic sites and a more dispersed strategy for growth, which seeks to focus housing in a number of smaller and medium sized sites that are capable of being delivered in the short to medium term. (GaddesdenTrust)
- Bloor Homes South Midlands support the level of development at Tring and consider that a significant boost to the town's population will assist in reviving the vitality and viability of the town and assist in bringing forward new infrastructure such as retail, schools and open spaces. They consider that land in their ownership at Waterside Way is a site that can meet the additional need for further dwellings to be allocated at Tring.
- Pennard Bare Trust make a number of points:
 - A more proportional growth strategy should be established by allocating a moderate level of housing development in smaller villages, commensurate to their: size (population and number of dwellings); services; environmental constraints; and degree to which development would preserve the local character and function of the village.
 - The settlement hierarchy should be re-evaluated to identify where growth is needed in small villages for these to remain sustainable.

- Flexibility awarded by smaller housing developments may need to be available throughout the Plan period to ensure a steady delivery of housing.
- Growth in the villages, particularly those washed over by the Green Belt, can help to strengthen the emerging Plan's ambition for further resilience in response to COVID-19. The Trust recommends directing some growth to Flamstead which is seen as benefiting from a direct access onto the M1, connecting to Hemel Hempstead and Luton, and public transport access to the nearby village of Markyate for further services.
- L&Q Estates recommends that the minimum requirement for the Plan Period should be 18,414 dwellings (based upon the 2014 SNHP (as revised)) and this should be stated in the draft policy. They also generally support the apportionment of the housing requirement between the identified settlements and that this aligns with the Vision for each of the three main settlements (as is carried through to the Settlement Hierarchy and Delivery Strategy for each settlement).
- The Gardener Family Trust acknowledge that the release of new housing sites on the edge of Hemel Hempstead will require land to be taken out of the Green Belt. The Trust are concerned that the large sites currently proposed for development, to the north of Hemel Hempstead, risk placing too many eggs in one basket and, owing to their scale, will take many years to come forward through the planning system. At policy SP2 paragraph 3 (a) they acknowledge and support the level of growth proposed for Hemel Hempstead but urge the allocation of more small to medium sites, which would provide diversity of choice and allow the quicker delivery of housing.
- Taylor Wimpey consider that In light of Bovingdon's sustainability credentials and the identified shortfall against housing requirements as proposed by the emerging Local Plan, the indicative target of 240 dwellings in Policy SP2 (Spatial Strategy for Growth) to be directed to Bovingdon is therefore considered to be low. This means that the emerging Local Plan has not planned positively or fully exploited the opportunities to achieve sustainable development at Bovingdon. The new Local Plan should recognise the opportunities available to deliver additional development at Bovingdon in a sustainable way to help meet housing needs. Their land ownership at Homefield, Bovingdon is felt to represent an appropriate and deliverable site for allocation in the emerging Local Plan.
- Hallam Land Management Ltd (HLM) make the following points:
 - HLM agree that the spatial strategy should focus on the main town of Hemel Hempstead to accommodate the major part of its growth requirements, but consider this should be a minimum.
 - The growth strategy for Hemel Hempstead is over-reliant upon a significant proportion of the growth requirements being delivered through the recycling of previously developed and underutilised land within the town's existing built-up area. HLM consider that at least 1,083 plots have been overestimated to be deliverable from this land supply source with many sites still in active use.
 - They do not consider the Urban Capacity Study is robust nor that it represents a reliable source of housing land to the stated levels. HLM point to deliverability issues with a number of Plan allocations in Hemel Hempstead and as a result some sites should form part of the windfall allowance while other sites need clearer evidence to support allocation in principle and capacity assumptions. This may affect the spatial strategy and demonstrating a 5-year housing land supply on adoption of the Local Plan.
 - The evidence base to support the levels of urban capacity/windfalls needs clarity and further explanation. HLM question whether historic levels of windfall supply can be sustained going forward.
 - HLM point out that contingency sites may need to be identified at Hemel Hempstead, including further greenfield/Green Belt release in the town.
 - HLM query whether the first phase of Hemel Garden Communities (HGC) is properly justified on its own and can be realistically delivered in advance of a comprehensive allocation for the whole garden community area to be identified through the JSP/other Local Plans. They are of the view that there is currently no mechanism in place to ensure the delivery of the wider HGC to secure the Councils aspirations for transformational growth. HLM would expect HGC to be planned and committed through the emerging JSP.

- HLM are not confident that HGC can be fully delivered to timetable which runs the risk of the Plan not having a 5 year housing land supply for an extended period of time. They are concerned that the Plan appears to be apportioning an amount of development for the period beyond 2038 for 4,000-4,500 new homes under HH02 without any detailed evidence to support this approach. There is no certainty over the lead in time for phase one (HH01) and what it needs to commit to in terms of strategic infrastructure and what is viable in the period to 2038.
- HLM consider that the infrastructure and transport improvements critical to supporting the spatial strategy should have been published as part of this consultation. Linked to the lack of cross boundary coordination of these matters the Draft Plan does not provide sufficient certainty that necessary infrastructure to support the provision for housing and jobs will be delivered.
- HLM is also concerned that the scale of growth proposed at the two market towns of Berkhamsted and Tring are disproportionate, both in terms of the scale of development proposed and the amount of land that is proposed to be released from the Green Belt to meet this part of the strategy.
- HLM note that some of the proposed allocations do not align with the policy objective of ‘attaching great weight to conserving the landscape and scenic beauty of the AONB’ required under NPPF 172. The scale of land proposed to be released from the Green Belt to deliver this amount of housing at Berkhamsted and Tring is excessive and not justified.
- St William Homes LLP (SWH) support the overall spatial strategy, particularly significantly boosting the housing land supply and maximising development on previously developed land. SWH welcome the recognition that the requirement must be a minimum and that exceeding this will have benefits in terms of affordability and sustainability. The minimum yields for individual site allocations should be able to be exceeded by design-led development solutions. The Plan needs to fully recognise the lead in timescales for strategic Green Belt releases and fully test their viability given the infrastructure needed to support them. Therefore, this justifies maximising delivery on previously developed land within the urban area as such sites – including the National Grid site which they have interest in – are available in the short term and do not have significant infrastructure requirements.
- W Lamb Ltd:
 - Object to Policy SP2 on the basis that it does not make provision for the full 18,414 dwellings over the 18 year period (1,023 dpa) based on the standard method as set out in the NPPF and PPG. In the interests of the soundness of the Plan, it is recommended that the housing numbers are amended to include for 500 dwellings on Land at Shendish, Apsley.
 - The Policy wording at 4 should be amended, on the basis that the current Plan does not make adequate housing provision and cannot therefore resist other development.
 - The Council provides no real justification, as to why it chose a lower housing figure than the current standard which clearly contradicts the advice set out in the NPPF and PPG. The current standard method will now need to be reflected in the emerging Plan and results in a shortfall of 1,818 dwellings over the Plan period and will also require further Regulation 18 consultation.
 - The Council have a track record of under delivery, as shown by the latest Housing Delivery Test results which show that over the previous 3 years, they only delivered 89% of their target, with a declining rate of new homes being completed each year. Therefore, to arrest this decline, the Plan should be using the 1,023dpa target set by the Government’s Standard Method. It needs to take an ambitious and proactive approach to meeting housing needs in the area and to also provide a greater number of sites.
 - The Council should give consideration as to whether a higher level than the Standard Method approach should be planned for taking into account meeting the unmet housing need of adjoining authorities and that of London.
 - Recommends that the Council consider whether increasing the proposed housing requirement would more fully meet the identified affordable housing need.

- EH Smith (Holdings) Ltd are suggesting amendments to Policy SP2 (Criterion f) to include the expansion of the General Employment Areas at Upper Bourne End Lane / Stoney Lane (Bourne End Mills) and the former Bovingdon Brickworks (resp. Growth Areas Cy01 and Cy02).
- Fairfax Strategic Land (Hemel) Ltd believe that the Plan fails the test of soundness as it is not positively prepared, justified nor effective and is inconsistent with national policy. They point out that the scale of growth now required is for at least 1,023 dwellings each year resulting in a need to find additional allocations for at least 1,818 dwellings. They object both in terms of the number of homes being planned for and in relation to the Plan period timetable not being realistic (necessitating an extended plan period until at least 2039). The Council should consider both the scope for increasing the minimum housing requirement and meeting unmet needs within the context of the duty to cooperate. They point out that there is no information indicating how the level of annual completions within the trajectory is derived, that it is too optimistic and not achievable, and that it fails to provide for sufficient homes to maintain a rolling 5 year housing land supply. Fairfax also argue that to ensure sufficient land is available to demonstrate a 5 year supply, further deliverable land should be identified including land in their control to the west of Leighton Buzzard Road, north of Hemel Hempstead for 400 homes.

Wider Community

Many local residents repeated and/or supported the views of the community organisations above. The main issues raised by the wider community are as follows:

- Growth will lead to sprawl / the merging of settlements / a significant loss of the Green Belt and countryside used for recreation.
- The Strategy makes no mention of Northchurch, it is a separate village from Berkhamsted, and should be treated in the same way as Potten End, Aldbury or Wigginton.
- The Plan does not give proper consideration to cross boundary issues and development sites and how they affect individual settlements (such as Kings Langley), and it should not be meeting the needs of other areas (including London).
- Heights of buildings should be carefully controlled and adequate gardens should be provided in all new development.
- Bovingdon Airfield should be identified for development.
- Future office and retail space projections need to be reviewed given new working and shopping patterns.
- Too much growth is focussed on the South East, the Council should challenge a national top-down approach to housing, and other spatial options should be properly explored.

SP3 - The Settlement Hierarchy

There were 334 separate responses to this consultation point. The following themes/issues were raised:

Statutory Bodies

- Buckinghamshire Council and Three Rivers District Council are broadly supportive of the settlement hierarchy.
- The Herts LEP generally supports Hemel Hempstead as being the most sustainable location in the Borough for housing and employment and that it should continue to be the focus for growth.
- Tring Town Council objects to the overall strategy of directing so much growth to Tring and believes other strategies have been insufficiently explored. Furthermore, it is their view that other, less sensitive, locations in the Borough ought to be considered much more thoroughly as destinations for growth before allocating such major development towards Tring. Many other locations in the Borough are equally accessible (say Kings Langley, which has a rail station and is much closer to the M25), although they may also be within the Green Belt, they are not close to the CAONB and so are not such sensitive locations in relation to landscape impact.
- Bovington Parish Council expects that the village will take a modest level of additional growth over the Plan period and no more than that which is currently anticipated, other than through 'windfall' development within the existing settlement boundary (with any additional growth, should it arise, being directed towards the main Strategic Settlement and the Market Towns).
- Wigginton Parish Council fully supports the principles behind the Dacorum Settlement Hierarchy but objects to the failure to follow this through by guiding development accordingly (i.e. a disproportionate amount of growth is directed towards Berkhamsted and Tring), and the policy has failed in the past to concentrate development within village envelopes.
- The Chilterns Conference Board considers that the decision to meet the identified development needs in full and locate a significant proportion of the necessary greenfield development required as a result in the setting of the AONB and in already narrow gaps between the main settlements and the AONB boundary, represents a failure of the Council to fulfil its duty under section 85 of the Countryside and Rights of Way Act 2000 to have regard to protecting and enhancing the natural beauty of the AONB; as a result the Plan is not sound. They also comment on the policy as follows:
 - there was overlap and confusion between the sections covering Policies SP2 and SP3;
 - the policy does not properly consider how constraints have shaped the settlement hierarchy; and
 - it seeks to distribute growth across the Borough before the Plan has justified the need for and appropriate levels of growth.

General Bodies/Other Organisations

- CBRE consider that Bovington and Kings Langley could support much higher levels of growth when compared to Markyate.
- Landhold Capital believe that it is correct to differentiate small and large villages, but they believe the Council has not maximised growth in the large villages, in particular Kings Langley.
- Other promoters and developers seek opportunities for growth in the smaller villages and hamlets, such as Flamstead and Piccotts End, linked to the promotion of specific sites.
- Hertfordshire County Council (Property Team) supports identifying Tring as a sustainable location for the focus of significant development, subject to impacts on the townscape character, landscape and ecological constraints.
- The Berkhamsted Residents Action Group want the policy to adopt the previous Core Strategy approach that limits growth of the market towns, as this better recognises their constraints.

- CPRE Hertfordshire believes that the policy should be amended to delete references to the eastward extension of Hemel Hempstead into St Albans District, which are dependent upon that area's local plan, not yet at a formal stage of preparation, and to 'significant growth' at Berkhamsted and Tring.
- Fairfax Strategic Land (Hemel) Ltd support the continued reliance upon the settlement of Hemel Hempstead as the principal focus for growth during the Plan period, but object to the draft site allocations on the basis that they do not represent the most appropriate locations for growth when assessed against the reasonable alternatives, which include the opportunity afforded by the allocation of land west of Leighton Buzzard Road to the west of Piccotts End, to the north of Hemel Hempstead.

Wider Community

The main points raised by the wider community are as follows:

- Support for Hemel Hempstead being designated as the most sustainable location in the Borough for housing and employment and should continue to be the focus for growth, although other residents had reservations about the town growing too much, particularly regarding expansion at Growth Areas HH01 and HH02.
- The hierarchy over-stated levels of growth and was based on out of date assumptions, whereas in some instances, others were supportive subject to seeing Berkhamsted and Tring accommodate a much lower level of change, pointing to the imbalance of growth between the two of them, and also when measured against Hemel Hempstead.
- The hierarchy over generalises their categorisation, does not differentiate between constrained and unconstrained locations (such as in the case of Long Marston and Wilstone which are recommended to be placed in a separate category), and it also prevents opportunities for limited growth there that could benefit their vitality and viability and help sustain local services.
- Various settlements, particularly Berkhamsted and Tring, are identified as being unsuitable for expansion for a variety of reasons including:
 - their expansion ignores / runs contrary to national advice on the importance of protecting the Green Belt / CAONB / biodiversity, and misinterprets the level of need as a target rather than being a starting point for assessing the housing requirement;
 - the level of growth is not justified / should be lower / is not sustainable / the settlement has already expanded enough / does not factor the impact of the COVID-19 pandemic / the need to better explore the potential for brownfield development;
 - growth will lead to sprawl / uncontrolled development / merging of settlements;
 - settlements are already at capacity, the lack of local physical, social and green infrastructure and its ability to be expanded, and limited employment opportunities there;
 - existing congestion and air quality problems / growth will exacerbate these problems, the distance of preferred sites to facilities, steep topography / valley location would deter active travel (in the case of Berkhamsted), and they are not well served by public transport; and
 - harm to their character / heritage / historic and landscape (particularly the CAONB) setting and environmental concerns.
- The policy should adopt the previous Core Strategy approach of seeking more limited growth of the market towns, as this better recognises their constraints.
- The Settlement Hierarchy should refer to Northchurch being a separate settlement from Berkhamsted, as it has its own Parish Council, history and distinct semi rural character and/or it should be reclassified as a small village.

SP4 - The Housing Strategy

There were 936 separate responses to this consultation point. The following themes/issues were raised:

Statutory Bodies

- Hertsmere Borough Council state that the housing requirement falls short of the levels required under the Government's revised standard methodology of 18,414 homes (1,023 per annum), clarification is required with regard to growth figures stated for each settlement and whether they include windfall development and homes delivered outside of the Plan period.
- Three Rivers District Council note that the Council will now need to plan for a higher local housing need figure of 1,023 homes per year, that there are implications from this as further sites, or other necessary adjustments, may need to be included in the next stage of the Plan.
- Hertfordshire County Council (Property Team) supports determining the density of development by a master planning exercise within the Dunsley Farm Growth Area (Tr01) and the Plan should ensure that the site can deliver the maximum amount of development that is appropriate, and not be constrained by setting maximum density figures at this stage. The Council is urged to encourage innovative design at these sustainable locations in order to meet increased housing need.
- Buckinghamshire Council considers that there is a significant risk of traffic impact from new development which may affect Buckinghamshire and traffic links that serve it, particularly on the A41. This may cause impacts outside the Plan area particularly on Aylesbury and potentially on other locations such as Chesham. They welcome discussion between the two Councils to evaluate and address the potential traffic impacts arising from proposed development on cross border traffic flows as part of the preparation of the pre-submission consultation draft Plan.
- Berkhamsted Town Council does not endorse the policy. It does not consider the growth areas to be 'sustainable sites'; and questions the desirability of imposing a 20% plus growth on the locality that it reckons already has severe infrastructure limitations as well as being constrained by proximity to AONB, Beechwoods SAC etc. Furthermore, they stress that transport choices and the distance from home to work are critical to those on lower incomes.
- Tring Town Council objects to the overall strategy of directing so much growth to Tring and that other options have not been sufficiently explored. Furthermore, it is their view that other, less sensitive, locations in the Borough ought to be considered much more thoroughly as destinations for growth before allocating such major development towards Tring. Many other locations in the Borough are viewed as being equally accessible (say Kings Langley, which has a rail station and is much closer to the M25), but although may also be within the Green Belt, they are not close to the CAONB and so not such sensitive locations in relation to landscape impact.
- Bovingdon Parish Council considers that the level of proposed greenfield development (150 homes at Grange Farm), as a maximum, together with the completion of the existing committed housing site at Chesham Road/Molyneaux Avenue (Site Bv02) for some 40 homes, is appropriate for the village across the Plan period.
- Markyate Parish Council point out that the housing need is not supported with the latest information, and access to services and employment are limited so any increase in the number of houses planned for the village is not sustainable.
- Great Gaddesden Parish Council and Nettleden with Potten End Parish Council query why the amount of urban growth referred to in paras. 5.12 and 7.7 differs, and in the context of the National Planning Policy Framework (NPPF) requiring that the Plan fully explores the potential to make effective use of urban land (paras 118 and 137), especially before considering the exceptional circumstances needed for releasing Green Belt land for housing.
- Little Gaddesden Parish Council suggests that, whilst there remains doubt about the potential growth in the Hertfordshire area (Brexit impact, change of work patterns, immigration level changes), they consider that c 700 homes pa c 11,000 over the Plan period would be sufficient and would avoid to some extent the pressure for greenfield development. They also see the most sustainable development for the

foreseeable future being based on flexibility and the adaptation of the current building stock, particularly current retail and office premises, to residential.

- Tring Rural Parish Council object to any fallback position involving major development abutting Long Marston.
- Wigginton Parish Council object to the level of housing growth for a variety of reasons, including that it fails to deal with the need to provide dwellings suitable for home working, it is completely inconsistent with the overall strategy of the Settlement Hierarchy which is primarily based on population size, the site selection process and assumptions are flawed, the evidence is lacking, it runs contrary to national advice and policy on the protection of the Green Belt and CAONB, and more work ought to have been done to identify land for more homes around Hemel Hempstead Station.
- The Chilterns Conservation Board object to the policy and believe that the housing strategy has not shown how overall growth has been constrained and reduced by the Green Belt, CAONBs and SAC, as required by national policy in the NPPF. The Board is also critical of the use of the standard methodology.
- Redbourne Parish Council objects to housing growth at HH01 and HH02 as it will lead to urban sprawl, narrow the gap between Redbourn and Hemel Hempstead, and result in harm to the local environment and ecology.

General Bodies/Other Organisations

- The Berkhamsted Residents Action Group believe that the windfall figure in the Plan is based on past local evidence, is a reliable source of supply across the Plan period and should be higher based on changes to working practices resulting from COVID-19. They also believe that the Council could achieve its "target" of 922dpa by releasing all of HH01 and HH02 now with the added benefit to Hemel Hempstead that only this scale of development can bring and remove from the Plan the need to develop on Green Belt elsewhere in the Borough. They feel this would align much better with the settlement hierarchy which was ratified by the Planning Inspector in 2013 on the Core Strategy, and would deliver the Council's Garden Town aspirations. BRAG object to the housing target as this is based on a flawed Government methodology and object to the proposed strategic urban extensions on land on the south and western edges of Berkhamsted and up to the A41 as these are not sustainable locations.
- Tring School appreciate that the timescale is quite lengthy before the building work for schools would take place and prefer if this could be shortened so that families are not rushing for a school place. It will also give schools sufficient time to implement the provision and recruit staff.
- Dacorum Environmental Forum point out that the standard method is likely to be revised and so the proposals are no longer justified. They believe the loss of Green Belt is neither justified by housing demand or compatible with preserving biodiversity and reducing carbon emissions. There was significant support during the previous consultation for protecting the Green Belt from development from key stakeholders including statutory consultees, Town and Parish Councils, individuals, resident action groups and other organisations.
- Tring & District Local History & Museum Society state that the Borough is having to cater for theoretical housing numbers rather than the actual needs of residents. The Council should not release Green Belt, which was designated primarily for the purpose of preventing the coalescence of settlements, which is now more likely to occur. Increasing the height of property is seen as being severely detrimental to towns like Tring and Berkhamsted, which are characterised by two-storey heights. They argue that large new developments pay no regard to the way these towns have grown by small incremental steps, and will turn characterful places into bland dormitory settlements.
- South West Herts Conservative Association acknowledges the complex, detailed work that has been put into the Plan, but oppose it on the grounds that there are too many houses and they are in the wrong places, especially on the south Berkhamsted ridge. The evidence base does not support the numbers or locations of proposed new homes and there is no evidence to justify a 31% population growth and no plan for any infrastructure to support this growth. It seems inevitable that the number of new houses required to be built in Berkhamsted until 2038 will be different from the figure currently driving the Local Plan as fewer houses will be required due to the massive negative effects unexpected national and international issues on the UK economy. Therefore, the levels of new houses in the Plan should be required

to reflect the new Government policies as they emerge in the next few months. They believe the topographical limitations of Berkhamsted will mean the development will adversely affect the road, rail and public transport facilities as they stand. It is doubtful if the planned expenditure to improve through routes and encourage cycling and walking will have any marked benefit.

- Berkhamsted Citizens Association (BCA) state that unless there is a demonstrable need for the proposed houses, the planned growth must be reduced to a more acceptable level. In view of the high proportion of AONB and Green Belt land new development needs to concentrate on affordable starter homes. The Plan is not seen as being clear enough as to how the the Council will work with developers and other stakeholders to mitigate loss of Green Belt and meet goals for climate change and biodiversity. BCA are seek a focus on the use of brownfield sites in the main centres of Hemel Hempstead, Tring and Berkhamsted rather than sacrifice the Green Belt (which should only be used in exceptional circumstances).
- CPRE Hertfordshire strongly oppose the housing figures and believe the Plan should be rewritten to properly reflect national policy together with up to date information, in order to reach a sound conclusion on how much housing should be provided for in the Plan. CPRE believe that the Plan's housing requirement is not the same thing as housing need, but has to be determined in the light of local circumstances and outline that the Council is not obliged to use the formulaic 'standard method' to determine housing need if there are exceptional circumstances applying in Dacorum, which CPRE Hertfordshire considers to be the case. If the standard method is used, it should be based on the latest available projections independently published by the Office for National Statistics (ONS) which reveal a dramatic fall in projected households from the much older ones advocated by Government. CPRE also point believe the Plan makes an inadequate allowance for windfalls and the potential for regeneration in the context of changes in demand for land and premises in retail, commercial, industrial and other employment uses following the COVID-19 pandemic and Brexit.
- The Dacorum Green Party (DGP) strongly objects to the Plan which proposes 16,600 new homes to be built primarily on 850 hectares of Green Belt around Tring, Berkhamsted and Hemel Hempstead in the next 18 years. This would irrevocably change the character of the towns and villages and destroy valuable Green Belt habitat and amenity. The growth figures are not substantiated by evidence and are based upon outdated rather than the latest (and lower) ONS projections and an arbitrary and simplistic algorithm. DGP supports the need for a local plan and accepts the need to build a reasonable number of new sustainable and affordable properties in the Borough. The Plan gives inadequate thought to the pressures on crucial local infrastructure requirements, the development it proposes is not sustainable, and it does not preserve local heritage.
- The Kings Langley & District Residents Association (KL&DRA) welcomes the work that the Borough Council has done so far with neighbouring authorities, and the initiative to prepare a South West Hertfordshire Joint Strategic Plan. As this will not be adopted for at least two years, KL&DRA considers that the timetable for the submission of the Dacorum Local Plan is premature, it needs to be revised and it is essential that the preparation of the two documents is run in parallel. They are concerned that there has been insufficient consideration of the role and function of Kings Langley which needs to be addressed. The Strategy does neither appreciate nor acknowledge fully the cross-boundary potential for development and a request should be made to Three Rivers District and St Albans Councils through the Duty to Cooperate, for any residential development to contribute towards the overall housing and employment needs of Dacorum Borough Council. The Plan should be more cognisant of development to the east of Kings Langley, particularly in and around the Kings Langley Employment Area in Three Rivers District Council area. Conversion of many of these sites for housing would increase pressures on infrastructure and services, much of which would be felt in the Kings Langley area.
- Safer Gravel Path Action Group and Tring Rugby Club are both concerned about the allocations, how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. They are of the view that the Housing Strategy is fueled by a faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Furthermore, it is seen as failing to take into account post-pandemic working practices.

- Tring Sports Forum (TSF) support the Dunsley Farm site (Tr01) as being suitable for considerable housing development, though the numbers could vary to that stated, and this site is the least challenging one to the environment. TSF take the view that providing the site is developed sensitively, it could actually enhance the appearance of the gateway into Tring and could solve many of the town's housing, environment and infrastructure problems. However, they do state that its current capacity constitutes over-development, although the housing numbers proposed could be made to work. They urge the Council not to move on to Regulation 19 before the substance of the eventual new planning laws are known or even in place.
- The Chiltern Society point out that as a result of Brexit the overall number of people needing housing has reduced. They believe that flatted development should be used to minimise land take and that these can be sensitively grouped in the lower lying areas so that their height does not spoil the cross landscape views. The Society are of the view that the area of Green Belt required should be reduced, especially the area around the AONB which will be very badly impacted. They also point out that every brownfield site and office should be built on first. This will also reduce the area of Green Belt land needed.
- Extinction Rebellion Dacorum are of the view that the Plan does not sufficiently promote renewable energy to meet the challenge of the Climate Emergency. To achieve net zero emissions by 2030 all new homes and offices must have maximum insulation, only utilise electrical energy, must have rooftop solar panels installed at the time of construction, and must be fitted with efficient heating such as air source heat pumps. All public transport must be electrified. Provision must be made for home electric vehicle chargers and an adequate number of community fast chargers. All power must be supplied by electricity or hydrogen generated from sustainable energy sources. ERD welcome the commitment to genuinely affordable housing to be included in developments in Berkhamsted and Tring, but believe affordable needs to be properly defined in the Plan and must contain an adequate proportion of social housing with rents set at no more than a third of the average income of workers in Dacorum. The proposals for infrastructure and employment growth are not seen as being sufficient for the number of new dwellings proposed in these market towns.
- Home Builders Federation (HBF) point out that the Council will need to plan for a higher level of housing than is proposed in its Emerging Strategy (a minimum of 1,023 new homes per annum between 2020 and 2038 – a total of 18,414 homes), must recognise that this is the minimum number of homes that they must plan for, and will also need to consider unmet needs in other areas, particularly that of London. The Plan expects to deliver around 16,900 homes which will not meet the minimum number of homes it needs to plan for and a further 1,514 homes are required. The Council should ensure that there is sufficient flexibility in their housing supply and the HBF recommends that a 20% buffer is necessary. Any additional supply should not be pushed back until much later in the Plan. The HBF suggest that the Council identify a range of small and medium sized sites that will bolster delivery in the early years of the Plan and ensure a strong five-year land supply position. The additional sites required to meet needs in full will need to be found through further amendments to the Green Belt.
- Landhold Capital highlight that the standard method should be 1,023 per annum or 18,414 dwellings in total and not 933 per annum or 16,596 in total. Policy SP4 is currently based on a housing requirement that is lower than should be the case, and the strategy for delivering this housing requirement is therefore considered to be flawed and not sound. They state that the Plan is over-reliant on a small number of large strategic urban extensions to deliver the majority of the housing requirement, with only a small number of small to medium scale sites proposed, such as those at the three large villages. They believe the housing trajectory is too optimistic. Strategic sites can often take long periods of time to come through the planning application process and can require significant infrastructure to be delivered prior to the first completions of dwellings. They also believe windfall development is finite and unplanned development should not be encouraged, instead more land should be allocated with windfall being seen as additional. Finally, the Council's land supply buffer is only 303 dwellings or 1.8% and does not provide the Council with much flexibility.
- The Berkhamsted Schools support the Council with their plan for growth and the NPPF's requirement that planning authorities make every effort to meet the housing needs of an area. They point out that the housing targets should now revert to the previous "standard method" and the consequence of this if applied, would be that the housing growth in the Plan would be a minimum of 1,023 dwellings per annum.

This would in turn increase the minimum number of homes target from 16,596 to 18,414 net additional homes over the period 2020-2038. This would simply serve to reinforce the appropriateness of their allocations Bk03 and Cy04. They also question the deliverability of some of the brownfield allocations (high density) on the basis of existing leases and having viable companies operating on them.

- Rectory Homes point out that the Plan only seeks to deliver 16,596 which falls significantly short of the new housing need figures published by the latest Government methodology. They agree with the recommendation of the HBF that a 20% buffer in supply should be applied. The Council will fail to demonstrate a 5 year supply of deliverable housing and upon adoption of the Plan. The Plan does not allocate any sites for housing in the small villages and they believe small and medium sized-sites are required to be delivered immediately as they can be built quickly. Villages such as Wilstone and Long Marston are among the least constrained settlements in the Borough (outside of the Green Belt) and have the potential to accommodate some level of growth to help meet housing requirements and help maintain local services and facilities within these areas.
- BHL point out that the Plan identifies just 16,899 homes which is significantly below the updated minimum housing need of 18,450 dwellings. They believe the supply of housing should be increased so as to comfortably exceed 18,450 dwellings to ensure the Borough is able to meet its housing requirement whilst retaining a five year supply of housing land throughout the Plan period. There is currently only a buffer of just 1.8% (303 dwellings) which provides little room for slippage in meeting the minimum need. They point out that some sites may not come forward for various reasons, particularly windfall sites, urban brownfield sites, and large sites. Therefore, not only should the Council identify at least a further 1,551 dwellings to meet its updated minimum housing need, but it should also provide a buffer significantly above that figure to ensure that there is flexibility and variety in the Borough's land supply. An increased buffer in Dacorum's housing land supply that takes it well above the minimum housing need would be sensible. They challenge the level of windfall allowance at 200dpa (representing 20% of Local Housing Need), caution over the reliance on delivery from brownfield sites, with 31% of the identified supply coming from such sites, particularly as this source can be complex to deliver, build-out rates are lower than greenfield development, and they do not provide sufficient certainty that development will commence in a timely manner. They support a supply of 20,000 dwellings (providing a buffer of 8.5%) and believe the Plan's evidence base (e.g. the Sustainability Appraisal) demonstrates that c 20,000 dwellings could be accommodated with little additional adverse impact. They support the focus of growth being Hemel Hempstead and believe that Growth Area HH02 should be allocated in this Plan period.
- Vistry Homes point out that the Local Plan's housing figure of 923 dpa is a significant shortfall on the standard methodology requirement. The Council should also be giving consideration towards the need to meet unmet housing needs elsewhere, particularly London. This could drive the total number of homes up. They point out that the a 2% buffer in housing land supply (303 homes) is wholly insufficient and point out that Local Plans typically build in at least a 10% contingency. They further point out that the size of the buffer should reflect the complexity of proposed sites and suggest the Council should be looking at c 20% as a result. As a result additional sites are needed in the Plan.
- Aberdeen Standard Investments (ASI) support the redevelopment of previously developed land, vacant or underused sites within the urban areas of the Borough. However, they also stress the importance of planning policies needing to reflect the changes in the demand for land which is relevant to a site ASI are promoting in a General Employment Area in Hemel Hempstead.
- Redington Capital state that the Council are not meeting the level of housing required by the Standard Methodology and that the correct number should be 18,414 homes over the Plan period. This is a significant shortfall which will have to be rectified prior to the pre-submission version of the Local Plan being published for consultation, otherwise the Local Plan will be unsound. They also identify the potential for unmet needs arising from elsewhere, particularly London and the importance of meeting this. They also view the Council's buffer (around 2%) to be wholly insufficient and believe this should be between 10-20% to allow for unexpected delays in the delivery of sites, changes in site capacity and under delivery of windfall. They believe additional sites will be needed to rectify the under provision.
- Rathbawn Properties Ltd also point out that the Plan does not currently meet the required housing numbers required by the standard methodology and a further 1,818 homes above the 16,596 figure set out within

the emerging Plan is required. They point out that the Council will also need to update its Sustainability Appraisal and this will need to be done before the publication of the Regulation 19 Local Plan. They point out that the Council needs to prepare an Action Plan to address that it is not delivering against its housing requirement.

- Bloor Homes also point out the shortfall in housing proposed against the standard methodology as well as outlining that the Council's buffer is only 2%. As with many other developers they believe that the overall level of housing should be increased to meet the standard methodology but to also build in a c10-20% buffer to ensure these needs can be met.
- Tesco Pension Investment Fund Management (TPIFM) strongly supports the delivery of new housing through the redevelopment of previously developed land, vacant or underused sites within the urban areas of the Borough as proposed by draft Policy SP4.
- The Park Garage Group PLC acknowledge that there is an identified need for electric vehicle charging infrastructure and affordable homes that they do not believe has been fully addressed. As a consequence, they are promoting a site known as Kings Langley Service Station and Adjoining Land, 124-127 Hempstead Road, Kings Langley, Bedfordshire, WD4 8AL for inclusion within the Plan as a mixed-use commercial/residential allocation. This will include an electric vehicle charging facility (sui generis) together with an ancillary roadside retail/café unit (Use Class E), and affordable residential development, providing 20 – 30 units.
- Pennard Bare Trust welcome the commitment to review the Local Plan housing target in line with new guidance and as new factors emerge. The changes mean that the Plan must use the figure of 1,023 dpa as the minimum local housing need starting point and plan for a minimum of 18,414 homes (a current deficit of 7,460 homes). They note what they consider to be under-delivery over the last few years. It is conceivable that prior to submission of the Plan that it may be required to find a 20% buffer of sites which will help improve the prospect of achieving the planned supply, if significant under delivery of housing is evident prior to submission. The Trust points out that their landholdings would be capable of contributing to the housing land supply deficit, make the Plan less reliant on 'windfall' sites and less sustainable 'Small Villages within the Rural Area' and 'Other small villages and the countryside'.
- L&Q Estates state that the housing figure should be uplifted to reflect the standard method of 1,023 dpa. They support the overall approach of concentrating housing growth in the three towns along with the three larger villages. Policy SP4 could helpfully cross-refer to the delivery strategy which sets out the specific allocations to deliver this (Tr01, Tr02 and Tr03). It is also noted that draft Policy SP23 (Delivering Growth in Tring) sets out that the urban extensions will deliver 'around' a specified number of dwellings. Draft Policy SP4 should also reflect this and state that Tring will deliver around 2,200 new homes through a series of strategic urban extensions.
- The Gardener Family Trust contend that land in their ownership at Fields End Lane, Hemel Hempstead should be brought into the Plan. The Trust acknowledges and supports the release of land from the Green Belt to meet housing targets. They are aware of the long lead in times associated with delivering strategic urban extensions (e.g. HH01 and HH02) and the consequent need to allocate small to medium sized sites, which can come forward more quickly, to meet the immediate housing need.
- Taylor Wimpey consider that the strategy has not correctly identified the level of housing growth required (at 1,023 dpa). The Council's Housing Topic Paper (November 2020) correctly identifies that the local housing need figure under the 2018 Standard Method would be 1,023 dpa, rather than 922 dpa, equating to a shortfall of 1,458 homes. The local housing need figure should be revised upwards accordingly to ensure the Local Plan is positively prepared as required by the National Planning Policy Framework. Accordingly, it will be necessary to allocate additional sites through the emerging Local Plan to address the identified shortfalls against housing requirements and land in their control at Homefield, Bovington, is seen as being capable of contributing towards housing needs in a sustainable manner.
- Hallam Land Management Ltd (HLM) urge the Council to increase the buffer to a minimum 5% and identify additional land for at least an additional 530 homes to 2038 above the level currently identified. This would provide flexibility to meet the Local Housing Need in full. HLM also highlight the need to correct Policy SP4 to provide a consistent scale of growth for Hemel Garden Communities across all related policies.

- St William Homes LLP point out that the current housing requirement will result in under provision of housing and highlight what they view as recent under-delivery of homes. The revised 2018 standard method will result in the local housing need increasing to 1,023 dpa (an overall total of 18,414 homes). Therefore, the Council will need to adjust the housing figures within the Regulation 19 Local Plan to reflect this and factor in the outcome of Duty to Cooperate discussions, in particular the need to accommodate unmet need from Watford and (particularly) London. The Council should focus growth on the towns, and increasing the capacity on the brownfield allocations, including the National Grid site (HH09). All yields from such allocations should be expressed as minima to enable design-led solutions that could allow capacity increases to optimise the amount of new homes delivered, including at HH09. The previous supply of windfalls is not a reliable guide to the future supply and they consider that a more realistic assessment should be undertaken of the contribution of windfalls in the future that places less reliance on this source. St William support encouraging development without any imposed phasing. Whilst the Plan demonstrates that a 5-year supply can be achieved, there is little flexibility, with a risk that a deficit could arise in these early years. This reinforces the need to make the best possible use of existing allocations. The housing trajectory in the Housing Topic Paper shows development commencing on the National Grid site in 2022/23. This is a correct assumption.
- Pigeon Investment Management Ltd consider that the Plan is not positively prepared, justified or consistent with national policy. Dacorum's Local Housing Need has increased from 922 dpa to 1,023 dpa and the Plan should meet this minimum housing requirement along with an appropriate buffer of at least 5% to provide flexibility and ensure delivery. The Plan does not justify not contributing to unmet needs of neighbouring authorities. Pigeon Hemel Hempstead Ltd welcomes that Policy SP4 requires urban extensions at Hemel Hempstead (Growth Areas HH01 and HH02) to meet the minimum housing target. However, they do not agree with deferring the release of Growth Area HH02 beyond the Plan period given shortfalls in housing supply, the need to contribute towards unmet needs of neighbouring authorities, the necessity to include an appropriate buffer of at least 5%, and the need to boost supply towards the latter part of the Plan period. It would also allow housing and infrastructure (e.g. the proposed link road between Leighton Buzzard Road and Redbourn Road) need to be delivered together across the HGC Growth Area. If the Plan continues to safeguard HH02 then further justification is required to demonstrate exceptional circumstances to release the land from the Green Belt now (in 2021), for development planned for after 2038.
- The Crown Estate (TCE) highlight that paragraph 7.17 requires clarification since it is unclear how the Growth Area allocations will contribute to the Government target of 10% of the housing requirement coming from sites of one hectare or more. TCE consider that avoiding the formal phasing of sites is sensible and prudent where a substantial uplift in housing completions is required. Furthermore, Policy SP4 should be amended to ensure consistency of reference to Growth Areas HH01 and HH02 across policies (detailed wording is provided).
- Whiteacre Ltd emphasises the need for effective and deliverable allocations that can deliver in the early or part of this Plan, such as at Grange Farm (Bv01), to counter falling housing delivery rates relative to the forecast level of completions, to offset delays in commitments and allocations coming forward, and in order to demonstrate a five year housing supply. The proposed development strategy does not expressly recognise the larger size of Bovingdon or the lower rate of growth since 2006. Whiteacre is of the view that early delivery of Bv01 can be prioritised substantially ahead of the stated start date and relative to allocations in Berkhamsted and Tring. Bv01 can also deliver a policy compliant level of affordable homes. Whiteacre Ltd do not endorse the Council exploring a 'stepped' trajectory and point out that the Plan does not provide for the minimum number of homes required, based on the calculation of local housing need using the standard method, nor the exceptional circumstances to provide for a lower assessment of housing need. They reject arguments that a reduction in more recent projections should result in fewer homes being built. Planning for levels of future housing provision that would maintain and 'lock-in' trends of suppressed household formation is not a sound approach to policy making, and the 2014 based projections continue to provide the relevant starting point.
- Thakeham Homes stress the housing requirement must be updated to a minimum of 18,414 homes and this will include additional allocations in order to deliver the extra dwellings needed. Even prioritising urban

sites, it is clear that there will remain a demonstrable need for releases of Green Belt land to meet both the Borough's needs and the higher housing requirement. Thakeham Homes consider that all references to dwellings numbers, save windfalls, should be expressed as minimum numbers. The potential for windfall sites is restricted within many settlements, insufficient evidence has been provided to demonstrate they will provide a reliable source of supply, and windfalls should only be viewed as providing flexibility to the housing supply on top of the allocations to ensure minimum housing numbers are met. The Council should therefore be seeking to allocate additional sites at higher tier settlements to ensure the deliverability of the Plan. The current housing supply contingency is minimal and should be boosted by more allocated sites for at least the additional 1,818 homes now required, plus a contingency of a similar level as a minimum. Thakeham Homes argue that allocation of their site, Bulbourne Cross, can bring many wider public benefits and is an opportunity to address the current disparity in the treatment of Berkhamsted and Tring in terms of the scale of development proposed.

- W Lamb Ltd are of the view that Policy SP4 is flawed as the housing requirement figures are based on an abandoned version of the Government's standard method approach. They recommend that the policy needs to make provision for 18,414 dwellings and 1 i) should also be amended to include for greater housing numbers at Hemel Hempstead, being Dacorum's largest and most sustainable settlement. Their land at Shendish should be specifically identified as a location for growth in the town. They are concerned that the Plan does not put forward a spatial strategy or a housing supply to satisfy the number of homes required, that the Council has historically under-delivered, there is an over-reliance on windfalls, urban growth areas and large urban extensions associated with long lead-in times, and it cannot demonstrate a 5 year land supply. Additional sites and land for housing must be identified in order to meet housing needs within the Borough. The Council should plan for a higher than 5% buffer of at least 10% or even 20%. W Lamb Ltd consider the housing trajectory to be unrealistic given the Plan timetable and lead-in times for allocations. The Plan must provide greater diversity in its housing supply and range of housing, including a greater number of smaller scale Green Belt sites at existing settlements of 500 units or less for which lead in times are shorter and delivery rates higher. They refer to a number of issues in relation to the deliverability of allocations in the Plan.
- Fairfax Strategic Land (Hemel) Ltd believe that the Plan fails the test of soundness as it is not positively prepared, justified nor effective and is inconsistent with national policy. They point out that the scale of growth now required is for at least 1,023 dwellings each year resulting in a need to find additional allocations for at least 1,818 dwellings. They object both in terms of the number of homes being planned for and in relation to the Plan period timetable not being realistic (necessitating an extended Plan period until at least 2039). The Council should consider both the scope for increasing the minimum housing requirement and meeting unmet needs within the context of the duty to cooperate. They point out that here is no information indicating how the level of annual completions within the trajectory is derived, that it is too optimistic and not achievable, and that it fails to provide for sufficient homes to maintain a rolling 5 year supply. Fairfax also argue that to ensure sufficient land is available to demonstrate a 5 year supply, further deliverable land should be identified including land in their control to the west of Leighton Buzzard Road, north of Hemel Hempstead for 400 homes.

Wider Community

Local residents often repeated or endorsed the comments made from the community organisations above. The main points raised by the wider community are as follows:

- Significant objections are raised to the location and level of growth proposed in the settlements (and to individual proposals), particularly at Berkhamsted and Tring. Their expansion ignores / does not give priority to / runs contrary to national advice on the importance of protecting the Green Belt / CAONB / biodiversity / aims of climate mitigation.
- The housing growth does not justify exceptional circumstances.
- The strategy gives priority to economic growth and greenfield development over other objectives of the Plan. It needs to be more strongly led by the climate emergency, meeting carbon emission targets, the

protection of the environment and biodiversity, and the prioritisation of 'brownfield' sites to meet housing needs.

- Some local residents support the current level of windfall/urban and underused land, but the majority consider that the Plan significantly underestimates such sources of supply given current and future trends in working and shopping patterns, and changes following COVID-19, Brexit and the national relaxation of changes of use/expansion of permitted development. Windfall should also be prioritised over Green Belt releases.
- Many stress the importance of the early/timely delivery of new schools.
- Increasing the height of property will be severely detrimental to the character of towns like Tring and Berkhamsted, which are typically made up of low-rise buildings.
- There is some support for growth, but often at much lower levels and tied to the need to build a reasonable number of new sustainable and affordable properties in the Borough, especially for social rent.
- Minor support for a range of accommodation including for people with disabilities, self and custom build and offsite construction and other forms of Modern Methods of Construction.
- The transport studies for Berkhamsted and Tring are inadequate in detail and understanding to address the planned levels of growth.
- The new housing should be targeted to local people in need and not to London commuters and those living outside the Borough.
- The Strategy makes no mention of Northchurch, which is viewed as a separate village from Berkhamsted.
- A number of residents objected to proposals at East Berkhamsted (Bulbourne Cross) and around Long Marston, although neither are preferred growth areas in the Plan.
- The Plan does not give proper consideration to cross boundary issues and development sites and how they affect individual settlements.

SP5 - The Employment Strategy

There were 320 separate responses to this consultation point. The following themes/issues were raised:

Statutory Bodies

- St Albans District Council (SADC) notes that Dacorum cannot meet its own employment need and are seeking support from SADC. There may be potential for employment growth at East Hemel. If so, this could play a role in overall South West Herts employment land provision. However, SADC's new Local Plan is at a very early stage and no decisions have been made. Further discussions are needed in the context of the overall joint work on the South West Herts geography / South West Herts Joint Strategic Plan. Authorities can only set policy for their own administrative area, so clause 2 e. in Policy SP5 about employment development at East Hemel should be deleted.
- Hertsmere Borough Council and Three Rivers District Council note that Policy SP5 proposes much less office and industrial space than suggested in the South West Herts Economic Study Update, with Dacorum looking to St Albans and Watford in meeting its unmet need. It will be important to clarify through statements of common ground how needs are being met across the area. The need for new employment provision should reflect updated information on employment commitments and changes to work behaviours resulting from COVID-19.
- Hertfordshire County Council (Growth Team) considers that paragraph 8.7 should recognise that high quality transport access includes all sustainable modes.
- Hertfordshire Local Enterprise Partnership (LEP):
 - Supports the strategy generally, but is concerned that current uncertainties may not be resolved before the Local Plan is published. Therefore, a number of iterations should be allowed for.

- Is pleased that cross boundary issues are identified and may wish to be a co-signatory to the memorandum of understanding.
- Is uncertain that the approach to meeting unmet employment needs in South West Herts (with one authority potentially meeting the needs of another) is correct, particularly given the AONB constraints in Dacorum. All the authorities should come together to resolve any problems and reach agreement on overriding principles. Otherwise, there is a danger that insufficient employment land will be delivered. This could be harmful to economic revitalisation and town centres
- Berkhamsted Town Council notes the absence of any commitment to preserve or improve local employment opportunities within or close to Berkhamsted.
- Bovingdon Parish Council supports in principle redeveloping Bovingdon Brickworks for employment purposes, and film and television activities at Bovingdon Airfield, that will help support the village's economic prosperity.
- The Chilterns Conservation Board (CCB) comment that:
 - Paragraph 8.2 should recognise that the NPPF allows plans not to meet the full need for commercial development in areas of policy restraint.
 - National policy on redeveloping or converting commercial land to residential use could have a significant impact on centres like Tring and Berkhamsted, resulting in a need for more greenfield commercial development. The CCB would welcome working with the Council to reduce this risk, including Article 4 directions where necessary.
 - Economic activity should be supported in and around the AONB, especially in sectors compatible with the AONB's designation.

General Bodies/Other Organisations

- Berkhamsted Residents' Action Group (BRAG), Berkhamsted Citizens Association, Berkhamsted and Tring Labour Party, Safer Gravel Path Action Group, Dacorum Green Party, Extinction Rebellion Dacorum and Tring Rugby Club consider that existing employment opportunities should be retained in Berkhamsted and/or Tring and new opportunities provided, particularly given the amount of housing development proposed. There is concern the new housing will be occupied by commuters, resulting in unsustainable travel and doing little to support the local economy. The Green Party calls for new business hubs close to town centres.
- The Dacorum Liberal Democrat Councillors point out that SP5 identifies that there should be no net loss of office floorspace from 2025 onwards. Considering the likely move away from office space by businesses looking to reduce costs after the pandemic, and maximise their use of new technology for home and distance working, this does not appear to be a logical starting point. The Policy also seeks to grow employment through capitalising on the borough's position close to the M25 and M1, and this fundamentally contradicts the UK's 2050 net zero commitment.
- CPRE Hertfordshire considers that much less land and floorspace should be proposed for employment use, particularly offices, given the post-COVID-19 context and revised population and household projections. Levels of employment space are not critically low and there are no exceptional circumstances justifying removing land from the Green Belt for employment use. Statements about proposals in St Albans should be reconsidered.
- Safer Gravel Path Action Group feel that increased working from home, accelerated by COVID-19 will reduce the need for office space, avoiding the need to encroach on Green Belt.
- Tring Sports Forum considers that only limited new employment development is needed in Tring, particularly given the nearby College Road Enterprise Zone in Buckinghamshire and increased working from home.
- The Crown Estate (owners of the proposed employment site at East Hemel in St Albans District) notes the assumption that Dacorum's shortfall of office space (84,000 sqm) and industrial space (80,000 sqm) can be met at East Hemel. Whilst the site can accommodate the industrial shortfall, it is unattractive for offices and may remain so throughout the Plan period. Therefore, reference to the site meeting Dacorum's office shortfall should be deleted.

- Prologis (developer of warehouses at Maylands Gateway, Hemel Hempstead) supports the employment growth strategy, which seeks to deliver additional industrial and office floorspace in the Borough, with an emphasis on the growth of the existing Maylands Business Park as a sustainable and accessible location.
- ICP Asset Management Ltd feels that an additional bullet should be included in Policy SP5, to recognise the importance of non B and E class uses in providing jobs (e.g. care homes) and state that the development of employment generating uses on appropriate sites will be encouraged.
- Aberdeen Standard Investments (promoting housing development to replace offices at Network House, Apsley) consider that General Employment Areas ('GEAs') should be referred to in Policy SP5. Point 2.f. is supported, but should also include releasing existing office sites which are no longer appropriate or viable. This part of the policy should also refer to Policy DM16 on GEAs, if they are to be retained as part of the overarching 'Employment Strategy'.
- Akira Eesa Developments Ltd (promoting employment development at Bourne End) state there is a need for additional employment allocations within the emerging Plan.
- EH Smith (owners of Bovingdon Brickworks) give qualified support to the employment strategy, as follows:
 - Support Bovingdon Brickworks in Table 3 as an employment 'Growth Area' (Cy02), but it should be in the 'Bovingdon Delivery Strategy', not 'The Countryside'.
 - Support the requirement for small and medium sized business uses on employment 'Growth Areas' (Policy SP5, point 2.c.), but larger units should be allowed if needed to meet unmet demand taking account of market and viability considerations.
 - Support paragraph 8.20, which states that exceptional circumstances justify releasing Green Belt land for industrial development, but it should be stated that this applies equally to extending existing 'General Employment Areas' in the Green Belt e.g. Bovingdon Brickworks.
- Hertfordshire County Council (Property Team) (owners of Dunsley Farm, Tring) welcomes the allocation in Policy SP5 of Dunsley Farm for employment development.

Wider Community

The main points raised by the wider community are as follows:

- The Plan fails to take account of COVID-19, which will mean less need for office space and more home working.
- Too little employment development is proposed in relation to the high level of housing growth proposed.
- Given the high level of housing development proposed in Berkhamsted, existing employment sites should be retained, to avoid an increase in out-commuting.
- Employment strategies are needed for Berkhamsted and Tring. Existing employment areas should be retained and more local jobs provided in view of the high level of housing proposed. This is necessary to achieve balanced housing and employment growth, ensure the vitality of these towns and avoid a large and unsustainable increase in commuting to London and elsewhere. The roads are already crowded, air pollution is a problem and rush hour trains are full.
- There are no exceptional circumstances to justify releasing land from the Green Belt for employment development, as Dacorum's unmet need can be accommodated elsewhere in South West Herts. Brownfield land should be used instead. Therefore, Table 3 in Policy SP5 should not include any employment growth areas on land that is currently Green Belt.
- Point 1 in Policy SP5 refers to capitalising on the location near the M1 and M25. This contradicts the Council's net zero commitment and the UK's 2050 net zero target.
- There is no need for new employment land in Tring, given the large scale employment development proposed nearby in Aylesbury.
- The employment strategy for Kings Langley should take account of the considerable losses of employment land in the part of the village in Three Rivers District.

SP6 - The Retail and Leisure Development Strategy

There were 226 separate responses to this consultation point. The following themes/issues were raised:

Statutory Bodies

- Hertsmere Borough Council recognises Hemel Hempstead's importance as a sub-regional retail centre. Any development should consider the linkages between Hemel Hempstead and the wider area. Hertsmere supports proposals which would increase the vitality and viability of existing centres.
- Hertfordshire County Council (Growth Team) will welcome the inclusion of a transport paragraph in the supporting text and/or within Policy SP6, to state that high levels of accessibility and high-quality public places are key to commercial centres, and transport plays a major role in both of those factors.
- Hertfordshire County Council (Property Team) welcomes the reference to the Dunsley Farm Growth Area (Tr01) being a 'back up' location for a supermarket, if it cannot be delivered in Tring town centre.
- Markyate Parish Council points out that Markyate is ignored in Policy SP6. Markyate does in its own way have a 'town centre' with a full range of shops, a gym/hydro and a range of restaurants and takeaways. The sustainable development strategy fails to mention Markyate; this needs to be rectified.
- The Chilterns Conservation Board is concerned that the strategy does not cover retail and leisure proposals in the countryside and smaller villages. This overlooks the importance of isolated shops, including farm shops, rural pubs and guest houses, and other small-scale commercial leisure activities to local economies and in meeting rural residents' needs. Such activities are important to the vitality of the Chilterns AONB.

General Bodies/Other Organisations

- CPRE considers that, pending a better understanding of the consequences for retailing of COVID-19, new floorspace should be created only in existing retail centres, not out of 'centre', out of 'town', or in the Green Belt, as currently proposed in Policy SP6 at Berkhamsted and Tring. Retail floorspace no longer required in town centres should be used for mixed uses, including housing, to ensure their vitality.
- Berkhamsted Residents' Action Group supports Policy SP6, but considers it unlikely that the small-scale retail provision in Growth Area Bk01 (South of Berkhamsted) will be viable.
- Dacorum Green Party calls for improved public transport and cycle routes to town centres and bike storage within centres, to support local businesses and the local economy.
- Berkhamsted and Tring Labour Party and Extinction Rebellion Dacorum consider that the strategy should protect local leisure facilities, pubs, bars and restaurants and shops. Local green businesses should be supported, including communal office space and businesses selling locally sourced goods.
- Tring & District Local History & Museum Society is opposed to a new town centre supermarket, as it would damage the town's historic grain and cause traffic problems. If new housing is built east of Tring, it would be better to locate new shopping there.
- Tring Market Auctions hold similar views. In addition, they stress the importance of the auction rooms, forming one of the largest and best known venues of its type in the Home Counties. Tring Market Auctions is an important part of the town's history and a key component of the town centre's economic sustainability, as it attracts many visitors to the town.
- Tring Sports Forum refers to local opposition to a new town centre supermarket, but regards Dunsley Farm as an unsuitable location for a supermarket. Better locations would be in the west of the town (Aylesbury Road/Icknield Way) or the proposed East of Tring site (Tr03).
- Tring in Transition made two points:

- It is doubtful that additional traditional retail space is needed in Tring town centre, but there is a case for dedicated market facilities, a 'food hub' and community facilities such as a repair shed.
- An additional supermarket may be needed in Tring, but the Bulbourne corner of Growth Area Tr03 (East of Tring) would be a much better location than Growth Area Tr01 (Dunsley Farm). An alternative might be to re-site the existing Tesco.
- Akzo Nobel propose a mixed use development scheme in Berkhamsted town centre at 168-192 High Street, including retail, leisure and community floorspace. This proposal is deliverable in the short term and would bring about significant regeneration to the High Street and act as a catalyst for wider regeneration.

Wider Community

The main points raised by the wider community are as follows:

- Even before COVID-19, changing habits with more online shopping and banking were resulting in many vacant premises. These trends have been accelerated by the pandemic. Although it is too soon to know the full impact, there will be less need for retail space in the future, so the proposals in Policy SP6 for new retail provision are not needed.
- Vacant shops and other town centre buildings should be converted to other uses, particularly housing, thus reducing or avoiding the need for housing on Green Belt sites.
- Local shops, pubs, bars, restaurants and leisure facilities should be protected.
- Hemel Hempstead and Tring town centres are struggling, with Hemel seeing vacancies in the Marlowes and the closure of Debenhams and Topshop, whilst Tring has been losing shops, banks and restaurants.
- There is a need for improved arts, cultural and leisure facilities. Hemel Hempstead's evening economy is poor. A replacement for the Pavilion is needed and the Market Square site in Hemel (Growth Area HH05) would be a good location.
- The proposed small scale retail provision in the South Berkhamsted Growth Area (Growth Area Bk01) is unlikely to be sufficient to stop residents from driving elsewhere for most of their shopping.
- The proposal for a new supermarket in Tring town centre on the High Street/Brook Street site (Growth Area Tr06) is not supported. Reasons include lack of need (given existing food stores and the number of vacant shops), the likely loss of further shops if a supermarket is built, traffic congestion in High Street/Brook Street and the museum, market and auction centre should be retained.
- A new supermarket at Dunsley Farm in Tring (Growth Area Tr01) is opposed, as it is too close to the town centre and Tesco, would cause traffic congestion and as the site should be used for other uses.
- Some residents regard the East of Tring site (Growth Area Tr03) as a better location for a new supermarket, but others disagree.

SP7 - Delivering Infrastructure to Support Growth

There were 455 separate responses to this consultation point. The following themes/issues were raised:

Statutory Bodies

- Sport England support the policy, in particular the confirmation within part 5 that an SPD will be provided.
- Little Gaddesden Parish Council express concerns regarding the provision of off-site contributions towards infrastructure.
- The Canal & River Trust support the inclusion of green infrastructure in this policy, however the definition of this needs to be expanded to include water or blue space.
- Education is a cross-boundary issue in Hemel Hempstead and Kings Langley for St Albans City and District Council and Three Rivers District Council respectively.
- St Albans City and District Council comment that they do not consider that to date there is appropriate school need, existing school expansion capacity and site selection evidence to reach a conclusion that a secondary school is required in East of Hemel Hempstead Growth Area (in St Albans district).
- Hertfordshire County Council (Growth Team) are in broad support of the policy, however they do not support the deferral of development contributions to a later stage as it may place a financial risk on infrastructure delivery agents if infrastructure is needed before payments are made, unless the deferral would not impact project delivery timescales.
- Hertfordshire County Council (Property Team) states that this policy should make it clear that contributions towards off-site infrastructure must still relate to the needs and impacts of the proposed development and be proportionate to the scale of development being proposed.
- Thames Water and Affinity Water need certainty on delivery timelines and support from the planning process in order to plan for new infrastructure and water supply to be in place for the site allocations.
- Berkhamsted Town Council and residents comment that new infrastructure should be delivered ahead of when the provision is needed, to prevent an additional burden on services. Policy wording on this should be strengthened.
- Berkhamsted Town Council also note that water supply is constrained as it is supplied by the local aquifer which also feeds the Borough's chalk streams and abstraction is restricted by the Environment Agency. Residents will need assurance that water supply is not threatened by the increased numbers.

General Bodies/Other Organisations

- The National Trust advocates a strategic approach to the provision of green infrastructure and the early delivery of a destination open space to reduce the impact of growth on sites such as Ashridge.
- The Berkhamsted Residents Action Group state that the Infrastructure Delivery Plan demonstrates the impracticalities of providing growth in settlements such as Berkhamsted, as too many requirements are impossible to achieve or require more significant investment from third parties. Funding arrangements are not clear in this policy.
- The New Gospel Hall Trust note the difficulties with regards to providing more specialist community infrastructure such as places of worship through developer provision.
- The Berkhamsted Schools Group state that a considerable amount of further work is required by the Council to ensure that any costs are directly linked and fair and that the timing is also appropriate, as the coordination of infrastructure must also have strong regard to the timing of housing delivery. Site BK03 is a relatively small and relatively stand-alone site compared with many others in the draft Plan.
- The Berkhamsted and Tring Labour Party, and Extinction Rebellion Dacorum state that the policy should include promoting green mobility and providing infrastructure powered electrically (with the electricity being derived from sustainable sources).
- The CPRE believes there should be more focus on issues relating to water supply, waste-water and sewage treatment.
- The Berkhamsted Citizens Association wish to see a stronger statement requiring infrastructure to be provided ahead of the time when provision is needed to avoid delays.

- D B Land and Planning, comment that the requirements in the policy are vague and that this brings into question whether some development contributions sought in the future under this policy are “necessary” or “directly related” to the proposed development. They also state that in preparing the proposed SPD, they wish to stress the guidance within the NPPG which looks to avoid such documents that would introduce planning policies or unnecessary financial burdens.
- L&Q Estates note that the IDP should be informed by discussions with developers and landowners around viability.
- The Crown Estate state that they support the principles set out in Policy SP7. However, as noted later in these representations, the IDP needs considerable further work prior to the Regulation 19 stage.

Wider Community

The main points raised by the wider community are as follows:

- Developers may use viability as an argument to not deliver the infrastructure required.
- Existing provision of education and healthcare is over-subscribed, transporting pupils to schools out of their neighbourhood/town (Tring and Berkhamsted) adds to travel congestion. Hospital provision at Watford is inadequate and inconvenient, a new local facility is needed.
- Water supply and sewage infrastructure cannot cope with current demand. The chalk aquifer and Dacorum’s important rivers must be protected from further abstraction.
- There are many transport issues across Dacorum, with congested routes to schools (Berkhamsted) and High Streets (Berkhamsted and Tring) and overcrowded trains. Traffic queues on the M1/M25/A41 also impact the towns. New link routes between the B440 and M1 will add more load to the rural road network. Growth will lead to too many additional cars.
- More safe and well-connected walking and cycle routes are needed to encourage trips by foot and bike. New local bus services and facilities for electric vehicles must be provided.
- Development in the neighbouring authorities of Three Rivers, St Albans and Buckinghamshire, east of Aylesbury, will add further strain on infrastructure and facilities in Dacorum.

SP8 - Neighbourhood Planning

There were 145 separate responses to this consultation point. The following themes/issues were raised:

Statutory Bodies

- The Canal & River Trust ask that those creating a Neighbourhood Plan undertake early engagement with stakeholders and that this should include the Canal & River Trust where a proposed NP area includes or is adjacent the Grand Union Canal. The Trust has written a document to help in the Neighbourhood Plan process which has been uploaded and can also be viewed on the Trust's website.
- Markyate Parish Council has not attempted to produce a Neighbourhood Plan. Produced a Parish Plan based on a census, not a sample of the population, and included questions which will still have some meaningful results despite the age of the work. The necessary community involvement would be very difficult to recruit given the time commitment involved and the current COVID-19 restrictions make any such consultation impractical.

General Bodies/Other Organisations

- No objection from BRAG; the Parish Councils of Great Gaddesden, Nettleden with Potten End, and Little Gaddesden; and Tring Sports Forum.
- CPRE state that Chapter 11, and SP8 'c' on Neighbourhood Planning, should also be reconsidered in the light of the latest available information and evidence, not just that published by the Council.
- Tring and District Local History and Museum Society consider that Neighbourhood Planning ought to take place before development, not after it. In any case it appears that rather than listen to what residents of any given neighbourhood want, the Council intends that the plans should be there to deliver what the Council wants. This is highly objectionable and undemocratic.

Wider Community

The points raised by the wider community are as follows:

- The idea of a neighbourhood plan, involving consultation and ensuring buy in from the local community is laudable. However, this has not been achieved with this Dacorum draft local housing plan. It is therefore not considered to be a valid representation of local opinion and will therefore not achieve buy in as a neighbourhood plan.
- Some Bourne End residents mention that Bourne End is not seen as an entity and is "spread" and is treated as being part of other settlements such as part being in Bovingdon Parish and part treated as part of East Berkhamsted area.
- Objection over growth numbers and loss of Green Belt, especially around Tring and Berkhamsted. Some feeling that Neighbourhood Plans would be used by the Council to promote its aspirations rather than a means to promote what local residents may want.
- Northchurch should be recognised as a settlement as are Potten End and Aldbury.

SP9 - Monitoring and Review

There were 131 separate responses to this consultation point. The following themes/issues were raised:

Statutory Bodies

No comments were made by statutory bodies.

General Bodies/Other Organisations

- Landowners/developers/agents are generally supportive of the need to annually monitor draft policies, that the process is transparent, enforceable and realistic, and they also support the role of various triggers for review of the Plan.
- The Berkhamsted Residents Action Group (and supported by other local residents) state that the Plan has no policies that help ensure that developers deliver in accordance with the associated masterplans for the sites.
- Tring Sports Forum consider that the work related to the playing pitch evidence base is dated and should be reviewed as a matter of urgency.

Wider Community

The main points raised by the wider community were as follows:

- Some local support for the policy, but preference for more frequent cycles of monitoring and doubts expressed over whether the Council has sufficient resources to ensure it is effective, enforceable and realistic.
- The Plan needs to ensure that commitments to affordable housing, environmental and biodiversity gains, and supporting infrastructure are kept on track by developers.
- The policy needs to be more effective and focus on actions, enforcement and outcomes, and not just monitoring and review.
- There needs to be a greater role for the Parish Councils and local people in the process of monitoring and review.
- The Plan should be reviewed as it promotes unjustifiable and disproportionate levels of growth, and as a consequence of changes in Government guidance, the ONS growth estimates, the COVID-19 pandemic, Brexit and shopping patterns over the last 5-10 years.
- The policy should not force Dacorum to take unmet needs from other authorities or conversely it should allow the Council to meet its needs elsewhere.

3.3 Guiding Development

Housing Delivery

There were 527 separate responses to this consultation point. The following themes/issues were raised:

Statutory Bodies

- Hertfordshire County Council (HCC) would like to see changes to Policy DM5 to include mitigation measures for commercial conversions to cover improved/reduced access arrangements in scale (as existing access arrangements are often oversized for the converted residential use) to support a safe and efficient pedestrian network. They are also seeking an additional criterion in Policy DM7 to secure space for cycle parking within Houses of Multiple Occupation. They feel that Policy DM13 should pick up the inadequacies of existing gypsy and traveller sites (inc. Three Cherry Trees Lane in Hemel Hempstead) and suggest taking the opportunity to provide additional pitches on proposed new sites as well as the addition of potential alternative sites to allow for the replacement of the Three Cherry Trees Lane site. HCC stress the importance of appropriate housing for older people. The County's Adult Care Service (ACS) department has developed local design standards on extra care housing, shaped by national standards, good practice and excellent schemes elsewhere. These standards aim to result in new homes for older people of excellent quality and desirability.
- HCC would like aspects of DM11 to be clarified, particularly the application of maintaining density levels for 'Elsewhere in Dacorum' is unclear and does not recognise that density levels for different types of housing, such as older person housing, are higher. HCC will not support any moorings that would have a negative impact on the use of waterways for the use of freight.
- St Albans District Council seeks confirmation that Dacorum is meeting its affordable housing need in full (including social rented housing) within the Council's administrative boundary.
- Three Rivers District Council supports the 35-40% affordable housing requirement, but higher percentages should be tested in the Local Plan viability assessment, to help meet needs in Dacorum/South West Herts. The reasons for a lower affordable housing percentage (35%) in Hemel Hempstead should be explained. The policy should state the split between affordable housing for rent and affordable home ownership. In doing so, it should take account of Government's conclusions on First Homes and the South West Herts Local Housing Needs Assessment (which recommends as much rented affordable housing as viability allows).
- Markyate Parish Council supports Policies DM5 and DM6, but advocates including loft conversions as they too can give rise to similar problems as conversions and annexes in a tightly packed community.
- Bovingdon Parish Council support policy DM2 and considers that any site in the village should provide 40% or more affordable housing. Both Bovingdon and Wigginton support the approach to provide a mix of housing. Wigginton would also like to see reference to home-working or live/work units. Bovingdon Parish Council supports specialist housing for older people at Grange Farm.
- The Environment Agency (EA) considers that Policies DM5, DM6 and DM14 should take into account flood risk to avoid inappropriate development in flood zones. Under Policy DM15, the EA point out that residential moorings should not reduce the capacity of the floodplain. Revised wording is provided in all cases.
- The Chilterns Conservation Board support Policies DM2, DM3 and DM4, but suggest that the reference to entry-level homes should be clarified in respect of the Rural Area. The Board also supports Policy DM5 but would like protections that ensure more sensitive redevelopment of existing buildings and a stronger reference to the Chilterns Buildings Design Guide. The Board is concerned that DM1 will fail to address the issue of there being a relative lack of smaller homes in rural locations.
- The Canal & River Trust support Policy DM15 but feels it overlaps with DM49.
- Nettleden with Potten End Parish Council query the nature and justification for a specific policy on residential moorings.

General Bodies/Other Organisations

- Grove Field Residents Association generally support Policy DM5, but query whether the Plan has fully accounted for the supply of homes from the conversion of flats and other non-residential properties.
- Tring in Transition considers that DM2 should be amended to state 'the subdivision of sites to avoid on-site contributions is prohibited'. They consider that the Council should do all it can to encourage self-build, in order to secure the delivery of truly affordable homes and/or homes built to high environmental standards (DM8). They believe the overall proportion of self-build proposed (70 homes out of 16,000) is too low and it should approach at least 5% of all homes built by the end of the Plan period.
- Berkhamsted Residents Action Group supports the principle of securing affordable homes but is concerned that developers will try to avoid/limit their contribution, particularly around arguments for the viability of a scheme.
- Berkhamsted and Tring Labour Party, Dacorum Green Party and Extension Rebellion Dacorum consider that affordability is ill defined in the Plan. 'Genuinely affordable' should mean the rent or mortgage repayment should be no more than a third of household income, calculated on the income of workers in Dacorum.
- The Dacorum Liberal Democrat Councillors state the policies were drafted prior to the onset of COVID 19, and so require updating to reflect expected changes in lifestyle. There is also a need to make sure that all of our policies tally with the UK's 2050 net zero commitment and the Council's 2030 net zero commitment.
- London Continental Railways, and a number of other developers/landowners/agents, generally support the aims of Policy DM11, but this view is not shared by all such organisations. A small number were supporting higher densities in Growth Areas to achieve efficient use of allocated land or specifically seeking indicative densities for Growth Areas HH01 and HH02. Some queried how the policy would operate and whether it would achieve the stated policy aims, whereas others cautioned that the issue of density may have a bearing on the overall viability and deliverability of schemes.
- The Home Builders Federation (HBF) notes that, as the Council has not published a Local Plan viability study, it is unclear if Policy DM2 and the other policies will make development unviable. The Council's approach to its viability assessment should reflect the HBF's briefing note. They are also supportive of the custom and self-build (CSB) housing sector, but feel that the Council's first priority should be to consider CSB housing on its own land, the policy should clearly state that it does not apply to flats (CSB housing cannot be provided in flats), the policy should state that unsold plots will be returned to the developer within a specified period to avoid plots sitting empty, the Council should set out how many plots the policy is expected to deliver, to ensure that it is a proportionate response to the evidence on demand. They also point out that Policy DM8 reflects the Three Dragons CSB Demand Assessment Framework, which modelled demand using unpublished survey data from the National Custom and Self Build Association (NaCSBA). This suggests demand double that shown in the self-build register. In order to justify this, the data should be set out in full, given that demand shown by the register is being met.
- There is general support for the proposed mix of housing on sites, subject to the following points submitted by the Berkhamsted Schools Group, Harrow Estates, BHL, Gleneden Plant Sales, Taylor Wimpey, L&Q Estates, The Retirement Housing Consortium (McCarthy & Stone and Churchill Retirement Living) and Whiteacre.
 - Many developers requested the policy should be flexible.
 - The high affordable housing percentages proposed may impede viability and therefore affordable housing delivery. The Council should consider whether increasing the overall housing requirement would enable the delivery of more affordable housing, to more fully meet the identified affordable housing need.
 - The Retirement Housing Consortium considers that Table 5 should apply only to general needs housing and not to specialist accommodation for older persons.
- The Berkhamsted Schools Group, BHL, Taylor Wimpey, Hallam Land Management and W Lamb commented that the affordable housing percentages need to be fully justified and that further consideration should be given to the affordable housing percentages in the Local Plan viability assessment, which should also consider the impact of changes to Building Regulations. They also state that the policy should be

flexible as some sites, particularly large ones, require significant infrastructure (e.g. Growth Area HH01, North Hemel phase 1). Also, circumstances may change. The policy should reflect the Local Plan viability assessment and Infrastructure Delivery Plan.

- The Retirement Housing Consortium (McCarthy & Stone and Churchill Retirement Living), Inspired Villages, ICP Asset Management, Retirement Villages and W. Lamb stated that the Council incorrectly includes extra care housing within use class C3. It should be C2 and that Use Class C2 care homes should not be required to deliver affordable housing. They also state that on-site affordable housing is usually unviable with retirement communities, due to high up-front costs, the level of non-saleable space, staffing and funding.
- The representations from BHL, Gleneden, L&Q Estates and Thakeham Homes on Policy DM10 (accessible and adaptable homes) generally support the need but highlight that the Council is required to provide sufficient evidence to justify the policy's requirements, that the viability appraisal of the Local Plan should assess whether the policy will undermine the Plan's deliverability and the policy should refer to viability at the decision-making stage, to ensure that schemes can come forward with suitable facilities whilst still enabling development on site. They also point out that the delivery of all homes to (at least) M4(1) standard will result in larger plot sizes and will impact density. They point out that national guidance states that policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. Finally, they state that the requirement for M4(3) units is high and the level should be agreed on a site by site basis, considering current need, location, scheme viability and impact on density.
- Responses to Policy DM9 were received from Inspired Villages, ICP Asset Management, Akzo Nobel, the Retirement Housing Consortium (McCarthy & Stone and Churchill Retirement Living), The Crown Estate, Whiteacre and Retirement Villages. They believe the Plan shows a substantial need for specialist housing for older people which is not met by the Plan and this cannot be left to windfall development. They also believe that need should not be met on five growth areas only. Specific allocations for older people's housing should be included in the Plan (and could be listed in Policy DM9).
- Objections to Policy DM8 were raised by Berkhamsted Schools Group, Harrow Estates, BHL, DB Land and Planning, Taylor Wimpey, L&Q Estates, Hallam Land Management, The Crown Estate and Thakeham Homes. The main concerns are that it is not clear how the 5% requirement and 40 houses threshold were derived. The 5% requirement is excessive in relation to demand and the Council need to support its figure with evidence.
- Bidwells supports Policy DM8 and considers that the Plan should aim to meet the full demand for CSB housing assessed in the Three Dragons study. However, they envisage that assessed demand will not be met, particularly early in the Plan period. They disagree that CSB plots should be only on larger sites. Smaller sites should be identified for CSB housing in the Plan.
- Akzo Nobel and St William Homes express concern about the proposed pepper potting policy citing concerns that it fails to recognise the management arrangements of registered providers, particularly in developments of apartments, that require clusters of affordable homes around common cores. There are also additional management costs associated with dispersed properties.
- St William Homes seeks more flexible wording to ensure that viability is taken into account and sites are deliverable. Some sites will require detailed viability analysis at planning application stage to ensure that an appropriate level and tenure mix of affordable housing can be provided taking into account any infrastructure and other S106 requirements.
- Harrow Estates is concerned that the policy calls for affordable homes to be 'substantially below the market price' which may impact on the ability to provide the full quantum of affordable housing units, particularly in growth locations where significant infrastructure and other contributions are also required.
- Thakeham Homes feel that it is not appropriate for the Council to set the value of affordable dwellings, as this may impact the viability of schemes.

- The Berkhamsted Schools Group needs accommodation for teachers, which are hard to recruit due to the absence of affordable housing in Berkhamsted. Some of the housing at Haslam Fields (Growth Area Bk03) may be retained for teacher accommodation.
- Taylor Wimpey and St William Homes consider that the Council's approach to tenure mix could have a significant impact on the viability of development. The policy should allow for other tenures, including shared equity or shared ownership. Indeed, the tenure split of affordable housing is likely to have a significant impact on overall viability of development.

Wider Community

The main points raised by the wider community are as follows:

- It is not clear whether the Plan has fully accounted for the supply of homes from the conversion of flats and other non-residential properties.
- Policies DM5 and DM6 should be amended so that both achieve the same standard of carbon emissions as new dwellings, unless other policies prevent this (e.g. listed building, conservation areas).
- Local residents broadly support Policy DM12.
- A small number of residents object to the justification and need to plan for more traveller sites under Policy DM14 and stress the need to restrict such opportunities.
- A few local residents support the tighter control of online moorings under Policy DM15, and that new moorings should be offline and not located outside of urban areas.
- Too many flats and executive homes are being built. The main need is for 2 and 3 bedroom houses for young people. Such homes are also suitable for older people who wish to downsize, thus freeing up larger homes for families to move into.
- There is an ageing population, so more bungalows are needed.
- There is general support for a mix of housing types on developments, but some people think that this is not appropriate.
- Some people support the affordable housing percentages in Policy DM2 but others think these percentages are too low given the high local house prices and the great need for affordable housing.
- The affordable housing percentages should be fully enforced on all developments. Many people are doubtful that this will happen, given past experience.
- Affordable housing must be genuinely affordable.
- There is a need for more social rented and Council housing. The expected level of social housing is way below the identified need in the Local Housing Needs Assessment.
- There are difficulties faced by many disabled people and their families living in poorly adapted homes.

Employment Development

There were 194 separate responses to this consultation point. The following themes/issues were raised:

Statutory Bodies

- Hertfordshire County Council (Growth Team) supports the references in Table 18 to the employment land areas of search, defined in the Waste Site Allocations DPD. However, it may be necessary to amend the table, as the new Waste Local Plan is likely to replace the areas of search with a criteria-based policy on waste management uses in employment areas.
- The Hertfordshire Local Enterprise Partnership supports the Guiding Development policies on Employment Development.
- Three Rivers District Council welcome Policies DM16 (General Employment Areas) and DM17 (Other Office and Industrial Sites), as they will help to protect employment areas and other existing sites. The designation of Sunderland's Yard, Kings Langley as a General Employment Area is supported to help retain jobs in Kings Langley and given the shortages of employment land in Dacorum.
- Berkhamsted Town Council considers that Northbridge Road in Berkhamsted, although supported by an Article 4 directive, should also be designated as GEA to protect local employment. Growth Area Bk11, the Sarthe Business Park (Jewson Site) should be retained for employment and not redeveloped for housing.
- Markyate Parish Council states that there is no justification for identifying only one General Employment Area in Markyate and that this will reduce the sustainability of the village. The Council is also opposed to the Plan's proposal that two existing employment sites in the village should be redeveloped for housing. This would remove all the local car maintenance businesses and long-established small businesses meeting the specialised needs of Vauxhall, Luton Airport etc. Markyate should not become simply a dormitory.
- Sport England supports Policy DM16 in permitting non-office and industrial uses in the GEAs. Some indoor sports facilities (e.g. gyms and activity studios) often occupy light industrial units. Such facilities create employment and provide facilities that can be used by workers. A new point 3 f. should be added to Policy DM16, stating: "Sports facilities, such as health & fitness suites (gyms), activity studios and gymnastics centres".
- The Chilterns Conservation Board (CCB) considers that the value of the Chilterns AONB in supporting local economies through tourism should be emphasised in the supporting text to Policy DM18 (tourism). The policy itself should support tourism activities consistent with the AONB, including in locations away from existing settlements (e.g. farm diversification). CCB's officers would be willing to assist the Council with drafting appropriate wording.
- London and Continental Railways and Network Rail generally support the inclusion of some offices on Growth Area HH08 (Hemel Hempstead Station Gateway) in draft Policy DM17, but this should be led by demand for such floorspace when a planning application is submitted.

General Bodies/Other Organisations

- CPRE Hertfordshire urges the Council to review the employment development policies. The employment floorspace requirements must be updated as COVID-19 is changing how businesses and offices operate. Land should not be removed from the Green Belt for development that may not be required or could be accommodated in urban areas. Policy DM16 and Table 19 should be re-written, as exceptional circumstances almost certainly do not exist for development of Green Belt land at Bourne End and Bovingdon Brickworks. Policy DM17 point 1 on offices in Green Belt 'growth areas' must be reviewed.
- Berkhamsted Residents Action Group and Berkhamsted Citizens Association consider that employment opportunities in the Berkhamsted area should be preserved or improved. Given the shortage of employment land, the Billet Lane GEA (Jewson Site) should not be reallocated for housing development and the Plan should protect the employment use at the British Film Institute site.

- Berkhamsted and Tring Labour Party and Extinction Rebellion Dacorum suggest the designation of Article 4 areas covering Berkhamsted and Tring town centres, to require planning applications for changes of use from offices to housing, given the shortage of offices. Dacorum Green Party also wants employment areas in town centres to be protected.
- The Dacorum Liberal Democrat Councillors state the policies were drafted prior to the onset of COVID 19, and so require updating to reflect expected changes in lifestyle. There is also a need to make sure that all of our policies tally with the UKs 2050 net zero commitment and the Council's 2030 net zero commitment.
- Tring & District Local History & Museum Society supports Brook Street Silk Mill's designation as a GEA, proposes GEA status for the New Mill flour mill and considers that land next to Icknield Way Industrial Estate should be retained for employment use, not reallocated for housing. Tring Local History Museum should be protected under the objective of promoting tourism.
- The Crown Estate comments on Policy SP5 indicated that the evidence base does not support the assumption that 84,000 m² of Dacorum's office shortfall can be met at East Hemel in St Albans District. The policies in Chapter 15 should be viewed in the context of this strategic concern about unsoundness.
- EH Smith (owners of Bovingdon Brickworks) considers that the name of the Bovingdon Brickworks GEA in Table 19 should be amended, as the GEA boundary covers more than just the brickworks. EH Smith's open storage area should also be included in the GEA, as it benefits from a lawful development certificate for sui generis builders' merchants use. EH Smith supports the flexibility in Policy DM16 to allow appropriate non-office and industrial uses in GEAs, including 'sui generis' uses (such as a builders' merchants).
- Expert Effect Ltd (trading as 'The Carpet Warehouse' on Sunderland's Yard, Kings Langley) employs local people where possible and supports the designation of Sunderland's Yard as a GEA.
- Aberdeen Standard Investments and Redington Capital (both have an interest in Network House, offices at Doolittle Meadows GEA) object to Policy DM16, point 4, which resists proposals for residential use. This is inappropriate, as the Article 4 direction gives the Council sufficient control over changes of use from offices to housing. Nationally, changes to the Use Classes Order and General Permitted Development Order give more flexibility in uses, even more so given COVID-19. Policy DM16 is also too inflexible in relation to NPPF paragraphs 80 and 81 and Planning Practice Guidance. It should be flexible enough to capture future needs/changes to demand which are not anticipated in the Plan. An approach similar to Draft Watford Local Plan Policy EM4.3 is advocated.
- OSD (One Stop Doctors) support the aspiration to encourage employment development in Hemel Hempstead, but development is constrained by the HSE Consultation Zones relating to Buncefield Oil Terminal. These restrictions should be reviewed in the Local Plan process, to maximise the range of uses that can be accommodated in Maylands Business Park, including on the Maylands Gateway Employment Growth Area and the OSD site (in Boundary Way).
- ICP Asset Management considers that bullet 3 in Policy DM16 should include reference to care and nursing home uses as an additional acceptable use, given the job generating benefits of such uses.
- Hertfordshire County Council (Property Team) welcomes the inclusion of the existing employment provision at Dunsley Farm set out within Policy DM16 and the additional employment space to be generated as part of the Tr01 Growth Area.

Wider Community

The main points raised by the wider community are as follows:

- The Plan fails to take account of COVID-19, which will mean less need for office space and more home working. There is scope to convert or redevelop vacant offices to provide housing. The employment assumptions in the Plan are now out-of-date and should be revisited in 2022/2023 once the position is clearer.
- Too little employment development is proposed in relation to the high level of housing growth proposed. This will result in increased out-commuting.

- Given the high level of housing development proposed in Berkhamsted, existing employment sites such as Billet Lane (Jewsons) and the British Film Institute should be retained, to avoid an increase in out-commuting.
- Local employment areas should be protected, particularly in town centres. Too many offices have already been converted to housing in Berkhamsted and Tring town centres, so Article 4 areas should be designated to control further such changes of use.
- Sunderland's Yard, Kings Langley causes environmental problems (e.g. noise and lorries), but there are differing views on whether it should become a General Employment Area. The owners do not want to sell the site for housing development.

Retailing and Other Town Centre Uses

There were 149 separate responses to this consultation point. The following themes/issues were raised:

Statutory Bodies

- Hertfordshire County Council (Growth Team) welcomes the importance given to libraries. However, the County is concerned that Policy DM19 (mix of uses in town, district and local centres) restricts libraries to upper floors of primary shopping areas and 'elsewhere in town and district centres'. Libraries should also be permitted in ground floor locations in primary shopping areas, where they are better used, easily accessible and will encourage retail activity. On Policy DM20, walking and cycling routes to neighbourhood centres and scattered shops should be protected/enhanced and high-quality cycle parking provided.
- The Chilterns Conservation Board (CCB) is concerned that Policy DM21 does not cover small-scale retail and other 'town centre uses' that could be included in farm diversification schemes. CCB can suggest appropriate wording. Also, Policy DM21 does not give sufficient protection against major out- of-town retail in the AONB or its setting on environmental grounds, although this may be provided by other policies such as DM27.
- London and Continental Railways and Network Rail consider that specific reference should be made to the unique characteristics of draft allocation HH08 (Hemel Hempstead Station Gateway) when discussing acceptable uses in Policy DM19. In particular, the provision of suitable uses to support the multi-modal transport interchange should not be constrained by this policy.

General Bodies/Other Organisations

- CPRE Hertfordshire regards the retail studies relied on by the Council as out of date. The retail landscape has changed considerably in the light of current circumstances, particularly regarding town and village centres and local shopping provision. Much more emphasis is required on regeneration and creation of mixed use, sustainable central areas.
- The Chiltern Society considers, given the impacts of COVID-19 on retail and other businesses, that more emphasis should be given in Policy DM19 to the reuse and conversion of disused properties to help to meet housing need in sustainable town centre locations.
- Berkhamsted Residents Action Group broadly supports the Council, but sees a lack of vision and ambition with regard to cultural and performing arts. Given the massive growth targets and the claimed benefits of the Garden Communities, it is time to replace the Pavilion which closed in 2002.
- The Dacorum Liberal Democrat Councillors state the policies were drafted prior to the onset of COVID 19, and so require updating to reflect expected changes in lifestyle. There is also a need to make sure that all of our policies tally with the UKs 2050 net zero commitment and the Council's 2030 net zero commitment.
- Berkhamsted and District Labour Party and Extinction Rebellion Dacorum would like public houses to be given protection in the Local Plan.
- The New Gospel Hall Trust sees no evidence for including places of worship in Table 21 or for the policy stance in Policy DM19, point 5.b.iii., although the policy is not necessarily promoting town, district and local centres as the preferred location for places of worship. Whilst some faith communities may accept such locations, they will not be suitable for others.
- The Crown Estate (owners of much of the North Hemel Growth Area) regards Policy DM19 as acceptable in principle, but point 1 should recognise that new local and district centres will be created in the Hemel North Growth Area.
- Hertfordshire County Council (Property Team) proposes changes to point 6 in Policy DM21 (main town centre uses outside existing centres). The first 4 words 'in the following locations' should be deleted. Also, Table 23 should refer to the proposed allocation at Growth Area Tr01 (Dunsley Farm), with the caveat that it will only be permitted if an additional supermarket cannot be delivered at Tr06 (High Street/Brook Street).

- Metric GP Income Plus Ltd (owners of Dunelm and Wickes, London Road, Apsley) supports the elevation of Apsley from a local centre to a district centre and the inclusion of their site within the boundary. However, while the definition of a primary shopping area is appropriate in town centres, this designation is not necessary in Apsley. There should be flexibility for a greater range of uses throughout Apsley, to allow it to evolve and diversify and become a more cohesive centre.
- Akzo Nobel (owners of 168-192 High Street, Berkhamsted) supports Policy DM19, which encourages a wide range of appropriate uses in town centres and new retail development in primary shopping areas. The flexible approach to uses on upper floors in primary shopping areas is also supported. However, to make the policy effective and justified, point 5(a) should be amended to include the full range of uses permitted under new Use Class E, in the interests of supporting the vitality and viability of town centres.
- Tesco Pension Investment Fund Management supports the designation of Jarman Square as an 'Out of Centre Retail Location' in Policy DM21. However, the Plan should recognise the potential for intensification and diversification at existing commercial sites. A wider mix of uses, including residential, could support redevelopment and help retain commercial floorspace. Jarman Square has potential for such change. This could involve re-use of existing floorspace, redevelopment or a standalone development (building above the existing structure or on underused land).
- Bourne Leisure (based at 1 Park Lane, Hemel Hempstead) supports Policy DM19 in encouraging a wide range of main town centre uses, including the support of the evening economy. The inclusion of 1 Park Lane within the town centre boundary is also endorsed. However, text should be added to Policy DM19 to protect the amenity of neighbouring uses, not just housing.
- Westmorland Ltd. consider that point 1 in Policy DM21 should make it clear that 'other policies in this Plan' includes allocations outside of the centres which may be expected to include main town centre uses.

Wider Community

The main points made by the wider community are as follows:

- As a result of COVID-19 and the rise in online shopping, the assumptions in the Plan are out of date. There are now more empty shops and offices and there will be less need for such floorspace in the future.
- More leisure and cultural facilities are required, including performing arts, particularly in Hemel Hempstead given the proposed growth of the town. A replacement for the Pavilion is needed.
- Protection for public houses should be written into the local plan. Applications for the loss of a pub should be accompanied by a viability report. Shops, cafes and leisure uses should also be protected.
- Increased working from home will mean more use of local shops and other facilities. Neighbourhood centres have been very useful during the pandemic.
- Regeneration of town centres should provide local hubs/office space and housing alongside leisure facilities to provide a basis for vibrant centres in the future.
- Business rates should be cut, to support local small businesses against online competition. Otherwise, local high streets will be empty apart from charity and coffee shops.
- Car parking should be cheaper, in order to encourage local convenience shopping.

Climate Change and Sustainability

There were 434 separate responses to this consultation point. The following themes/issues were raised:

Statutory Bodies

- Natural England, and others, ask that the Plan recognise the role of the natural environment in tackling climate change, including hedgerows, woodlands and other habitats. When delivering new green infrastructure, such as for carbon offsetting, opportunities should be sought to improve strategic ecological networks through tree planting or by creating new areas of priority habitats.
- The Chiltern Conservation Board do not support wind turbines in locations that would harm the AONB or its setting. The Board ask that policy wording and mapping be amended to show where they would be appropriate, with reference made to their statement on renewable energy.

General Bodies/Other Organisations

- The Chiltern Society and the CPRE do not support wind turbines in locations that would harm the AONB or its setting.
- The Dacorum Liberal Democrat Councillors state the policies were drafted prior to the onset of COVID 19, and so require updating to reflect expected changes in lifestyle. There is also a need to make sure that all of our policies tally with the UKs 2050 net zero commitment and the Council's 2030 net zero commitment.
- The British Film Institute and Taylor Wimpey state the climate change policies are onerous and over prescriptive. The policies should be flexible to allow the most suitable carbon reduction strategy for each site to be determined, and be subject to viability.
- St William Homes LLP and L&Q Estates consider the requirement for development to be net zero from 2030 is aspirational and would increase development costs. This should be tested through a viability assessment alongside the Plan's other costs.
- Hertfordshire County Council (Property Team), St William Homes LLP and Thakeham Homes believe the requirement for two new trees per dwelling in Policy DM22 Sustainable Design and Construction will undermine the design and layout of a site, and conflict with the required housing densities. Tree planting numbers could instead be determined by design guides or the biodiversity net gain requirement. Other requirements of Policy DM22 are open to interpretation and should be made clear and enforceable for consistent use at planning determination.
- The Crown Estate seek clarification on what the additional 19% reduction in Policy DM23 Energy and Carbon Reductions in New Development is applied against. The policy may not be needed given the proposed roadmap to the 2025 Future Homes Standard.
- The Crown Estate, L&Q Estates and DB Land and Planning comment that Policy DM24 Low Carbon Community Heat and Energy Networks should be more flexible to enable the most appropriate and viable low carbon option for a site to be implemented, such as solar energy, heat pumps and any new technology. The 'areas of opportunity' (Figure 6) for wind turbines and district heating should be reviewed.
- Berkhamsted Residents Action Group ask that SP10 go further in regard to new development. At the very least all development on Green Belt should be net carbon neutral with immediate effect.
- Dacorum Environmental Forum Waste Group argue that all new development should be net zero from the adoption of the Plan, include an explanation of how net carbon gain will be achieved over the building's lifecycle, and be connected to low or zero carbon energy sources rather than be enabled for retrofitting.
- Tring in Transition point out that the Renewable and Low Carbon Energy Study referenced dates from 2010 and focuses on just two technologies. It also asks that the Plan's climate change strategy be linked to the work of the Hertfordshire Climate Change and Sustainability Partnership and the Sustainable Hertfordshire Strategy.

Wider Community

The main points raised by the wider community are as follows:

- Climate change and sustainability should be at the centre of the Plan.
- As new homes will add to the volume of carbon emissions, the scale of growth should be reduced.
- Development on Green Belt will take away land uses that absorb carbon dioxide and rainfall.
- The Plan proposes development in locations that are not sustainable and will result in households owning multiple cars and making more car journeys to reach services and facilities, adding to carbon emissions. The Plan should focus instead on regenerating brownfield land and town centres, where walking and cycling are viable transport options.
- Comments on measures to reduce the energy use of buildings include:
 - All development must be to the highest external certified standards and have charging for electrical vehicles, good insulation and solar panels, and minimise water usage.
 - New homes should be connected to heat pumps at construction rather than providing an option for later retrofitting.
 - A plan is needed to improve energy efficiency standards in existing buildings through retrofitting.
- Comments on carbon emission targets and standards for new buildings include:
 - The Plan should be more ambitious and introduce net zero development on adoption, rather than waiting until 2030.
 - The Plan should include interim targets leading up to 2030 and set out how net zero carbon will be achieved in this timescale.
 - The Plan must include carbon budget targets that contribute towards the national target of net zero by 2050.
 - Carbon calculations must consider the full lifecycle of the new building through construction, operation and demolition.
 - The Plan's targets must be monitored.

Environment and Biodiversity

There were 373 separate responses to this consultation point. The following themes/issues were raised:

Statutory Bodies

- The Natural Trust strongly support the Plan's policy for all relevant development proposals to help conserve and enhance the Chilterns Beechwoods Special Area of Conservation and for an Appropriate Assessment to examine the impact of recreational disturbance on the SSSI's. To avoid any adverse impacts, the Trust recommend an alternative destination site be provided early in the Plan period, and contributions be sought for monitoring and mitigation from new housing developments within an established Zone of Influence.
- The Chilterns Conservation Board consider the Plan is inconsistent in its approach to protecting and enhancing the SAC and following of the mitigation hierarchy's first step of avoiding harm, by not thoroughly considering alternative sites located further away from the SAC's or reducing the scale of development. It would like stronger protection of the AONB, including policies preventing light pollution, and the Board's management plan and technical guidance documents to be taken into account when development proposals in the AONB and its setting are considered.
- Hertfordshire County Council (Ecology) welcome the overall approach of the plan and ask that the section and its wording be strengthened to:
 - Recognise the importance of local wildlife sites through policy and related mapping, and be linked to supporting a Local Nature Recovery Network;
 - Include further strategic policies on ecological networks, local wildlife and geological sites and valuing biodiversity;
 - Give the mitigation hierarchy more prominence and reflect the biodiversity net gain principles of 'Do everything possible to first avoid and then minimise impacts on biodiversity'; and
 - Provide further development guidance to reduce community exposure to poor air quality, by requiring development to achieve overall improvements to air quality and minimise the potential adverse impacts.
- Similarly Natural England support the policies introduced and advise:
 - Adding a separate strategic green infrastructure policy to the Plan for its protection and enhancement, supported by a Green Infrastructure Strategy;
 - Making biodiversity net gain mandatory for all development linked to a mitigation hierarchy in alignment with the NPPF;
 - That sufficient evidence be provided through the SA (including assessment of local ecological networks) and HRA to justify the site selection process and ensure sites of least environmental value are selected and that these contribute towards enhancing ecological networks where opportunities are available; and
 - Irreplaceable habitats such as ancient woodland, ancient and veteran trees should be protected by policy.
- The Environment Agency provide detailed comments on a number of policy areas within the section, with requests for the Plan to:
 - Strengthen policies on protecting sites, species and habitats to also include protection for important sites/habitats that are not designated and aim for a positive impact on priority species and habitats rather than just avoiding a negative impact.
 - Seek a long term monitoring and management plan for areas of biodiversity net gain to secure the improvements for 30 years.
 - Required developments to plan for future flood risk and improve defences if required.
 - For watercourses, development should include suitable buffer zones where lighting levels are restricted to below 2 lux, action should be taken against invasive species, and detailed requirements should be specified for culverts, where it is not possible for these to be removed.

- Both Thames Water and the Environment Agency ask that the wording of Policy DM34 Flood Risk and Protection be expanded to include all forms of flooding including sewer, groundwater and fluvial (from rivers) flooding, with no development permitted in flood zone 3b.
- Herts Gardens Trust have concern that the Plan does not consider historic designed landscapes. Policy DM36 should include the retention or replacement of trees as necessary in accordance with any historic design intent in historic parks or gardens or the setting of listed buildings.
- The Canal & River Trust support the inclusion of a policy relating to the Grand Union Canal but state elements of concern with the supporting text. The Trust note that Tring Reservoirs are not sufficiently mentioned within the Plan, and ask that the definition for green infrastructure is expanded to include blue infrastructure.

General Bodies/Other Organisations

- There is general support, including from the Box Moor Trust, for Policy DM33 Protection and Enhancement of the River Character and Water Environment, however more detail is needed on how the policy will be achieved, particularly as urban development will add further stress to rivers.
- The Dacorum Liberal Democrat Councillors state the policies were drafted prior to the onset of COVID 19, and so require updating to reflect expected changes in lifestyle. There is also a need to make sure that all of our policies tally with the UKs 2050 net zero commitment and the Council's 2030 net zero commitment.
- Hertfordshire County Council (Property Team), DB Land and Planning, and Gleneden Plant Sales Ltd argue that development sites adjacent to but outside of the AONB should not be subject to the same level of requirements as sites within the AONB.
- Hertfordshire County Council (Property Team), Taylor Wimpey, L&Q Estates and Thakeham Homes comment on the requirement under DM36 Tree Retention and Protection for new tree planting, with three 'like for like' replacement trees for any specimen lost considered to be over prescriptive and would restrict landscape schemes.
- Berkhamsted Residents Action Group and Dacorum Environmental Forum Waste Group raise concern at the increase demand for water resulting from growth and how this will be supplied. CPRE Hertfordshire ask that the Plan protect chalk streams, and the Chiltern Society ask that policy seeks to restore flows, improve water quality and ecological conditions.

Wider Community

The main points raised by the wider community include:

- While there is overall public support for policies that protect the AONB, other parts of the Plan contradict this intention, points made include:
 - The screening exercise to establish the impact on the Special Area of Conservation has not yet been completed.
 - Development on Green Belt in vicinity of the AONB will not protect it nor preserve and conserve its special features but instead will lead to harm to the AONB and SAC.
 - Green Belt development in Tring and Berkhamsted will be visible from the AONB.
 - This in turn is against the purposes of Green Belt land as set out by the NPPF.
- Members of the public think there is little detail or plan on how biodiversity would be improved and the accompanying evidence base is out of date. Many add that when development takes place on greenfield land it should include connecting corridors of habitat for wildlife with new mixed woodland and re-wilding. Ancient and woody hedgerows were highlighted as important habitats that should be protected with a 10 m buffer zone.
- They also have concern that the Borough's chalk streams and aquifer will be damaged by increased water abstraction to supply new homes, pollution from surface water drainage and waste water, and rising temperatures.

Managing Development in the Countryside

There were 207 separate responses to this consultation point. The following themes/issues were raised:

Statutory Bodies

- Northchurch Parish Council and Markyate Parish Council consider that Policy SP11 does not demonstrate nor fully evidence and justify exceptional circumstances for the release of Green Belt land, the evidence and assumptions behind housing growth are flawed, and it also wrongly assumes that identified development need alone justifies/outweighs such releases.
- Bovingdon Parish Council supports the principles of film, television and related production at Bovingdon Airfield under Policy DM40, policies that seeks to promote the protection of the countryside from unnecessary and inappropriate development, and the limited release of land at Grange Farm for housing and other purposes.
- Markyate Parish Council cites that the Plan is flawed as the latest information suggests that there is no need to build on Green Belt sites to meet the justifiable housing needs. They are of the view that the Council has not distinguished between the postal addresses for Markyate and Flamstead and the civil parish boundary between the two villages. The boundaries are very different and policies adopted for the two villages have also been very different.
- Great Gaddesden Parish Council highlight that the use of Green Belt land is contrary to the wishes of the community, and it also runs counter to the Government's response to the local housing need proposals of 16th December 2020. There is an over-reliance on a few very large strategic Green Belt allocations. The Parish Council is also of the view that there is insufficient evidence that Dacorum has looked widely enough to meet its housing commitments from less sensitive, more sustainable, sites. They dispute whether the demonstrable benefit of the proposed release of Green Belt land outweighs the adverse impact of building on it.
- Little Gaddesden Parish Council consider that there remains doubt about the potential growth in the Hertfordshire area (Brexit impact, change of work patterns, immigration level changes) and believe that c 700 homes pa c. 11,000 over the plan period would be sufficient and would avoid to some extent the pressure for greenfield development.
- Wigginton Parish Council argues that the village boundary is out of date and should be reviewed, the village should be treated equal with Aldbury given they both lie in the CAONB, and the four selected small villages should be "inset" from the Green Belt.
- Redbourn Parish Council state that the Hemel Garden Communities project will see urban sprawl into the Green Belt and the narrowing of the gap between Redbourn and Hemel Hempstead, damaging the local environment and ecology and adding to the problems of climate change.
- The Chilterns Conservation Board (CCB) considers that Policy SP11 should make clear that:
 - the boundaries of the Green Belt will not be amended until the Plan is adopted;
 - the extent of landscape buffers in development sites necessary to maintain the protection and enhancement of the CAONB and the Chilterns Beechwoods SAC should have been identified by this stage of the Plan process, and retained as designated Green Belt. The CCB suggests that clause 2 of the policy could be clarified by referring to the relevant sites as being "developed sites washed over by Green Belt" or similar; and
 - clause 3 of the policy could be clarified by noting that proposals will only be acceptable".
- The CCB are of the view that the reference to the Rural Area in Policy SP12 (and across the Plan generally) is confusing and should be removed or should only apply to the (small) area of the Borough that is neither town, nor Green Belt, nor AONB.
- The CCB also state that the policy does not draw out a distinction between villages in the Green Belt only, and those in or adjacent to the AONB. Wigginton is in the AONB, and Flamstead and Potten End are very much in its setting. They add that it might be appropriate to include the Chilterns Buildings Design Guide in the supporting guidance.

General Bodies/Other Organisations

- The Berkhamsted Residents Action Group (BRAG), and the CPRE consider that Policy SP11 does not demonstrate nor fully evidence and justify exceptional circumstances for the release of Green Belt land, the evidence and assumptions behind housing growth are flawed, and it also wrongly assumes that identified development need alone justifies/outweighs such releases. BRAG also point out a typographical error in paragraph 1 to Policy SP11 that makes its meaning unclear.
- CPRE Hertfordshire state that Policy DM39 should include criteria to ensure that infilling within villages is only allowed where it is sustainable, they believe that Policy SP11 should not allow inappropriate development in both specified and unspecified locations in the Green Belt, and that Policy SP12 '1' (d) should be limited to those uses that are essential and will not harm to the Green Belt and designated landscapes.
- The Dacorum Liberal Democrat Councillors state the policies were drafted prior to the onset of COVID 19, and so require updating to reflect expected changes in lifestyle. There is also a need to make sure that all of our policies tally with the UKs 2050 net zero commitment and the Council's 2030 net zero commitment.
- The Chiltern Society believe that the Plan needs to be much more explicit as to how the Council has demonstrated 'exceptional circumstances' for removing land from the Green Belt to allow for development, however the society expresses support for Policy SP12.
- The New Gospel Hall Trust welcomes and supports in accordance with national advice the proposed provisions of Policy SP12 – Development in the Rural Area which include support for social, community and leisure uses.
- Tring & District Local History & Museum Society objects to the general re-drawing of the Green Belt boundary implied by SP11. Green Belt should be permanent and not regarded merely as a land bank to satisfy developers. They do not agree that Aldbury should see development under SP12, since it occupies a very special and particular landscape setting in the Chilterns AONB.
- Tring Sports Forum have no objections to Policies SP11, SP12, DM39 and DM40.
- Landhold Capital agree that the Plan does set out the exceptional circumstances required to release land from the Green Belt for housing.
- Landhold Capital also mention that the Council should reconsider the boundaries to the Green Belt in a number of locations under Policy SP11 recognising the need to allocate further sites in order to meet the housing requirement in full during this Plan period, and avoid the need to make further modifications to the Green Belt boundaries within this Plan period and beyond.
- Vistry Homes does not consider Policy SP11 to be sound, as currently worded, although the broad intentions of Dacorum's Green Belt Policy and the emerging Plan, taken as a whole, are generally supported. Policy SP11 should have more flexibility to facilitate the release of minor areas of Dacorum Green Belt in boundary fringe locations, where this would help to bring forward sustainable development in adjacent settlements in neighbouring authorities, such as at Redbourn in St Albans District. Suggested wording is provided.
- Gleneden Plant Sales Ltd believe that the draft Policy SP11 does not consider the merits of or give priority to previously developed land in the Green Belt as is required by the NPPF. As such, the Policy should be edited to include reference to brownfield sites and to note that they should be preferred for development compared to those sites located in the Green Belt.
- LQ Estates point out that Policy SP11 should refer to land within Growth Areas is proposed to be (rather than has been) removed from the Green Belt.
- Gardener Family Trust support the need to release land from the Green Belt to meet need, but argue that land in their ownership could be released from the Green Belt, to allow development which would assist in meeting the housing targets within the Borough.
- Westmorland Ltd states that Policy SP11 should refer to the Watling Street Truck Stop under Renewal Area Cy03 and not Cy05.

- Tullys Children's Fund query why the Council is proposing its largest allocation (HH01 and HH02) in close proximity to the AONB when there are more appropriate alternative options such as dispersing the growth around the Borough and to the smaller villages. They are of the opinion that this would help to achieve the growth levels required whilst minimising the impact on the AONB and the amount of land released from the Green Belt.
- Greene King Brewing and Retailing Ltd request that land in their ownership north of the Red Lion Public House, London Road, Hemel Hempstead is removed from the Green Belt and is allocated a Growth Area for housing in the emerging Plan. They highlight that it is not clear whether the site is within or outside of the settlement boundary as the draft Proposals Map appears to show the site both within the settlement boundary of Hemel Hempstead and within the Green Belt with the two designations conflicting with one another. It is their view that the site should lie within the defined settlement boundary of Hemel Hempstead.
- The Crown Estate:
 - supported, in principle, the policies in the chapter;
 - paragraph 19.1 should make it clear that 'countryside' policies do not apply to land within the adopted development allocations of the Plan; and
 - welcomes under Policy SP11 the proposal to exclude all of the North Hemel Growth Area from the Green Belt and the proposed detailed boundary shown on the Policies Map.
- EH Smith Ltd supports the inclusion in Policy SP11 (Point 2) that the Council will support the principle of development in the Green Belt in order to help meet Borough-wide strategic commercial objectives on the former Bovingdon Brickworks (Growth Area Cy02).
- DLA Town Planning object to Policy DM39 it is considered to be too restrictive undermining opportunities for growth in smaller villages, and the definition of "limited infilling in villages" is not consistent with national policy, is inappropriate/not required, and the policy should be deleted.
- AR Planning state that DM39 should clarify that policy village boundaries are not definitive in establishing whether a site falls in a village, and suggest amendments to the policy wording.
- KTB Commercial considers that the Plan appears to contradict itself as to the definition of a village. They argue that Piccott End satisfies sufficient criteria to be identified as a settlement under Policy DM39. The fourth criterion in the supporting text should not be used as other policies within the Plan will seek to protect heritage assets and Conservation Area. Identifying the village would allow for limited infill development in compliance with the NPPF. KTB also propose that the settlement boundary of Piccotts End should be amended to include the parcel of land to the south east of 92 Piccotts End to allow for a small scale limited development of 3 properties on this land.
- Local landowner representation is made in support of amending the Green Belt boundary to the rear of Coniston Road, Kings Langley which seeks to move it to follow the permanent defensible line at the end of the gardens adjoining open countryside.

Wider Community

The main points raised by the wider community are as follows:

- There is support for the Berkhamsted Residents Action Group, the Chiltern Society, and CPRE's views that Policy SP11 does not demonstrate nor fully evidence and justify exceptional circumstances for the release of Green Belt land, the evidence and assumptions behind housing growth are flawed, and it also wrongly assumes that identified development need alone justifies/outweighs such releases.
- Disagreement with the need to review the Green Belt boundary under Policy SP11 because of the substantial loss of Green Belt land and countryside, the impact of development on the CAONB and Chilterns Beechwoods SAC, it will lead to urban sprawl, is based on flawed assumptions for housing need, and it is unsustainable.
- Objections to a variety of housing growth areas across a number of settlements linked to the potential release of Green Belt land.

- Policy SP12 should not permit development in Aldbury because of its location in the CAONB and it should be treated the same as Wigginton, and there is a need for an additional compatibility criterion referring to 'the nature' of the Rural Area under paragraph 2 to avoid harm to the local environment and ecology.
- Objections raised querying whether point 2 to Policy DM39 accords with guidance in the NPPF.

Delivering Great Places

There were 181 separate responses to this consultation point. The following themes/issues were raised:

Statutory Bodies

- Markyate Parish Council comment as follows:
 - Policy DM41 - They consider that it is unlikely that buildings of more than 2 storeys would be acceptable in the conservation area of Markyate, point out that extending into the roof space of one and two storey buildings can be quite overpowering, and consider it appropriate to restrict roof extensions in bungalows, if not for existing properties then possibly for new builds.
 - Policies DM43 and DM44 - The Parish Council welcome the protection proposed in the Plan to preserve our heritage.
 - Policy DM49 - They are pleased to see that the Plan intends to make more use of the opportunities offered by the canals but note that the canals are there to provide navigation with a secondary statutory use for angling. Nearby accommodation needs to be provided with this in mind. The Plan should also recognise that the towpath is there for boaters and anglers.
- Hertfordshire County Council (Growth Team) (HCC) comment as follows on Policy SP13:
 - This policy has the potential to deliver multiple benefits for health through the design outcomes and principles it sets out. Most, if not all of the principles could be linked directly back to a desired outcome of walkable neighbourhoods and high levels of active and sustainable travel. The policy might benefit from making explicit reference to this given the co-benefits for health outcomes, environmental sustainability, air quality etc.
 - HCC welcome transport impacts being recognised within this section and policy and would support working on including transport aspects within the proposed Detailed Design Guide SPD.
- Hertfordshire County Council (Property Team) welcomes the guidance in relation to building heights within Growth Areas, whereby Policy DM41 guides that these will be dictated by site specific master plans.
- Hertfordshire Constabulary stress the importance of crime prevention and security ensuring that building developments achieve the police preferred minimum security standard: Secured by Design (SBD), can lead to more secure, safer and sustainable environments; and can provide a better quality of life for the residents living in the area. Many different environments can be designed to reduce criminal activity and the fear of crime, and they have a significant impact on anti-social behaviour. Incorporating crime prevention and security considerations into the local Plan would also help to align police and planning department efforts in the future to provide safer environments for living, working and leisure.
- Hertfordshire County Council (Senior Historic Environment Advisor and Growth team) have made the following comments:
 - The Plan could be more effective at conserving and enhancing the historic environment of the Borough and contributing to sustainable development, and it also lacks local distinctiveness.
 - Areas of Archaeological Significance are not shown on any of the maps in the Plan.
 - The policies and accompanying text mainly repeat the NPPF rather than considering what makes the Borough's historic environment distinctive and they would greatly benefit from a small number of policies containing local archaeological information.
 - They recommend that there is a requirement for access to a suitable repository to store archaeological archives and make them available to the public as Dacorum currently does not have a museum and the storage it has is full up.
 - They suggest that the Plan should encourage new development to reference the local architectural styles and building materials and, where possible, historic buildings should be kept and maintained to complement and inspire this.

- The Plan needs to clarify the expected scope and content of Heritage Impact Assessments (paragraph 20.49). This is because the information required to enable the planning authority to make an informed decision regarding the historic environment is more clearly contained in existing document types such as archaeological desk-based assessments, historic building assessments and conservation assessments.
- Many of the other sites will require archaeological assessment prior to the submission of a planning application since they have the potential to contain heritage assets which may be a constraint on development.
- The Environment Agency (EA) comment as follows:
 - Policy DM41 – The EA suggest that an additional point is included within this policy which references managing risks to groundwater resources associated with deep piled foundations that are typically required for tall buildings in line with paragraph 170 of the NPPF. They would also like it to be recognised that the height of buildings along rivers needs to be addressed here. Over shading of rivers is seen as causing issues to rare chalk stream habitats and development proposals should be mindful of this. The EA provide suggested detailed wording.
 - Policy DM49 – The EA are pleased to see the inclusion of this policy, but point out that some stretches of the Grand Union Canal are also classified ‘Main River’ where the River Bulbourne and River Gade join the canal. In these sections their requirements (and Policy DM33 requirements) should also apply. Point 3 of the policy should also refer to making a positive contribution to WFD objectives, as development near watercourses and the Grand Union Canal will affect water quality. The EA provide suggested detailed wording.
- Homes England (HE) welcomes the references to design quality and the opportunities to deliver quality design. HE point out that paragraph 129 of the NPPF makes reference to Building for Life and that this design tool has now been updated to Building for a Healthy Life. They suggest that a definition could be added to the Glossary in the Plan.
- The Chilterns Conservation Board considers that the policies (especially Policy SP13) should make explicit reference to the Chilterns Buildings Design Guide and a requirement that its provisions should be applied with regard to all development proposals in the AONB and, preferably, its setting. The Guide, and its supporting technical notes, should also be included in the supporting guidance here.
- Historic England (HE) note and support policies DM43 - DM47 in relation development affecting the historic environment, but point out that these are hidden away in chapter 20 ‘Delivering Great Places’ where they could be missed. HE recommend a reordering of the Plan so that ‘Development affecting the historic environment’ is a chapter in its own right.
- Sport England supports Policy SP13 as it requires all development to be in accordance with a range of principles that support active lifestyles especially principle 7 “Active and Healthy”. This is consistent with Government policy in section 8 of the NPPF and Sport England’s Active Design guidance.
- The Canal & River Trust comment as follows:
 - Under Policy DM44, they wish to be involved in work on the Detailed Design Guide SPD and ask the Council to consider whether the Grand Union Canal needs formal recognition as a Non-Designated Heritage Asset in any area where it is not already a designated asset.
 - They support the inclusion of Policy DM49, but are seeking more active involvement to review both the policy and text to ensure that their aspirations align before the next stage of the local Plan. The Trust are wishing to discuss issues relating to the supporting text and are suggesting a number of changes to points 2, 3 and 4 in the policy.

General Bodies/Other Organisations

- Berkhamsted Residents Action Group (BRAG) suggest that the Council is not pro-actively engaging with communities, and has grave misgivings about the ‘masterplan’ procedures as they are of the view that developers rarely adhere to them and that historically the Council has not been rigorous enough to enforce them. Many other residents have repeated BRAG's points about masterplans.

- The Dacorum Liberal Democrat Councillors state the policies were drafted prior to the onset of COVID 19, and so require updating to reflect expected changes in lifestyle. There is also a need to make sure that all of our policies tally with the UK's 2050 net zero commitment and the Council's 2030 net zero commitment.
- The Chiltern Society make the following points:
 - The Society supports Policies SP13, DM43, DM46 and DM47.
 - Policy DM41 - The Society supports this policy as it provides a method for meeting more of the housing need within sustainable locations in urban areas, thus helping to reduce the need for development in the Green Belt and/or AONB. Taller buildings also provide opportunities for more dense development, including more affordable and starter homes. However, there is a need to safeguard the setting of listed buildings and historic sites from high buildings.
 - Policy DM44 – The Society would like to see this policy make more reference to the importance of historic landscapes. They point out that the Chilterns contains many landscapes which should be considered of historic importance.
- The Berkhamsted and Tring Labour Party and Extinction Rebellion Dacorum want taller buildings to be prioritised over releasing areas of Green Belt land, seek a programme to actively identify non-designated heritage assets during the Plan period, and think fuller consideration should be given to the impact of traffic from new development on schools and existing residential areas (if the development will cause significant congestion in the area of a school, it should not be approved). A number of local residents repeated these comments.
- The Dacorum Green Party is calling for the following if land is released from the Green Belt for development (also repeated by other local residents):
 - significant levels of rewilding and planting of locally sourced trees, including public rights of way;
 - new allotments for resident of new homes as well as laying out gardens to support 'Growing your own'; and
 - nature to be incorporated into the design of each new development.
- Tring Sports Forum raise no objections to Policy SP13 and Policies DM41-49 inclusive.
- Tring & District Local History & Museum Society support the rationale behind SP13, but oppose the use of buildings of more than three storeys except within the most urban parts of Hemel Hempstead under Policy DM41. They also support Policy DM44 and cite Tring Local History Museum as an example of a non-designated asset which is deserving of protection.
- Bloor Homes object to Policies DM43, DM44, DM46 and 47 as they are not in accordance with national guidance.
- The Berkhamsted Schools Group agree with the objectives under SP13 for achieving high quality design. However, they urge a more flexible approach to detailed design criteria and height of development on land in their ownership (site Bk03) and stress concerns over avoiding unnecessary delay to delivery due to over complex and unduly wide masterplanning/design codes. Site Bk03 is seen as a relatively small and stand-alone site that is available for immediate delivery.
- Akzo Nobel CIF Nominees Ltd supports the detailed design principles and requirement for high quality design that reflects local character as set out under Policy SP13. However, the Council should amend Policy SP13 to clarify what schemes will qualify for the Council's Design Review Service. In the interests of soundness, they suggest that Policies DM43, DM44, DM45, DM46 and DM47 should make specific reference to the NPPF (chapter 16).
- L&Q Estates generally support the aspiration of Policy SP13 and recommend that Policies DM43 – 47 should all accord with relevant national policy, in particular NPPF Section 16.
- The Gardener Family Trust consider that land that they are promoting can deliver a high quality development in accordance with the aims of the Great Places.
- St William Homes (SWH) shares the objectives of the Council in delivering 'great places' and raising design standards, but urge that policies (and supporting Supplementary Planning Guidance) need to be sufficiently flexible to ensure innovative approaches to design on each site. SWH supports Policy DM41, which recognises that in the Opportunity Area in Hemel Hempstead (including in Two Waters), tall and

taller buildings will be supported there. They consider that the definition of “taller” and “tall” is appropriate, particularly in the context of their land interest (HH09). The definition of and approach to viewing corridors is seen as being important in this context and SWH note that detailed guidance on this will be forthcoming.

- Thakeham Homes highlight what they consider to be inconsistencies between the wording within Policy DM41 and the wording in Table 27 of the supporting text (suggested amendments provided). They are also of the view that the Council should not limit 2.5 or 3 storey dwellings, where these can provide additional habitable space, in order to create efficient use of land and allow the Council to meet its density requirements set out under Policy DM11.

Wider Community

The main points raised by the wider community are as follows:

- Some support for Policies: SP13, DM42, DM43, DM44, DM47, DM48 and DM49, while others express doubts over the execution and actual implementation, delivery and enforcement of the standards/objectives/ambitions of Delivering Great Places.
- There is a contradiction between the aims/objectives of Great Places and the need to deliver so many homes in the Plan, particularly with reference to Berkhamsted, Tring and Kings Langley and its impact on the countryside/CAONB and loss of Green Belt land.
- Query the involvement of residents in and the operation of, Community Review Panels.
- Minor support for building more mooring berths for canal trips in order to promote local tourism.
- Policy SP13 should focus more on environmental benefits and heritage matters.
- Table 26 to Policy SP13 - Climate crisis should feature higher up in the list of 'principle categories'.
- Table 27 to Policy DM41 - The need for better signposting to 'opportunity areas', and 'intensification areas' (both physical location, and where in the documentation).
- Support expressed for new homes being built to better space standards and to take into account the needs of households for outdoor space/garden space/balconies/vertical gardens and more play areas and facilities, particularly as a result of the COVID-19 pandemic. The latter is also seen as an opportunity to re-think town centres and employment areas.
- There is not a clear description in Policy DM41 explaining how to meet the new home demand whilst controlling the amount of taller buildings being proposed in the Borough. Residents were generally concerned over (or sometimes hostile to) the Plan encouraging higher densities and promoting taller buildings, and their overall local suitability / desirability. Furthermore, some are seeking greater protection of the character and appearance of the surrounding development, especially listed and other historic buildings and open spaces, and avoiding high buildings along the ridges of the valley.
- Some residents made a number of suggestions for changes to policies:
 - 20.17 (1) / Table 25. It is essential to ask local residents about their perceptions of the look and feel of the character of the area as it stands and this should be a requirement in the section. 20.17(4). A fourth point should be added to the table - For larger developments (over 10 dwellings) a 3D model actual or virtual showing local context and land form should be available to view before the design is approved.
 - Table 26 to Policy SP13 - A Distinctive Place - a more appropriate term would be 'A Comparable Place' or 'A Comparable Place'. 2) This should include a reference to inclusion of private garden space. 6) High quality home should include reference to at least one reasonable sized garden (front or rear) in family homes. (8) the preservation or enhancement of biodiversity should be a specified outcome.
 - Policy DM41 - Table 27 Elsewhere in towns - up to 3 storeys and Elsewhere in Dacorum should not have a tick, but the comment - "subject to compatibility with the local character and screening".
 - Policy DM43 - Large sites and smaller development sites where there is suspected of being a heritage asset, must have at least an independent desk-based historical survey carried out, followed by a field based survey and Heritage Impact Assessment if there is evidence that such an asset may exist.

- Policy DM44 - (1) This should specify inclusion of a method to enable finds of heritage assets or suspected heritage assets to be reported to the Council by the public on an ongoing basis rather than rely on periodic consultations. (2) would benefit from an example such as 'Rural Hedges Over 100 years old'.
- Policy DM45 - Where a Desk Based assessment has already been carried out and there is evidence that an unscheduled or previously unrecognised archaeological or heritage asset exists, the field based assessment should be carried out prior to approval of the development (including consideration of release of Green Belt for development), so as not to prejudice the outcome for that asset.
- Policy DM46 (3) should include: 'Organisations or groups with an appropriate interest must be invited and facilitated to remove, take off site and conserve structures and features destined for demolition prior to demolition to avoid valuable assets of significance to future generations being lost forever.' This concept should also apply to features of listed buildings that would be damaged or removed as part of the proposed modifications.
- Policy DM49 - ecological considerations must take priority, including minimising disruption to wildlife, particularly during the breeding season. (3) A buffer strip adjacent to the canal for the protection of wildlife should be a requirement specified in this policy.
- Support is being sought under Policy DM49 for the early stage proposals by Chilterns Canoe and Rafting Club (who also run paddle boarding) to develop a canal side boathouse and base facility to support its activities and growing membership/participation. Further support to other water-based sports clubs (such as canoe clubs, scuba and angling clubs) would also be welcomed.
- General suggestion made for incorporating the following in new development: mini forests, green corridors, community allotments and local facilities, cycleways, EV charging points, and local bus routes.
- Minor support for the Council to better promote moorings for recreation, while remembering that the towpaths, locks and adjacent facilities are there for the users of the canal. Any new developments nearby need to be designed with this in mind.

Sustainable Transport & Connectivity

There were 345 separate responses to this consultation point. The following themes/issues were raised:

Statutory Bodies

- Hertfordshire County Council made a number of suggested policy changes, and raised that there should be a section within transport on behaviour change through travel planning. They also object to some of the policy decisions on the grounds that they are not compliant with national policy.
- Great Gaddesden and Nettleden with Potten End Parish Councils raise concern about the lack of information available for transport interventions outside of the three main towns and the impacts that the north Hemel Hempstead link Road will have on existing rural settlements and request a policy is put in place to protect them from increased traffic. They also question what the plans are for increasing connectivity to existing rural communities.
- Nash Mills Parish Council raise concern about parking standards noting that pavement parking has been an issue in the area and that lower densities should be sought to minimise this. They also mention the need to introduce safe walking and cycling routes and public transport into and in the Two Waters Apsley Area. They also make reference to the Infrastructure Development Plan and the reorganisation of the London Road/ Durrants Hill Road Junction to improve the streetscape, while they support this in principle they raise concern about the nature of Two Waters as a retail location and the ease of access by car which could result in further traffic issues in Apsley.
- Markyate Parish Council note that they are located away from inter-urban bus corridors and separated from the rest of the borough and no foot ways and narrow roads and the transport issues are enough to reject further building in Markyate. They wish to see policy that is directed to local need and the need for private transport in rural communities. The Plan does not consider the impacts of the Strategic Road Network and Luton Airport nearby. The Parish Council support the digital policies.
- Wigginton Parish Council believe there should be mention of home working.
- Flamstead Parish Council believe aspirations for a shift to sustainable travel are an unrealistic notion, as bus services which cater for outlying villages are consistently being reduced.
- Only Three Rivers and St Albans City and District Councils responded to this section of the Plan and were both in support, however St Albans recommends strengthening policies for sustainable travel.
- Sports England support the approach to encourage active lifestyles and promoting the health benefits of walking and cycling. They request that design guides be included within the evidence base.
- Chilterns Conservation Board raise that parking policies should also refer to their 'Chilterns Building Design Guidance' as part of the supporting guidance.
- The Canal & River Trust is concerned that the canal towpath is not being adequately promoted as an active travel route.

General Bodies/Other Organisations

- Berkhamsted Residents Action Group are concerned that there is little detail for Berkhamsted Transport and there are issues with accessing the station currently which will be made worse by the distance between sites and facilities. The limited bus provision available is not regular nor reliable and there are limited opportunities to increase road capacity. BRAG disagrees with the statement that a Sustainable Transport system is in place in Berkhamsted.
- Tring in Transition want to understand what proposals are mandatory and what is aspirational and state policy should be more site specific for Tring. They include a number of measures they would like to see introduced such as electric public transport, free EV parking and a joined up cycle network.
- The Dacorum Liberal Democrat Councillors state the policies were drafted prior to the onset of COVID 19, and so require updating to reflect expected changes in lifestyle. There is also a need to make sure that all of our policies tally with the UK's 2050 net zero commitment and the Council's 2030 net zero commitment.

- Vincent & Gorbing on behalf of St William Homes LLP, and Quod Ltd on behalf of Pigeon Investment Management Ltd, state the current policy DM51 for schemes to deliver infrastructure beyond what is required to make them compliant does not meet the soundness test of the NPPF.
- Aitchison Raffety on behalf of The Berkhamsted Schools Group accept the general principle that all sites must make an appropriate contribution to relevant linked transport improvements, however further discussion is needed to understand the implications of this, stating that their site is of a relatively small scale and has existing access. They state that the finalised strategy may change and the level of interventions will reflect that final growth level. The development of their site should not be undermined or delayed due to funding transport improvements and that these should be fully justified, reasonable fair and directly linked.
- Hallam Land Management Ltd state that the Hemel Hempstead Sustainable Transport Strategy is not available and along with the transport policies should be subject to separate examination before the Plan reaches Regulation 19.
- Vincent & Gorbing on behalf of St William Homes LLP recommend a few changes to policy so that it is more flexible towards parking standards.
- Berkhamsted and Tring Labour Party request that all residential developments of 15 units and above must be required to contribute towards the creation and improvement of electrified bus transport to local key destinations. All developments of 30 units and above must create safe cycling routes and must be required to install publicly accessible bikes and electric vehicle fast charge points. Permission for larger development must be conditional to the prior completions of necessary infrastructure projects to keep pace with development.
- South West Herts Conservative Association state that Berkhamsted is a narrow town with significant parking problems. The development proposals will generate considerable more traffic and the Plan recognises this because of topography in Berkhamsted. There are no plans to improve access to the A41 and this will lead to more congestion.
- Dacorum Green Party notes that electric car charging points must be mandatory for all new developments. Safe cycle paths to town centres and rail stations with secure parking provision must be provided and mandatory for all development. Public transport should be improved and replaced with an electric fleet. Public transport connections to stations must be improved.

Wider Community

The main points raised by the wider community are as follows:

- The proposed sites in the Emerging Strategy for Growth, located on steep hills at edge of town locations and away from facilities and transport, will not be able to support sustainable transport and will encourage more car use. This is primarily made in relation to growth in Berkhamsted, but views are shared for Hemel Hempstead and Tring, as well as Long Marston.
- The existing settlements (specifically Berkhamsted and Tring) already suffer from congestion in their high streets and local roads. There is no evidence to suggest these will be improved and limited scope to do so because of historic small/narrow roads.
- Concern from residents in more smaller rural settlements about the impacts of the North Hemel Hempstead link road and the increase in rat running this may cause through their communities.
- The capacity at existing stations in terms of the stations themselves and the services that run through them are at capacity, growth will worsen this (more specifically at Berkhamsted and Tring).
- The bus service available in the Borough is infrequent, unreliable and expensive.
- There is a lack of evidence available - such as the justification for a new North Hemel Link Road which would likely result in an increase in traffic through other settlements to reach it and worsened by reducing capacity on the A414. The walking and cycling infrastructure proposed in Berkhamsted and Tring is not sufficient to enable mode choice.
- The Plan does not take into consideration the impact COVID-19 will have on working patterns.

- There is a lack of safe and suitable walking and cycling infrastructure across the Borough which will need to be improved. Use of this type of provision is likely to be seasonal meaning more car traffic during the winter months.
- Pollution, air quality and climate change are all areas of concern linked to increased growth and traffic congestion in the towns. Others have raised this as a reason to make more drastic changes to transport provision.
- The need to provide more Electric Vehicle charging infrastructure is raised along with the need for other forms of EV transport (bus, bikes and scooters).
- Parking problems both within town centres and on local roads would be worse with growth proposals. Current on road parking makes travel through towns (specifically Berkhamsted and Tring) difficult and unsafe.

Healthy Communities

There were 257 separate responses to this consultation point. The following themes/issues were raised:

Statutory Bodies

- Sport England support the introduction of Health Impact Assessments that support opportunities for encouraging physical activity through the design of a development.
- Sport England wishes to see changes to policy wording in order for the Council to 'expect' as opposed to 'encourage' community use of new facilities provided in schools.
- Sport England expect policies to be reviewed so that residential development in other areas of the Borough, in addition to Hemel Hempstead, contribute to the provision/refurbishment of leisure facilities, as there are identified qualitative deficits in settlements such as Berkhamsted in the Council's Leisure Facilities Study.
- Hertfordshire County Council state that the introduction of Health Impact Assessments should consider flood risk as flooding has an impact on health, particularly mental wellbeing.
- The County Council support a standalone policy on Education, however they also state that new education allocations should be shown on the inset and proposals map, and that where applicable, the build zones should be removed from the Green Belt.
- The County Council reiterated that they only build schools to the size required and would not be providing enhanced facilities above the standard unless they were funded by an external source.
- The West Herts Hospitals NHS Trust supports policy DM59 and will work with the Herts Valleys CCG to develop a model for acute service provision on the site and to identify the best location for the urgent treatment centre. The trust aims to complete the redevelopment of Hemel Hempstead Hospital in 2027, with work commencing in 2022.
- Nash Mills Parish Council have concerns with regard to developments of higher densities and the impact on wellbeing via lack of light, smaller living space, the ability to see open space from the home and amenity.
- The Chilterns Conservation board believe that the health benefits of the Chilterns AONB should be referenced in this section of the Plan, and that its enhancement should be seen as an investment in community health. The Environment Agency supports this, stating that natural and green spaces should be enhanced and maximized. Comments also support the potential auditing of the positive value of green spaces to justify policies further.

General Bodies/Other Organisations

- The Berkhamsted Residents Association Group (BRAG) state that healthcare facilities have failed to increase in line with growth in the past, and there is nothing in the policies that reassures the community that this trend will be reversed. They also state that Green Belt and open countryside are beneficial to the health of residents and should be protected.
- It was raised by L&Q Estates that provision for acute health services from site allocations should now be considered at Local Plan stage within the viability testing, and not at planning application stage.
- The Dacorum Liberal Democrat Councillors state the policies were drafted prior to the onset of COVID 19, and so require updating to reflect expected changes in lifestyle. There is also a need to make sure that all of our policies tally with the UK's 2050 net zero commitment and the Council's 2030 net zero commitment.
- St William Homes LLP state that the approach to open and play space provision should be flexible, as in some areas a mix of on and off-site contributions would be more applicable, if this can be justified on the basis of wider access and place making. The proposed use of the Fields in Trust standards have been identified as a benchmark, and their use should be supported with local evidence.
- The Tring and Berkhamsted Labour Party, and Extinction Rebellion Dacorum believe that the proposed thresholds for Health Impact Assessments are too low, and should be reduced to any development of 25 units and above.

- The Dacorum Green Party encourage the provision of additional allotments and wild spaces to help create healthy communities.
- OSD Healthcare state that the Plan needs to be in line with the NPPF with regards to its definition of community facilities.

Wider Community

The main points raised by the wider community are as follows:

- New sports and leisure facilities are often privately owned and unaffordable for those with low incomes and families with multiple children. They also largely cater for those who have high fitness levels and do not consider the needs of the elderly or less mobile.
- Existing health infrastructure is inadequate and would worsen with the planned development, with particular concern regarding GP practices and the hospital at Hemel Hempstead.
- Existing school infrastructure is inadequate and/or under pressure, and would worsen with planned development, particularly regarding primary school provision in Kings Langley and Two Waters Hemel Hempstead, and secondary school provision in Berkhamsted and Tring.
- The Green Belt and wider countryside provide the population of Dacorum with health and recreational benefits, and should therefore be protected.
- The policies do not detail how new sports and play facilities will be funded, nor who will provide or maintain these facilities.
- Consultation has not been carried out with neighbouring councils and NHS trusts on the impact of development on health infrastructure outside of Dacorum, especially with regards to the Stoke Mandeville and Luton and Dunstable A&E services.
- The Plan does not discuss mental health, or facilities for the provision of mental health care, both acute and long term.
- Larger outdoor play areas and free outdoor facilities are needed for older children to use for recreation, a large number of parks and open spaces in the Borough only cater for younger children.
- The Plan should allocate land for new allotments and support growing your own food.
- There should be a policy specifically supporting the production and consumption of healthier local food, and restricting unhealthier choices.
- The Plan should mention loneliness and the impact this has on the health of the population, and how integrated design can help to reduce loneliness.

3.4 Settlements

Hemel Hempstead Garden Communities Delivery Strategy

There were 206 separate responses to this consultation point. The following themes/issues were raised:

Statutory Bodies

- Natural England ask that the strategic policy for Hemel Garden Communities (SP14) require all development to conserve on site biodiversity and provide biodiversity net gain through multi-functional green infrastructure.
- Hertfordshire County Council would like to see more emphasis placed on the importance of transport infrastructure that will encourage the use of sustainable modes of transport within and between Hemel Garden Communities. Also to note - a network of MMTIs (multi modal transport interchanges) (of differing scales) is expected across Hemel Hempstead, not just Maylands and the Hemel Garden Communities development area.
- Affinity Water report that the network will need major reinforcements, such as new pipelines and pumping stations, to support new development in Hemel Hempstead.
- The Canal & River Trust would like any new residential or employment development either adjacent to the canal or likely to result in an increase in its use to promote and improve the towpath as a transport route and also consider waterbased recreation uses.
- Sport England ask that the Hemel Hempstead Infrastructure section include the strategic sport and leisure infrastructure needs of the town, in line with the approach taken with other types of community infrastructure.

General Bodies/Other Organisations

- The Dacorum Liberal Democrat Councillors point out that the strategies include a large amount of Green Belt which they do not consider should be released. A housing target which cannot be considered an objectively assessed need for our area is not an exceptional circumstance to release Green Belt.
- Herts Gardens Trust recommend conserving and enhancing Hemel Hempstead's 20th century New Town heritage, a period which is increasingly being recognised. In their view, the proposed expansion of Hemel Hempstead is contrary to the Garden City and New Town Principles that the Mission Statement states will be followed, as development on HH01, HH02, HH05 and HH22 will remove green spaces that both separate neighbourhoods and are within easy reach of communities for health and recreation.

Wider Community

The main points raised by the wider community are as follows:

- The scale of development is excessive and will spoil Hemel Hempstead's rural town character and identity, and make it feel like a city. Proposed development on green fields, the need for more tall buildings and denser development are all factors in this. Too many flats are proposed, rather than houses with gardens and parking spaces.
- In a larger town, residents will be more dependent on cars for local journeys, leading to a greater strain on road infrastructure and parking. More car journeys and congestion will generate more CO₂, while Green Belt land that would absorb CO₂ will be developed.
- Other concerns include:
 - The loss of open, attractive countryside and long views in the Gade Valley with development shown up to the AONB boundary.
 - Lack of infrastructure, both now and in the future, with not enough schools, medical facilities, hospital facilities or roads to support growth.
 - The impact on local water supplies, the chalk aquifer, and flows and biodiversity of the River Gade.

North and East of Hemel Hempstead

- Hertfordshire County Council Children's Services calculate that growth within North and East of Hemel Hempstead will require five new 2.92 ha primary school sites (amounting to 15 forms of entry). They point out that there is no guarantee that a new secondary school site will be delivered in East Hemel Hempstead (within St Albans City & District) to meet Dacorum's needs and that this is a strategic cross boundary issue.
- Great Gaddesden Parish Council oppose this growth which will bring overwhelming and completely negative transformational change to the parish of Great Gaddesden which currently has 450 houses spread across five hamlets in an area which is entirely either AONB or Green Belt.
- Redbourn Parish Council object to the Green Belt growth which will narrow the gap between Redbourn and Hemel Hempstead and cause environmental and ecological damage.
- The Chiltern Society, Chilterns Conservation Board and Water End & Upper Gade Valley Conservation Society and the public oppose the significant loss of countryside. Development on Green Belt land up to the AONB boundary will remove one of the few remaining green lungs on the edge of Hemel Hempstead and be visible across the surrounding area. The exceptional circumstances for Green Belt development are not demonstrated.
- This area of Hemel Hempstead is one of the least sustainable locations in Hemel Hempstead and is far from the station. As it does not have any existing transport infrastructure, journeys by private car, and associated carbon emissions, will increase and will be likely to require travel through central Hemel Hempstead. More information is needed on the transport plan.
- The proposed strategic sustainable movement corridor linking Leighton Buzzard Road in the west to Redbourn Road (within SADC) to the east is of concern. Issues include:
 - Traffic will increase on Leighton Buzzard Road, making it more difficult to join.
 - No detail given on the route and where it would join the B440.
 - Rural routes, villages, important landscapes and the listed bridge at Water End do not have the capacity for more traffic.
 - Pollution and noise will cause significant environmental harm.
- Residents ask if the withdrawal of the St Albans City and District draft Local Plan 2018 will impact the north Hemel Hempstead sites given the need for joint working on the Hemel Garden Communities programme.

Hemel Hempstead Town Centre

- The Environment Agency seek improvements to the River Gade through Policy SP17 Hemel Hempstead Town Centre, and for the River to be given greater prominence for its flood risk, biodiversity and health benefits.
- Hertfordshire County Council (Children's Services) seek a 2.03 ha site for a new 2fe primary school to accommodate additional child yield.
- The Hertfordshire Local Enterprise Partnership are very supportive of the measures to promote environmental improvements, ensure better accessibility and provide for a more varied range of employment activities.
- There are a number of vacant buildings and empty units in Hemel Hempstead town centre, such as Debenhams, there needs to be a plan to cope with this change.

Two Waters Opportunity Area

- Hertfordshire County Council (Children's Services) require a 2.03 ha site for a 2 fe new primary school to meet the pupil yield arising from developments within the Two Waters area.
- The Hertfordshire Local Enterprise Partnership welcome the focus given to this area, and the opportunities for employment space along the A414/A41 junction, with investment in major transportation infrastructure including a multi modal interchange being the key driver to future investment.

- Residents want to protect the beauty of the moors and character of Boxmoor village and feel development on surrounding sites should be a maximum of 4 storeys high.
- The roads through Boxmoor, Apsley and Nash Mills are often badly congested and difficult to navigate due to traffic volumes and parked vehicles from developments with inadequate parking provision. Development will lead to more pollution and pressure on struggling infrastructure and resources.

Maylands Business Park

- Nash Mills Parish Council have concerns that development in Maylands Business Park and the Leverstock Green area will bring more traffic through minor roads in Nash Mills that are narrow, residential and already congested.
- The Hertfordshire Local Enterprise Partnership support Policy SP19 Maylands Business Park and in particular, the initiatives set out in point 8.
- The public highlight existing traffic issues in Maylands which the proposals will add to.

Rest of Hemel Hempstead

- Hertfordshire County Council (Children's Services) note that there will be a need for additional schools to accommodate child yield from other sites and seek a 2fe (2.03 ha) primary school site at land to the north of Astley Cooper School and also a further secondary site (of sufficient size for a 10fe school).

Hemel Hempstead Garden Communities Proposals and Sites

There were 432 separate responses to this consultation point. The following themes/issues were raised:

HH01: North Hemel (Phase 1) and HH02 North Hemel (Phase 2)

- Hertfordshire County Council (Minerals and Waste Planning) support the relocation of the Household Waste Recycling Centre to HH01 and require the proposed location to be shown as an allocation. They note that the current facility is too small to cope with demand and expansion is not viable.
- Hertfordshire County Council (Transport) want opportunities for sustainable transport modes to be maximised, and the requirement for a new strategic corridor to be guided by further transport assessment.
- In HH01 Hertfordshire County Council (Children's Services) calculate that a further allocation of one new primary school (2.92 ha) is needed in addition to the proposed provision for a new primary and secondary school. For HH02 there is a requirement for a third 2.92 ha 3fe primary school above the proposed provision for two new primary schools and a secondary school.
- The Environment Agency note that this area has a significant surface water flow path and that future modelling to determine the extent of flood risk should include climate change allowances.
- Historic England advise that a Heritage Impact Assessment will be required to confirm the suitability, extent and capacity of HH01 and HH02 and to inform any development criteria that may be required to mitigate harm resulting from development.
- Sport England and Dacorum Sports Network highlight the opportunity the scale of HH01 and HH02 provides to deliver new outdoor and indoor sports facilities and ask that this be added to the site requirements.
- The Dacorum Liberal Democrat Councillors believe that moving Household Waste to HH01 with no route to the north for >7.5 tonne vehicles and overlooked by AoNB is not in line with policy.
- The Trustees of the Gaddesden Trust's view is that HH01 and HH02 should be removed as allocations on grounds including housing delivery issues, impact on AONB, deliverability of infrastructure and associated carbon footprint. Notwithstanding this, in the event that HH01 and HH02 are retained, it is imperative that the current policy wording is amended to give suitable protection to the AONB, neighbouring receptors and the setting of nearby listed buildings.
- The Crown Estate has concerns regarding infrastructure stating that HH01 cannot deliver the whole strategic transport corridor and that land instead should be safeguarded for its future delivery. It also queries the evidence requirement for two new secondary schools for HH02 and for one new secondary school and the household waste recycling centre for HH01.

- Some respondents argue that HH02 should be allocated for development alongside HH01 and do not support the Plan's approach to instead safeguard this site for the future. These include;
 - Berkhamsted Town Council and Berkhamsted Citizens Association who argue that HH01 and HH02 are likely to be more sustainable as they are better located for employment opportunities and adjoin the existing urban network.
 - BHL, Pigeon Hemel Hempstead Ltd and Kitewood Estates Ltd who raise points regarding; the need to identify more sites to reflect the current higher housing needs figure and as HH01 may deliver less dwellings than proposed due to topography, heritage assets and safeguarded land for the link road; the funding and delivery of infrastructure and in particular the link road, which is at risk if development is phased.
 - Berkhamsted Residents Action Group believe that HH01 and HH02 both need to be available to achieve development of a scale that will create a new vibrant, dynamic and sustainable community that will help regenerate the New Town core.
 - Some residents agree that the benefits of bringing HH02 forward earlier in terms of accessibility, opportunities for green energy use and contribution to Hemel Garden Communities is preferable to over development of Dacorum's market towns.
- Hallam Land Management's view is that HH01 should be deleted and instead be safeguarded with HH02 and taken forward through the emerging Joint Strategic Plan to contribute towards long-term cross-boundary transformational growth.
- The CPRE, the Chilterns Society and Dacorum Environment Forum Waste Group also argue strongly against the development on visual and environmental themes, opposing the scale of development and location on high grade agricultural land in the setting of the AONB.
- Members of the wider community object to the proposals on grounds including:
 - Transport and accessibility – the local area, the Link Road and Redbourn Road are gridlocked during rush hour; the location is far from the train station and public transport is not sufficient; rural roads are not suitable for more traffic; further congestion and poor air quality will result.
 - Visual impact on the Gade Valley, with the proposals for HH01 and HH02 contradicting the recommendation of the October 2017 Schedule of Site Appraisal (Technical Studies A, Green Belt Review and Landscape Appraisal) to 'exclude from further assessment and retain as Green Belt'.
 - Loss of high-grade agricultural and Green Belt land that forms the only accessible countryside on the north side of Hemel Hempstead and provides bridleways, footpaths and open space for exercise and wellbeing. The allotments on Grovehill Playing Field must be retained.
 - Environmental damage including the impact on the CAONB (and its potential National Park status), Ashridge, the Gade Valley Water Meadows, small historic villages and the rural parish of Great Gaddesden.
 - Flood impact - Grovehill Playing Fields and agricultural fields regularly flood after rain. The fields create large rivers and a lake which can spread from close to Redbourn to Dodds Lane towards Piccotts End. Development will push flood water closer to houses in Wootton Drive and increase the flood risk to Piccotts End.
 - Nature and biodiversity – the area is considered a haven for wildlife and has a large density of protected species. Development will bring light pollution and will impact important habitats, such as woodlands and hedgerows.

HH03: Hospital Site

- Berkhamsted Town Council believe this site should not be considered for redevelopment until a clear sustainable NHS strategy for this part of Hertfordshire is confirmed and initiated.

- West Hertsfordshire NHS Trust (WHHT) support the allocation and ask the delivery strategy be driven by the Trust's operational and timing requirements. WHHT's Strategic Outline Case for hospital services identifies Hemel Hempstead Hospital as the location for a specialist centre delivering a range of planned medical services. The size and location of land needed is likely to be confirmed in late 2021.
- Local residents want the development of this site to prioritise health facilities, with concerns that existing healthcare is inadequate and that routine appointments are carried out at Watford.

HH05: Market Square

- Historic England object to the development of Market Square as it forms an important part of the setting of the Water Gardens and the New Town's urban design, and also supports Sir Geoffrey Jellicoe's original design intentions for Hemel Hempstead.

HH06: Civic Centre Site

- As this site is within a Source Protection Zone 1 and within 100m radius of an abstraction for potable water, the Environment Agency would object to any proposals involving piled foundations unless it can be demonstrated they are appropriate in this location.
- Berkhamsted Town Council and some residents state that this site should be reserved for cultural uses.

HH07: NCP Car Park, Hillfield Road

- Historic England request that requirements relating to the Rowland Emmett Mosaic and need for listed building consent be included in the site specific policy and that the height of development be balanced against the New Town's urban design and not harm the historic environment.

HH08: Station Gateway

- London Continental Railways and Network Rail support the draft allocation HH08: Station Gateway and the role that the site can play in delivering a multi modal transport interchange and high density residential development. They propose a mixed use development of around 530 residential units, alongside improvements to the train station, a multi-modal transport interchange and a multi-storey car park. They request that the site specific requirements include an explicit reference to a landmark building and confirmation that this could be up to 14 storeys.
- Residents feel that heights of up to 8 storeys are inappropriate for the area, and would be detrimental to the natural beauty of the moors, open views and local character.
- There is concern at the impact of additional road infrastructure needed to support development, and that this will add further traffic and congestion to the existing problems.
- New commercial and retail facilities should not be provided at the station, as it would deter use of the town centre and local shopping in Boxmoor.

HH09: National Grid Land

- The Environment Agency require intrusive investigations to establish risks to controlled waters. The site may not be suitable for SuDS or piled foundations due to in ground contamination from previous uses.
- St William argue the site could accommodate more homes and that 'around 460' or more should be included, with the potential for building heights to be above 6 storeys. The site requirements, such as affordable housing, should take into account the constraints and associated costs of developing former utility sites.

HH10: Symbio Place, Whiteleaf Road

- The Canal & River Trust consider contributions are needed to the canal towpath and access point closest to H10 to allow use as a sustainable transport route linking the site to other parts of the town.

HH11: Two Waters North

- The Environment Agency raise that parts of this site are within Flood Zone 2, and 3 and that there is an opportunity to address Water Framework Directive Action ID 33,577. In designing the development, tall buildings should not impact on overshadowing of the River Gade and an assessment of shadowing levels should be undertaken.

The Canal & River Trust ask that public realm enhancement at Boxmoor Wharf be in keeping with the industrial heritage of the canal and former wharf use and seek access improvements to the towpath, including for water based recreation.

HH12: Two Waters/London Road

- The Environment Agency propose that the drain through this area be renaturalised to create wetlands that would filter surface water run-off.

HH13: Frogmore Road

- The Environment Agency ask that the development protect and enhance the chalk stream priority habitat and address Water Framework Directive Action ID 33622. A 10m buffer should be maintained for flood risk reasons.

HH16: Two Waters Road / A41 Junction Employment Site

- Hertfordshire County Council (Transport) require further evidence and measures in policy to improve accessibility through high quality walking, cycling or public transport connections in order to support this site being included.
- The landowner of HH16 highlights the opportunity to improve footpath and cycle access through the site, with the potential to support upgrades to connecting links in the wider area.

HH20: Breakspear Way / Green Lane / Boundary Way, Maylands Gateway

- Herts Gardens Trust and Historic England note that this area is within the setting of heritage assets, namely Gorhambury and Breakspears, which should not be harmed through the development.
- The Crown Estate highlight the opportunity for this site to facilitate improved pedestrian and cycle links and other transport infrastructure proposals through the Maylands area.

HH21: West Hemel Hempstead

- Residents raise concern at the approved planning application for this site, and the need for a suitable wildlife corridor link to Shrubhill Common LNR.

HH22: Marchmont Farm

- Development on this site will become joined with growth at HH01 and will isolate nearby Howe Grove Local Nature Reserve.

HH23: Old Town

- The location of this site, between Gadebridge Park and the Old Town, is of concern, with views that it should be retained as an extension of Gadebridge Park that is well-used for recreation and by wildlife, and that the development will be visible from the Old Town and may adversely affect its character.

HH26: South of Green Lane

- The Crown Estate confirm this land is available now and suggest that it is allocated for development in the first five years of the Plan period.

HH27: Jarman Park - Out of centre retail allocation

- The Environment Agency note that the site includes a Historic Landfill, as a result it is unlikely to be suitable for SuDS or development with deep foundations and contaminated land conditions may be needed.

HH28: Bunkers Park - crematorium allocation

- Nash Mills Parish Council are concerned that the boundary line for the allocation extends into Bunkers Park and would like reassurance that Bunkers Park is not under threat of development and that the car park and access route to reach the car park will remain available for park users.

Hemel Hempstead Alternative Sites

- Tesco Pension Investment Fund Management request Jarman Park be reallocated as a growth area to allow residential development and an intensification of uses to come forward in the existing leisure and retail area.
- W Lamb Ltd put forward land at Shendish Manor, Apsley for consideration as an additional growth site, with design proposals that could potentially offer 439 new homes, a 160 unit care village, a small mixed use area, a community hub, a site for a 2FE Primary School and associated pre-school, infrastructure and open space.
- On behalf of their client, Bidwells LLP raise a proposal for 7 custom and self-build houses on land to the edge of Piccotts End adjoining the Marchmont Farm allocation. This site is number 73 in the Site Selection Topic Paper.
- Lansdown offer land south of Chaulden Lane, adjacent to HH21 West Hemel Hempstead. This 5.6 ha site is immediately available for a residential development of up to 100 dwellings.
- Walsingham Planning on behalf of Greene King Brewing and Retailing Limited ask that a 1.09 ha unused site north of the Red Lion Public House, London Road be included. This land is adjacent to the settlement boundary could provide 150 residential developments within the next 5 years, subject to viability appraisal.
- Land East of Berkhamsted Road, Hemel Hempstead, shown as Site 78 Polehanger Lane in the SHLAA, is submitted by Hallam Land Management Limited. This could delivery up to 800 homes and a new primary school on a 34 ha site.
- The Gardener Family Trust recommend their 7.8 ha site - land off Fields End Lane for development.
- Redington Capital point out that Network House, London Road, Apsley, which forms part of Doolittle Meadows GEA in Apsley, has been unoccupied for over a year, and would be better suited to a mixed use residential scheme. Such a development would currently be restricted by Policy DM16 General Employment Areas.
- PRP promote for their client Apsley Retail Park a 2.63 ha site that could deliver upwards of 400 homes and support the Two Waters Opportunity Area.
- Land west of Leighton Buzzard Road, Piccotts End is put forward by Fairfax Strategic Land (Hemel) Limited (reference HH69 in the site assessment report). This is a 26 ha site that could provide up to 400 homes with informal public open space and landscaping.

Berkhamsted Delivery Strategy

There were 1146 separate responses to this consultation point. The following themes/issues were raised:

Statutory Bodies

- Hertfordshire County Council (HCC) comment that:
 - In order to accommodate the additional child yield two new primary schools are sought (ideally, one 2fe in the west of the town and one 3fe in the east of the town) and one 8fe secondary school;
 - The technical work presented within the evidence base for the Plan is welcomed and considers that many aspects are on the right track to deliver a real sustainable transport uptake in the location;
 - There are concerns regarding the delivery of bus service improvements to developments in south-west Berkhamsted, the number of different sites and their size may present challenges to the delivery of service improvements through the usual mechanisms and a settlement wide approach is required;
 - A single site approach would not be supported when considering transport design. Sites Bk01, Bk02, Bk04 and Bk10 should have a joint master planning/connectivity strategy approach, required through policy, to enable the best possible design for all transport modes, maximise permeability and potentially enable sustainable transport route options. HCC would not support an approach of these sites coming forward individually without an approach that enables permeability and connectivity along with clearly well thought out routes across the area (HCC does not see a need currently for private vehicle access between Bk02 and Bk03).
 - They would welcome a settlement policy to enable a growth area bus route to be a feature of all the sites masterplans as a significant way to address the cumulative impact of growth by enabling high quality access to public transport; and
 - They would also welcome a mechanism for funding bus services so that they can be delivered in a timescale that supports modal shift, including early provision and extended services.
- Thames Water comment that the scale of growth in Berkhamsted is likely to require upgrades to the wastewater network. Thames Water recommends that developers and the Local Planning Authority liaise with them at the earliest opportunity to agree a housing and infrastructure phasing plan.
- Berkhamsted Town Council ask that the Berkhamsted allocations be reconsidered and the majority be rejected. They also raise issues concerning infrastructure and transport as follows noting that the town already experiences a high level of congestion:
 - The Berkhamsted and Tring Sustainable Transport Strategy provides no substantive detail on the strategic infrastructure or sustainable transport options needed to provide access to the town centre and station, from the proposed development sites, other than by car. Road and transport links providing alternative travel options are needed at the outset. HCC transport studies show there is no scope for new roads or widening in central Berkhamsted where there is congestion.
 - Berkhamsted residents will want to be assured that details for the key infrastructure needed to integrate the edge of town sites will be published prior to consultation on the Regulation 19 plan.
 - West Berkhamsted development will add congestion to Shootersway, Darrs Lane will require major investment to support additional traffic, and congestion will intensify around Northchurch village centre.
 - There is currently a shortage of secondary school places, and the IDP does not address ensuring the viability of a new school in West Berkhamsted during the early phases of development.
 - The Plan makes no provision for additional local GP services, nor social or dementia care in Berkhamsted. Adequate and sound public health provision must not fall between the cracks of HCC/CCG/PHE.
- Sport England support the requirement for the playing pitches associated with the Haslam Fields Growth Area to be replaced at Berkhamsted School's Haresfoot campus and for the proposal to make a linked allocation for the replacement sports facilities.

- The Canal & River Trust comment that any new residential or employment uses adjacent to the canal or likely to result in an increase in its use should recognise the benefits the canal towpath can bring and actively look at ways these benefits can be increased and improved upon. This could include improvements to the towpath to allow it to be used more as a sustainable transport route but also include water-based recreation and access facilities such as car parking.
- The Environment Agency would like to be consulted on the Masterplan for these areas. They are pleased to see that a comprehensive green (and blue) infrastructure network will be enhanced including biodiversity net gain and water management which should specifically mention flood risk. Other comments include:
 - A Sequential test and a level 2 Strategic Flood Risk Assessment (SFRA) will need to be carried out for any site allocations that have flood risk before the EA would consider the Plan sound.
 - Major development should be required to demonstrate that there is adequate capacity for local water supply. The subject of water resources and supply needs to be embedded as much as possible within any development plan. Wherever green infrastructure is mentioned it should be changed to 'green and blue infrastructure' to recognise the importance of the interconnectivity of the green and blue network.

General Bodies/Other Organisations

- The Berkhamsted Residents Action Group (BRAG) does not agree with the delivery strategy. They consider:
 - Housing targets are a flawed starting point;
 - The vision for Berkhamsted is contrary to health and wellbeing of current and future residents;
 - The strategy prioritises developer-led demand over the protection of the Green Belt;
 - Have doubts over developers compliance with Masterplans;
 - The Berkhamsted and Tring Sustainable Strategy is flawed, allocations are located at ridge tops and steep valley sides at distance from town centres and are unlikely to achieve the aims of encouraging more walking and cycling and public transport use;
 - There is no effective policy in place to back up zero carbon, energy efficiency and significant environmental enhancement aspirations; and
 - The Plan does not address infrastructure issues.
- BRAG, other organisations and local residents consider the level of growth proposed is too high and the loss of Green Belt land is not justified.
- The Dacorum Liberal Democrat Councillors point out that the strategies include a large amount of Green Belt which they do not consider should be released. A housing target which cannot be considered an objectively assessed need for our area is not an exceptional circumstance to release Green Belt.
- Thakeham Homes query if the collection of smaller sites in West Berkhamsted are capable of delivering the required infrastructure such as schools, this could constrain the delivery of planning policies to meet wider needs in a co-ordinated and strategic manner. It considers that its site at Bulbourne Cross would result in delivery in a comprehensive manner with significant supporting infrastructure.
- Berkhamsted Rugby Club and Thakeham support proposal for development at East of Berkhamsted (Bulbourne Cross) to include new sports facilities for the town.

Wider Community

The main points raised by the wider community are as follows:

- Northchurch has a rural character and should have a separate delivery strategy and be recognised as a distinct entity from the more urban Berkhamsted.
- Concern over traffic congestion and local infrastructure provision.
- Growth numbers will impact on local infrastructure provision, including increased demand upon local roads, schools and health and amenity provision.

- Loss of Green Belt land, impact on the setting of the AONB and character of the town are regular themes.
- Topography, distance from town centre and size of many of the allocations are seen as constraints to sustainable transport principles.

Berkhamsted Proposals and Sites

There were 1027 separate responses to this consultation point. The main key themes/issues identified are as follows:

Bk01: Land South of Berkhamsted

- Sport England comment that this allocation should specifically include new outdoor sports facilities given it is the only residential allocation in Berkhamsted that would be large enough to justify an on-site sports facility. The Chair of Trustees Berkhamsted Raiders supports this view.
- Hertfordshire County Council note that housing provision for older people is welcomed at this site. However, HCC would like confirmation of the type of accommodation for older people which will be provided and assurances that a proportion of accommodation will be available for people with fully funded care (affordable rented) as per the South West Herts LHNA.
- Hertfordshire County Council require an access strategy for this site prior to submission due to the possible complexities and constraints of the site. Width/alignment for walking, cycling and public transport infrastructure will be required for the eastern most access point unless otherwise agreed.
- Berkhamsted Town Council argue that the exceptional circumstances to justify the removal of this site from the Green Belt are not substantiated, infrastructure and sustainability provisions are weak, and they highlight that Swing Gate Lane is already congested.
- Thames Water comment that the scale of development/s is likely to require upgrades to the wastewater network. They recommend that the developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan.
- The Environment Agency notes that its records show that this site is part of a local wildlife site. The appropriate body should be consulted to ensure this site is suitable for development. The allocation needs to include an appropriate acknowledgement of the designation of the site and that it will be protected/enhanced throughout development.
- Taylor Wimpey as landowner and developer consider the site specific requirements to be largely reasonable and can be satisfied as part of the comprehensive approach to delivery. However, they do recommend a number of amendments to ensure consistency between the allocation and the technical evidence base and be able to demonstrate that all requirements are justified in satisfying the NPPF tests of soundness. TW point out that:
 - The draft allocation should not be pre determining the extent of contributions sought towards off-site highway work nor to provide compensatory/mitigation measures to address pre-existing issues, such as the pylons.
 - The site-specific requirements should only refer to provision of land and commitment to facilitating the school's delivery at this plan stage.
 - The site-specific requirements should not be seeking to pre-empt technical conclusions by indicating a need for on-site SANG provision.
 - TW provide detailed suggested amendments to the site-specific requirements.
- BRAG objects to this allocation. Reasons include the release from the Green Belt would weaken previously identified boundary between urban area and countryside, impact on landscape and setting, topography and distance from town provide barriers to sustainable transport principles. Pressure on existing transport infrastructure and suggests a new East - West link road is required but this has been previously rejected. Growth at this site will place demands upon Shootersway and Swing Gate Lane. Development may add to AQMA issues at Northchurch and concern expressed at possible noise impacts from the A41 on development. The size of the development may lend itself to the creation of a neighbourhood area with associated infrastructure and services.

- The Chiltern Society comment that Bk01 is close to the A41 for access, so will encourage increased car use.
- Thakeham consider that whilst this is the largest allocation site, it is separated from the other smaller stie allocations which means those other sites will be less able to support the provision of infrastructure and services to serve this site. Thakeham favours development to the East of Berkhamsted instead.
- Some local residents support this allocation over the other West Berkhamsted allocations largely due to its size which makes matters such as sustainable transport and other infrastructure more viable.
- Local resident object over the loss of Green Belt and its impact on the setting of and views across the local countryside.
- A number of local residents object to this allocation largely due to concerns over possible traffic pressures it may place upon local roads, especially Shootersway and Swing Gate Lane. The site's distance from the town centre and topography are seen as constraints to promoting walking and cycling.
- Concern also over loss of "green buffer" between the A41.

Bk02: British Film Institute

- Hertfordshire County Council require an access strategy for this site prior to submission due to the possible complexities and constraints/existing use of the site. This growth area, along with sites Bk03, Bk04 and Bk10 should have a joint master planning/connectivity strategy approach. HCC would not support these sites coming forward individually without an approach that enables permeability and connectivity along with clearly well thought out routes across the area. HCC consider that significant walking/cycling measures will be required for Shootersway, including a high quality crossing.
- Thames Water comment that on the information available to date it does not envisage infrastructure concerns regarding wastewater networks in relation to this development individually. However, considering the general upcoming growth within this particular location, further and comprehensive details will be required regarding the connection point(s) and the discharge type, in order to assess more effectively the impact of this development as part of a development cluster.
- Thakeham comment that the cluster of the four sites BK02, BK03, BK04 and BK10 are distant from the town centre and are unlikely to be viable in terms of sustainable transport measures. Concern expressed over possible loss of playing fields at these sites.
- BFI considers that the site makes minimal contribution to the Green Belt and has good links to the town centre. BFI queries the required provision for public open space, green corridors and pedestrian links given likely phased delivery of this and other nearby proposed sites.
- The Chiltern Society consider the effect on the listed building and its setting needs to be addressed.
- Local residents are concerned over traffic impact upon Shootersway and Kings Road and comment that the local objective to "Support the British Film Institute to consolidate on their site" has been dropped.

Bk03: Haslam Playing Field

- Sport England has no objection to this allocation on the basis that it is proposed to replace the playing fields at Berkhamsted School's Haresfoot Campus and a related site allocation has been made in the Local Plan for this (Site Cy04). They require the replacement sports facilities to be equivalent or better in terms of quantity and quality on the site of the Haresfoot Campus.
- Hertfordshire County Council indicate where flood risk should be considered and managed for a development site, and point out that there are some instances where the development of sites can help manage existing flood risk e.g. Bk03: Haslam Playing Fields, Bk10: Hansburys and to the west of Berkhamsted. Management of the flood risk should start as close to the source as possible and these sites offer this opportunity.
- Hertfordshire County Council requires an access strategy for this site prior to submission due to the possible complexities and constraints/existing use of the site. This growth area is remote from existing bus services and even if considered together with other sites in Berkhamsted, is not likely to be able to contribute to improvements for an adequate period, nor produce patronage to make any such improvements viable in the long term. This growth area, along with sites Bk02, Bk04 and Bk10 should have a joint master

planning/connectivity strategy approach, required through policy, to enable the best possible design for all transport modes, maximise permeability and potentially enable sustainable transport route options. HCC would not support these sites coming forward individually without an approach that enables permeability and connectivity along with clearly well thought out routes across the area (the County Council does not see a need currently for private vehicle access between Bk02 and Bk03).

- Hertfordshire County Council note that protected species are known to exist in the area. Opportunities include retaining trees and hedgerows, and provision of a green corridor along south-western edge to adjacent habitats.
- Berkhamsted Town Council note that as there is a shortage of community pitches in Berkhamsted, if Haslam Fields is surplus to the school's requirements it should be passed to Berkhamsted Sports Grounds Charitable Organisation.
- Thames Water comment that on the information available to date it does not envisage infrastructure concerns regarding wastewater networks in relation to this development individually. However, considering the general upcoming growth within this particular location, further and comprehensive details will be required regarding the connection point(s) and the discharge type, in order to assess more effectively the impact of this development as part of a development cluster.
- BRAG objects to this allocation. Reasons include release from Green Belt would weaken previously identified boundary between urban area and countryside, impact on landscape and setting, topography and distance from town provide barriers to sustainable transport principles. Pressure on existing transport infrastructure suggest a new East - West link road is required but this has been previously rejected. Growth at this site will place demands upon Shootersway and Swing Gate Lane. Development may add to AQMA issues at Northchurch. Concern over possible loss of playing fields serving the town (a view also shared by Berkhamsted Citizens Association).
- The Chiltern Society express concerns over the possible loss of these playing fields for the town.
- Berkhamsted Schools Group supports the allocation and the receptor sports provision at Haresfoot.
- Thakeham comment that the cluster of the four sites BK02, BK03, BK04 and BK10 are distant from the town centre and unlikely to be viable in terms of sustainable transport. Concern expressed over possible loss of the playing fields at these sites. At this site the proposed relocation of the playing fields will be to a less accessible location.

Bk04: Land Between Hanburys and A41

- Hertfordshire County Council require an access strategy for this site prior to submission due to the possible complexities and constraints/existing use of the site. This growth area is remote from existing bus services and even if considered together with other sites in Berkhamsted, is not likely to be able to contribute to improvements for an adequate period, nor produce patronage to make any such improvements viable in the long term. This growth area, along with sites Bk02, Bk03 and Bk10 should have a joint master planning/connectivity strategy approach, required through policy, to enable the best possible design for all transport modes, maximise permeability and potentially enable sustainable transport route options. HCC would not support these sites coming forward individually without an approach that enables permeability and connectivity along with clearly well thought out routes.
- Hertfordshire County Council note that protected species are known to exist in the area. Opportunities include provision of green corridor to adjacent habitats and to the south.
- Thames Water comment that on the information available to date it does not envisage infrastructure concerns regarding wastewater networks in relation to this development individually. However, considering the general upcoming growth within this particular location, further and comprehensive details will be required regarding the connection point(s) and the discharge type, in order to assess more effectively the impact of this development as part of a development cluster.
- BRAG objects to this site for reasons including its impact on landscape and setting, topography and distance from town provide barriers to sustainable transport principles. Pressure on existing transport infrastructure suggest a new East - West link road is required but this has been previously rejected. Growth at this site will place demands upon Shootersway. Development may add to AQMA issues at Northchurch, close proximity to the A41.

- Thakeham comment that the cluster of the four sites BK02, BK03, BK04 and BK10 are distant from the town centre and unlikely to be viable in terms of sustainable transport. Concern expressed over possible loss of playing fields at these sites. Delay in delivering site BK03 may impact upon proposed access to this site.
- Taylor Wimpey (TW) as landowner and developer agrees that the site specific requirements listed under the allocation are largely justified where required as mitigation or in contributing to the wider place-making principles. However, TW have some concerns:
 - The allocation should not be identifying requirements for off-site provision and contributions (e.g. new pedestrian and cycle links within the existing town centre and train station and public open space) where these will be subject to detailed testing and based on impact.
 - Confirm that there are opportunities for a new wildlife site in principle through the creation of new and improved habitats as part of the proposed ecological enhancements.
 - TW provide detailed suggested amendments to the site-specific requirements in all cases.

Bk05: Blegberry Gardens (land adjacent to)

- Hertfordshire County Council note that this growth area, along with site Bk08, has a joint master planning/connectivity strategy approach secured through policy, notably for transport to enable the best possible design for all transport modes, maximise permeability and potentially enable sustainable transport route. Significant walking/cycling measures will be required for Shootersway including high quality crossing provision.
- Hertfordshire County Council note that protected species are known to exist in the area. Opportunities include provision of green corridor to adjacent habitats, Local Wildlife Site, and to the south.
- Northchurch Parish Council objects to the allocation noting it is adjacent to BK08 (Rossway Farm) and considers it will result in negative impact upon the amenity and wildlife of the area.
- Thames Water comment that on the information available to date it does not envisage infrastructure concerns regarding wastewater networks in relation to this development individually. However, considering the general upcoming growth within this particular location, further and comprehensive details will be required regarding the connection point(s) and the discharge type, in order to assess more effectively the impact of this development as part of a development cluster.
- BRAG object to this site for reasons including impact on landscape and setting, topography and distance from town provide barriers to sustainable transport principles. Pressure on existing transport infrastructure suggest a new East - West link road is required but this has been previously rejected. Growth at this site will place demands upon Shootersway. Development may add to AQMA issues at Northchurch, close proximity to the A41.
- Thakeham query possible impact of surface water flooding mitigation measures upon viability of the site.
- Crest Nicholson support the allocation including a Masterplanning led approach to developing West Berkhamsted in principle, as it will enable the delivery of a well-connected, cohesive urban extension. The evidence base confirms that exceptional circumstances exist for the release of land from the Green Belt.

Bk06: East of Darrs Lane

- Hertfordshire County Council note that provision for an additional primary school and a new secondary school within Berkhamsted is needed, although HCC has concerns that an allocation for a new secondary school as suggested within this growth area might not be deliverable, due to the site's existing topography, site access and highway constraints. A new secondary school should be 10.78ha in size and the additional 2fe primary school site should be 2.03ha in size.
- Hertfordshire County Council note an agreed access strategy is suggested for this site prior to submission due to the possible complexities and constraints with connections through the site and identifying key access points for all modes. Measures to protect the rural nature of local lanes will be required. Where existing routes in the area support walking and cycling, these will need to be protected fully from potential impacts and maximised/enhanced. HCC will not support Bell Lane for any private vehicle access points

and exploration of maximising this route, aligned to both internal and settlement wide walking/cycling connections should be considered. This growth area, along with sites Bk05 and Bk08 are remote from existing bus services and are not large enough to contribute to adequate improvements individually.

- Hertfordshire County Council note that the site is adjacent to Ecosite 'The Rookery', the southern part of which is in the Ancient Woodland. Bats are known to be in the area. Opportunities to retain trees and hedgerows and provision of green corridors to adjacent habitats and to the south.
- Berkhamsted Town Council state that the proposed secondary school is likely to require capital funding from several developments and additional revenue funding to support its sustainability until pupil numbers grow. This must be identified in the IDP.
- Northchurch Parish Council comment that topography and narrow nature of the access roads provide barriers to sustainable transport. They are also concerned over road safety.
- Historic England comment that Bk06: East of Darrs Lane and Bk08: Rossway Farm (land between Shootersway and A41) fall within the wider setting of a number of designated heritage assets and therefore development here has the potential to impact on the significance of these through a change in their settings. These include the Hertfordshire Grim's Ditch: 210 metre long section immediately north west of Woodcock Hall (scheduled monument), and The Old Cottage (opposite Darrs Lane) (Grade II listed building). While development here may be feasible, given the sensitive nature of these sites, a Heritage Impact Assessment (HIA) will be required.
- Thames Water comments that the level of information provided does not allow them to make a detailed assessment of the impact of the proposed housing provision will have on the wastewater infrastructure. They require an indication of the scale of development regarding the maximum capacity of the proposed secondary school together with the anticipated timing of the development to provide more specific comments on the site proposals.
- BRAG object to this site for a number of reasons including impact on landscape and setting, topography and distance from town provide barriers to sustainable transport principles. Pressure on existing transport infrastructure suggest a new East - West link road is required but this has been previously rejected. Growth at this site will place demands upon Shootersway. Development may add to AQMA issues at Northchurch. Parking at Northchurch facilities already insufficient.
- Chiltern Society object to the allocation for reasons including development would erode the distinction between Northchurch and Berkhamsted, impact on landscape and setting, topography and distance from town and services provide barriers to sustainable transport principles.
- Taylor Wimpey support the allocation and the overall findings of the Green Belt Review in that the site clearly makes, at best, a limited contribution to Green Belt purposes and is not overly sensitive to change in landscape terms. Therefore, the release of the site would not give rise to significant harm in Green Belt terms.
- Thakeham consider the vision for this site is unclear as to whether it will be provided for development or for green infrastructure. Capacity of site to provide a country park is questioned given its size. Considers land to the East of Berkhamsted has capacity for this together with other community assets including education provision.
- Some local residents are concerned that this development will erode the boundary and character between Northchurch and Berkhamsted. They also worried over the loss of Green Belt land and its impact upon the setting and character of the locality. Development constrained by narrow single track road.

Bk07: Lock Field, Northchurch

- Hertfordshire County Council are seeking an agreed access strategy for this growth area, due to existing constraints, including the severance to walking/ cycling caused along New Road.
- Hertfordshire County Council note that protected species are known to be in the area. Opportunities exist to retain trees and hedgerows, provision of a green corridor to adjacent habitats, especially along the canal.
- Berkhamsted Town Council point out that the road beyond the canal bridge is narrow and that it will be difficult to provide safe access to New Road. The site has previously been rejected for inclusion in the Core Strategy.

- Northchurch Parish Council object on similar grounds to BRAG, especially road safety including proximity of the primary school and constraining factor of the single track Canal bridge in New Road.
- Canal & River Trust welcome ecological enhancement to the canal corridor. They want consideration given to the use of the canal towpath as a sustainable transport route and possible improvement and mitigation required as a result. Opportunities to provide access points and facilities for water based recreation to be explored with them and local sports groups.
- Thames Water comment that on the information available to date it does not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site. They recommend that the developer and the Local Planning Authority liaise with them at the earliest opportunity to advise of the developments phasing.
- The Environment Agency observe that any development within 8m of a main river will require a Flood Risk Activity Permit from them.
- Network Rail requests that the site is removed from the proposed allocations as it includes an access road leading to a vital track access point known locally as 'Lock Keepers Cottage'. The access is required longer term.
- BRAG object to the site for reasons including impact on landscape and setting next to AONB, topography and distance from town provide barriers to sustainable transport principles. Pressure on existing transport infrastructure suggest a new East - West link road is required but this has been previously rejected. Growth at this site will place demands upon Shootersway. Development may add to AQMA issues at Northchurch. Site is too small to offer scope for additional town-wide leisure space. The canal bridge on New Road is narrow and results in poor pedestrian access to local facilities. Visually prominent site. Impact on setting of the canal. Concerns over safety for children attending St Mary's School. Proximity to and noise from the railway.
- Berkhamsted Citizens Association objects as safe access to New Road will be a challenge given how narrow the road is beyond the Canal bridge. The canal is an important tourism asset within Berkhamsted and the Borough of Dacorum. Development should not be countenanced along this priceless asset. Once lost it is gone for ever as green space and an important wild life corridor.
- Chiltern Society objects as the site is constrained by the main line railway, the canal and the River Bulbourne. Concern expressed over New Road access with narrow and steep contours and traffic pressure on the narrow canal bridge. They raise the possible impact on Northchurch AQMA. The Society comments that climate change has increased the risk of flooding in numerous areas and as this is adjacent to the River Bulbourne and the canal, that no development should be allowed.
- Local residents raise concerns over road safety impact especially by the canal crossing area and primary school, and impact upon wildlife corridor to the canal and nearby sites.

Bk08: Rosway Farm (land between Shootersway and A41)

- Hertfordshire County Council suggest that an agreed access strategy is needed for this site prior to submission due to the possible complexities and constraints with connections through the site and identifying key access points for all modes. This growth area, along with sites Bk05 and Bk06 are remote from existing bus services and are not large enough to contribute to adequate improvements individually. Some of East of Darrs Lane would be within 400m of bus stops on Granville Road and Westfield Road, but services are limited.
- Hertfordshire County Council point out that south-eastern end of the site is an Ecosite 'Cross Oak Meadow & Wood (Shootersway), Berkhamsted. and is adjacent to 'Meadow S.W. of Shootersway Road' Local Wildlife Site; and Ecosite 'Shootersway Green'. Other features include undeveloped land with agricultural fields, woodland at north-western end, hedgerows and scattered trees. Protected species are known to be in the area. Opportunities exist to retain trees and hedgerows and provision of a green corridor to adjacent habitats.
- Thames Water comments that the scale of development/s is likely to require upgrades to the wastewater network. They recommend that the developer and the Local Planning Authority liaise with them at the earliest opportunity to agree a housing and infrastructure phasing plan.

- Historic England comment that this and neighbouring sites fall within the wider setting of a number of designated heritage assets and therefore development here has the potential to impact on the significance of these through a change in their settings. These include the Hertfordshire Grim's Ditch: 210 metre long section immediately north west of Woodcock Hall (scheduled monument), and The Old Cottage (opposite Darrs Lane) (Grade II listed building). While development here may be feasible, given the sensitive nature of these sites, a Heritage Impact Assessment (HIA) will be required.
- Northchurch Parish Council objects noting it is adjacent to BK05 (Blegberry Gardens) and considers it will impact upon the amenity and wildlife of the area.
- BRAG object to this site for reasons including impact on landscape and setting, topography and distance from town provide barriers to sustainable transport principles. Pressure on existing transport infrastructure suggest a new East - West link road is required but this has been previously rejected. Growth at this site will place demands upon Shootersway. Development may add to AQMA issues at Northchurch. Parking at Northchurch facilities is already insufficient. Site is too small to offer scope for additional town-wide leisure space. Very close to the A41.
- Chiltern Society objects for reasons including that the soft edge to the town along with BK06 would be eroded, impact on landscape and setting, topography and distance from town provide barriers to sustainable transport principles, proximity to A41, will coalesce Berkhamsted with Northchurch and along with proposed other development (BK05 and BK06) would mean continuous development along the southern side of Shootersway. Concern also expressed over possible loss of wildlife.
- The developer supports the allocation who considers, with nearby developments in the West Berkhamsted Growth Area such as BK05 (Blegberry Gardens) and BK06 (Darrs Lane), that sustainable transport measures will be more viable thereby easing traffic demand from the new sites. Noise from A41 is not considered a constraint as mitigation and intervention measures can be implemented. Development on this site would be very contained, generally being limited and confined to the site itself and the immediate locality, with no effect on the wider landscape beyond the A41 or Shootersway, and therefore no adverse landscape effect on the Chilterns AONB. Masterplanning of the Site will ensure that there is no net loss to biodiversity and opportunities for biodiversity gains are maximised, consistent with emerging national and local policy.
- Thakeham raise concerns over the site including adverse noise, air and light pollution impacts from the A41.
- Local residents raise concerns about the potential loss of a wildlife corridor and noise impacts from the A41.

Bk09: Bank Mill Lane

- Hertfordshire County Council require an access strategy for this site due to the possible complexities and constraints with connections through the site and identifying key access points for all mode types, including new access onto a primary route (LTP4, policy 5). Vehicle access to Bank Mill Lane is unlikely to be supported and deliverable. Opportunities for walking/cycling connections should also be maximised from the site, including to River Bulbourne towing paths. This growth area, along with site Bk05, also has a joint master planning/connectivity strategy approach secured through policy, notably for transport to enable the best possible design for all transport modes, maximise permeability and potentially enable sustainable transport route options.
- Hertfordshire County Council highlight that bats are known to be in the area. If the whole of the site or a significant area is lost to development, consider measurable biodiversity offsetting to mitigate for loss of semi- natural habitats.
- Berkhamsted Town Council prefer the site to be retained as a Green Belt entrance to the town. If it is to be developed a more appropriate use could be a retirement/care home.
- Thames Water comment that on the information available to date it does not envisage infrastructure concerns regarding wastewater networks in relation to this development individually. However, considering the general upcoming growth within this particular location, further and comprehensive details will be required regarding the connection point(s) and the discharge type, in order to assess more effectively the impact of this development as part of a development cluster.

- Historic England comment that the allocation is situated adjacent to the Berkhamsted Conservation Area which includes three Grade II listed buildings (including Lock Keepers Cottage, and The Old Cottage). While development here may be feasible, given the sensitive nature of the site, a Heritage Impact Assessment (HIA) will be required prior to allocation.
- The Environment Agency observe that the proposed development in these locations will reduce the buffer zone, and allow development up to 10m of the water bodies. This will result in an increase in non-point source pollution and ultimately a local deterioration of the water body. The locations identified should instead be given greater protection from development as they are unique pockets of green field surrounding the water bodies in their usually urban encroached setting. Development of this site may also mean the two WFD actions on this site below are unachievable.
- The Canal & River Trust recommend that the requirements include 'contribute towards new/enhanced pedestrian and cycle links with Berkhamsted town centre and train station, including off-site provision' to consider enhancement of the canal towpath as a sustainable transport route.
- The Chiltern Society objects to Bk09 for reasons including that it is a water meadow and the adjacent building density having exacerbated the problem, it serves as a soft edge at the entrance to the town, the proximity of recent adjacent development have impacted upon the River Bulbourne reducing the wildlife corridor, and any further development will severely affect the chalk stream.
- BRAG objects to this site for reasons including impact on landscape and setting, in a Conservation Area, topography and distance from town provide barriers to sustainable transport principles. The site will reduce the separation between the town and Bourne End. More appropriate use could be for retirement/ care homes.
- Berkhamsted Citizens Association object as the site is Green Belt land at the entrance to the town, contains the River Bulbourne, it is on the flood plain, and it is an asset to local green space.
- Thakeham comment that whilst the site has major constraints including the River Bulbourne and its floodplains running through the centre of the site and its location within the Berkhamsted Conservation Area, it is considered to be in a more sustainable location than several of the other proposed South Berkhamsted allocations with better connectivity to the town centre. If Land East of Berkhamsted was allocated, Bk09 would have easy access to the services and facilities that would be provided as part of that development. It would make the site more sustainable as residents would be able to access the country park which would be located to the east of this proposal.
- Local residents raise concerns regarding the impact on the River Bulbourne, flood meadows, and the visual impact as an important soft edge "gateway" to the town.

Bk10: Hanburys

- Hertfordshire County Council indicate where flood risk should be considered and managed for a development site, and point out that there are some instances where the development of sites can help manage existing flood risk e.g. Bk03: Haslam Playing Fields, Bk10: Hansburys and to the west of Berkhamsted. Management of the flood risk should start as close to the source as possible and these sites offer this opportunity.
- Hertfordshire County Council supports a joint approach to sites in the area. A single site approach would not be supported when considering transport design. Growth Area Bk11: Billet Lane Transport This growth area, along with sites Bk09 and Bk13 are within 400m of bus stops on the High Street, London Road and A4251 with regular bus services available. Maximising these connections should be required within a central location and may support a highly sustainable approach, including low parking levels. Opportunity for a high-quality connection to the towpath via this site should also be secured. Access arrangements reflecting new use type will be required/reinstated.
- Hertfordshire County Council note that protected species are known to be in the area. There may be potential for nesting birds in trees; and roosting bats in mature trees if suitable roosting features are present. Opportunities exist to retain trees and hedgerows and provision of green corridor to adjacent habitats.

- Thames Water comments that on the information available to date it does not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site. It recommends that the developer and the Local Planning Authority liaise with them at the earliest opportunity to advise of the developments phasing.
- BRAG objects as the current proposal bears no resemblance to the agreed Master Plan and has been changed without reverting to the local community.
- Thakeham comment that the cluster of the four sites BK02, BK03, BK04 and BK10 are distant from the town centre and unlikely to be viable in terms of sustainable transport. Concern expressed over possible loss of playing fields at these sites.

Bk11: Billet Lane (Jewson Site)

- Hertfordshire County Council point out that protected species are considered unlikely although there may be potential for roosting bats in mature trees and buildings if suitable roosting features are present. Opportunities are limited.
- Berkhamsted Town Council argue that this site is needed to meet Berkhamsted's community and employment needs and should not be developed for residential dwellings.
- The Canal & River Trust recommend that the allocation includes 'contribute towards new/enhanced pedestrian and cycle links with Berkhamsted town centre and train station, including off-site provision' to consider enhancement of the canal towpath as a sustainable transport route. Public open space and canalside enhancement need to be carefully considered and pedestrian cycle access provided onto the canal towpath. Opportunities to provide access points and facilities for water based recreation to be explored with the Canal & River Trust and local sports groups.
- Thames Water comment that on the information available to date it does not envisage infrastructure concerns regarding wastewater networks in relation to this development individually. However, considering the general upcoming growth within this particular location, further and comprehensive details will be required regarding the connection point(s) and the discharge type, in order to assess more effectively the impact of this development as part of a development cluster.
- BRAG objects to the loss of this employment site and premises which serve local needs for housing.
- Chiltern Society consider development acceptable if traffic issues on to Billet Lane and the High Street are controlled. Development should be no higher than the 3 stories of existing development in the proximity.
- Berkhamsted Citizens Association and local resident objection to the loss of employment space.

Bk12: Berkhamsted Civic Centre and Land to the Rear of High Street

- Hertfordshire County Council comment that a central location may support a highly sustainable approach, including low/no parking. There is a very good opportunity to connect the site to a sustainable corridor from the South West in a high-quality way to the town centre/High Street.
- Hertfordshire County Council state that there may be potential for roosting bats in buildings if suitable roosting features are present. Opportunities are limited.
- Berkhamsted Town Council point out this proposal conflicts with Policies DM64 and DM65 and fear redevelopment will result in the provision of community facilities, such as the hall, being lost to the town. The Town Council supports local community groups that have an interest in a transfer as a Community Asset.
- Thames Water comments that on the information available to date it does not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site. They recommend that the developer and the Local Planning Authority liaise with them at the earliest opportunity to advise of the developments phasing.
- Historic England highlight that the allocation is adjacent to the Berkhamsted Conservation Area which includes 69 Grade II, 5 Grade II*, and one Grade I listed buildings. While development here appears feasible, given the sensitive nature of the site, a Heritage Impact Assessment (HIA) will be required.

- BRAG and Berkhamsted Citizens Association object to the potential loss of a community accessible facility, the hall, from the town. Local community groups supported by the Town Council have an interest in a transfer as a Community Asset. Disposal by the Borough for development is considered to conflict with Policies DM64 Community Facilities and DM65 Community Stewardship and Management. Their preference is to retain community facilities.
- The Chiltern Society consider that the Civic Centre is an important amenity and the Police station remnant is in there, with the increase in population proposed this is even more essential than now, as is the car park which should be retained.
- There is a desire of local groups and residents for the Civic Centre to be equipped as a centre for films and performing arts and to be kept as a community facility for the benefit of the wider community. The general feeling is that the current facility is underutilised and there is frequent mention of support for B-Hive's proposal for "Civic Central".

Bk13: Gossoms End/Billet Lane

- Hertfordshire County Council Transport comment that this growth area, along with sites Bk09 and Bk11 are within 400m of bus stops on the High Street, London Road and A4251 with regular bus services available. The policy should maximise these connections.
- Northchurch Parish Council believe the site would be better served by low cost residential apartments and considers the location to be more sustainable as such than developments along Shooterway and Darrs Lane.
- The Canal & River Trust recommends that the policy should include 'contribute towards new/enhanced pedestrian and cycle links with Berkhamsted town centre and train station, including off-site provision' to consider enhancement of the canal towpath as a sustainable transport route. Public open space and canalside enhancement need to be carefully considered and pedestrian cycle access provided onto the canal towpath.
- Thames Water comment that on the information available to date it does not envisage infrastructure concerns regarding wastewater networks in relation to this development individually. They recommend that the developer and the Local Planning Authority liaise with them at the earliest opportunity to advise of the developments phasing.
- The Environment Agency observe that:
 - No development should take place in the Flood zones. Redevelopment of flood zones should return the land to flood plain as much as possible.
 - Proposals are expected to de- culvert the river and provide a naturalised 10m buffer zone to the river.
 - There is a WFD action at this site that should be addressed in any planning application:
- BRAG observes that Lidl are understood to be seeking a developer purchaser to provide the foodstore and parking on a leaseback basis and build the residential element to its own account. Any element of affordable housing in the existing consent should be retained.

Berkhamsted Alternative Sites

- Thakeham and Berkhamsted Rugby Club support development to the East of Berkhamsted (Bulbourne Cross) that could provide homes, and infrastructure including improved and expanded sports facilities. Thakeham as part of their promotional campaign for their alternative site provided flyers to Berkhamsted residents. The Council received a total of 114 flyers, with 83 of these supporting the proposal. However, local residents responses are mixed:
 - Those supporting the alternative site note its potential to deliver new and/or improved community infrastructure, including a country park, new schools and sports facilities. It was also noted that the site had better links to the A41 and would likely have less of an impact upon the town centre in terms of traffic generation.

- Those opposed to the site noted that its development would result in coalescence between Berkhamsted and Hemel Hempstead, taking into account the location of Bourne End also. There were concerns that its development would result in the removal/disposal of existing sports facilities from the centre of the town, and that it is distant from the railway stations, contrary to sustainable transport principles. Some respondents were concerned that it would have an adverse impact on infrastructure in the local area, including on schooling and that development would impact on the setting of the AONB.
- Rathbawn Properties Ltd submit for their client a 3.48ha site at Thorn Plant Hire, Spring Garden Lane, Berkhamsted. This could provide around 80 dwellings and also specialist accommodation to be given over to the neighbouring Hospice of St Francis.
- Vistry Homes Ltd seek to promote their site located at Land off Pea Lane, Northchurch (Site Reference: 19)
- A 1.2ha site Land west of Darrs Lane is put forward, this forms part of a large area of former worked out brick clay workings.
- Premier Property Acquisitions propose for development land west of Ivy House Lane (Site Reference:15), an arable field which could provide around 100 dwellings.
- The landowner request that pockets of land totalling 825m² at Ashlyns Farm, Chesham Road, be added to the adjacent allocation Bk01.
- 168-192 High Street, Berkhamsted, is made available by Akzo Nobel CIF for either a residential-led mixed-use development or a later living development.
- Edgeworth House in proximity to BK11 (Jewsons site) is promoted for development.
- ICP Asset Management Ltd propose Policy SP20 should include an additional allocation, on the former Golf Driving Range at Spring Gardens Lane for a new care home facility to help contribute to meeting housing needs. They argue that this brownfield site is located in a cluster of local services and facilities.

Tring Delivery Strategy

There were 596 separate responses to this consultation point. A further 549 people supported the representation made by Grove Fields Residents Association. The following themes/issues were raised:

Statutory Bodies

- Aldbury Parish Council believes the development proposals for Tring are out of proportion with the town and would represent a 50% increase in the town's population.
- Tring Rural Parish Council would strongly advocate and support a Service Level Agreement between Dacorum Borough Council and Buckinghamshire Council agreeing a cross-boundary partnership to allow residents of the parish to utilize the facilities of the Household Recycling Centre at Aston Clinton, a distance from the Parish boundary of approximately 1 mile.
- The British Pipeline Agency will need to be consulted with as the Plan progresses as development proposals in Tring have the potential to impact on their infrastructure.
- Environment Agency would like to be further involved in the masterplanning process of sites noting that Long Marston Brook runs close to the growth areas proposed. They are pleased to see a comprehensive Green and Blue infrastructure network will be enhanced including biodiversity net gain and water management, although this should specifically mention flood risk.
- Environment Agency would need a Sequential Test and a Strategic Flood Risk Assessment Level 2 carried out on all sites at risk of flooding before they could find the Plan sound. They would like to see strengthening of policy on waste water capacity and see the need for major development to demonstrate that there is adequate capacity for local water supply.
- Hertfordshire County Council (Growth Team) states that transport decisions here remain unclear but welcome the inclusion of the Berkhamsted and Tring Sustainable Transport Strategy while understanding that more work is required. However, they would like to see specific policy linking the station to the town for pedestrians and cyclists. Further work will be needed to determine how this should be prioritised.
- Tring Town Council are concerned about the level of growth proposed in the town and believe that there are less sensitive locations within the Borough such as Kings Langley which may be better able to accommodate growth due to its location next to the M25 and its proximity to the railway station, whilst also being located a distance away from the Area of Outstanding Natural Beauty. They raise that some evidence is missing including the Habitats Regulations Assessment and a traffic assessment. The evidence required to release Green Belt land appears to be quite high and the Town Council believe that alternative options have not been fully explored. They also raise that at present average densities for Tring are less than 16 dwellings per hectare and this is out of line with Government policy to make effective use of land.
- St Albans City and District Council note that there does not appear to be any provision for SANGs included in the Tring Allocations which is inconsistent with Policies SP24 and SP25.

General Bodies/Other Organisations

- Chiltern Society would like to see a greater concentration of development within the existing urban area of Tring through reusing shops and offices. If some development on Green Belt is allowed then this should be scaled down and will need to provide more parking provision at Tring Station. Other infrastructure deficits will need to be resolved such as a new reservoir to meet the needs of growth, and there are no plans or budget for this. They also raise whether the scale of countryside that will be lost can be justified, the impacts to the openness to the Green Belt and landscapes, the impact on wildlife and habitats, the effects of growth on infrastructure and the increase this would represent to the population along with a number of other points.
- Tring in Transition refer to the NPPF requirement that Green Belt development achieves an environmental gain and is mitigated by compensating development of surrounding natural spaces. The Council has not provided evidence of this and suggests a similar level of detail is given to sites for biodiversity improvements as those allocated for development. To accompany this they have also developed four distinct visions for improving the development standards in Tring that address issues within the Plan and build upon Tring's

distinctive features. These views are supported by Hardings Wood Trust and Community Action Dacorum, however Community Action Dacorum also add that there should be specific reference to additional community facilities specifically aimed at older members of the community.

- The Dacorum Liberal Democrat Councillors point out that the strategies include a large amount of Green Belt which they do not consider should be released. A housing target which cannot be considered an objectively assessed need for our area is not an exceptional circumstance to release Green Belt.
- Grove Field Residents Association (GFRA) feel that Tr02 and Tr03 need to be protected and there has been insufficient evidence to support the need for these sites to be released from the Green Belt. GFRA also notes that the Infrastructure Delivery Plan has not been completed as it does not identify the funding needed for infrastructure and therefore the Plan is not ready for consultation. GRFA questions whether funding for sustainable transport interventions has been secured. They also raise that no assessment has been undertaken on the impacts of growth on the A41 junctions or the impact of other developments outside of Tring/Dacorum.
- Extinction Rebellion Dacorum and Berkhamsted and Tring Labour Party raise that the strategy is too heavily reliant on two storey dwellings rather than more affordable higher density development on brownfield land and proposals will not solve the current housing issues experienced by local people and workers. Infrastructure in Tring and Berkhamsted is connected and is not sufficient to meet proposed growth levels.
- Chiltern Countryside Group states that the Plan fails to take into account the cumulative impacts of growth on air quality, which is also likely to be worsened by the expansion of airports locally. The health of the proposed population will be adversely affected by this and the destruction of green open spaces and woodland.
- The Tring Youth Council stated that the new housing in Tring is not truly affordable, with the cheapest house on the 'LA5' development costing £400,000. There is a concern that young people are being priced out of their home town.
- Tring Sports Forum would like to be involved with discussions with landowners in the development of a Tring masterplan in order to provide additional sports facilities for the town.
- Tring Rugby Club state that current facilities are too small and there are limited funds and space for them to expand. They also add that they believe the housing calculations are flawed and contrary to the NPPF and it is illogical to hold back growth in Hemel Hempstead.
- Pendley Sports Centre accept the need for more housing, but are concerned about the impacts this will have on the club. Any new development should have as little negative impact as possible on the community amenity and the wider area. They are concerned that there is already inadequate walking and cycling routes locally and the development of the two large sites will increase local movements significantly.
- Tring & District Local History & Museum Society state that Tring would be unable to absorb this level of growth without also causing significant harm to its character. The Council has no understanding of the history, people and traditions that exist in Tring. The housing need for Tring is only a fraction of that proposed meaning new residents would have no connection to the town. There is no Neighbourhood Plan in place.
- Aitchison Raffety on behalf of individuals state that the housing allocations at Tring are disproportionate to the size of the settlement and Berkhamsted is better able to accommodate growth with more facilities and infrastructure.

Wider Community

- Growth in Tring is disproportionately higher than the expected population growth and is based upon outdated growth assumptions using 2014 predictions, and will have also changed drastically due to Brexit and COVID-19.
- Consideration needs to be given to the impacts of COVID-19 on residential, employment and retail need. More opportunities maybe available on previously developed land.
- Lack of evidence to justify exceptional circumstances for Green Belt release, and goes against the environmental objectives. The current proposals would have a significant impact on wildlife and important designations in and around the area.
- Development would have a detrimental impact on the openness of the Area of Outstanding Natural Beauty.

- Policy SP23 and SP24 are not fit for purpose as the benefits of development do not outweigh the harm to the Green Belt and are therefore not NPPF compliant.
- A full assessment of sites available within the settlement is needed and an assessment of need across the Borough.
- Consideration has not been given to the impacts of development in the wider area on Tring.
- Development of this scale would harm the character of the market town.
- Development around and adjacent to the AONB will have an impact on its potential to gain National Park status.
- Concern that significant expansion of the town will lead to an increase in crime.
- Infrastructure in Tring is already struggling to cope with existing residents including healthcare (both local GPs and hospitals), education provision, retail, public transport is unreliable (trains from Tring are at capacity), sport provisions, roads and parking in the town centre as well as publicly accessible open space.
- Traffic congestion in Tring, especially in the High Street, Brook Street and Station Road, is already bad and it is not possible to improve these roads, growth in Tring will worsen this and increase pollution levels.
- The economy in Tring would not be able to support this level of growth meaning people would have to travel out of town for work.
- The Plan currently isn't clear on its commitment to Climate Change and sustainable construction methods.
- The growth locations proposed are too far away from the town centre and facilities therefore encouraging car use and not supporting sustainable transport.
- Not enough consideration has been given to meeting housing need for older people, those living with disabilities and genuinely affordable housing.

Tring Proposals and Sites

There were 1234 separate responses to this consultation point. A further 549 people supported the representation made by Grove Fields Residents Association. The following themes/issues were raised:

Tr01: Dunsley Farm

- Hertfordshire County Council (Growth Team) supports the provision of older accommodation although they are concerned about the amenities on site that would be available to make such accommodation suitable. The County would also like confirmation that this would include an allowance for fully funded care (affordable rent). County also note that there is no mention of housing for people with disabilities. The site contains a Local Wildlife Site and will need to be tested against the Biodiversity Mitigation Hierarchy Test and included in the Habitats Regulations Assessment. The proposals on this site will require existing walking and cycling routes to be redesigned given that the site is likely to be a key destination and should connect to a settlement wide walking and cycling network. Protected species are known to live in the area and opportunities to retain habitats where possible should be considered. An ecology appraisal and Local Wildlife Site quality survey may be required.
- Vincent and Gorbong on behalf of Hertfordshire County Council (Property Team) support the allocation of the site and provision for older people accommodation and back up location for new supermarket and fire and rescue station as part of the employment area. Should education provision be sought here the Council would be expected to secure funding from other developments for the use of facilities on site. They request that policy is amended to ensure the amount of land allocated for education use is of sufficient size. Masterplanning of the site and design codes should be done by the developer as part of an outline planning application therefore saving the need for the Council to prepare and adopt an SPD before the site can come forward. HCC does not support reference to junction improvements, and notes that transport improvements should be limited to making the development acceptable, although they are happy to contribute to off-site enhancements. A survey is to be carried out on the Local Wildlife Site to understand the quality and extent of the grassland and to inform the next stages of the Plan.
- Environment Agency note that part of the site is designated a local wildlife site and suggest that the appropriate body is engaged to ensure the site is suitable for development. Policy will need to protect/enhance the site through development.

- Thames Water raises that the scale of development on site is likely to require upgrades to the wastewater network and that the Council should liaise with Thames Water to agree a housing and infrastructure phasing plan.
- Wigginton Parish Council feel that development here would cause harm to the Area of Outstanding Natural Beauty and should therefore be withdrawn following the guidance from Government that housing need is not a reason to cause harm to places.
- Tring Town Council state that the site is considered to be performing an important Green Belt role according to evidence and there is little evidence to suggest the Council has looked more widely to meet its housing commitments upon less sensitive land. Proposal for supermarket here may not meet the sequential test given its dependence on car travel and its location away from the town centre.
- Tring in Transition state that there has not been consideration of Buckinghamshire in the proposals, as there is no need for warehousing on this site when there is already provision a few miles away. A supermarket here would also be inappropriate as the majority of trade comes from north of Tring and would be better placed near or on Tr03 . Development is not supported here on the basis that it would impact upon the environment and the character of Tring, however if development is required industrial units should all be under 2,000 sqm or smaller as anything larger would impact on the landscape and entrance to Tring.
- Aitchison Raffety on behalf of an individual believe there is insufficient evidence to allocate the site on the basis of the need for new playing pitches for Tring School, or for a supermarket or new school. The Council are viewing this as a development site whilst it is still Green Belt and therefore it cannot be developed until exceptional circumstances have been justified. Site is not of a sufficient scale to require a new primary school and is already well served to the north and through the proposals on Tr03. Development of the site would also have an impact on the AONB, biodiversity on the site and would result in a loss of amenities for residents forever changing the character of Tring. They propose that any employment need is accommodated in Dacorum.
- Tring & District Local History and Museum Society - Site is a working farm and should be retained as such. Development here would be highly visible from Pitstone Hill and would represent an urban intrusion to a rural scene. If development comes forward S106 contributions should be spent locally. A new supermarket should be located at Tr02 or Tr03 should these go ahead.
- Chiltern Countryside Group supports the notion to improve the economy of the towns but this should not be done so at the expense of existing assets such as Tring Brewery. The Group do not support the proposal for a supermarket on the edge of town as this would attract shoppers from the town centre.
- Chiltern Society consider the site is inappropriate as it is very sensitive as the gateway into the town and is bordered by the Area of Outstanding Natural Beauty.
- Tring Sports Forum would like to see the site include provision for at least 16 hectares of land for sports use which would link the two existing sports hubs as well as the inclusion of a car park and leisure trail linking the town centre to the train station. Similar views are expressed by Tring Squash Club.
- Herts Gardens Trust state that development here will impact the setting of Tring Park and Dunsley Bungalow.
- TSEL Tring Tornadoes note there is no mention of 18 hectares of open space and sports/leisure facilities and these should be included in policy.
- If the Council is looking to dispose of this land then it should be considered for community uses or a country park.
- Development here would damage the landscape at the entrance of the town and impact on the surrounding Area of Outstanding Natural Beauty.
- Development would have a detrimental impact on the character and heritage of the town, although this view has also been expressed for other proposals in Tring.
- A new road junction at Cow Lane along with two more on London Road would create indirect routes leading to more traffic congestion and noise and air pollution.
- The public rights of way through the site provide a recreational and health and well being benefit for the community and is well used by a number of residents. The importance of this asset along with others has been particularly important during COVID-19.

- The site serves as an important wildlife link between Tring Park and Pendley Manor as well as wildlife on site and this should be protected.
- The site and surrounding area has been known to flood, with concern about on site drainage and surface water run off.
- Infrastructure in Tring is already insufficient to meet local needs including GP capacity, education provision, parking at the station and in the High Street.
- Development of this site would result in the loss of community/retail locations Tring Brewery and Dunsley Farm and shop and will need to consider how practical it would be to relocate facilities such as the fire station.
- Development of the site would go against the Government's objective to protect Green Belt land and more should be done to look at Previously Developed Land, although this view was also shared for other developments proposed.
- Greater consideration should be given to this site over other Green Belt proposals (Tr02: New Mill and Tr03: East of Tring) as it contributes less to the Green Belt than those sites and has the potential to deliver more than the 400 units proposed. There needs to be a more detailed allocation strategy provided for this site and it should include more affordable starter homes.
- Commercial development would be better located in Aylesbury where plans are already in place, so there is no need to provide more in such close proximity.
- Development here would lead to coalescence with Wigginton.

Tr02: New Mill

- Hertfordshire County Council (Growth Team) support the provision of accommodation for older people, but are concerned about the amenities on site that would make such accommodation suitable. The County would also like confirmation that this would include an allowance for Fully Funded Care (affordable rent). County also note that there is no mention of housing for people with disabilities. Transport provision should be considered in tandem with Tr03 and therefore would not support the delivery of the sites individually. Part of Marshcroft Farm ecology site falls within the site boundary. Protected Species are known in the area. Biodiversity Net Gain Measures such as native species planting should be considered and an ecology appraisal may be required.
- Thames Water raise that the scale of development on site is likely to require upgrades to the wastewater network and that the Council should liaise with Thames Water to agree a housing and infrastructure phasing plan.
- Tring Town Council consider the site to be performing an important Green Belt Role according to evidence and see little evidence to suggest the Council has looked more widely to meet its housing commitments upon less sensitive land. The land is Grade 2 agricultural land and the NPPF states that poorer quality land is preferred.
- Chiltern Society point out that the site is Green Belt land and has views over the countryside, it is within a historic area of Tring and is close to and in the setting of, the Area of Outstanding Natural Beauty.
- Berks, Bucks and Oxon Wildlife Trust note the site is within close walking proximity to College Lake Nature Reserve and has the potential to impact upon it. To mitigate risk an appropriate amount of land should be reserved as a nature area within the site and included within policy.
- TSEL Tring Tornadoes ask that public open space be included as an element of this site and request to see the location, size and intended use of this space.
- Tring & District Local History & Museum Society consider this site, along with Tr03, is unacceptable as it is in open countryside, will be remote from the town and clearly visible from the AONB.
- L&Q Estates support the inclusion of this site in the Plan. The site will be able to provide significant areas of public open space including the retention of the existing hedgerow through the middle of the site.
- The Council needs to reassess need to allocate Green Belt land and if exceptional circumstances for release around Tring are identified then Tr01: Dunsley Farm should be considered first.
- Release of this site from the Green Belt would have a substantial impact on the Green Belt and Area of Outstanding Natural Beauty which has not been justified in planning policy terms.

- Roads and footpaths around this site are narrow, dangerous, or in places non-existent (footpaths), development here would likely worsen this and surrounding roads and a new access onto Grove Road should not be provided.
- Existing vegetation around the site provides habitats for wildlife and should be protected.
- Development here would change the character of the town.
- The site is subject to flooding.

Tr03: East of Tring

- Hertfordshire County Council (Growth Team) would like to see greater emphasis on encouraging sustainable transport in line with Local Transport Plan 4, and believe that both primary schools should be located on this site as opposed to Tr01 to minimise the need to travel. The County support the provision of accommodation for older people, but are concerned about the amenities on site that would make such accommodation suitable. The County would also like confirmation that this would include an allowance for Fully Funded Care (affordable rent). County also note that there is no mention of housing for people with disabilities. There is an ecology site, Marshcroft Farm, within the northern half of the site. Protected species live in the area around the Grand Union Canal and Station Road/Grove Road Fields. Opportunities should be explored to create green corridors for habitats and Biodiversity Net Gain measures such as native species planting should be considered. An ecological appraisal may be required.
- Sport England supports the principle of a sports hub on the site and agrees that the site is of a sufficient size to support it. Presently they cannot comment further as it is dependent on the sports needs of the community and the land available. They do note that facilities will need to be coordinated with school development as there is potential for shared facilities.
- Aldbury Parish Council object to this site on the grounds that it would result in the merger of Tring Town with the hamlet of Tring Station and would remove the buffer from the Area of Outstanding Natural Beauty and impact on its views. They also raise a number of other concerns including the capacity at the station, the ability for roads around Tring Station to handle extra traffic and the impacts on the A41, the severe recreational pressure impact on Ashridge and that current proposals place too much emphasis on Tring to deliver growth.
- Thames Water raise that the scale of development on site is likely to require upgrades to the wastewater network and that the Council should liaise with Thames Water to agree a housing and infrastructure phasing plan.
- Tring Town Council consider the site to be performing an important Green Belt role according to evidence see little evidence to suggest the Council has looked more widely to meet its housing commitments upon less sensitive land. The land is Grade 2 agricultural land and the NPPF states that poorer quality land is preferred. The site contains archaeological deposits on the southern end.
- Tring in Transition state that this site needs to be considered as two separate sites which are split by Marshcroft Lane. The northern site along with Tr02 (New Mill) would have a lower impact than development of the whole site and would be more fitting to growth in Pitstone. The Plan so far does not indicate how environmental issues will be addressed, but the proposal for a link road through the site would have substantial environmental impacts.
- Chiltern Countryside Group (GGC) do not support this allocation on the basis that it is located too far away from the town centre and necessary infrastructure and will worsen air quality due to the need to travel by car. While it is understood that this was to join the town to the station consideration needs to be given to the COVID-19 pandemic and how this has changed working patterns. CCG object to any development on high quality agricultural land, there is no evidence to justify such development.
- Chiltern Society consider this site particularly sensitive on Green Belt and adjacent to the Area of Outstanding Natural. The site's location is too far away from the town centre and so would encourage car travel. There is no provisions made for infrastructure other than schools.
- Herts and Middlesex Badger Group - site would need to provide wildlife/parkland at the edge of the site from the Grand Union to the garden centre and maintain this width through the length of the site to be compliant with the Environment Bill and provide a 10% net gain in biodiversity.

- Berks, Bucks and Oxon Wildlife Trust - the site is within close walking proximity to College Lake Nature Reserve and has the potential to impact upon it. To mitigate risk an appropriate amount of land should be reserved as a nature area within the site and included within policy.
- The Canal & River Trust suggest that consideration is given to the use of the canal towpath to provide enhanced pedestrian and cycle links to Tring Town Centre and Tring Station and as part of a recreational route to Tring reservoirs. Development will need to be set back from the canal to minimise any structural issues and a new pedestrian access should be provided to reduce safety concerns on Maxcroft Bridge.
- Tring & District Local History & Museum Society- this site, along with Tr02, is unacceptable as it is in open countryside, will be remote from the town and clearly visible from the AONB.
- Herts Gardens Trust suggest that the large scale development to the north east of Tring will destroy Green Belt land and has not been justified as required by NPPF. It will have a impact on the setting of the listed Pendley Manor.
- TSEL Tring Tornadoes note that there is provision for a new neighbourhood centre which will include a sports and community hub and open space. They would again request to see the size, location and facilities that are expected to be provided.
- Walbrook Planning Consultants support East of Tring as it will make a significant contribution towards the Council's housing target and is of a scale that allows for a range of housing type and mix and ensure that there are no wider impacts to the AONB and Green Belt. The fact that this will also allow for the town to be better connected to the station by active travel is also supported.
- Harrow Estates support the inclusion of East of Tring and agree that the site should come forward in conjunction with Tr02 and acknowledge the sensitives of the AONB and propose an ecological buffer along the canal. The site will provide high quality green and blue infrastructure and enhance the connectivity between the new and existing communities through safe and attractive pedestrian and cycling routes and the extension of the bus network into the site with links to the station.
- The Council needs to reassess the need to allocate Green Belt land and if exceptional circumstances for release around Tring are identified then Tr01: Dunsley Farm should be considered first.
- Release of this site from the Green Belt would have a substantial impact on the Green Belt and Area of Outstanding Natural Beauty which has not been justified in planning policy terms.
- The provision of cycling would not solve the issues at Tring Station, parking is difficult and trains are currently running at capacity.
- The site contains wildlife that would be lost if the site were to be developed.
- Tring lacks the infrastructure to support such levels of growth for example medical facilities are already at capacity.
- The site provides recreational space for the community and should be protected, the existing Marshcroft Lane is well used for walking/ running etc and provides habitats for wildlife in the hedgerows.
- The site's proximity to the Grand Union Canal would detract from its views/appeal and have an impact on the wildlife that lives there.
- Growth here is too great, will result in the merger of Tring and Tring Station, will shift development away from the town centre and will have a detrimental impact on the character of the town.
- Consideration has not been given to the wider traffic impacts of the development with the need for residents to access the A41 and local services and that the link road proposed within the site does not become a rat run.
- Site is subject to flooding.

Tr04: Icknield Way

- Hertfordshire County Council (Growth Team) consider the site is not of a sufficient size to facilitate a bus service. There is potential for wildlife to be living on site and Biodiversity offsetting to mitigate the loss of semi-natural habitats should be considered.
- Thames Water raises that the scale of development on site is likely to require upgrades to the wastewater network and that the Council should liaise with Thames Water to agree a housing and infrastructure phasing plan.

- Tring & District Local History & Museum Society note that the site is already consented for employment use and should be retained as such.
- A school is needed on the western side of town as current provision would not be able to accommodate growth including LA5.
- Additional employment need, such as warehousing, would be better met here.
- This site will cause congestion and safety issues when taking into account existing development at LA5.

Tr05: Miswell Lane

- Hertfordshire County Council (Growth Team) set out that enhancements to pedestrian facilities will likely be required. The site is within the accessibility criteria for bus provision and is well served. Pedestrian links though the site would help to encourage access to the town centre through sustainable modes. There is potential for wildlife to be living in existing trees and buildings and Biodiversity Net Gain measures such as native species planting and habitat boxes should be considered. Additional land from the site would be needed to provide a foot/cycle way to access the Industrial Site.
- Thames Water raises that the scale of development on site is likely to require upgrades to the wastewater network and that the Council should liaise with Thames Water to agree a housing and infrastructure phasing plan.
- Chiltern Society note that careful landscaping and design would be needed to mitigate any impact on views from existing residential and commercial properties.
- Access road to the site is narrow and would need to be widened to make this acceptable.
- This site will cause congestion and safety issues when taking into account existing development at LA5.

Tr06: High Street/Brook Street

- Hertfordshire County Council (Growth Team) note there is potential for bats to be living in existing buildings. Development should consider Biodiversity Net Gain measures such as native species planting.
- Hertfordshire County Council (Hertfordshire Archives and Local Studies) have concerns about the relocation of Tring Local History Museum and such relocation would need to be to a site which is fit for purpose, able to house and display, has achievable rent and has adequate footfall. The museum is currently working towards accreditation which requires the museum to be stable and secure.
- Thames Water raises that the scale of development on site is likely to require upgrades to the wastewater network and that the Council should liaise with Thames Water to agree a housing and infrastructure phasing plan.
- Tring Town Council state that the site is sensitive in heritage terms and does not lend itself to the development of a supermarket. The site is in multiple ownership and thought needs to be given to the potential impact development here would have on the town Centre.
- Tring in Transition consider that there is no demand for a supermarket on this site and it would be better located to the north of Tring along Bulbourne Road.
- Chiltern Countryside Group supports the notion to improve the economy in the town but this should not be done so at the expense of other assets such as Tring Local History Museum.
- Chiltern Society believe that this proposal is unacceptable as it would include the demolition of historic buildings. This is also regarded as an attractive entrance to the town which is important to maintaining its character.
- Tring & District Local History & Museum Society - no indication has been given as to where the museum would be relocated to, or the need for it to be relocated and could mean that it is in a less advantageous position. The Society does not have the funds to establish a museum elsewhere and there are no details regarding who would fund this. The current building is of historical merit, contributing to the towns heritage and character, and attracts tourism to the area. This proposal will undermine plans for a phase 2 expansion.
- The Tring Youth Council state that the auction rooms have historically employed young people in the area in their first jobs, and play a significant role in recycling affordable furniture for young people, and this service should be retained.
- The delivery of a supermarket would worsen traffic congestion and noise and air pollution in the area.

- Those travelling to the supermarket from surrounding villages would still use the car to access it, passenger transport will not stop car use.
- The museum and auction house are of historical importance to Tring providing a unique tourism aspect to the town and is important in retaining its character and should not be relocated.
- More should be done to support the existing High Street, the approach taken is not appropriate for 21st century needs.
- Proposals should consider the impact of COVID-19 on retail and office needs.
- Flooding along Brook Street is a known problem there is suspected underground streams under the site.
- The site should be used for additional High Street parking.
- The site would be better used to provide social facilities/activities.
- The site is not of a sufficient size for the proposals put forward in the Plan.

Tring Alternative Sites

- Icen Projects on behalf of Millbank Land Ltd have promoted land at Bulbourne Park (Site 128 in the Site Assessment Study). The site is effectively boarded by existing development on three sides and is within close proximity of Tr02 and Tr03. The site is of a small scale so could be built out within the first five years. The site would deliver 39 units.
- Cullercoats Landholdings promote land between Cow Lane and Station Road (Tr-h4 in Schedule of site appraisals 2017). Development of the site would better enable access to the AONB, and while the approach is to accommodate growth outside of the AONB it does not preclude some modest growth coming forward on land designated AONB. The site would facilitate free movement between the two proposed sites Tr01 and Tr03.
- Emery Planning on behalf of Bloor Homes promote land north of Icknield Way (known internally as Waterside Way), the site could deliver up to 300 new homes including key worker and extra care accommodation. The site was within zone Tr-A9 in the Green Belt Stage 2 review.
- Generator Group promote land south of Aylesbury Road which would be able to provide a new 2FE primary school and could deliver up to 220 homes.
- Although not officially promoted by developers the following sites and locations were suggested by the wider community:
 - RAF Halton which has been proposed for redevelopment, this should be a new town proposal.
 - Pitstone Quarry as this will have good access to Tring station, is a brownfield site and will have minimal impacts on the landscape and Green Belt.
 - Akeman Street business centre as the impacts of COVID-19 come to light.
 - Land in Cow Roast although no specific details as to the location were provided.
 - Land in Aston Clinton although no specific details as to the location were provided.
 - AONB land adjacent to the LA5 allocation which would connect up to the A41 roundabout.
 - Small scale development around the edge of Tring - suggestions put forward were: land adjacent to the allotments on Western/ Aylebury Road, opposite the Industrial area on Icknield Way, on land adjacent to Tesco, on the field at the New Mill end of Grove Road or a small area of Cow Lane.
 - Reference to a Postal sorting office although the location of this was not made clear.

Kings Langley Delivery Strategy

There were 77 separate responses to this consultation point. The following themes/issues were raised:

Statutory Bodies

- The Environment Agency wishes to be consulted further on any masterplans/strategies for developments in Kings Langley as it is set along a main river.
- Hertfordshire County Council state that there is no expansion capacity within Kings Langley Primary School, and therefore there is no feasible option to accommodate the additional yield. However, demand for secondary school places could be met at new schools in Hemel Hempstead.
- Hertfordshire County Council also reference the capacity of the M25 Junction 20/A41 should be amended to consider the wider impact of congestion and not focus on road capacity alone.
- The Canal & River Trust state that any new development should reflect improvements to the canal towpath, including but not limited to improving/expanding the route to allow for increased capacity, provision of water based recreation, and facilities to improve access, such as car parking. The Trust also state that development should contribute to maintenance and enhancement of the canal towpath through S106 and CIL payments.
- Three Rivers District Council has stated that growth in both authority areas will potentially impact on the M25 Junction 20/A41, and that suitable and achievable measures to improve capacity will be included in their Infrastructure Delivery Plan.
- The British Pipelines Agency highlight that Kings Langley will be affected by pipelines and as such the BPA and FINA need to be consulted for new key developments.
- Kings Langley Parish Council:
 - reflect on a 2017 village poll which detailed that 99% of respondents oppose any Green Belt development, and a further Parish Plan survey in 2019 found 95% of respondents wished for Kings Langley to remain as a village.
 - are of the opinion that the Emerging Strategy for Growth is against the views of local people.
 - state that the Plan has not considered that a large amount of employment land in Three Rivers administrative area has been lost to housing conversions, equaling over 250 units.
 - point out that it is likely that 80% of the housing target will be delivered within the first 5 years of the Plan being adopted, which will put an immediate strain on infrastructure in the village and will compromise the aims of their Neighbourhood Plan.

General Bodies/Other Organisations

- The Kings Langley District and Residents Association (KL&DRA) state that they welcome existing engagement undertaken with Three Rivers District Council and other South West Herts Authorities, however they believe there has been insufficient consideration of the role and function of Kings Langley in a sub-regional context.
- The KL&DRA are of the view that Dacorum's strategy should reference the cross boundary potential for development in the village. They believe that the Council should request from St Albans and Three Rivers that any residential development on boundaries should contribute towards the housing and employment need of Dacorum.
- The Dacorum Liberal Democrat Councillors point out that the strategies include a large amount of Green Belt which they do not consider should be released. A housing target which cannot be considered an objectively assessed need for our area is not an exceptional circumstance to release Green Belt.
- W Lamb Ltd mentions that there is no reference for an additional primary school site despite under provision in the area, however their land at Shendish which has been promoted, but not included in the Plan, could provide a potential solution for this.
- CBRE note that the evidence supports that Kings Langley is more sustainable than Bovingdon and Markyate (with regards to services and access to transport). They argue that development here will cause less environmental damage than development in Tring would (due to the proximity of the AONB and SAC).

Wider Community

The main points raised by the wider community are as follows:

- There is a strong desire to preserve the heritage and community of Kings Langley, and that this is threatened by development.
- There is a general concern that the strategy for Kings Langley is premature, with regards to the impact of the COVID-19 pandemic and Brexit, and should be re-considered following further consultation.
- New development in Kings Langley needs to offset the pressure on local infrastructure.
- The local road network cannot handle the proposed expansion set out in the Plan.
- Some local residents oppose Sunderland Yard being designated as a General Employment Area, as its location is inappropriate and causes amenity and pollution concerns for neighbouring residents.
- The King Langley school sports facilities cannot be relied upon as a community facility, as its availability is constrained due to drainage and flooding issues.
- Concern that there will be a negative impact on health due to the loss of countryside and green space.
- New development will exacerbate existing flooding and drainage issues in the area.
- The level of development is causing Kings Langley to be at risk of merging into existing settlements of Watford and Hemel Hempstead, losing its identity as a separate village.
- Green Belt development will cause a reduction in wildlife and species, such as kites and skylarks.
- Recent developments in the area have not delivered housing that was affordable for local people.
- The Plan does not recognise the local food growing initiatives in Rectory Farm.
- There is support for the Plan not including proposed developments from the earlier 2017 consultation at Wayside Farm, Hill Farm and Shendish Manor.

Kings Langley Proposals and Sites

There were 148 separate responses to this consultation point. The following themes/issues were raised:

KL01: Land adjacent to Coniston Road

- Hertfordshire County Council stated that this site is within 400m of a bus stop, however the service provided is limited.
- Thames Water did not envisage infrastructure concerns with regards to wastewater network, or wastewater treatment.

KL02: Land at Rectory Farm

- Hertfordshire County Council state that maximising connections to services and facilities in Kings Langley should be prioritised, via improvements to active travel routes and the bus stops on Hempstead Road.
- Hertfordshire County Council states that protected species, are known to live in the area, alongside a potential for nesting birds and roosting bats in trees and buildings and reptiles in rough vegetation. The hedgerow should be retained, and consider a green corridor on the eastern boundary with the canal. Both an ecological appraisal and a preliminary roost assessment may be required.
- The developer should avoid light spill on adjacent woodland/existing trees, and consider Biodiversity Net Gain measures such as native-species planting / wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.
- Thames Water highlight the potential of SUDs development indicated by the existence of a watercourse near to the location of the proposed development. They will only consent to a connection to a public surface water when it can be demonstrated that the hierarchy of disposal methods have been examined and proven to be impracticable. Thames Water also states that the developer should liaise with the local flood authority to agree an appropriate sustainable strategy following the sequential approach before considering connection to the public sewer network.
- Three Rivers District Council consider that it is important to provide high quality walking and cycling routes to Kings Langley train station, and potentially to the employment area in Three Rivers.

- The Environment Agency state that there should be a minimum of 10m buffer zone between the River Gade and any built environment (except tow path if present). There should be no lightspill above 2 lux. The development should protect and enhance the chalk stream priority habitat. A Water Framework Directive Assessment will be required to be submitted as part of any application. They support no residential development on flood zone 2 and 3, however flood risk on site should still be managed effectively. The Environment Agency specify that any development within 8 m of a main river will require a Flood Risk Activity Permit from them.
- The Canal & River Trust state that enhancement to the canal corridor should consider improved access to the waterspace for watersports and angling, including the provision of necessary supporting facilities such as car parking. The access route should ensure it is accessible for all users.
- Concern that the development will create more traffic in the High Street, worsening air quality and pollution.
- The site is not of sufficient size to provide any solutions to local infrastructure concerns such as GP surgeries and primary school places.
- Development will cause more difficulty for non-road users to cross the traffic at Vicarage Lane, thereby discouraging active travel.
- Accidents are a regular feature of this part of Hempstead Road where traffic is either decelerating or accelerating to or from the short 40mph section which begins at the point where the access road is planned. This area should be reduced to 30mph, however no changes are planned to the 40mph designation.
- Gade Valley Close emergency access point will be threatened by increased parking in the village.
- Development will increase traffic congestion on the A4251 and the roads leading to the schools (Coniston Road and Common Lane), increasing the risk of accidents and worsening air quality.
- Development will worsen the canal environment, which is a designated local wildlife site, and cause irreparable damage to wildlife and biodiversity.
- Some responses agree that the brownfield part of the site is acceptable for development, but the greenfield part should be retained for recreation.
- The development does not include a relocation of the local vegetable growing scheme at the 'transition in kings' site.
- This site will increase Kings Langley in size by 10%, this is overdevelopment and will cause the village to lose its character.
- The Neighbourhood Plan Residents survey in 2019 stated that 96% of respondents said they were against any development on Green Belt land. The Local Plan has ignored this majority view.

Kings Langley Alternative Sites

- A number of comments support that unspecified surplus office space and brownfield land should be reviewed again to identify further sites.
- The Telephone Exchange and the Steiner School premises (existing building conversions) have been proposed as alternatives to greenfield sites.
- The site promoted 'Hill Farm' (Site 89) performs extremely strongly in the evidence base that has been undertaken by the Council. The site could be added to the Draft Plan with no requirement to revisit the evidence base. The site is close to educational facilities and would allow more trips to be made sustainably. Within the Green Belt Review Stage III, Site 89 is included in a number of the accompanying images as a 'Preferred Site Allocation'.
- Landhold Capital, as set out in other representations made to the Plan, strongly considers that the Plan should include a further allocation at Kings Langley, extending to the west and north-west of the existing built up area of the village. It is proposed that this would include land to the west of the secondary school, and include the land up to Barnes Lane.
- Chilworth Intn Corp have submitted land at Barnes Lodge field, Kings Langley for consideration. As this is currently bare field subjected to pesticides or methane gas issues (grazing animals). The north of the site is envisioned to create parkland. The south west half could provide a kindergarten, sports fields, a retirement home, and/or further medical facilities.

- The Park Garage Group PLC are offering land at Kings Langley Service Station and Adjoining Land, 124-127 Hempstead Road, Kings Langley, for inclusion within the Plan as a mixed-use commercial/residential allocation. They intend to deliver an electric vehicle charging facility (sui generis) there together with an ancillary roadside retail/café unit (Use Class E), and affordable residential development, providing 20 – 30no. units.
- Local landowner representation is made in support of amending the Green Belt boundary to the rear of Coniston Road, Kings Langley which seeks to move it to follow the permanent defensible line at the end of the gardens adjoining open countryside.

Bovingdon Delivery Strategy

There were 61 separate responses to this consultation point. The following themes/issues were raised:

Statutory Bodies

- Hertfordshire County Council request that housing growth in Bovingdon is reduced so that the existing primary school can accommodate additional demand. They object to the proposal to relocate the school due to the funding gap of securing this and the implications this would have on transport. Parking proposals are contrary to adopted policy as access to the centre should be achieved via walking and cycling.
- Bovingdon Parish Council accepts the proposed growth but insists that this is the upper limit for growth taking into account the other large villages have better transport connections. They also state that there needs to be consideration for the lack of infrastructure. The Council supports the proposed allocation of Grange Farm in that it will provide public open space, safeguard land for a primary school, include specialist elderly housing as well as affordable and will provide appropriate flood prevention measures.
- WSP on behalf of Homes England notes that proposals will need to comply with the NPPF and should consult NATS and The Civil Aviation Authority in regards to development around the Bovingdon Airfield Air Traffic Navigation Beacon. They also raise the need to make an amendment to the delivery strategy to support the Councils housing delivery targets and highlight the deliverable scale of the Bobsleigh Hotel.
- The Environment Agency would need a Sequential Test and Strategic Flood Risk Assessment for site allocations before they could consider the Plan sound along with -embedding wastewater capacity into policies, major development demonstrating that there is adequate capacity for local water supply, water resources and supply need to be embedded within development plans and reference to green infrastructure should also include blue infrastructure to recognise the connectivity between the two.
- British Pipeline Agency note that their infrastructure may be affected by development in Bovingdon.

General Bodies/Other Organisations

- The Dacorum Liberal Democrat Councillors point out that the strategies include a large amount of Green Belt which they do not consider should be released. A housing target which cannot be considered an objectively assessed need for our area is not an exceptional circumstance to release Green Belt.
- Bovingdon Scout Group state that the Scouts Hut is in desperate need of a replacement, that current space for such services is very limited in the village, with an immediate need for such facilities to be provided and that at present the plan makes no realistic attempt to rectify this.

Wider Community

The main points raised by the wider community are as follows:

- Parking problems along the High Street and congestion and pollution were frequently raised by residents as a concern as the roads are not able to handle the traffic. The use of roads by HGVs was also raised.
- Bovingdon already has an infrastructure deficit including public open space, community facilities, healthcare facilities.
- Green Belt is protected and proposals would go against Government views. Brownfield sites should be used before Green Belt.
- The primary school should not be moved from its current location.
- The growth assumptions for the village are too high and the calculation is flawed.
- Density standards should be lower to protect the character of the village.
- Growth to the south west of the village will have an impact on the wildlife site adjacent.
- Flooding along Green Lane and the Moody Estate was raised as a concern.

Bovingdon Proposals and Sites

There were 108 separate responses to this consultation point. The following themes/issues were raised:

Bv01: Grange Farm

- Hertfordshire growth team - school on this site is unsustainable and undeliverable with the numbers currently proposed. Numbers to be reduced before proposal can be supported or increased to make school viable. Access from Green Lane would not be supported over Chesham Road. Proposals to improve connectivity to Hemel Hempstead by non car modes should be reflected in policy. It would be challenging to improve bus provision for the site.
- Savills on behalf of Thames Water -Development is likely to require upgrades to wastewater network, and will require consultation with Thames Water to phase development accordingly. Further discussions are needed with flood authority to minimise the need for surface water to enter the sewerage network and the re-examination of numbers to meet discharge criteria.
- Cedra planning on behalf of Bovingdon Parish Council are supportive of the allocation as it had a lesser impact on the Green Belt as well as their capability to provide infrastructure and safe road access. 150 dwellings should be the absolute maximum as Bovingdon is not as sustainable as other settlements in the Borough.
- DLP Planning Limited on behalf of Whiteacre Limited support the inclusion of Grange Farm and the benefits it will provide to the High Street through the relocation of the school. However, they believe there is a lack of reference in the plan to the site-specific benefits of non-car permeability at Grange Farm. They also seek to alleviate concerns with the site such as its impact on congestion in the High Street and flood risk. The site can provide 40% affordable, an 80 bed nursing home and new public open space
- Some residents supported the proposal to relocate the school to this site, stating it would provide better access for the school, would alleviate the issues of flooding on Green Lane/Chesham Road and is the most appropriate Green Belt release of the sites promoted.
- There was also objection to the proposal to relocate the school most of them being on the basis that the school would not be delivered within the Plan period. There was also concern that this would be at detriment to retail in the village centre and is part of the character of Bovingdon. There were a few suggestions for the safeguarded land to be used as a sports centre/community space (cubs) and or allotments.
- Traffic and congestion were raised as being key challenges not only in the roads immediately serving the site but also the impact it will have on the High Street and already busy Chesham Road.
- The site is known to flood.
- The site is in the Green Belt and doesn't reflect Government approach to increase development in the north of the country and to protect Green Belt land, if development must happen then this should be on brownfield land first.
- The site is adjacent to a wildlife site and would have a detrimental impact.
- The site does not provide safe access for pedestrians, routes along Chesham Road were mentioned as being the worst for this due to high vehicle speeds and narrow footpaths.

Bv02: Chesham Road and Molyneaux Avenue

- Hertfordshire growth team - site only has limited bus services available and is not of a scale to contribute to improvements of provision.
- WSP on behalf of Homes England acquired this site from the Ministry of Justice in 2018 and are in the process of undertaking technical studies of their landholding to support the submission of a planning application for residential development. They would seek that policy is amended to remove the restriction to building height, and to maximise the delivery of the site providing up to 60 homes. They suggest that policy is too prescriptive and does not need the test of soundness by failing to plan positively. The site is not within the NATS zone and so development heights can be increased. The decrease from 60 units to 40 in the new plan has not been evidenced or justified the issues around the reservoir is outside of the

ownership of the site the risk this will pose will need to be agreed with the Lead Local Flood Authority in future work. Access may be required from Chesham Road and Lancaster Drive however work has not advanced sufficiently to determine this and so should be relaxed in policy.

- Savills on behalf of Thames Water -object to proposal as it is located within 15m of a Thames Water Sewerage Pumping Station and contrary to best practice. Presently no infrastructure concerns. Further discussions are needed with flood authority to minimise the need for surface water to enter sewerage network.
- Safe access to the site was raised as a concern stating that there is insufficient pavement width along Chesham Road and traffic travels through this section at high speed.
- There is a large amount of biodiversity and wildlife on the site which would be lost if developed.
- Question whether the site is available or achievable given its inclusion in the existing plan, but is yet to be built.
- Concerns over a potential sinkhole and the reservoir on the site.
- Would worsen the parking problems and pollution (light/noise/litter) already experienced locally due to The Mount.
- The site would be better used as a public open space.

Bovingdon Alternative Sites

- Bovingdon Airfield as the this is no longer in active use, has good access and would not encroach on the Green Belt.
- Louise Walk was supported by a few respondents on the basis that it is to provide a new scouts hut, as well as sustainable homes and improvements to biodiversity, however one respondent also objected to this proposal.
- Duckhall Farm given that it is suitable from a heritage and highways perspective with minimal impact on the Green Belt. The site would provide public access onto adjoining land which will support biodiversity and is in close proximity to the High Street. They did not agree with the suggestion that the primary school needs to be expanded or relocated to accommodate additional growth.
- A developer raises that at present the plan has not identified a sufficient level of housing growth to meet the needs of the Borough. Further allocations are required and suggest Homefield is an ideal location with minimal Green Belt impact or to the landscape. The site provides safe access, limited heritage impact as well as low flood risk and should be viewed the same as Bv01 as is shown in evidence. The site would provide a good housing mix and affordable housing. They also state that based on education work undertaken there is sufficient capacity in the primary school to meet further growth than is currently proposed.

Markyate Delivery Strategy

There were 55 separate responses to this consultation point. The following themes/issues were raised:

Statutory Bodies

- Hertfordshire County Council state that development proposed in Markyate throughout the Plan Period will generate a child yield of 4fe. The expansion of Markyate Primary School and Katherine Warington Secondary School in Harpenden should be sufficient to in order to meet the pupil yield arising from developments within the village.
- Hertfordshire County Council also believe the development could lead to high quality walking and cycling access to local employment.
- Markyate Parish Council dispute the assessment of local employment. Markyate has a long established engineering workforce with small businesses meeting specialised needs of Luton based companies such as Vauxhall and suppliers to Luton Airport.
- Markyate Parish Council is very concerned that possible backfilling off the High Street (Renewal area Mk04) will add to congestion and create dangerous, blind entrances between High Street properties. Such developments should be considered as a whole, not with individual developers.
- The Environment Agency wishes to be consulted on any future masterplans/strategies for Markyate as it is set along a main river, and comment that a sequential test and a level 2 Strategic Flood Risk Assessment (SFRA) would need to be carried out for any allocations with flood risk before a Local Plan can be considered sound.

General Bodies/Other Organisations

- The Dacorum Liberal Democrat Councillors point out that the strategies include a large amount of Green Belt which they do not consider should be released. A housing target which cannot be considered an objectively assessed need for our area is not an exceptional circumstance to release Green Belt.
- DBLP supports the requirements of Policy SP28 and the contribution site Mk01 will contribute to delivering this policy, as this site will provide rural housing which will support local services and facilities.

Wider Community

The main points raised by the wider community are as follows:

- During the Hicks Road redevelopment Markyate lost several employers to other areas and some small businesses were forced to close. The local shopping and services should be maintained, not lost to further redevelopment.
- The River Ver floods every 5/6 years and building on the flood plains could have negative impact on the new and existing residents. No development should take place on floodplain.
- The width of the roads and lack of any way to widen them will mean any increase in development will cause greater congestion and more accidents.
- Markyate is not a green option for development as there are very few bus routes into the village and the majority of residents rely on cars to access services. Parking on the pavement means it is difficult for pedestrians to walk safely.
- The Hicks Road development did not provide extra parking for the village centre as set out and the extension of the doctor's surgery has reduced parking provision in the car park by transferring spaces to that facility.
- The main drains/sewage pipes are currently very full and are at risk of overflowing. The contractor who inspected the drainage issue stated that the drainage system is 'overloaded'.
- The delivery strategy needs to take into account the latest information with respect to carbon, nitrogen and nutrient neutrality issues.
- Urban development is narrowing the gap between Markyate and Flamstead, which should remain as two distinct separate settlements.

- The village is set within an Area of Outstanding Natural Beauty and should be protected.
- There are frequent power cuts across the village and digital infrastructure is poor.
- The village is subject to noise nuisance from Luton Airport, unavoidable noise pollution makes development unacceptable.
- There are only two outdoor play facilities for younger children, and one of these is largely not suitable as it floods during the rain, and there is no shade which means it is dangerous to use in the summer. There are very few facilities for older children and teenagers.
- The scale of the development is not enough to deliver any improvements or new infrastructure, therefore it will make existing problems worse.
- The village of Markyate should not be compared to Bovingdon or Kings Langley with regards to sustainability as it is much smaller, has fewer facilities and is less accessible to the rest of the Borough.

Markyate Proposals and Sites

There were 73 separate responses to this consultation point. The following themes/issues were raised:

Mk01: South of London Road

- Hertfordshire County Council confirm that this site meets the accessibility criteria for a northbound bus stop, however improvements would be needed to the southbound service, this site is currently not large enough to contribute to any improvements to the bus service.
- Thames Water envisage no infrastructure concerns regarding the wastewater network or wastewater treatment capacity in relation to this site.
- Markyate Parish Council believe that the Dacorum Local Plan discounts the problems of building on a water meadow of the River Ver.
- Markyate Parish Council state that this site is at the top of a slope, and it subject to considerable run-off from the fields during times of heavy rain. There are plans in hand to restore the winterbourne River Ver, which could mean the river flows more consistently, increasing the likelihood of flooding.
- The Environment Agency have concerns with regards to Mk01, as the proposed development will reduce the buffer zone, with development up to 10m of the watercourse, which provides protection from flooding and non-point pollution. This ultimately results in a local deterioration of the water body, and thus should instead be given greater protection from development.
- The Environment Agency records show that part of the River Ver may be culverted, and they expect to see this de-culverted unless the applicant can demonstrate why this isn't feasible. Furthermore, the proposal should provide enhancement to the riparian zone of the site to conserve and enhance wildlife and biodiversity.
- The Herts & Middlesex badger group states that there needs to be a suitable corridor/buffer between development and woodland.
- DBLP support the identification of Land South of London Road, and state that the site is deliverable, and that any technical considerations will be factored in to the layout and design of the proposal.
- CBRE states that the allocation of this site is not consistent with the NPPF, as villages such as Bovingdon and Kings Langley are far better placed in delivering sustainable transport and easier access to local facilities, than Markyate.

Mk02: Corner of Hicks Road/High Street

- Hertfordshire County Council confirm that this site meets the accessibility criteria for a northbound bus stop, however a southbound stop on the A15138 would need to be added.
- Thames Water envisage no infrastructure concerns regarding the wastewater network or wastewater treatment capacity in relation to this site.

- Markyate Parish Council state that this site currently contains local facilities and these should be retained. The Parish Council also state that 13 houses on a site area of 0.1ha will mean the density will be very high if this is to include appropriate parking. This site will draw more traffic to a busy junction where parking is already a concern.
- The Environment Agency states that parts of this site are within flood zones 2 and 3 and should not be included for development.

Mk03: Watling Street

- Hertfordshire County Council confirm that this site meets the accessibility criteria for a northbound bus stop, however a southbound stop on the A15138 would need to be added.
- Thames Water envisage no infrastructure concerns regarding the wastewater network or wastewater treatment capacity in relation to this site.
- Markyate Parish Council states that the development of this site is contrary to draft employment policies, as this will lead to the loss of local employment. The loss of car maintenance services would mean that car owners would need to travel out of the village, which is not sustainable.

Markyate Alternative Sites

- Bidwells LLP on behalf of an individual have promoted land to the west of Markyate. The site was subject to site assessment by AECOM under the site reference 110/105.
- Markyate Parish Council suggest the Caddington Hall site is purchased and used as a care home as an alternative to the one which has been planned at the Mk03 site.

Countryside Delivery Strategy

There were 69 separate responses to this consultation point. The following themes/issues were raised:

Statutory Bodies

- Hertfordshire County Council note that flood risk exists in the rural area, where the topography could result in large volumes of run-off water being generated. The County Council suggest that infill in existing settlements should be screened to ensure flow routes are not compromised. General support is given for the delivery of intra settlement sustainable travel through the use of different modes of transport.
- Little Gaddesden Parish Council seek the same protection for the village as exists under the adopted Core Strategy Policy CS7. The Parish Council also seek the designation of some land in the village as a Local Green Space where no development will be permitted.
- Redbourn Parish Council highlight that proposed developments will erode the countryside gap between Redbourn and Hemel Hempstead, and damage the local environment and ecology adding to the problems of climate change.

General Bodies/Other Organisations

- The Dacorum Liberal Democrat Councillors point out that the strategies include a large amount of Green Belt which they do not consider should be released. A housing target which cannot be considered an objectively assessed need for our area is not an exceptional circumstance to release Green Belt.
- Dacorum Environmental Forum Waste Group consider there to be a contradiction in the strategy whereby the removal of land from the Green Belt and Rural Area does not safeguard the land's intrinsic character, biodiversity and heritage assets, and key landscape features.

Wider Community

The main points raised by the wider community are as follows:

- The loss of land to development will impact the countryside, farm land, green space, heritage assets and the rural economy, and the lives of those who have chosen to live in the area. It will also impact upon country roads as a result of growth and the impact that this will have on rural communities.
- Greater emphasis should be given to what should be done in the countryside to combat levels of growth, in terms of biodiversity improvements, greater support for agricultural, enhancing the setting on the AONB, etc.
- Villages in the countryside/rural area should be protected from infill development and development on the edge of settlements.
- Increased numbers of people using Ashridge Estate and other local tourists spots is putting a strain on the parking and footpaths. The Strategy does not say how these and other recreational pressures will be addressed.
- Concern that relying on windfall figures supporting growth through the countryside delivery strategy could negatively impact upon infrastructure in these locations.
- Growth will have a detrimental impact on the special characteristics of the Chilterns Area of Outstanding Natural Beauty (AONB). Consideration should be given to the conclusions of the Glover Report which recommends the Chilterns AONB should be designated a National Park.
- Brownfield land should be given greater reference in this section including having a greater emphasis placed in policy. A brownfield first approach to development in the countryside will help to preserve development of greenfield land.
- No further applications should be approved in Long Marston and Wilstone until the matter of surface water flooding is addressed.

Countryside Proposals and Sites

There were 162 separate responses to this consultation point. The following themes/issues were raised:

Cy01: Upper Bourne End Lane / Stoney Lane (Bourne End Mills GEA Extension)

- Hertfordshire County Council note that the site is in a remote location and would not deliver improvements to bus services in the area.
- Thames Water do not envisage infrastructure concerns regarding wastewater networks in relation to this development.
- Site is allocated but remains in the Green Belt. It is therefore unclear how this justifies the exceptional circumstances test.
- Expanding industrial land without restricting its ability for alternative uses needs to be considered. Other industrial land nearby has recently been redeveloped for residential.
- Concerns raised about highway safety and traffic management in the vicinity of this site.
- Concerns about flood risk and drainage in this location, including in particular to the swale which was installed with the construction of the A41.
- The allocation of the site is contrary to the strategy to protect smaller villages.

Cy02: Bovingdon Brickworks (Extension)

- Hertfordshire County Council note that the site would be expected to improve connectivity to Bovingdon for walking and cycling. Suitable cycle parking provision should be delivered.
- The Box Moor Trust note that the site is adjacent to a designated Local Wildlife Site that is in the ownership of the Trust. They would not wish to see any detrimental impacts occur to the wildlife site as a result of expansion of the brickworks but would welcome further engagement with the landowners/developers to ensure improvements can be made through off-setting and biodiversity net gain.
- Thames Water do not envisage infrastructure concerns regarding wastewater networks in relation to this development.
- General support from the landowner/site promoter for the allocation, and requests an extension to the southern boundary of the site alongside a number of other amendments to the site specific requirements.
- Location is unsuitable for heavy lorries and vehicles, which are breaking up the road surfaces in the immediate area.

Cy03: Watling Street Truckstop, Flamstead

- Highways England generally support the proposed allocation. They note that it will help address their wider ambition to increase provision for lorry parking on the strategic road network, including improved rest facilities in support of highway safety and dedicated parking to reduce unauthorised parking and associated public nuisance. They note that the impacts of additional movements at Junction 9 of the M1 should be assessed.
- The Environment Agency (EA) makes reference to the River Ver running through the site and a 10 metre build free buffer zone should be maintained. They note that this could form part of the biodiversity net gain requirement. The EA highlight that the east of the site has areas of Flood Zone 2 and 3 and are pleased that no development is proposed in this area. Any development within 8 metres of a main river will require a Flood Risk Activity Permit from them. Development should protect and enhance the chalk stream priority habitat, and a water framework directive assessment will be required to be submitted as part of any application.
- Hertfordshire County Council are generally supportive of the allocation which is in line with LTP4 Policy 16 supporting freight and logistics. They note that the site must meet the broader transport design policies set out within the plan to ensure its impact is fully mitigated in accordance with the user hierarchy, with added reference to this in the supporting text.
- Markyate Parish Council note that the expansion of the truck stop could displace lorries from using the lay-bys on the Markyate bypass. The Parish Council raise a concern with respect to access and the need for this to be improved alongside any expansion or enhancements of facilities. They also highlight a number of accidents that have occurred in this area, including some fatalities.

- Westmorland Ltd support the proposal for the Truck Stop stating that the NPPF makes specific reference to ensuring these needs are catered for and the ongoing issues and recommendations made through Hertfordshire County Council and their studies. They also state that the allocation will need to meet the requirements set out in Section 2 Circular 02/13 on mandatory parking provision for roadside facilities.
- Support from landowner/ site promoter for the proposed allocation and supporting text referenced in the Plan. They request that the policy could benefit with further clarity on what a detailed scheme would be expected to deliver.
- Concerns raised about the site's proximity to the river and a pumping station, which could increase the risk of contamination from different sources.
- Further concerns highlight the need to have a clear maintenance and cleaning plan for the site.

Cy04: Haresfoot Campus, Chesham Road, Berkhamsted

- Hertfordshire County Council note that further archaeological assessments may be required in relation to the significance of any remaining historic park and landscape features. They advise that the Herts Gardens Trust should also be consulted.
- Hertfordshire Ecology note that the proposed allocation should recognise the historic parkland of Haresfoot House.
- Sports England support the proposed allocation, including in particular the clarity and status of the allocation relative to the Haslam Playing Fields allocation (Bk03).
- The Berkhamsted Schools Group (as landowner) support the proposed allocation.
- Some concerns raised that the proposed allocation is in the wrong place / potentially dangerous to access for school users. One comment notes that this scheme is not necessary if the Haslam Playing Fields site is not allocated/developed in due course.

Cy05: Amaravati Buddhist Monastery

- Some high level support for this proposal
- A comment notes that the characterful facades on this site should be retained, where possible.

Cy06: Bovingdon Airfield

- Some high level support for its use as a filming location.
- Some comments note that the site should be given to alternative uses such as residential.

Countryside Alternative Sites

- New settlement, Long Marston (Site Reference: 155L). A large number of comments object to this site being considered as an option for allocation. Key issues raised with respect to this site include:
 - The existing road network is inadequate and would be unable to cope with the increase in volume of traffic;
 - The site is distant from the A41 and public transport corridors;
 - The area is subject to flooding; and
 - Development will impact natural and heritage assets in the area, including in particular on the Chilterns AONB, designated Local Wildlife Sites, listed buildings and conservation areas.
- There was some small level of support for this site, where it was noted that it would focus on the delivery of new infrastructure in a new location. This would in turn relieve the pressure on existing infrastructure elsewhere in the borough. It could also result in reduced traffic through neighbouring towns and villages if it delivered a new link road.
- Site at Three Fields in Felden, near to Hemel Hempstead is promoted for development.
- Caddington Hall, Luton Road, Markyate is being promoted for development by the landowner and is identified by Markyate Parish Council as a site which should be used as a new care home.
- Land at Upper Borne End Road adjacent to Bourne End GEA is promoted for development.
- A number of sites are promoted at the settlement of Flamstead.

- A site promoter requests a change to the village boundary of Piccotts End so as to enable the development of their site on land to the south east of 92 Piccotts End Road.
- Dixons Gap, Wilstone is being promoted with comments highlighting that it should not have been discounted early on. It was noted that the site could be suitable as a rural exception site.
- The Cow Roast Inn, Cow Roast was identified by a respondent who noted it was a large site with land to the rear and the side. The same respondent also mentioned a derelict public house near the reservoirs in Marsworth, believed to be the White Lion Pub, however this is just outside of the administrative area of Dacorum.

3.5 Sustainability Appraisal

There were 456 separate responses to this consultation point. The following themes/issues were raised:

Statutory Bodies

- Natural England expect sufficient evidence to be provided through the SA and HRA to justify the site selection process and ensure sites of least environmental value are selected (Paragraph 171 of the NPPF).
- Berkhamsted Town Council raise a number of concerns which stem from particular sections of the appraisal report. These relate to the aquifers and water abstraction in the area; the assessment of landscape impacts across spatial options; lack of a sustainable transport network; the impact that growth will have on the health and wellbeing of existing and future residents, and general inconsistency between the appraisal of some sites.
- Northchurch Parish Council highlights that the development of greenfield land is incompatible with a number of SA objectives, and does not meet the needs for social housing in the Borough.
- Bovingdon Parish Council considers the level of growth set out for Bovingdon through the report is a sustainable level of development and would not welcome the loss of any further greenfield sites to accommodate higher levels of growth.
- Markyate Parish Council accepts that the report has done a thorough job in its assessment of sites in the parish. In addition to reference to noise pollution, the Parish Council would wish to see additional reference made to air pollution.
- Wigginton Parish Council raise a number of concerns with the development of Dunsley Farm in terms of its impact on landscape/Green Belt, including coalescence between settlements.

General Bodies/Other Organisations

- Berkhamsted Residents Action Group (BRAG) concerns relate to the conclusions set out in Section 7.1 of the SA. Some or all of these concerns are repeated by a number of other respondents, including Berkhamsted Citizens Association, to this section and are summarised as follows:
 - Excluding windfall, only 23% of planned development is on brownfield sites with the remainder to be built on Green Belt or greenfield sites;
 - The Council has underestimated potential brownfield regeneration opportunities, particularly in town centres, and not taken account of the impacts of COVID-19, Brexit and recently expanded permitted development rights;
 - The windfall allowance in the Plan should be increased in line with evidence;
 - The location of sites on the edge of Berkhamsted will result in more adverse effects rather than less;
 - Public transport in Berkhamsted is either at capacity (rail), or is not frequent or reliable enough (bus);
 - There is no sustainable transport system in place;
 - There is nothing in the Plan to address water quality, supply or wastewater treatment; and
 - The report is biased in its analysis to justify specific outcomes.
- The Berkhamsted Schools Group agree with the robust process and criteria followed in the SA report.
- Tring in Transition highlight a number of concerns which are repeated by a number of other respondents to this section. These are summarised as follows:

- The effects of the Plan on the Chilterns Beechwoods Special Area of Conservation (SAC) and other Sites of Special Scientific Interest (SSSIs) have not been represented in the Plan, and no mitigation is proposed;
- Options for road connections and sustainable transport have not been adequately explored for Tr02/Tr03; and
- The provision of 20 hectares of open space is inadequate to serve growth proposed for Tring.
- Grove Fields Residents Association (GFRA) raise a number of issues that are repeated by a number of other respondents to this section. These are summarised as follows:
 - The methodology and scoring system set out in the report lacks specificity, which is an issue when assessing individual sites as well as cumulative impacts;
 - Sites Tr02 and Tr03 are rich in ecology (flora and fauna), and provide a wildlife corridor between the reservoirs and Ashridge Woods; and
 - The same sites experience flooding which will become worse through development, and their development would cause irreversible and substantial harm that cannot be reversed or mitigated.
- CPRE's concerns on the SA report relate to the overarching strategy of the Local Plan (set out in more detail under other sections), and revisions to the report will be required to address these.
- The Dacorum Liberal Democrat Councillors make the following points:
 - The Chalk streams in Dacorum are Globally rare, and already carry an unacceptable burden. The plan proposes an increase in our population of up to 28% (probably at least 20%), which indicates a likely increase in water requirements by a similar amount but there is no credible plan to avoid extraction of water from the ground.
 - For the UK to meet its net zero obligations by 2050, local emissions must come down even faster. The plan does yet provide sufficient details to indicate how carbon emissions from the building and use of new homes will align with the government 2050 net zero target. The Plan needs to have a comprehensive carbon reduction action plan in place.
 - To meet biodiversity targets policies need to be more stringent.
 - The Infrastructure Delivery Plan identifies cycle routes as having 'lesser relevance'. It is essential that environmental improvement schemes are not competing for funding with major road improvement schemes.
 - It is essential that any new housing development include a transport plan which does not rely solely on cars. Family homes must be within easy and safe walking distance from schools, and if they are not, then these trips must also be included in the transport plan. The Local Plan proposes large housing estates far from the train stations and no explanation is provided how people will travel to and from work.
- The Chilterns Countryside Group, Water End & Upper Gade Valley Conservation Society (WEUGVCS) and Berkhamsted Citizens Association (BCA) raise specific concerns on water supply, quality and wastewater treatment in light of existing issues on over-abstraction.
 - The former also note the report is inadequate in terms of the impacts of growth on the character and resources of Tring and Berkhamsted.
- Tring Squash Club support the objective to provide more foot and cycle paths.
- Landowners/Developers of sites proposed to be allocated in the Local Plan are broadly supportive of the appraisal. Some raise detailed comments on the scoring of their particular sites, including suggested changes. Conversely, those representing sites not proposed to be allocated in the Local Plan are mixed in terms of their feedback. Key issues mainly relate to the scoring of their site and other sites in the area.

Wider Community

The main points raised by the wider community are as follows:

- The Sustainability Appraisal is too long and complex, with some respondents noting there was insufficient time to review it to be able to comment.

- Some evidence in the document is out of date, and links provided do not work.
- The impact of Brexit, the COVID-19 pandemic and changes in permitted development rights mean that the preferred strategy is no longer credible or up-to-date.
- On SA1 (Biodiversity) the objective to focus growth on in urban areas is not followed through in the selection of sites, and that the scale of growth will have an overall negative impact on green infrastructure and biodiversity. Net gain should mean gains through the integration of green infrastructure into new developments, protection of natural habitats in the new areas of development and a return of natural ecosystems by rewilding and connection of habitats.
- On SA2 (Water) many comments highlight the sensitivities associated with the chalk rivers in the Borough and the impact that this would have on their ecosystems and biodiversity. Proposed growth puts a severe strain on water supplies, with limited option other than to extract additional water from the chalk aquifers.
- On SA3 (Flood Risk) comments mainly relate to the market towns. At Tring, there are flooding issues on Tr02 and Tr03, which would worsen with development of these sites. At Berkhamsted, development on the valley slopes and higher ground will increase flooding on lower levels by the River Bulbourne.
- On SA4 (Climate Change) comments highlight that the development of large parts of the Green Belt is contrary to the climate and ecological emergency declared by the Council. Comments also seek a greater emphasis on the use of low/zero carbon processes and technologies relating to green energy and transport, as well as tree planting. All new homes should be carbon neutral.
- On SA5 (Air Quality) comments highlight the proposed growth will result in an increase in background emissions through an increase in the number of vehicles on the road. Traffic impacts have not been fully considered to date. The Plan needs comprehensive analysis on the negative impact on air quality and a clear strategy to mitigate impacts.
- On SA6 (Soils) comments highlight sites proposed to be allocated at Tring include Grade 2 agricultural land and should not be developed. The proposed growth will also result in the significant loss of agricultural land across the Borough.
- On SA7 (Resource Efficiency) comments highlight the need for more solar panels and/or wind farms as sources of renewable energy in the borough.
- On SA8 (Historic Environment) comments highlight the proposed growth in locations like Berkhamsted and Tring will destroy the character of these towns. Also some site specific references to heritage assets that may be affected by proposed allocations in the Local Plan.
- On SA9 (Landscape and Townscape) comments mainly relate to the impact that growth will have on protected landscapes, including the Chiterns AONB and views from the Ridgeway. Such effects are significant and irreversible.
- On SA10 (Health and Wellbeing) comments highlight the need for appropriate social infrastructure, including open/green spaces, community and healthcare facilities to be delivered early on or ahead of development.
- On SA11 (Sustainable Locations) comments generally identify that many of the proposed allocations on the edge of settlements are distant from existing town centres and other services and facilities, including transport hubs. Comments also note the topography in places such as Hemel Hempstead and Berkhamsted makes accessibility even more difficult resulting in more people using cars as a preferred mode of transport. More sites in urban areas should be considered.
- No key issues were identified for SA12 (Community Cohesion).
- On SA13 (Housing) in addition to comments on the general scale and location of housing development proposed, a common issue highlighted the need for the report to consider affordability of housing relative to the minimum wage and the average income in Dacorum.
- On SA14 (Sustainable Prosperity) and SA15 (Employment Skills) few key issues were identified. Some comments highlighted the lack of sites for employment in key settlements alongside housing growth while others sought the report to better highlight the role of the rural area as land in productive use, providing food, employment and leisure opportunities.
- Other comments in support for the Sustainability Appraisal include reference to it containing sufficient knowledge of the area, and that it appropriately highlights elements of the plan that can be improved and where damage will be caused.

3.6 Evidence Base

There were 599 separate responses to this consultation point. The following themes/issues were raised:

Statutory Bodies

- Highways England present a review of the transport modelling evidence undertaken to date, and conclude that further work is needed to better understand the impacts of growth on the strategic road network, with notable reference to the M25 (Junction 20) and the M1 (Junction 8). Any new initiatives and infrastructure projects should be designed in a manner that does not impact on the operation and safety of these junctions and the wider strategic road network.
- Historic England highlight the importance for some of the sites proposed to be allocated to be informed by a Heritage Impact Assessment and provide guidance on what should be considered in this.
- Berkhamsted Town Council objections on the evidence base relate to identified housing requirement figures and the need to consider a lower figure using the more recent ONS data from 2018. It also seeks an increase in the total proportion of affordable housing, mainly to address the acute need for social rents, and would deliver a better share to the community.
- Markyate Parish Council make a general objection to the evidence base and refer to the wider views expressed by the Town and Parish Councils to the leader of Dacorum Borough Council.
- Northchurch Parish Council highlight that evidence informing the Local Plan does not take account of the effects of the global pandemic and that the housing figure is considered to be too high and out of date in light of more recent population projections.
- Wigginton Parish Council consider the evidence base to be inadequate as a full consideration of all possible sites has not been carried out.
- Hertfordshire Local Enterprise Partnership request that additional studies are considered as part of the evidence base informing the Local Plan.
- Herts Gardens Trust highlights the need for policies to cover heritage assets such as national and locally listed Parks and Gardens, and ensure they are considered alongside development proposals.
- The Canal & River Trust state that infrastructure delivery plans should address the funding of any works needed to the waterway network.
- West Herts Hospitals NHS Trust confirms the accuracy of the statement included in the draft Infrastructure Delivery Plan with respect to Hemel Hempstead Hospital, and sets out the expected next steps for bringing forward this site.

General Bodies/Other Organisations

- Berkhamsted Residents Action Group's (BRAG) views were endorsed by many other individual respondents. BRAG highlight that views expressed from the previous issues and options consultation were not considered as part of the evidence informing the draft Local Plan. They added that evidence has been prepared to facilitate a higher housing target set by Government rather than asking what is an appropriate target for the Borough, taking account of local factors and general demographic change.
- Berkhamsted Citizens Association (BCA) reflect the comments made by others in that the housing requirements should be revised and based on evidenced local needs. They also seek a higher level of affordable housing provision (50-60%) than what is evidenced. Other issues raised by BCA include the lack of exceptional circumstances to justify changes to the Green Belt; and that greater consideration needs to be given to sustainable transport links in the selection of sites, including the use of existing and new bus routes.
- The Dacorum Liberal Democrat Councillors point out that the vast majority of the Local Plan was prepared prior to the offset of COVID-19, and there are significant impacts to be considered from the proposed white paper, many of the documents in the evidence base are not up to date with these changes. The Dacorum Infrastructure Plan remains in draft form, and it is difficult for residents to make an informed judgment on the Local Plan as a whole when key documents such as this are not final. There is no mention

of the Glover Report, which proposed the AoNB become a National Park, there is no strategy for or mention of agriculture even though 85% of borough is rural. The Habitats assessment is out of date (2006) and no Habitats Regulations Assessment (HRA) documents are published alongside the Plan for consultation.

- Tring Sports Forum note that any additional housing in Tring will over burden existing facilities. They request that the Plan specifies the amount of additional sports facilities/space to be provided, taking account of current shortfalls. They also consider the existing playing pitch strategy is becoming dated and needs to be reviewed.

Wider Community

The main points raised by the wider community are as follows:

- The supporting evidence does not take account of, or is out of date as a result of the ongoing COVID-19 pandemic and the impacts of Brexit, including economic and social wellbeing and climate impacts.
- The evidence supporting the policies/allocations is not up to date.
- Too much supporting evidence to review within the consultation timescales.
- The Local Plan is supported by a number of strategies and plans that have no formal planning status.
- The Local Plan is focused more on economic growth than taking account of the climate emergency, environmental impacts and making the most use of brownfield sites.

Issues raised in relation to Housing, Employment and Retail evidence:

- Significant comments highlight that the housing requirement is out of date as it is based on the 2014 ONS household projections. The more recent 2018 projections should be used.
- Some comments, mainly from site promoters and developers, highlight that the housing requirement should be increased as a result of Government's confirmation on the standard methodology to be used in the future.
- Evidence on employment and retail needs are likely to have significantly changed as a result of the global pandemic, and an expectation that there will be less demand for office or retail floorspace. Such land could be used to address other needs, such as residential.
- Employment land needs to be considered for the whole of the Functional Economic Market Area (FEMA) and not on an authority-by-authority basis, as recommended in the evidence.

Issues raised in relation to Green Belt and evidence on the natural environment:

- Significant comments note that the Green Belt assessments are not up to date. The Stage 1 and Stage 2 studies predate the 2019 NPPF and no study assesses sites against the more recent framework.
- Significant comments consider there is not enough evidence to satisfy paragraph 137 of the NPPF (i.e. limited or no justification of exceptional circumstances to make changes to the Green Belt).
- No compensatory improvements to the Green Belt have been set out in the Local Plan.
- No evidence of engagement with neighbouring authorities to justify exceptional circumstances.
- A number of parcels have been identified which make a significant contribution towards one or more of the purposes of the Green Belt.
- No consideration has been given to the potential for parts of Dacorum becoming a National Park, as set out in the Glover Report.
- There is no agricultural strategy to inform the Local Plan.
- Significant evidence has been prepared for the Chilterns Beechwoods Special Area of Conservation (SAC), however limited or no evidence has been prepared for other important designated sites, including Sites of Special Scientific Interest (SSSIs).
- A Habitat Regulations Assessment is needed to inform the Local Plan, and the likely impacts of growth on the Chilterns Beechwoods SAC is not addressed in the draft.
- The current Air Quality Action Plan is now out of date and air quality/pollution has not improved since its adoption.

Issues raised in relation to water, wastewater and evidence on flood risk:

- The evidence would benefit from a full ecological survey of the chalk rivers, and all main wildlife corridors and consider impacts from proposed developments. Parts of some proposed allocations should be retained as critical parts of new or enhanced wildlife corridors.
- Existing water studies are out of date and some date from 2010.
- Existing evidence demonstrates problems with water supply, drainage and waste water treatment in the Borough. The majority of comments made on this issue relate to the Berkhamsted area.
- Natural flood plains should be considered in addition to the functional flood plain.

Issues raised in relation to evidence on infrastructure, including transport:

- The Infrastructure Delivery Plan is not finalised, with a number of gaps that need to be filled. It should be a core document which sits up front alongside the Local Plan rather than in the background.
- Insufficient infrastructure has been identified to support future growth. Majority of comments relate to the delivery of education, health, policing, transport improvements, water and waste water infrastructure.
- On transport, no up to date transport plan exists for the Borough and its main settlements. Evidence regard existing and proposed traffic levels is not yet available. Transport studies for Berkhamsted do not take account of the town's geography and valley setting.
- No detailed transport improvement projects or proposals (including sustainable transport initiatives) are set out in the Local Plan.
- The Berkhamsted and Tring Sustainable Transport Study underestimates the road congestion at peak times and the challenges in creating a new sustainable transport network that is an alternative to the car.
- Delivering a new road link to the M1 via the north of Hemel Hempstead would result in more traffic using Potten End. This has not been fully considered in evidence prepared to date.

Issues raised in relation to other evidence:

- On leisure/open space/sport: the Local Plan does not follow the strategic advice and guidance offered within elements of the Playing Pitch Strategy and should be taken into consideration. The requirements set out in the Leisure Facilities Strategy/Assessment are based on a much lower housing/population target and outcomes are severely understated.
- On Supplementary Planning Documents and other strategies: many of these should be progressed and finalised alongside the Local Plan, rather than left to a later date. Particular reference is made to the Climate Change and Sustainability SPD, Strategic Design Guide SPD and the Climate Change Strategy and Action Plan.
- Some existing evidence, such as the Hertfordshire Biodiversity Action Plan and the Green Infrastructure Plan are now out of date and should be reviewed.
- No detailed viability appraisal has been prepared to date to test whether the policies and other requirements identified in the plan can be delivered.
- On urban capacity, more work should be done to prioritise the use of previously developed land. Evidence demonstrates that the windfall allowance should be much higher than that included in the draft Local Plan. Further consideration should be given to existing retail sites that are not important to the overall strategy, and whether these could make a meaningful contribution to housing supply.
- A number of detailed comments have been made on evidence relating to site selection, including in relation to Green Belt studies, the landscape sensitivity assessment, the AECOM site assessment study, the urban capacity study, the sustainability appraisal and the site selection topic paper. These are not repeated here, but broadly challenge the conclusions made with respect to sites proposed to be allocated in the Plan as well as those not currently recommended for allocation.

3.7 National Policy

There were 556 separate responses to this consultation point. The following themes/issues raised were:

Statutory Bodies

- Three Rivers District Council note that the figure of 16,596 net additional homes is based upon the revised standard method which the Government is no longer intending to take forward. They point out that the housing target will therefore have to be higher than stated in this consultation version of the Plan and subsequently, further sites may need to be included in order to meet its local housing need figure and to ensure that future versions of the Plan are consistent with the NPPF and guidance.
- Berkhamsted Town Council (BTC) comment as follows:
 - BTC remain unpersuaded on the assumptions made that lead to the number of dwellings proposed to be built over the Plan period.
 - They are not convinced that the Plan explains what is the demonstrable benefit that outweighs the disbenefits of the proposed release of land from the Green Belt and the Plan is not accompanied by evidence to support the argument.
 - The Plan conflates open market housing supply with housing need which leads to a further increase of dwelling numbers, in excess of what the ONS data is projecting, and locally, to significant demand for Green Belt land release beyond the urban capacity.
 - Until the adoption of the Draft Plan, it should only refer to the proposed release of land from the Green Belt (para. 19.7).
 - BTC do not agree that the Green Belt allocations selected for Berkhamsted [and Northchurch] can be considered locations well served by public transport.
- Northchurch Parish Council (NPC) make a number of points:
 - They highlight that the CPRE state that the Plan is not consistent with the NPPF, as it does not take account of such constraints as Green Belt and AONB when calculating housing need.
 - Dacorum has failed to restrict the scale of development due to other planning constraints such as the impact on the Green Belt and AONB.
 - When calculating housing need, the Plan does not give sufficient weight to the physical and mental health of local people. NPC are concerned that their efforts to improve these matters will be undermined by the loss of much local Green Belt.
- Bovingdon Parish Council are content that the Plan is consistent with the guidance in the NPPF where indicated as appropriate in their other representations.
- Markyate Parish Council point out that the housing needs are not calculated using the 2018 ONS data and do not take adequate account of Green Belt and AONB constraints.
- Flamstead Parish Council are of the view that proposals within the Local Plan directly contradict the national planning policy.
- Wigginton Parish Council consider that the Plan fails to comply with the NPPF and with the Government guidance, Ministerial Written Statement and the revised indicative housing need figure for Dacorum. They stress that while such policy and resulting guidance was issued after the Plan was published, it does nevertheless make it out of date and in need of revision before submission.
- Great Gaddesden Parish Council and Nettleden with Potten End Parish Council consider that the Plan is inconsistent with the NPPF as it uses out of date evidence (the 2014 ONS figures for housing need), it has not fully explored the potential to make effective use of urban land before releasing Green Belt land, and does not contribute to and enhance the natural and local environment.
- Nash Mills Parish Council refer to the NPPF stating that planning should offer a “genuine choice of transport modes” and that “local car ownership levels” should be taken into account. Given the most recent census data and their proximity to major road networks, they feel that the Plan should recognise that owning a car (even if not used for all journeys) will still be a choice for many people.

General Bodies/Other Organisations

- The Dacorum Liberal Democrat Councillors make the following points:
 - Not enough consideration has been given to policies which protect assets such as green belt and AoNB. They point to recent Government announcements that the Standard Methodology doesn't provide a 'target' and other constraints (such as the Green Belt) can be factored into consideration when setting the final housing figure. They also point to recent statements made by Government that meeting housing need should never be a reason to cause unacceptable harm.
 - The housing target produced by the standard method cannot be accurately described as an objectively assessed need as it is not based on up to date information. The Council should use provisions in national policy to set their own housing need under 'exceptional circumstances' and that the figure should to be planned for should be in the region of 9,000 homes over 18 years.
 - Finally, the Group do not believe enough is being done to provide social housing in Dacorum and point to the size of the current waiting list (over 7000 people) and do not feel the Plan will help to address this. Of the 922 dwellings proposed per year only 70 per year are expected to be social housing, as compared to the need for 315 social dwellings per year from the LHNA.
- While Tesco Pension Investment and the Gardener Family Trust do consider that the Plan is consistent with national policies, this was not a shared view.
- CBRE point out that the Plan is inconsistent with the NPPF because:
 - It is based on a consultation version of the local housing need figure (922pa), rather than the now adopted position of 1,023pa homes;
 - Of the existence of alternative sites in areas located furthest away from the SSSI which would avoid significant harm on environmental resources;
 - It does not follow the approach for how protected sites should be considered; and
 - Of the need to ensure that development is located in areas that can offer opportunities for sustainable development (such as at Kings Langley).
- Landhold Capital highlight what they consider to be a number of examples of inconsistencies between the emerging Plan and the provisions of the NPPF in relation to:
 - Requiring strategic policies to provide for the objectively assessed need for housing and other uses as a minimum;
 - The requirements for plans to be positively prepared in a way that is aspirational but deliverable, and to contain policies that are clearly written and ambiguous;
 - The need for the plan to meet the tests of soundness;
 - Significantly boosting the supply of homes;
 - Market housing facilitating the delivery of affordable housing on rural exception sites;
 - Policies to optimise the use of land and the use of minimum density standards;
 - The need strategic policies to establish changes to Green Belt boundaries to be made through neighbourhood plans;
 - Giving first consideration to land which has been previously developed and/or is well served by public transport when releasing land from the Green Belt.
- The Berkhamsted Schools Group (BSG) continue to urge the Council to plan for a level of growth that is consistent with the NPPF and the crux of Government housing policy to provide adequate housing. BSG continue to support the Plan's objectives in adopting a balanced approach which weighs the need for additional housing and investment, with the desire to retain the unique character of Berkhamsted. They support pressing ahead with a Plan despite uncertainties and reform of the planning system.
- Harrow Estates plc make the following points:
 - Harrow agrees that the Plan has been prepared in accordance with the NPPF and supporting guidance, and are satisfied that the Council has produced significant evidence to demonstrate that it has explored all reasonable alternatives, as required by paragraph 137 of NPPF, and that exceptional circumstances exist to justify changes to Green Belt boundaries.

- Harrow see the analysis and evidence base as supporting the allocation of land east of Tring as a strategic growth area (Tr03) which is in accordance with NPPF criteria; and offers opportunities for compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land.
- Harrow also notes that subsequent changes to the standard method would result in an increase of c.1800 additional homes over the Plan period which should be reflected in the Submitted Plan and increase the urgency to identify deliverable sites to ensure the five year housing land supply is met.
- Millbank Land Ltd feel that the Plan fails to include the correct housing requirement figure as calculated using the standard method set out in the national planning guidance and does not allocate sufficient land to meet this higher housing requirement for the full Plan period. It is therefore key that the Local Plan includes the higher housing requirement as its minimum housing target and seeks to allocate sufficient variety of sites to allow for suitable flexibility in the supply to meet this target and to ensure a five-year supply of deliverable housing sites upon adoption of the Plan.
- The Trustees of the Gaddesden Estate consider the current Plan to be unsound because of the unsuitability of sites HH01 and HH02 and when they are compared against the benefits of alternatives on the south side of Hemel Hempstead. It is their view that these sites should be removed as allocations from the Plan. Furthermore, the Trustees are of the view that the housing figures used to calculate demand for housing, are based on out of date ONS figures and the Plan has also not provided an assessment of COVID-19, which could free up additional employment floor space for residential development. They provide suggested policy wording changes to HH01 and HH02 should the sites continue to be retained.
- Westmorland Ltd support the early approach the Plan takes to the Planning White Paper consultation. They also support the Plan's approach to expanding the Watling Street Truckstop and that this accords with various national policies seeking to improve lorry parking facilities. Westmorland Ltd welcomes land use policies that proactively drive proposals for HGV parking.
- Lansdown stress that their land south of Chaulden Lane, Hemel Hempstead would have less impact on the Green Belt than other sites included in the Plan, is demonstrably more sustainable than alternatives, and the Plan should therefore be modified to include this site.
- Greene King Brewing and Retailing Ltd consider that their land on Red Lion Lane, Hemel Hempstead does not satisfy the purposes for including land within the Green Belt.
- Hallam Land Management Ltd (HLM) comment as follows:
 - HLM do not believe that the spatial strategy accords with the settlement hierarchy, there is an overreliance on the urban sites and an overly aspirational rate of delivery from them. They consider this to be contrary to national policy that requires new housing to be made available for affordable home ownership to meet identified needs (NPPF 64 and 65). A strategy for Hemel Hempstead town that relies disproportionately upon the delivery of brownfield land to 2038 runs the risk of not meeting identified housing needs in a sustainable way. The distribution of the main strategic greenfield allocations runs the risk of a significantly lower proportion of affordable homes being delivered at the most sustainable settlement.
 - They see the safeguarding of land under Site HH02 as conflicting with the NPPF as safeguarded land should not be allocated until it is required and should then be considered for allocation in a future plan period.
 - HLM are seeking further justification as to why the Plan sets aside allocating growth in the AONB to meet future needs.
 - Generally, they consider that the need to release Green Belt land has been justified and the NPPF is met in this regard.
- Fairfax Strategic Land (Hemel) Ltd state that there are a number of fundamental shortcomings with the approach to site selection in the Plan that result in the need for amendments if it is to satisfy the tests of soundness at paragraph 35 of the NPPF. The Plan is not justified as it fails to represent an appropriate strategy and nor does it adequately take account of the reasonable alternatives. This is particularly the case for the approach to site selection at Hemel Hempstead. The Plan should have identified land at

Piccotts End (being promoted by them) as a housing allocation(s). They are of the view that the evidence base fails to provide a reasoned approach to site selection. The Council's Green Belt appraisal also failed to undertake a finer grain analysis of the site as an individual land parcel.

- The Crown Estate consider that the Plan is generally consistent with the NPPF. It has reflected the advice in paragraphs 133 to 147 of the NPPF in seeking to set clear, defensible and long term Green Belt boundaries which will meet development needs beyond the 2038 end date of the Plan. This will provide the local community and developers with clarity and certainty in the long term.
- Whiteacre Ltd have addressed specific references to national policy and guidance through their representations within the relevant chapters of the document.
- Akzo Nobel CIF Nominees Ltd consider the draft Local Plan to be broadly consistent with the NPPF and supporting guidance. They acknowledge that the next iteration of the Local Plan may need to reflect the Government's latest NPPF and National Model Design Code.
- Local landowner representation is made in support of amending the Green Belt boundary to the rear of Coniston Road, Kings Langley which seeks to move it to follow the permanent defensible line at the end of the gardens adjoining open countryside.
- The Berkhamsted Residents Action Group (whose views were widely shared and supported by local residents) do not consider that this Plan is consistent with the NPPF because:
 - It fails to use the latest data to calculate the Borough's needs;
 - It does not provide any justification for accepting the Standard Methodology numbers as a strict target;
 - It fails to take into account the natural constraints of the Borough, and so fails to provide protection for Green Belt as required by the NPPF;
 - No evidence is given as to the 'exceptional circumstances' to plan for building on Green Belt that passes the tests included in the NPPF; and
 - The Plan promotes sites that cannot be regarded as sustainable or well served by public transport.
- Grove Fields Resident Association feel that the Emerging Strategy fails to:
 - Justify the test of exceptional circumstances so as to justify development in the Green Belt;
 - Examine all other reasonable options for meeting its identified need for development before being able to warrant changes to Green Belt boundaries;
 - Make as much use as possible of suitable brownfield and under utilised land;
 - Properly undertake an assessment of whether minimum density standards can be uplifted within existing settlements, particularly in Berkhamsted and Tring; and
 - Proactively cooperate with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire.
- The Dacorum Environmental Forum believes that Councils do have the flexibility to adopt lower housing numbers, but the Plan has not used this option. They do not consider that the Plan contributes to the mitigation of and adaptation to climate change nor does it take into account the latest changes to algorithms for Local Housing Demand.
- The Chiltern Society's main concerns are whether the removal of land from the Green Belt for new development demonstrates the exceptional circumstances required by the NPPF and the need to address reducing housing numbers where there would be a detrimental impact on the Green Belt and/or AONB.
- Chiltern Countryside Group (CCG) comment as follows:
 - The CCG state that the Plan fails to demonstrate any fulfilment of Government policy through the NPPF that Green Belt should only be released for development in 'exceptional circumstances';
 - The Plan fails to identify any co-operation with the adjoining Local Authorities of Hertfordshire, Buckinghamshire and Bedfordshire;
 - The Plan ignores the latest Government statements on protecting the Green Belt and in meeting housing needs in other ways, particularly in urban areas;

- The CCG finds limited opportunities within the Plan to support the beneficial aims of the Green Belt and the options for housing development would significantly diminish these; and
- The CCG finds that the Plan is imbalanced in its twin objectives of meeting (a) perceived (but not demonstrated or obligatory) housing demand, rather than need and (b) protecting natural green spaces. They see the Plan as prioritising development at the expense of sacrificing green, natural landscapes/spaces.
- Tring Sports Forum take the view that the level of growth in Tring is not justifiable compared to Hemel Hempstead and Berkhamsted and given its setting in the foothills of the CAONB is unique.
- Tring Rugby Club state that the Plan is not consistent with NPPF because it does not offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.
- Tring in Transition set out a number of examples where they view that there is inconsistencies with the NPPF in terms of:
 - The objectively assessed needs for housing proposed for Tring;
 - The lack of provision for local community facilities;
 - Proposals at Tr01, Tr02 and Tr03 do not sufficiently take into account the conservation and enhancement of the natural environment including landscapes and green infrastructure;
 - The lack of cooperation across administrative boundaries; and
 - That development on Green Belt land achieves net environmental gain and is mitigated by compensating development of surrounding natural spaces, and the creation of wildlife corridors.
- The Berkhamsted and Tring Labour Party point out that the number of houses should specifically meet Dacorum's need for the full range of affordable social housing, that the Plan does not take account of the ability to restrict the scale of development due to other planning constraints including impacts on the Green Belt and AONB, and repeat the above comments made by Tring in Transition.
- The Dacorum Green Party believe that the Plan does not comply with the NPPF in respect of protection of designated areas of landscape and wildlife importance and the Green Belt, or in respect of the identification of the need for development for housing and employment. Further, the Emerging Strategy does not take sufficient account of matters relating to climate change adaptation, the promotion of biodiversity and provision of infrastructure as required by legislation.
- The Safer Gravel Path Action Group and Tring Rugby Club do not believe that the Plan is consistent with the NPPF because it does not offer the protection for Green Belt that the NPPF demands, and prioritises Green Belt development over brownfield/urban development.
- Extinction Rebellion Dacorum are of the view that the Plan has failed to meet Dacorum's need for the full range of affordable social housing.

Wider Community

The main points raised by the wider community are as follows:

- A modest number of local residents did express support for the Plan being consistent with national policy.
- The Plan should be revised to take into account changes in emerging Government policy regarding the levelling-up of the north/south divide.
- Much of the Plan is foisted upon the Borough by Central Government.
- The Plan cannot be said to be in accordance with the NPPF bearing in mind the extensive and unnecessary Green Belt releases, potential impacts upon heritage assets, the AONB and the SAC, and the profligate use of high quality agricultural land.
- A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to demonstrate that exceptional circumstances have been met to justify the Green Belt allocation.
- There has been no assessment of whether minimum density standards can be uplifted within an existing settlement, particularly in respect of Tring and Berkhamsted.

- There is a major gap between national policy and proposals as they do not acknowledge sustainable building in any way.
- There is insufficient confidence that national policy can be adhered to when it comes to actual plans put forward by developers.
- The Local Plan is proposing new housing and economic siting whilst it has not fully considered where or how it will meet the need for the new sporting facilities to meet the increased demand from the new housing; or where and how new sites for these important community facilities will be provided.
- A number of residents have stated their support for comments made by local groups including Berkhamsted Residents Action Group (BRAG), Berkhamsted Citizens Association, CPRE, Chiltern Society, Berkhamsted Town Council, Dacorum Green Party, Berkhamsted and Tring Labour Party.
- The policy fails to give sufficient weight to environmental considerations, carbon plans must be integral to development plans, the Plan fails to take account of topographical constraints, and it promotes the use of sites not served by public transport and which are not regarded as sustainable.
- The pandemic has changed the demands on housing, businesses and travel.
- The pressing national requirement is for levelling up. Therefore, there should be greater housing density and regeneration in other parts of the country to encourage the movement of populations to more peripheral areas.
- Given that the Government is currently revising planning policy, and the impact that these revisions have on the NPPF, it seems relevant to this process that the Plan be revised to take these changes and the emerging Government policy objectives into account before proceeding any further.
- The NPPF is also flawed as it has not been revised in line with changes needed for the country to meet its legally binding Zero Carbon Target.

3.8 Any Other Comments

There were 922 separate responses to this consultation point. The following themes/issues raised were:

Statutory Bodies

- Nash Mills Parish Council wish to see more explanation of the processes to ensure developers provide the correct levels of affordable housing/parking/community space within the Plan.
- Hertsmere Borough Council state that the Emerging Strategy for Growth is comprehensive and well supported by evidence; however improvements could be made to the document's layout so that it is easier to navigate.
- Three Rivers District Council, Hertsmere Borough Council and St Albans City and District Council Council committed to continuing with ongoing discussion and continued collaboration with regard to local planning matters.
- The Hertfordshire Local Enterprise Partnership expressed concerns regarding the consultation process being time consuming.
- Markyate Parish Council believe the quality and legibility of the maps within the document require improvement, and state that the summary document circulated did not include the questionnaire and did not give adequate information for the location of this on the Council's website.
- Northchurch Parish Council expressed concerns that the consultation process does not meet the legal requirements for a Regulation 18 consultation, as the COVID-19 regulations mean a number of residents were excluded from participating.
- Tring Rural Parish Council believe that Neighbourhood Development Orders, Village Design Statements, Assets of Community Value and Parish Plans should be encouraged in parishes, as they ensure that future development in rural communities is appropriate to the location.
- Little Gaddesden Parish Council believe that it was generally felt that the consultation process was made deliberately difficult in order to deter a negative response to the Plan.
- The Chilterns Conservation Board did not find either the online portal or the downloadable pro forma to be conducive to an effective response. They also provided a number of comments in relation to the proposals map as it did not include the SAC and zones of influence, the rural area, or the Borough's chalk streams.
- Historic England encourage the Council to draw on the knowledge of conservation officers, the county archaeologist and local heritage groups when preparing the Regulation 19 version of the plan.

General Bodies/Other Organisations

- A number of organisations, including the Chiltern Society and Berkhamsted Citizens Association, believe the consultation to be limited as a result of COVID-19 restrictions meaning engagement was primarily digital.
- There was a large number of support expressed for the 'One Voice Alliance' by individuals and organisations alike, including the Berkhamsted Residents Association Group (BRAG), Berkhamsted Citizens Association, Chiltern Countryside Group (CCG), Grove Fields Residents Association (GFRA), and Tring in Transition.
- The Grove Fields Residents Association state that the Emerging Strategy requires substantial additional assessments before exceptional circumstances can be demonstrated.
- A large number of housing developers commented on the Emerging Strategy not meeting Dacorum's identified housing need of 1,023dpa.

Wider Community

The main points raised by the wider community are as follows:

- The consultation period happened during COVID-19 restrictions - as this will inevitably lead to a reduced level of feedback.

- There was not enough effort made for those who do not use digital communication, and the process excluded those without access to the internet, or those who were not computer literate.
- There was confusion about the availability of hard copy documents within Borough libraries, such as if these services were open or if collecting books counted as an essential journey.
- The general long term implications of the COVID-19 pandemic should be taken into account before the next revision of the Plan.
- Local Plans should be community led and engagement should be clearer and ongoing.
- The Plan itself contained too many sections, which overlapped one another. This made the document very difficult to follow for those who are not familiar.
- The language of the Plan was not clear enough, as it contained too many abbreviations and relied on technical terms which were poorly defined.
- The content of the virtual exhibition and summary document needed to be simpler.
- The consultation should include more face to face open forums for debate, outside of office hours, so interested parties can directly ask questions and make comments.
- The maps included in the document were not always clear. The maps should include more labels to allow people to understand where development is in relation to the Borough. Maps should also be interactive.
- The consultation portal itself was described as 'very clunky to use', and that on many occasions the comments pages were unavailable, or the site froze. Some stated that they did not receive an email to reset their password after requesting one.
- The posted summary document either did not arrive, or arrived too late, for individuals to consider what was being proposed within it.
- The Council should provide a simple survey option for those who do not wish to make detailed comments.
- The comments posted within the chat function of the Virtual Exhibition should have been included as official responses to the consultation.
- The process was not mobile friendly, despite there being mobile versions of the documents and exhibitions. Many residents do not use a computer anymore and engage via their mobile phones.
- The Council should notify all residents of a planning consultation via letter, not just those on the planning database.

Appendix 1

Supporting Documents

Supporting Documents

Consultation notification letter

Date: 27th November 2020
Your Ref:
Our Ref: Emerging Strategy for Growth
Consultaion
Contact: Strategic Planning
Email: Strategic.planning@dacorum.gov.uk
Directline: 01442 228660
Fax:



«Full_Name»
«Company__Organisation»
«Address_Line_1»
«Address_Line_2»
«Address_Line_3»
«Post_Town»
«County»
«Post_Code»

The Forum
Marlowes
Hemel Hempstead
Hertfordshire
HP1 1DN

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

Dear «Full_Name»

DACORUM LOCAL PLAN (2020 – 2038) EMERGING STRATEGY FOR GROWTH - CONSULTATION

What is this consultation about?

Dacorum Borough Council is consulting on the Emerging Strategy for Growth. This is the next stage of preparing the new Dacorum Local Plan 2020-2038. It will be a key document in shaping the future of our Borough. Once adopted, the new Local Plan will replace the Core Strategy and Site Allocations DPDs and the 'saved' policies from the 2004 Local Plan.

Other supporting documents and evidence are also available, including a Sustainability Appraisal.

When can I comment and where are the documents available?

The Council is inviting comments on the Emerging Strategy for Growth document, between **5:00pm on Friday 27th November 2020 and 11:59pm on Sunday 7th February 2021.**

All information and documents relating to the consultation is available:

- via the Council's consultation portal <https://consult.dacorum.gov.uk/kse/event/35755>
- on the Council's website <http://www.dacorum.gov.uk/localplan>



100% recycled paper

The Emerging Strategy for Growth is also available as a hard copy:

- To loan from:
 - Hemel Hempstead Library
 - Berkhamsted Library
 - Tring LibraryInformation on locations and opening hours can be found here:
<https://www.hertfordshire.gov.uk/services/libraries-and-archives/library-opening-hours/library-opening-hours-and-locations.aspx>

- To view at:
 - The Forum in Hemel Hempstead on an **appointment only basis**
Please contact the Strategic Planning team to make arrangements (see 'How can I find out more' below).

How can I visit the virtual exhibition?

There will be a virtual exhibition open throughout the consultation managed by representatives of the Council. This can be found at <https://dacorumlocalplan.consultation.ai/>

As a part of this you will be able to ask questions via the 'leave a message' function. Please note any comments made via 'leave a message' will not be considered as official responses to the consultation and will not be made public.

How can I find out more?

Please contact the Strategic Planning team if you have any questions or require further information:

Email: strategic.planning@dacorum.gov.uk

Phone: 01442 228660 - **Due to COVID-19 you may experience longer wait times than normal when calling, please email if at all possible.**

Address: Strategic Planning, Dacorum Borough Council. The Forum, Marlowes, Hemel Hempstead, Hertfordshire. HP1 1DN

Yours sincerely,



Alex Robinson
Strategic Planning Manager
Dacorum Borough Council

Consultation extension letter

Date: 14th January 2021
Your Ref.
Our Ref: Emerging Strategy for Growth
Consultation – Change to
Consultation Date
Contact: Strategic Planning
Email: Strategic.planning@dacorum.gov.uk
Directline: 01442 228660
Fax:



«Full_Name»
«Company__Organisation»
«Address_Line_1»
«Address_Line_2»
«Address_Line_3»
«County»
«Post_Code»

The Forum
Marlowes
Hemel Hempstead
Hertfordshire
HP1 1DN

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

Dear «Full_Name»

**DACORUM LOCAL PLAN (2020 – 2038) EMERGING STRATEGY FOR GROWTH
CONSULTATION – CHANGE TO CONSULTATION END DATE**

Please be aware that due to the current national situation, the consultation on the Dacorum Local Plan (2020 – 2038) Emerging Strategy for Growth has been extended.

The consultation will now **close at 11:59pm on Sunday 28th February 2021.**

For all information and documents relating to the consultation please visit:

- the Council's consultation portal <https://consult.dacorum.gov.uk/kse/event/35755>
- the Council's website <http://www.dacorum.gov.uk/localplan>

The Emerging Strategy for Growth is also available as a hard copy:

- To loan from:
 - Hemel Hempstead Library
 - Berkhamsted Library
 - Tring Library

Information on locations and opening hours can be found here:

<https://www.hertfordshire.gov.uk/services/libraries-and-archives/library-opening-hours/library-opening-hours-and-locations.aspx>



100% recycled paper

- To view at:
 - The Forum in Hemel Hempstead on an **appointment only basis**
Please contact the Strategic Planning team to make arrangements (see 'How can I find out more' below).

How can I visit the virtual exhibition?

The virtual exhibition will remain open up until 28th February 2021 and can be visited at <https://dacorumlocalplan.consultation.ai/>

As a part of this you will be able to ask questions via the 'leave a message' function. Please note any comments made via 'leave a message' will not be considered as official responses to the consultation and will not be made public.

How can I find out more?

Please contact the Strategic Planning team if you have any questions or require further information:

Email: strategic.planning@dacorum.gov.uk

Phone: 01442 228660 - **Due to COVID-19 you may experience longer wait times than normal when calling, please email if at all possible.**

Address: Strategic Planning, Dacorum Borough Council. The Forum, Marlowes, Hemel Hempstead, Hertfordshire. HP1 1DN

Yours sincerely,



Alex Robinson
Strategic Planning Manager
Dacorum Borough Council

Classified

PUBLIC NOTICES

PUBLIC NOTICES

HERTFORDSHIRE COUNTY COUNCIL:

(TEMPORARY CLOSING OF PARKHILL ROAD, HEMEL HEMPSTEAD) ORDER 2020
 NOTICE is given that Hertfordshire County Council intends to make an Order under Section 14(1) of the Road Traffic Regulation Act 1984, to prohibit all vehicular traffic from using that length of Parkhill Road, Hemel Hempstead from a point in line with the northern boundary of No.20 Parkhill Road south eastwards for a distance of approximately 34m ("the Road").
 An alternative route will be via Parkhill Road, Lockers Park Lane, Hanger Close and Parkhill Road.
 The Order is needed because gas service connection works are proposed to be executed on or near the Road.
 If the Order is made, it shall come into force on 14 December 2020 for a period of up to 18 months. However, the restrictions specified shall only take effect at the times indicated by signs on or near the Road.
 If you have any queries about the proposed Order, please contact Liam Johnson tel. 0330 016 9696 at MLP Traffic or Tommy Clew tel. 0300 123 4047 at Hertfordshire County Council.

(TEMPORARY CLOSING OF VARIOUS ROADS IN BERKHAMSTED) ORDER 2020
 NOTICE is given that Hertfordshire County Council intends to make an Order under Section 14(1) of the Road Traffic Regulation Act 1984, to prohibit all vehicular traffic from using the following lengths of roads ("the Roads"), except for access:
 1. that length of Station Road, Berkhamsted from its junction with New Road south eastwards for a distance of approximately 75m.
 An alternative route will be via Station Road, Lower Kings Road, A4251 High Street, Ravens Lane, Gravel Path and Station Road.
 2. that length of White Hill, Berkhamsted from its junction with Brownlow Road south eastwards for a distance of approximately 215m.
 An alternative route will be via Brownlow Road and New Road.
 3. that length of New Road, Berkhamsted from its junction with Station Road north eastwards to its junction with White Hill, a distance of approximately 50m.
 There is no alternative route available for vehicles when the works are being carried out. However vehicular access to properties in this road will be maintained whenever possible throughout the duration of the works.
 The Order is needed because the removal of vegetation and railway inspection works are proposed to be executed on or near the Roads.
 If the Order is made, it shall come into force on 14 December 2020 for a period of up to 18 months. However, the restrictions specified shall only take effect at the times indicated by signs on or near the Roads.
 If you have any queries about the proposed Order please contact Joe Stacks tel. 0121 520 7474 at J Murphy and Sons Ltd or Deanna Briggs tel. 0300 123 4047 at Hertfordshire County Council.


(TEMPORARY CLOSING OF GADERBRIDGE LANE, HEMEL HEMPSTEAD) ORDER 2020
 NOTICE is given that Hertfordshire County Council has made the above Order under Section 14(1) of the Road Traffic Regulation Act 1984, to prohibit all vehicular traffic from using that length of Gaderidge Lane, Hemel Hempstead from its junction with Picotts End south westwards to its junction with A4146 Leighton Buzzard Road ("the Road"), a distance of approximately 294m, except for access.
 An alternative route will be via Picotts End, A4147 Link Road and A4146 Leighton Buzzard Road.
 The Order is needed because tree maintenance works are proposed to be executed near the Road.
 The Order has been made and shall come into force on 30 November 2020 for a period of up to 18 months. However, the restrictions specified shall only take effect at the times indicated by signs on or near the Road.
 If you have any queries about the Order, please contact Brian Cole tel. 01438 726 425 at Aborcor or Tommy Clew tel. 0300 123 4047 at Hertfordshire County Council.

(TEMPORARY CLOSING OF GRAVEL PATH, BERKHAMSTED) ORDER NO.2 2020
 NOTICE is given that Hertfordshire County Council has made the above Order under Section 14(1) of the Road Traffic Regulation Act 1984, to prohibit all vehicular traffic from using that length of Gravel Path, Berkhamsted from its junction with Meadow south westwards for a distance of approximately 53m ("the Road"), except for access.
 An alternative route will be via Gravel Path, The Common, Water End Road, Potten End Hill, B440 Leighton Buzzard Road, A4146 (Leighton Buzzard Road/Station Road), A4251 (London Road/High Street), Ravens Lane and Gravel Path.
 The Order is needed because water main repair works are proposed to be executed on or near the Road.
 The Order has been made and shall come into force on 1 December 2020 for a period of up to 18 months. However, the restrictions specified shall only take effect at the times indicated by signs on or near the Road.
 If you have any queries about the Order, please contact Eileen O'Riordan tel. 0345 357 2407 at Affinity Water or Deanna Briggs tel. 0300 123 4047 at Hertfordshire County Council.

A copy of the Orders may be inspected free of charge at County Hall, Hertford between the hours of 9am and 5pm (excluding weekends, bank and public holidays).

Consulting on Traffic Regulation Orders is a statutory duty of the County Council. Any personal data you provide in responding to this Notice will be treated as confidential but will be shared with HCC Officers, County Councillors and contracted third parties who are involved in the statutory process. We will not share identifiable data with third parties outside of the statutory process. Guidance on your rights in respect of personal data are published in the Privacy Policy on our website, Hertfordshire.gov.uk

25 November 2020.
 Mark Kemp, Director of Environment & Infrastructure, County Hall, Hertford, Herts, SG13 8DN




**Dacorum Local Plan 2020-2038
Emerging Strategy for Growth**

Notice of Public Consultation



This notice is provided in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012 and the Environmental Assessment of Plans and Programmes Regulations 2004.

What is the consultation about?
 Dacorum Borough Council is consulting on the Emerging Strategy for Growth. This is the next stage of preparing the Dacorum Local Plan 2020-2038. It will be a key document in shaping the future of our Borough. Once adopted, the new Local Plan will replace the Core Strategy and Site Allocations DPDs and the 'saved' policies from the 2004 Local Plan.

Other supporting documents and evidence are also available, including a Sustainability Appraisal.

When can I comment?
 The Council is inviting comments on the Emerging Strategy for Growth document, between 5:00pm on Friday 27th November 2020 and 11:59pm Sunday 7th February 2021.

- Where are the documents available?**
 Information and documents relating to the consultation are available:
- via the Council's consultation portal <https://consult.dacorum.gov.uk/kse/event/35755>
 - on the Council's website <http://www.dacorum.gov.uk/localplan>

- as a hard copy:
- To loan from:
 - Hemel Hempstead Library
 - Berkhamsted Library
 - Tring Library

Information on opening hours can be found here: <https://www.hertfordshire.gov.uk/services/libraries-and-archives/library-opening-hours/library-opening-hours-and-locations.aspx>

- To view at:
 - The Forum in Hemel Hempstead on an appointment only basis. Please contact the Strategic Planning team to make arrangements (see 'Further Information' below).

Where is the virtual exhibition?
 There will be a virtual exhibition open throughout the consultation managed by representatives of the Council.
 This can be found at <https://dacorumlocalplan.consultation.ai/>

As a part of this, you will be able to ask questions via the 'leave a message' function. Please note any comments made via 'leave a message' will not be considered as official responses to the consultation and will not be made public.

How can I comment?
 Comments should be received before 11:59pm on Sunday 7th February 2021.

- We would request you submit your comments electronically:
- Using the Council's consultation portal <https://consult.dacorum.gov.uk/kse/event/35755>

- If this is not possible, your comments form can also be submitted:
- By email to responses@dacorum.gov.uk
 - By post addressed to: Strategic Planning, Dacorum Borough Council, The Forum, Marlowes, Hemel Hempstead, Hertfordshire, HP1 1DN

Copies of the comments form are available to download from www.dacorum.gov.uk/localplan

Comments received cannot be treated as confidential and will be available to view publicly. However, published comments will exclude your personal contact details and include only your name.

Further information
 Please contact the Strategic Planning team if you have any questions or require more information:

Email: strategic.planning@dacorum.gov.uk
 Phone: 01442 228660 – Due to COVID-19 you may experience longer wait times than normal when calling, please email if at all possible.
 Address: Strategic Planning, Dacorum Borough Council, The Forum, Marlowes, Hemel Hempstead, Hertfordshire, HP1 1DN

Public & Legal Notice COVID-19 UPDATE FROM JPI MEDIA:

If you require a Public & Legal notice, our team is still on hand to assist you with this. Our business hours and deadlines will remain the same. For any enquiries in the first place please email publicnotices@jpimedia.co.uk with your requirements,

- ◆ Including your full name,
- ◆ Full business address including post code,
- ◆ A contact telephone number
- ◆ Full wording for the notice you require
- ◆ Newspaper title and date required.

For your advice please call the team on

0207 023 7931 jpimedia

JOBS

GENERAL VACANCIES



Beaury Precision Moulds is the UK leading supplier of extrusion blow moulds to the plastics industry. Based in Aylesbury since 1964 we now have Toolmaker positions available due to continued growth.

TOOLMAKERS

Experienced Toolmakers required for the manufacture of blowmoulds. The work entails the use of CNC equipment - experience desirable, but the necessary training will be provided.

Please apply to Mr Paul Matthews paul@beaury.co.uk



WHAT DO YOU WANT TO DO TOMORROW?

JOBSTODAY HAS THOUSANDS OF JOBS ONLINE NOW. COME AND FIND YOUR NEW TOMORROW WITH US.

JOBSTODAY.CO.UK

EXPERIENCED ROOFERS REQUIRED

CLARIDGE & HALL BRICK LID MARKYATE

MUST HAVE CSCS CARD
 IMMEDIATE START
 PLEASE CALL GRAHAM ON 07984 784903 or email accounts@claridgeandhall.com



WHAT DO YOU WANT TO DO TOMORROW?

JOBSTODAY HAS THOUSANDS OF JOBS ONLINE NOW. COME AND FIND YOUR NEW TOMORROW WITH US.

JOBSTODAY.CO.UK

Gazette Public Notice 20 Jan 2021

1 Hemel Gazette

Wednesday, January 20, 2021

Classified

PUBLIC NOTICES

PUBLIC NOTICES

HERTFORDSHIRE COUNTY COUNCIL:

(TEMPORARY CLOSING OF BARBERY ROAD, HEMEL HEMPSTEAD) ORDER 2021
 NOTICE is given that Hertfordshire County Council intends to make an Order under Section 14(1) of the Road Traffic Regulation Act 1984, to prohibit all vehicular traffic from using that length of Barbary Road, Hemel Hempstead from a point in line with the western boundary of No.11 Barbary Road south westwards for a distance of approximately 40m ("the Road"), except for access.
 An alternative route will be via Barbary Road, Gravel Lane, Green End Road, Northridge Way and Barbary Road.
 The Order is needed because water service connection works are proposed to be executed on or near the Road.
 If the Order is made, it shall come into force on 10 February 2021 for a period of up to 18 months. However, the restrictions specified shall only take effect at the times indicated by signs on or near the Road.
 If you have any queries about the proposed Order, please contact Anthony Beard tel. 0191 691 5162 at Hutton Traffic Management Ltd or Deanna Briggs tel. 0300 123 4047 at Hertfordshire County Council.

(TEMPORARY CLOSING OF SELDEN HILL, HEMEL HEMPSTEAD) ORDER 2021
 NOTICE is given that Hertfordshire County Council intends to make an Order under Section 14(1) of the Road Traffic Regulation Act 1984, to prohibit all vehicular traffic from using the westbound carriageway of Selden Hill, Hemel Hempstead from its junction with Wolsley Road south westwards to its junction with King Harry Street ("the Road"), a distance of approximately 50m.
 An alternative route will be via Wolsley Road, King Harry Street, Hillfield Road, Marlowes, Bridge Street, Waterhouse Street, Moor End Road, A4146 Leighton Buzzard Road and Selden Hill.
 The Order is needed because utility service works are proposed to be executed on or near the Road.
 If the Order is made, it shall come into force on 4 February 2021 for a period of up to 18 months. However, the restrictions specified shall only take effect at the times indicated by signs on or near the Road.
 If you have any queries about the proposed Order, please contact Robbie West tel. 0330 016 9636 at MLP Traffic or Deanna Briggs tel. 0300 123 4047 at Hertfordshire County Council.

(TEMPORARY CLOSING OF SCATTERDELS LANE, CHIPPERFIELD) ORDER 2021
 NOTICE is given that Hertfordshire County Council intends to make an Order under Section 14(1) of the Road Traffic Regulation Act 1984, to prohibit all vehicular traffic from using that length of Scatterdels Lane, Chipperfield from a point in line with the western boundary of No.4 Scatterdels Lane north eastwards for a distance of approximately 100m ("the Road"), except for access.
 There is no alternative route available for vehicles when the works are being carried out. However vehicular access to properties in this road will be maintained whenever possible throughout the duration of the works.
 The Order is needed because utility service works are proposed to be executed on or near the Road.
 If the Order is made, it shall come into force on 5 February 2021 for a period of up to 18 months. However, the restrictions specified shall only take effect at the times indicated by signs on or near the Road.
 If you have any queries about the proposed Order, please contact Shannon Smith tel. 0370 050 0792 at Sunbelt Rentals Ltd or Deanna Briggs tel. 0300 123 4047 at Hertfordshire County Council.

(TEMPORARY CLOSING AND TEMPORARY WAITING RESTRICTIONS IN PESCOIT HILL AND MAXTED CLOSE, HEMEL HEMPSTEAD) ORDER 2021
 NOTICE is given that Hertfordshire County Council has made the above Order under Section 14(1) of the Road Traffic Regulation Act 1984, to prohibit all vehicular traffic from using the following lengths of roads ("the Roads"), except for access and to prohibit all vehicles from waiting at any time on both sides of these lengths of Roads whilst works are in progress:
 1. that length of Pescoit Hill, Hemel Hempstead from its junction with Long Annots north eastwards to its junction with Woodview, a distance of approximately 267m.
 An alternative route will be via Long Annots, Hilldown Road, Gadsbridge Road, Galey Hill and Maxted Close.
 2. that length of Maxted Close, Hemel Hempstead from its junction with Maxted Road south eastwards and south westwards for its entire length.
 There is no alternative route available for vehicles when the works are being carried out. However vehicular access to properties in this road will be maintained whenever possible throughout the duration of the works.
 The Order is needed because works are proposed to be executed on or near the Roads.
 The Order has been made and shall come into force on 25 January 2021 for a period of up to 18 months. However, the restrictions specified shall only take effect at the times indicated by signs on or near the Roads.
 If you have any queries about the Order please contact Adrian Redrup tel. 0300 123 4047 at Hertfordshire County Council.

(TEMPORARY CLOSING OF MANOR STREET, BERKHAMSTED) ORDER 2021
 NOTICE is given that Hertfordshire County Council has made the above Order under Section 14(1) of the Road Traffic Regulation Act 1984, to prohibit all vehicular traffic from using that length of Manor Street, Berkhamsted from its junction with Chapel Street south westwards for a distance of approximately 50m ("the Road"), except for access.
 An alternative route will be via Chapel Street, Castle Street, A4251 High Street and Manor Street or via Chapel Street, Ravens Lane, A4251 High Street and Manor Street.
 The Order is needed because utility works are proposed to be executed on or near the Road.
 The Order has been made and shall come into force on 25 January 2021 for a period of up to 18 months. However, the restrictions specified shall only take effect at the times indicated by signs on or near the Road.
 If you have any queries about the Order, please contact Jodie Hote tel. 0345 241 0261 at 1st Choice Traffic Management or Deanna Briggs tel. 0300 123 4047 at Hertfordshire County Council.

(TEMPORARY CLOSING AND TEMPORARY WAITING RESTRICTIONS IN WOODFARM ROAD AND FURTHERGROUN, HEMEL HEMPSTEAD) ORDER 2021
 NOTICE is given that Hertfordshire County Council has made the above Order under Section 14(1) of the Road Traffic Regulation Act 1984, to prohibit all vehicular traffic from using the following lengths of roads ("the Roads"), except for access and to prohibit all vehicles from waiting at any time on both sides of these lengths of Roads whilst works are in progress:
 1. that length of Woodfarm Road, Hemel Hempstead from its northernmost junction with Turners Hill south eastwards, south westwards and south eastwards for a distance of approximately 221m.
 An alternative route will be via Turners Hill.
 2. that length of Furthergroun, Hemel Hempstead from its junction with Woodfarm Road south westwards for its entire length.

There is no alternative route available for vehicles when the works are being carried out. However vehicular access to properties in this road will be maintained whenever possible throughout the duration of the works.
 The Order is needed because works are proposed to be executed on or near the Roads.
 The Order has been made and shall come into force on 25 January 2021 for a period of up to 18 months. However, the restrictions specified shall only take effect at the times indicated by signs on or near the Roads.
 If you have any queries about the Order please contact Chris Stubbs tel. 0300 123 4047 at Hertfordshire County Council.

(TEMPORARY CLOSING OF PENMANS GREEN, CHIPPERFIELD) ORDER 2021
 NOTICE is given that Hertfordshire County Council has made the above Order under Section 14(1) of the Road Traffic Regulation Act 1984, to prohibit all vehicular traffic from using that length of Penmans Green, Chipperfield from a point in line with the northern boundary of "The Woodlands" north westwards for a distance of approximately 305 metres ("the Road"), except for access.
 There is no alternative route available for vehicles when the works are being carried out. However vehicular access to properties in this road will be maintained whenever possible throughout the duration of the works.
 The Order is needed because water main connection works are proposed to be executed on or near the Road.
 The Order has been made and shall come into force on 25 January 2021 for a period of up to 18 months. However, the restrictions specified shall only take effect at the times indicated by signs on or near the Road.
 If you have any queries about the Order, please contact Anthony Beard tel. 0191 691 5162 at Hutton Traffic Management Ltd or Deanna Briggs tel. 0300 123 4047 at Hertfordshire County Council.

(TEMPORARY CLOSING OF PARKHILL ROAD, HEMEL HEMPSTEAD) ORDER 2021
 NOTICE is given that Hertfordshire County Council has made the above Order under Section 14(1) of the Road Traffic Regulation Act 1984, to prohibit all vehicular traffic from using that length of Parkhill Road, Hemel Hempstead from a point in line with the northern boundary of No.18 Parkhill Road south eastwards for a distance of approximately 30m ("the Road"), except for access.
 An alternative route will be via Parkhill Road, Lockers Park Lane, Hanger Close and Parkhill Road.
 The Order is needed because water service connection works are proposed to be executed on or near the Road.
 The Order has been made and shall come into force on 27 January 2021 for a period of up to 18 months. However, the restrictions specified shall only take effect at the times indicated by signs on or near the Road.
 If you have any queries about the Order, please contact Anthony Beard tel. 0191 691 5162 at Hutton Traffic Management Ltd or Tommy Obe tel. 0300 123 4047 at Hertfordshire County Council.

(TEMPORARY CLOSING OF ANGLEFIELD ROAD, BERKHAMSTED) ORDER 2021
 NOTICE is given that Hertfordshire County Council has made the above Order under Section 14(1) of the Road Traffic Regulation Act 1984, to prohibit all vehicular traffic from using that length of Anglefield Road, Berkhamsted from a point in line with the western boundary of No.2 Anglefield Road south eastwards to a point in line with the eastern boundary of No.12 Anglefield Road ("the Road"), a distance of approximately 127m, except for access.
 An alternative route will be via Anglefield Road, Cross Oak Road, Charles Street, North Road and Anglefield Road.
 The Order is needed because water connection works are proposed to be executed on or near the Road.
 The Order has been made and shall come into force on 25 January 2021 for a period of up to 18 months. However, the restrictions specified shall only take effect at the times indicated by signs on or near the Road.
 If you have any queries about the Order, please contact Anthony Beard tel. 0191 691 5162 at Hutton Traffic Management Ltd or Deanna Briggs tel. 0300 123 4047 at Hertfordshire County Council.

A copy of the proposed Orders may be inspected free of charge at County Hall, Hertford between the hours of 9am and 5pm (excluding weekends, bank and public holidays).

THE HERTFORDSHIRE (VARIOUS ROADS, TRING) (RESTRICTION OF WAITING) ORDER 2021

NOTICE is given that the Hertfordshire County Council in order to improve road safety, in particular associated with junction protection, proposes under the Road Traffic Regulation Act 1984 to introduce waiting restrictions in parts of Tring as specified in the Schedule to this Notice.
 Documents giving more detailed particulars of the proposals are held on deposit at the offices of Hertfordshire County Council, Pegg Lane, Hertford. However, due to the current COVID 19 emergency, in particular the restrictions imposed on Social Distancing, the documents may be viewed on line from 20 January 2021 at www.hertfordshire.gov.uk/trafficorders by selecting Dacorum and looking at Ref. D00720, or you may request a copy of the documents quoting Ref. D00720 by emailing trinh@hertfordshire.gov.uk, or paper copies may be collected by prior arrangement, from Front Reception, Hertfordshire County Council, County Hall, Pegg Lane, Hertford tel 01992 555533
 General enquiries relating to the proposals should be referred to the Highways Engineer concerned Peter Wright tel. 01992 658124 or peter.wright@hertfordshire.gov.uk
 Objections to the proposals should be made in writing to Terry Curtis, Postal Point (CH0242), First Floor, East Link Corridor, County Hall, Pegg Lane, Hertford, Herts, SG13 8DN or trinh@hertfordshire.gov.uk by 11 February 2021 stating the grounds on which they are made.
SCHEDULE: No waiting at any time – affecting those roads herein listed and as set out in the Order and accompanying plan – Parts of Dundale Road, Wingrave Road, Sutton Close, New Mill Terrace, Pheasant Cusse, New Road, Silk Mill Way and Adams Way.
 The making of Traffic Regulation Orders is a statutory function of the County Council. Any personal data you provide in responding to these Notices will be treated as confidential but will be shared with HCC Officers, County Councilors and contracted third parties who are involved in the statutory process. We will not share identifiable data with third parties outside of the statutory process. Guidance on your rights in respect of personal data are published in the Privacy Policy on our website. Hertfordshire.gov.uk
 20 January 2021.
 Mark Kemp, Director of Environment & Infrastructure, County Hall, Hertford, Herts, SG13 8DN



Dacorum Local Plan (2020-2038) Emerging Strategy for Growth Notice of Public Consultation (change to consultation dates)

This notice is provided in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012 and the Environmental Assessment of Plans and Programmes Regulations 2004.
 The Council has extended the consultation period for the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth. The consultation (that commenced on 5pm on Friday 27th November 2020) will now close at 11:59pm on Sunday 28th February 2021.

What is the consultation about?
 Dacorum Borough Council is consulting on the Emerging Strategy for Growth. This is the next stage of preparing the Dacorum Local Plan 2020-2038. It will be a key document in shaping the future of our Borough. Once adopted, the new Local Plan will replace the Core Strategy and Site Allocations DPDs and the 'saved' policies from the 2004 Local Plan.

Other supporting documents and evidence are also available, including a Sustainability Appraisal.

Where are the documents available?
 Information and documents relating to the consultation are available:

- via the Council's consultation portal <https://consult.dacorum.gov.uk/wse/event/35755>
- on the Council's website <http://www.dacorum.gov.uk/localplan>
- as a hard copy:
 - To loan from:
 - Hemel Hempstead Library
 - Berkhamsted Library
 - Tring Library

Information on opening hours can be found here: <https://www.hertfordshire.gov.uk/services/libraries-and-archives/library-opening-hours/library-opening-hours-and-locations.aspx>

• To view at:

- The Forum in Hemel Hempstead on an appointment only basis. Please contact the Strategic Planning team to make arrangements (see 'Further Information' below).

Where is the virtual exhibition?
 The virtual exhibition will remain open up until 28th February 2021 and can be visited at <https://dacorumlocalplan.consultation.ai/>

As a part of this, you will be able to ask questions via the 'leave a message' function. Please note any comments made via 'leave a message' will not be considered as official responses to the consultation and will not be made public.

How can I comment?
 Comments should be received before 11:59pm on Sunday 28th February 2021.

- We would request you submit your comments electronically:
 - Using the Council's consultation portal <https://consult.dacorum.gov.uk/wse/event/35755>

If this is not possible, your comments form can also be submitted:

- By email to responses@dacorum.gov.uk
- By post addressed to: Strategic Planning, Dacorum Borough Council, The Forum, Marlowes, Hemel Hempstead, Hertfordshire, HP1 1DN

Copies of the comments form are available to download from www.dacorum.gov.uk/localplan
 Comments received cannot be treated as confidential and will be available to view publicly. However, published comments will exclude your personal contact details and include only your name.

Further information
 Please contact the Strategic Planning team if you have any questions or require more information:

Email: strategic_planning@dacorum.gov.uk
 Phone: 01442 226650 – Due to COVID-19 you may experience longer wait times than normal when calling, please email if at all possible.

Address: Strategic Planning, Dacorum Borough Council, The Forum, Marlowes, Hemel Hempstead, Hertfordshire, HP1 1DN

GOODS VEHICLE OPERATORS LICENCE
 Absco (UK) Limited of 5 Spring Park, Spring Way, Hemel Hempstead, Herts, HP2 7ER is applying to change an existing licence as follows: To add an operating centre to keep 2 goods vehicles and 0 trailers at 5 Spring Park, Spring Way, Hemel Hempstead, Herts, HP2 7ER. Owners or occupiers of land (including buildings) near the operating centre(s) who believe that their use or enjoyment of that land would be affected, should make written representations to the Traffic Commissioner at Hillcrest House, 386 Harehills Lane, Leeds, LS9 6NF, stating their reasons, within 21 days of this notice. Representatives must at the same time send a copy of their representations to the applicant at the address given at the top of this notice. A Guide to Making Representations is available from the Traffic Commissioner's office.

94% OF PEOPLE PREFER TO BUY FROM LOCAL BUSINESSES.



Don't miss out, you can advertise in your local newspaper and website at a cost effective rate.

Call your friendly Classified team today to hear about our multimedia advertising solutions. Tel: 0207 084 5207

NEED to PROMOTE your business?
 Local news delivers for you!
 Find your local customer by advertising with your local newspaper.
 We carry multimedia solutions to suit any business any size.
 Tel: 0207 084 5206
 Call now to hear about our SPECIAL OFFERS



Consultation advertising Poster



Dacorum Local Plan 2020 to 2038

Emerging Strategy for Growth Consultation

The consultation runs from
5pm on 27 November 2020,
until 11.59pm on 28 February 2021

For further information about the
Local Plan and how to take part
in the consultation please visit:
www.dacorum.gov.uk/localplan

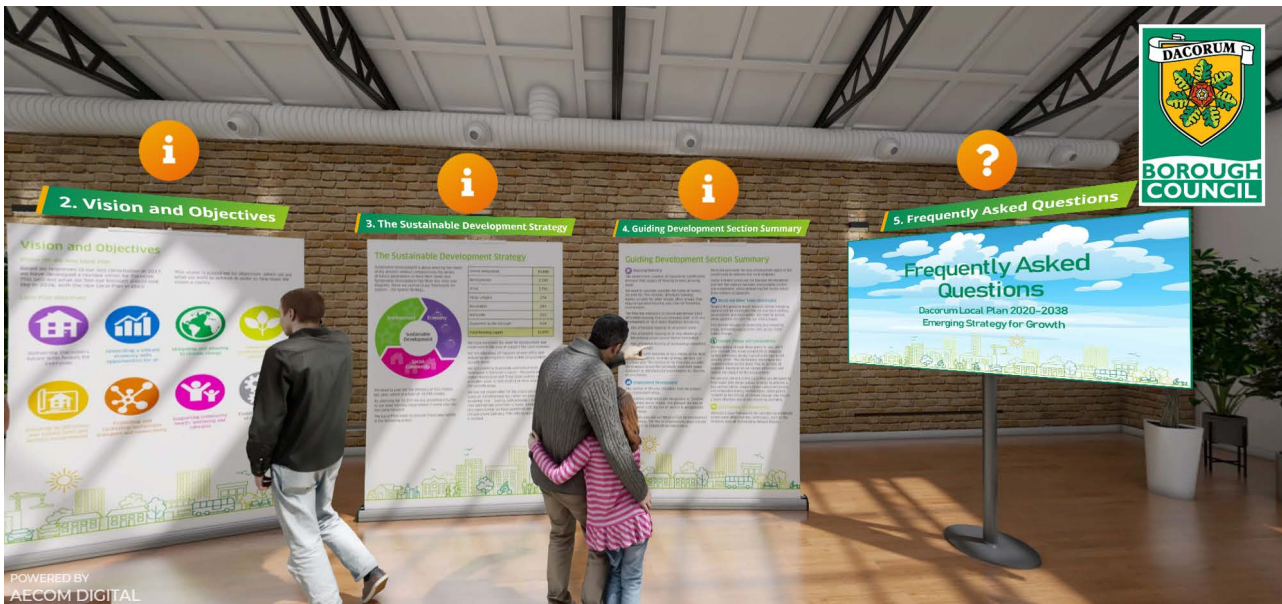
Email: strategic.planning@dacorum.gov.uk
Phone: 01442 228660



Virtual Exhibition 1



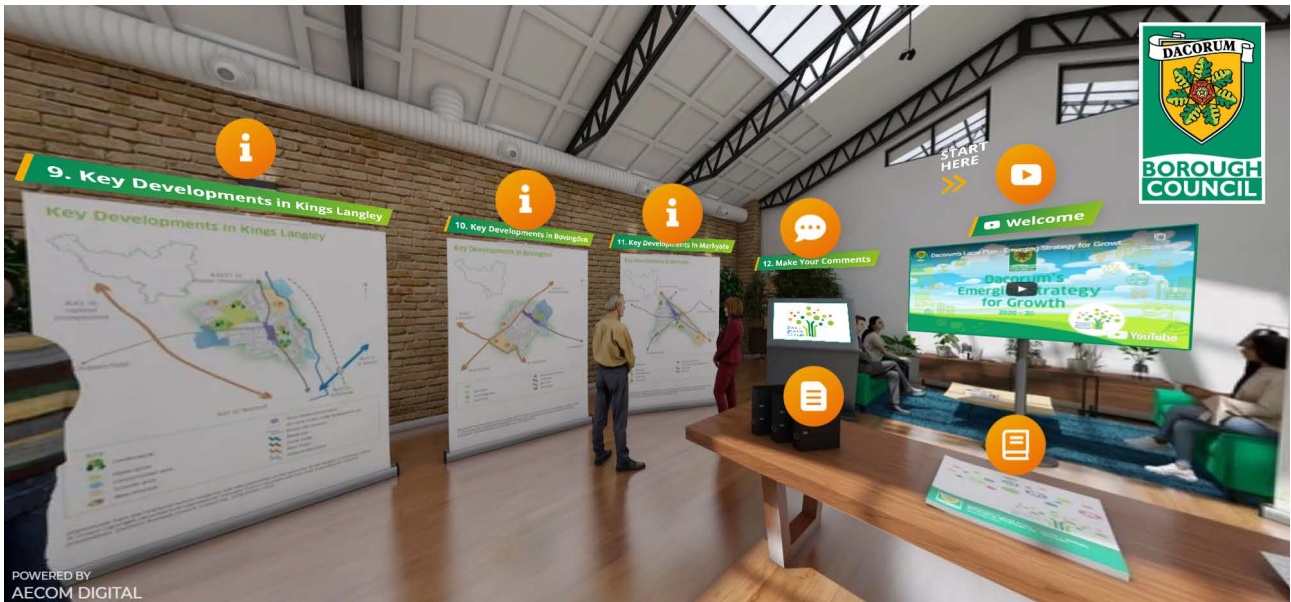
Virtual exhibition 2



Virtual exhibition 3



Virtual exhibition 4



Appendix 2

Responses by Consultation point

Responses by Consultation Point

Comments that we received by letter or email have been categorised with the most appropriate section of the Emerging Strategy for Growth. We may have redacted text that we do not feel is suitable for publication. This includes comments that are negative or insulting about a particular group of people or person. In many cases, the redacted text is where respondents have provided personal information such as addresses, phone numbers and email addresses within the body of their comment.

For the full list of responses please refer to the following separate documents:

Appendix 2a - Consultation points 3 to 5

3. Vision and Strategic Objectives - pages 2 to 896
4. Sustainable Development in Dacorum - pages 897 to 1244
5. Spatial Strategy for Growth - pages 1245 to 2291

Appendix 2b - Consultation points 6 to 12

6. The Settlement Hierarchy pages 2 to 210
7. The Housing Strategy - pages 211 to 1002
8. The Employment Strategy - pages 1003 to 1199
9. The Retail and Leisure Development Strategy - pages 1200 to 1337
10. Delivering Infrastructure to Support Growth - pages 1338 to 1667
11. Neighbourhood Planning - pages 1668 to 1748
12. Monitoring and Review - pages 1749 to 1820

Appendix 2c - consultation points 14 to 22

14. Housing Delivery - pages 2 to 455
15. Employment Development - pages 456 to 576
16. Retailing and other Town Centre uses - pages 577 to 668
17. Climate change and Sustainability - pages 669 to 993
18. Environment and Biodiversity - pages 994 to 1330
19. Managing Development in the Countryside - pages 1331 to 1473
20. Delivering Great Places - pages 1474 to 1586
21. Sustainable Transport and Connectivity- pages 1587 to 1836
22. Healthy Communities - pages 1837 to 2007

Appendix 2d -Consultation point 23 All Settlement Delivery Strategies

- Hemel Hempstead Garden Communities Delivery Strategy - pages 2 to 181
- Berkhamsted Delivery Strategy - pages 182 to 1184
- Tring Delivery Strategy - pages 1185 to 1789
- Kings Langley Delivery Strategy - pages 1790 to 1854
- Bovingdon Delivery Strategy - pages 1855 to 1907
- Markyate Delivery Strategy - pages 1908 to 1945
- Countryside Delivery Strategy - pages 1946 to 1997

Appendix 2e - Consultation point 24 - Hemel Hempstead Garden Communities and Berkhamsted Proposals & Sites

- Hemel Hempstead Garden Communities Proposals & Sites - pages 2 to 570
- Berkhamsted Proposals & Sites - pages 571 to 1799

Appendix 2f - Consultation points 24 Tring to Countryside Proposals & Sites

- Tring Proposals & Sites - pages 2 to 1483
- Kings Langley Proposals & Sites - pages 1484 to 1652
- Bovingdon Proposals & Sites - pages 1653 to 1780
- Markyate Proposals & Sites - pages 1781 to 1848
- Countryside Proposals & Sites - pages 1849 to 2022

Appendix 2g - Consultation points 25 to 28

25. Sustainability Appraisal - pages 2 to 443
26. Evidence Base - pages 444 to 964
27. National Planning Policy Guidance - pages 965 to 1502
28. Any Other Comment - pages 1503 to 2275



Report for:	Cabinet
Date of meeting:	27 th July 2021
Part:	1
If Part II, reason:	

Title of report:	Elms Hostel, contract management
Contact:	Margaret Griffiths, Portfolio Holder Housing Author/Responsible Officer – Fiona Williamson – Assistant Director - Housing
Purpose of report:	To outline the options for the ongoing management of the Elms Homeless Hostel and provide updated performance management information.
Recommendations	It is recommended that: <ol style="list-style-type: none"> 1. The Council extends the concessionary contract by a further two years, on the basis of a 1 plus 1 year extension, subject to ongoing satisfactory performance. 2. The additional years' extensions are linked to performance which should be at, or above, target and that this is reviewed on an annual basis to ensure services are delivered in line with the contract.
Corporate Objectives:	Providing good quality affordable homes, in particular, for those most in need – including Temporary Accommodation Ensuring efficient, effective and modern service delivery
Implications:	<u>Financial</u> <u>Financial</u> The financial implications of the various options have been considered. The budgets are monitored and reported as part of

<p>'Value For Money Implications'</p>	<p>the Monthly Budget Monitoring Meetings with the HRA Financial Accountant. Budget Reporting is quarterly to Housing and Communities Overview and Scrutiny Committee.</p> <p><u>Value for Money</u></p> <p>The options appraisal considered the value for money assessment of the proposal to award a commissioning contract and informed negotiations with DENS to ensure that Value for Money could continue to be demonstrated.</p>
<p>Risk Implications</p>	<p>The pandemic has resulted in an increased number of homeless individuals and households that have presented to the service and the Elms continues to operate at capacity. Procurement of a new provider during this period would put additional pressure on the service and would divert resources and this would negatively impact the response to pandemic-related homeless cases.</p>
<p>Community Impact Assessment</p>	<p>Community Impact Assessments are developed whenever there is a requirement to change or create a new policy or procedure or significant change to service delivery.</p>
<p>Health And Safety Implications</p>	<p>The existing policies relating to the management of the health and safety will apply, so there are no additional implications.</p>
<p>Monitoring Officer/S.151 Officer Comments</p>	<p>Deputy Monitoring Officer: The proposed contract extension to DENS would be in furtherance of the Council's housing strategies and housing obligations.</p> <p>The contract extension complies with both the Council's Procurement Standing Orders and Concession Contracts Regulations 2016.</p> <p>Deputy S.151 Officer Dacorum Borough Council does not pay DENS to deliver the core homelessness service at the Elms, these costs are funded through rental income and other contributions as detailed in para 4.01.</p> <p>The Concessionary contract with DENS started in June 2020 and this recommendation will extend that contract until June 2023, which would result in an estimated contract value based on turnover of £3m which is within the £4.733M threshold as outlined in the Concessionary Contract Regulations 2016.</p>
<p>Consultees:</p>	<p>Mark Gaynor – Corporate Director, Housing and Regeneration</p> <p>Jason Grace – Group Manager Property and Place</p> <p>Natasha Beresford – Group Manager Strategic Housing</p> <p>Oliver Jackson – Group Manager Tenants and Leaseholders</p>

	<p>David Barrett – Group Manager, Housing Development</p> <p>Ben Hosier – Group Manager, Procurement and Contracted Services</p> <p>Nigel Howcutt – Assistant Director, Finance and Resources</p>
Background papers:	Covid-19 Impact Report, Cabinet, 23 June 2020
Glossary of acronyms and any other abbreviations used in this report:	<p>DENS – Dacorum Emergency Night Shelter</p> <p>HRS – Housing related support</p> <p>HCC – Hertfordshire County Council</p> <p>NNDR – National Non-Domestic Rates</p>

1.0 Introduction

- 1.01 The Elms hostel was commissioned in 2015 and, following a procurement process, DENS was successful in securing the contract to act as a managing agent for the facility on behalf of the Council. The Strategic Housing Service works closely with DENS to ensure that a consistent and high-quality service is provided to single homeless clients. A key element of delivering accommodation for these clients is the ongoing management of the Council's contract for the Elms Hostel, as this underpins the Council's Homelessness strategy. A strong working partnership has been developed between the Council and DENS and there are a number of ongoing projects that are being jointly resourced to address the increasing demand upon the Homelessness service within Dacorum.
- 1.02. DENS is required to deliver a service that promotes inclusion and does not prevent access unreasonably to any one group of people. Rooms are let on a priority basis to those single homeless clients with a local connection to Dacorum. The hostel provides accommodation for individuals with varying levels of support needs, including those with very complex needs. As DENS receives an element of grant funding from HCC in the form of the Housing Related Support (HRS) Grant, the level of support must be provided in line with HRS contract requirements.
- 1.03 DENS is required to demonstrate to the Council the successful move on of clients. Successful move on is defined as a client leaving the hostel to move into more settled accommodation in a planned way, through engagement with support and services. Each client receives support from a dedicated officer, who develops a support plan that is appropriate and meets a full range of client needs, which focuses on clients achieving certain outcomes and improving their independent living skills.
- 1.04 The Council requires DENS to fund and provide training and educational programmes for the clients accommodated in the hostel. DENS deliver training directly and in partnership with other providers in Dacorum. Individual training needs are agreed with clients during the support plan process and include back to work pathways, independent living skills, life skills, and tenancy sustainment.

- 1.05 There are further requirements for DENS to continue to support clients through outreach services once they have left the hostel, through the employment of outreach officers, who follow up case management after move-on, to prevent future tenancy failure.
- 1.06 Work had been started to procure a new contract, using an open tendering process, and a Prior Information Notice (PIN) was issued by the Council in November 2019. Expressions of interest were received from four organisations; DENS, St Mungo's, Hightown Housing, and Thames Reach. All provided details as to how they would be able to deliver the services and, at that stage, consideration was given to a hybrid model, whereby the Council and one of the organisations worked jointly to deliver the service. The Hybrid model was investigated further and it was considered that it would not derive any additional benefits beyond the service model currently being delivered and may introduce more operational and contractual risks, so this was subsequently discounted.
- 1.07 The expressions of interest to manage The Elms, all provided details of how each organisation would approach the operational management of the service. The internal project team did not consider that there were any new initiatives or alternative approaches to service delivery that would result in an improvement upon the existing DENS service, or which demonstrated any enhanced benefits to the client cohort. It should be noted that the PIN submissions are the preliminary part of the procurement exercise and that the opinions of the project group were based upon these initial submissions, which had not been fully developed by any of the interested providers.
- 1.08 The procurement of a new contract was then suspended due to the pandemic and the need to focus on operational delivery due to the rise in homeless numbers. The original five-year contract was extended by 2 months to June 2020 and authority was granted by Cabinet, on 23rd June 2020, to award a concession contract for a one-year period, with the option of extending for a further year, to June 2022 to provide resilience during the Pandemic and in the recovery phase.

2.0 DENS Performance

- 2.01 It is acknowledged, both by officers and members, that DENS provide a valuable service to Dacorum's homeless residents and that this extends beyond the provision of accommodation and support at the Elms. DENS has a strong brand identity as an effective homeless charity in the Borough and is able to leverage funding and other donations from individuals and businesses, and to invest in both the Elms and other community initiatives. DENS has been very successful in securing assistance with food donations and catering support to enable much of the food at the Elms to be heavily subsidised. It also has an established volunteer base, which is able to support some areas of delivery and it has a number of social enterprise opportunities, which assist their clients to develop skills and experience to secure employment.
- 2.02 DENS performance is assessed by way of monthly operational meetings, conducted with the Hostel Manager and the Council's Independent Reviewing & Project Lead Officer and quarterly Core Group meetings, led by the Group Manager, Strategic Housing. The Core Group meeting covers a number of areas against the contract including, building management and repairs, health & safety, staffing and delivery against the Key Performance Indicators, which

are outlined in Table 1 below. The performance report is contained in Appendix A and the Continual Improvement Review for the year ending September 2020, is contained in Appendix B.

2.03 In addition, quarterly joint monitoring meetings are held with Hertfordshire County Council, to monitor delivery against the Housing Related Support, commissioned contracts. The partnership relationship is strong and well managed, there have been no contract non-conformities or major delivery issues. Any minor issues arising are addressed through close joint working.

Table 1

Key Performance Indicator	Aspiration service level	Expected service level	Agreed service tolerance	Critical service level
Occupancy rate	96%	90%	70 - 89%	<70%
Percentage of rooms ready-to-re-let within 24 hours of becoming vacant	100%	90%	80 - 89%	<79%
Arrears as percentage of income	1.5%	2.5%	2.51 - 4%	>4%
Percentage of clients successfully moved-on (defined later in this document)	95%	80%	70-79%	<69
Percentage of clients receiving an initial assessment within 24 hours	100%	90%	80 - 89%	<79%
Percentage of clients receiving an initial support plan within 5 days	100%	100%	95%	<90%
Number of clients involved in service scrutiny (defined later in this document)	Minimum 5 people	Minimum 3 people	1 - 2 people	0 people
Number of clients accessing crash pad facilities	0	0	0	1 or more
Percentage of support plans up to date	100%	90%	80 - 89%	<79%

2.04 The impact of the pandemic increased the number of homeless presentations, due to the restrictions imposed through the Health Protection (Coronavirus Restrictions) (England) Regulations 2020, and the “Everyone in” requirement. At the height of the first wave, the number of homeless households increased from 95 to 160, and this figure included a large cohort of single individuals who were accommodated at the Elms hostel.

2.05 DENS worked closely with Public Health colleagues to make sure that all measures that were implemented at the Elms complied with the guidance and reduced the risk of virus transmission as far as possible. This involved a higher degree of control on the movement of residents, especially during the most restrictive lockdown period, and additional cleaning regimes and increased service provision to ensure that any residents who did test positive could self-

isolate safely and that any necessary medical supplies and food could be delivered to the individuals' rooms.

- 2.06 In summary, there are a number of benefits of maintaining an ongoing relationship with DENS, who aside from managing the Elms facility, provide a number of wider community initiatives including a food bank, a day centre services for homeless clients, access to move on accommodation, a community outreach day programme including a skills and training hub. DENS have both a very strong level of community support, including a large bank of volunteers.

3.0 Contract Options Appraisal

- 3.01 The impact of the pandemic and a desire to ensure continuity of service delivery during this challenging period, resulted in the initial two months extension to the original five-year contract, to conclude in June 2020. Subsequently authority was granted by Cabinet, on 23rd June 2020, to award a concession contract for a one-year period, with the option of extending for a further year, to June 2022 to provide resilience during the Pandemic and in the recovery phase.
- 3.02 A further review of the options for either procuring a new contract, or extending the concession contract, has been undertaken and the relative merits of each considered. The review has taken into account the marked increase in complex cases presenting as homeless. Such cases can have more than one negative factor influencing their ability to access and retain stable accommodation. These cases include those who have dual diagnosis, with alcohol and/or drug dependency combined with a mental health diagnosis, or those who due to Adverse Childhood experiences or who have been in care, which often impacts the ability to sustain tenancies. Additionally, the numbers fleeing domestic abuse are increasing.
- 3.03 At this time, HCC is also undertaking a review of temporary accommodation countywide, as part of the Hertfordshire Growth Board Development Programme. The review is considering opportunities to address the disproportionate availability of accommodation in relation to demand and to improve collaboration across districts. One option that is being considered, as part of this review, is to centrally control and procure services across the County. If this option is adopted, it will be necessary to consider the impact of this on any future contracts for the management of the Elms, as the Housing Related Support funding (HRS), currently £115K may be reduced, or allocated based upon differing criteria. Housing related support (HRS) services for adults with complex needs have been commissioned by Hertfordshire County Council since 2003, with the aim of developing or sustaining an individual's capacity to live independently in accommodation. The uncertainty that this would introduce into a procurement process would make it difficult for any potential bidders to assess the impact on the delivery of the service and therefore is likely to impact the costs in the tender returns. Therefore, it is considered prudent to ensure that the review is concluded, and the recommendations implemented, before a new contract is procured.
- 3.04 The Government has produced a Green Paper: Transforming Public Procurement and the consultation period closed on 10th March 2021. It is anticipated that this will result in some changes to future public procurement activities. Any anticipated changes would not impact the timeline for the current recommendations, but financial thresholds may be subject to revision and any

future procurement of the Elms contract will need to be in line with resulting changes to the Public Procurement Regulations.

- 3.05 The option to procure a new contract to deliver the management and operation of the Elms has been considered as there are a number of benefits to undertaking an open market tendering exercise, to provide a full assessment of service provision and costs. The ongoing uncertainty, as a result of the Covid-19 pandemic and the recent ending of the moratorium on evictions, is likely to continue with a period of significant increased demand on both the Elms service and the Council's homeless prevention team. It is crucial to provide stability and resilience, which could be undermined by diverting resource into a tender exercise. Additionally, the cladding on the hostel will need to be replaced imminently and DENS is aware of this and has agreed to work closely with the Council to ensure service provision can be maintained throughout the delivery of the project.
- 3.06 In summary, an extension of the period for the concessionary contract would enable the HCC review to conclude and the impact of the proposed changes to public procurement to be understood and would also provide a further period of much-needed stability and resilience for the both the current service provider and the Council.
- 3.07 Under the criteria set out in the Concession Contracts Regulations 2016, an option for the concessionary contract to be extended for a further two years on a 1+1 basis could be awarded to DENS, as the concessionary contract would transfer the operating risk to DENS. Should the recommendation to extend the concessionary contract with DENS be agreed, the total value of this concessionary contract should not exceed the £4.733M threshold, as outlined in the Concessionary Contract Regulations 2016.
- 3.08 It is proposed that the concessionary contract would be extended to June 2024, which would provide sufficient time for the recovery from the pandemic, conclusion of the HCC review, for the cladding works to be completed and the impact of any material changes to public procurement regulations to be understood. This would enable the retendering exercise will be reflective of the future delivery of the service and any improvements upon that which DENS currently provide. This approach will also provide the opportunity to consider the performance measures used on this, and other concessionary contracts that the Council awards, to make sure they deliver on the stated objectives and derive the maximum benefit to the community.

4.0 Financial Considerations

- 4.01 DENS receives the income from the rental licence fees, housing benefit and HRS grant income and some ancillary income from a van lease rebate, service charges, (including laundry services), and, in 2020, additional grant to address the impact of the Covid-19. The Council does not pay DENS for managing these services, as the contract was designed to have sufficient income from the rents and other income to cover the costs of the service provision.
- 4.02 Under the existing Elms contract arrangements, the Council recovers the costs of utilities and day to day repairs, but there is no provision for dilapidations or for ongoing management of cyclical repairs and maintenance, which the Council oversees. The Council also retains the insuring liability.

- 4.03 The Elms operation, managed by DENS, is a vital service, which underpins the Council's statutory response in preventing homelessness. Without the ability to prevent, or relieve, homelessness into a facility like the Elms, there would be significant additional pressures on the Council's Strategic Housing Service, which manages the homeless prevention response. Each household placed into the Council's own temporary accommodation, costs on average £67 per case in respect of administration costs. In addition, support provided at 1 hour each week per client, equates to an average cost of £1477.52 per client, if delivered by our internal Tenancy Sustainment team.
- 4.04 Where a client's homelessness cannot be relieved by placement into the Elms, it is necessary for the Strategic Housing Service to take a homelessness application, each application costs the Council on average £730 for non-complex case, rising to £1100 for complex casework and intervention, which further highlights the benefits of the existing contract with DENS for the management of the Elms to alleviate additional costs, which would otherwise be borne directly by the Council.
- 4.05 Should the recommendation to extend the concessionary contract with DENS be agreed, the total value of this concessionary contract with DENS will need to ensure that it does not exceed the £4.733M threshold as outlined in the Concessionary Contract Regulations 2016. An extension of the concessionary contract of a further two years is within this threshold value. The threshold limit of £4.733m is based on the turnover of the contract. In the case of the Elms service, this is the projected income received by DENS for the provision of housing and support services. As current income is projected to exceed expenditure, the Council receives a proportion of the annual surplus received by DENS towards the costs of cyclical maintenance.

5.0 **Recommendation**

- 5.01 It is recommended that the Council extends the concessionary contract by a further two years, on the basis of a 1 plus 1 year extension, subject to ongoing satisfactory performance.
- 5.02 It is recommended that the additional years' extensions are linked to performance which should be at, or above, target and that this is reviewed on an annual basis to ensure services are delivered in line with the contract.

APPENDIX A PERFORMANCE REPORT

	Client Data	Number	Definition and notes
1	Total no. of clients accommodated (excl crash pad)	54	Number of residents who have stayed at least one night during the reporting month
2	Total no. of clients accommodated in the crash pad	13	Number of people who have stayed at least one night during the reporting month.
3	No. of clients referred by DBC	1	figure represents number of new TA clients referred during the reporting month only who took up places at The Elms
4	No. of clients referred by other agencies	2	Figure represents number of new clients referred during the reporting month only who took up places at The Elms.
5	No. of self-referrals	8	figure represents number of new clients referred during the reporting month only who took up places at The Elms
6	No. of occasions that SWEP provisions are activated	20	refers to any period of one or more nights where SWEP beds are made available
7	Total no. of nights that SWEP provision is available	20	
8	No. of unilateral support plans	0	Refers to any support plan created in the month by the key worker without the involvement of the client.
9	No. and length of exclusions	0	
10	No. of people refused access	0	
11	No. of evictions	5	1 for ASB 3 due to breaches of Covid rules 1 due to prison recall
12	No. of rooms ready to re-let within 24 hours/ over 24 hours	1	Additional cleaning required due to Covid 19 protocols

13	No of clients receiving their initial assessment within 24 hours		All new clients received their initial assessment within 24 hours of admission
14	No of repairs logged	9	Repairs to showers, doors, windows, Fire doors inspected.
15	No and type of H&S incidents	0	
16	Any relevant Force Majeure Events or Relief Events		
17	Number and type of incidents of conflict and behavioural management;		5 related to the cases outlined in item 11
18	No of CCTV requests	4	Viewed in relation to evictions/ASB
19	No. of complaints	0	
20	Average Length of stays	93 days	
	General Update		Clients began engaging in our new "Life Skills" programme which assists clients with cooking, cleaning, washing clothes, computer skills and training which empowers them for when they leave The Elms. Clients attended in house TST, the feedback was very positive and found the courses very interesting



The Elms

Continual Improvement Review

September 2020

This report covers the period from September 2019 - September 2020.

1 Coronavirus Impact and Response:

By mid-March 2020, Coronavirus had begun to impact on the operational service The Elms Working with the Director of Public Health, Hertfordshire County Council, DBC and following government guidance, a COVID plan was quickly put in place, to ensure the Elms could remain open, in a safe and COVID secure manner. This was modified on March 23rd, when 'lock-down' commenced, and then constantly revised in line with changes government guidance.

Summary of the Elms COVID Response plan

- 6 Isolation rooms set up for clients, each room has a microwave and kettle.
- All new referrals require to self-isolate in an isolation room for 7 days; any resident reporting or displaying symptoms to self -isolate
- Meals are bought to the room by staff and let outside the room, in line with social distancing
- Mental health and well-being of our clients is a priority, and therefore regular contact maintained with those in isolation through phone and Face-time
- All residents to wash their hand for 20 second before being given access.
- Additional 8 hours cleaning a day.
- As of Tuesday 24th March, all residents were advised they were to stay within The Elms and can only go out for 30 minutes unless it is for urgent medical appointment or agreed with Management. This was revised with lifting of government restrictions
- The police will be contacted if residents leave for non-essential reasons.
- Residents will be warned if they leave for a period of time for non- essential reasons, and if they continue to do this, they will be evicted. DBC would be notified
- Rota implemented for meals times to ensure social distancing.
- Crash-pad: as of 26th March and in accordance with Government guidance, individual could no longer share the crash-pad space; each attendee must have their own room. This reduced capacity to just 3 beds.



- All non-operational staff to work from home, until government guidance changed.
- During this period, DENS worked with DBC to ensure all rough sleepers were found alternative accommodation.

The period from end of March until mid-July, when the majority of the restrictions were lifted, posed very challenging time for both residents and staff. Residents could not access the full range of drug and alcohol and mental health support services as previous. A number of clients went through drug and alcohol withdraw whilst in isolation; with staff doing all they can to support them.

A number of residents made the decision to leave the Elms and stay with family and friends during lock down.

The Elms did remain fully operational during this time. We continue to monitor the COVID situation locally, and have COVID continuity plans in place that will be implemented if forte restrictions are applied locally or nationally.

2 Annual Equality Impact Assessment

DENS is committed to promoting equality and diversity within its services. The Council and DENS continue to work closely together to ensure that the service provided is joined up and clients are provided with appropriate advice and assessment to secure accommodation.

Where DENS is not able to provide a service which may be due to the immigration status of the client or health or safety restrictions, which can relate to previous offending behaviour of the client, DENS works closely with the Council to ensure the client receives appropriate advice and intervention to prevent street homelessness.

DENS will make adjustments to service provision and provide specialist individual support to uphold diversity and equality principles. The Elms has two disabled accessed rooms, these rooms have bene used throughout the year by residents with mobility issues.

The fire evacuation procedure to evacuate any resident with mobility or sensory issues was reviewed and revised this year by Black and White Fire Services.

It is mandatory for all DENS staff to complete Disability Awareness Training within one year of commencing employment and to attend as refresher course every 3 years.

3 Performance and Service Provision

DENS strives to constantly improve the service we provide for all our service users.

KPI's

	2019	2020
Occupation Rate	99%	99%
Percentage Of Rooms available within 24 hours	100%	100%
Personal contribution arrears	11%	7.7%
Positive Move on rate	58%	48%
Percentage of support plans up to date	100%	100%
Average Stay	113 Days	89 days

Move Ons

Where residents move to:

	2019	2020
DENS Move On	25%	31%
Social Housing	38%	31%
Private Rent	3%	2%
Friends/Family	23%	30%
Other	2%	6%

Key Points:

- Average Length of stay: this had decreased significantly in 12 months. This is due to several factors;
 - Greater number of Move On clients moving into alternative accommodation, freeing up rooms in these properties

- Significant increase in residents moving in with family and friends. During COVID lock-down, a number of residents moved in with family or friends.
- Decrease in positive move on rate; this is likely to be due to high number of evictions or breach of COVID protocols.

Evictions

Reasons for Eviction

	2018/19	2019/20
Drug & Alcohol	29.5%	18%
Personal Contribution Arrears	39.5%	18%
ASB	31%	16%
Prison	Not recorded	6%
Abandonment	Not recorded	13%
Breaches of COVID protocol	NA	29%

- Breaching COVID protocols was the most prevalent reason for evictions. This was, in the main during ‘lock-down’ when residents could only leave the Elms for very short period of time in line with government guidance.
- Failure to pay personal contributions has decrease significantly. Residents on Universal Credit are now reminded to pay their contributions on the day they receive their UC; all residents on benefits also received an increase in their benefit amount and therefore have more income.
- ASB had decreased significantly: due to more robust management of resident’s challenging behaviour; better use of the ‘warnings’ system and residents being more aware of the implications of anti-social behaviour.

Re-Settlement

For Elms residents moving directly into either council or social housing, DENS Resettlement Team provides up to 12 months support to manage the transition from hostel living into more independent accommodation.



This service is fundamental to reducing the 'revolving door' syndrome that happen to so many clients who leave a hostel and move into social or council housing with limited support. This will often result in person not being able to cope, losing their tenancy and ending up either back in the hostel or homeless.

Whilst face to face to face meetings were put on put on hold during lock-down, support was maintained through telephone calls, FaceTime and WhatsApp. During this 12 month period, 73 clients were supported, and all have maintained their tenancy.

Crash-pad

Demand for the crash-pad remained busy. During this period, 57 individuals have accessed the crash-pad.

As stated previously prior to COVID, we could accommodate up to 12 people each night in the crash-pad; however this had now reduced to 3. This had led to referrals being turned away almost every night, and a decrease in the annual number of those accessing the crash-pad.

Cold Weather Provision

With funding from DBC, from the 24th November 2019 until the 23rd March 2020 (when lock down came in), we were able to extend the Cold Weather Provision, which included;

- Day centre open 5 nights a week and Saturday during the day, for any person who had no accommodation. They could use all the Day Centre facilities (shower, laundry, access to clothes etc.), and on week nights, transport was provided to the Elms.
- Elms - crash-pad - available to anyone who otherwise would have nowhere else stay. Anyone accessing the crash-pad would meet either with a DENS Key-worker or DBC Housing officer the following morning to work with them to find more appropriate accommodation
- During this period a total of 55 individual accessed the crash-pad

Training and Development for clients

All residents have a support plan that they develop and review with their key worker. The support plan includes training and development. Where possible Elms key workers will link residents into locally based training and support providers, such as Southill Centre.



In June 2020 DENS Board agreed to use un-restricted income to fund the post of ETE (Education, Training and Employment) Co-ordinator. The post holder will work across DENS services to support clients to develop and access pathways to education, training and employment. The ETE Co-ordinator will work closely with key-workers and the DENS Social Enterprise Team.

The recruitment of the post has been delayed due to COVID, however we expect the post-holder to be in place by the December 2020.

4 Social Enterprise

The overall aims of the social enterprise programme are short term to provide DENS clients as well as vulnerable adults in the community with a supportive environment to develop pre-employability and work skills; medium term to provide an additional income source for DENS that can be used to further develop our social enterprise and training programme.

Three programmes were initially piloted to ascertain which would be the most feasible long term based on participation and engagement rates; potential for clients to develop employability skills and medium term income potential. During this year, it was agreed to focus on the Bike project, and the Catering project.

Bike project: The bike project has really developed this year. Participants can attend 3 days a week and learn a range of skills including bike repair and maintenance, customer service, as well as team work, communication skills and acceptable behaviour in the work-place.

14 current or previous residents have participated in the project. All participants involved in repairing bikes, get to keep a bike for personal use. Bikes have also been provided for several residents of the Elms to use to get to work.

Catering project: The Catering project was just starting to pick up bookings when COVID hit; resulting in bookings being cancelled and events postponed. The project has catered for 4 small events, with ex-residents from the Elms (who are now in Move On), participating in all.

The team does have a number of bookings scheduled from spring 2021 onwards, COVID dependent.



5 Partnership Working

Partnership working is key to the success of DENS, not only at The Elms, but organisationally. This includes working in partnership with DBC, as well as other statutory and third sector organisations.

- DENS are active members of the Homelessness Forum and DENS CEO is the vice-chair
- A Senior Manager from DENS also attends JAG, and the PCC Rehabilitation of Offenders sub-group and Early Intervention sub-group.
- ELMs Manager is a member of HART

The Elms work closely with a number of third sector and public sector organisations, including Drug-link, Southill Centre, HYH, CGL, and Hightown Housing.

Prior to COVID restrictions, Alcoholics Anonymous, Narcotics Anonymous, Marijuana and Cocaine Anonymous all hold weekly meetings at the Elms.

6 Customer Feedback and Quality Assurance

Residents meetings are held monthly and the times of these are advertised widely within the Elms. There is also a suggestion box at the Elms. Quarterly feedback surveys are undertaken.

In September 2020 DENS was awarded the nationally recognised Trusted Charity Mark (formerly the PQASSO Quality Mark). The Trusted Charity Mark is externally verified and addresses all the essential areas necessary for the effective management and governance of a charity.

7 Challenges

COVID: Like all, we do not know what is likely to happen with the pandemic. We have a robust COVID contingency plan in place that can be implemented immediately if there is a significant increase in cases in the Dacorum area, and/or more stringent restrictions are implemented.

Increase in Demand: Year on year, there has been an increase in demand for the Elms. As the full financial impact of COVID takes its toll on the community, we do expect to see an increase in demand for all DENS services,



including The Elms. We are currently working with DBC Housing Team in regard to the development of alternative temporary housing options.

Recruitment of Key-workers: We have found it difficult to recruit to experienced and committed individuals to this post. This is due to a combination of factors including currently fairly low unemployment rates in the area, close proximity to London and therefore competing with roles offering inner London weighting and the post involving shift work. We have reviewed our recruitment process, as well as the remuneration packages and are confident this will make a difference

8 Planned Improvements for the Next Year

Additional Stage 2 Accommodation. DENS had identified alternative accommodation for those residents who are ready to move on from The Elms, but still require more support that is provided within our Re-settlement and Move on Services. We are currently in discussion with DBC Housing Team in regard to this.

We are also aiming to purchase our first property for Move On service; at present DENS Move On properties are all leased from either the Council or private landlords. Owning our own properties will give us far more flexibility in terms of the service we can offer. We will be investigating the feasibility of providing long term supported accommodation for those who require far greater support in the community.

Social Enterprise: We have recently been awarded a grant for Homeless link to invest in the development of the Social Enterprise programme. The funding will be utilised to develop more formalised training pathways for participants of the programme and the development of the catering arm.

ETE co-ordinator: The ETE will be recruited by December 2020, and will work across the served to support DENS clients into education, training and employment.

Wendy Lewington
Chief Executive

Sean Fitzgerald
Head of Accommodation Services

9th October 2020







Report for:	Cabinet
Date of meeting:	27 th July 2021
Part:	1
If Part II, reason:	

Title of report:	Syrian Refugee Resettlement Program
Contact:	Margaret Griffiths, Portfolio Holder Housing Mandy Peters – Team Leader Tenancy Sustainment Team
Purpose of report:	To update Cabinet on the Refugee Families resettled in Dacorum and to consider their longer-term housing options, once Indefinite Leave to Remain (ILR) is obtained
Recommendations	<ol style="list-style-type: none"> 1. That, at the end of the 5-year flexible tenancy, each family within the Syrian Vulnerable Persons Resettlement Scheme is offered a secure Council tenancy, dependant on a successful application of Indefinite Leave to Remain. 2. That Cabinet delegates authority to the Assistant Director of Housing, to agree suitable arrangements for up to four families from Afghanistan to be accommodated under the Locally Employed Staff scheme, for an initial period of one year.
Corporate Objectives:	<p>Building Strong & Vibrant Communities</p> <p>Providing Good Quality Affordable Homes, in particularly for those most in need.</p>
Implications:	<u>Financial</u>
'Value For Money Implications'	<p>The current scheme provides sufficient grant to support the families. If Cabinet approves the recommendation, then a regular tenancy will be created, the income from which will cover the costs.</p> <p><u>Value for Money</u></p> <p>The Council took the approach of housing the refugee</p>

	households in its own stock which allowed the grant income to cover support requirements.
Risk Implications	There are risks to the wellbeing of the resettled individuals if they are required to relocate. Increased costs associated with alternative accommodation options. Reputational risk around the treatment of vulnerable persons.
Community Impact Assessment	The Community Impact Assessment is contained in Appendix A
Health And Safety Implications	The existing policies relating to the management of the health and safety will apply, so there are no additional implications.
Monitoring Officer/S.151 Officer Comments	Deputy Monitoring Officer: The proposed recommendation would provide Syrian Refugee families further certainty regarding their accommodation and confirms the Council's ongoing commitment to the Syrian Vulnerable Persons Resettlement Scheme. Deputy S.151 Officer The proposed recommendation to transfer these families to secure Council tenancies will have no financial impact.
Consultees:	Mark Gaynor, Corporate Director of Housing & Regeneration Fiona Williamson – Assistant Director Housing Natasha Beresford – Group Manager Strategic Housing Oliver Jackson – Group Manager Tenants & Leaseholders Senior Leadership Team
Background papers:	
Glossary of acronyms and any other abbreviations used in this report:	DBC – Dacorum Borough Council LHA – Local Housing Allowance DHP – Discretionary Housing Payment SVPRS – Syrian Vulnerable Persons Resettlement Scheme LA – Local Authority ESOL – English as a Second Language GP – General Practitioner LAs – Local Authorities CMT – Corporate Management Team ILR – Indefinite Leave to Remain LES – Locally Employed Staff

1. Introduction and Executive Summary

- 1.1 The Government advised that the UK would commit to resettling 20,000 Syrian Refugees over a period of 5 years between 2015 and 2020. On the 30th September 2015, the Council carried a motion supporting the Syrian Vulnerable Persons Resettlement Scheme (SVPRS) and, along with 8 other Hertfordshire districts, Dacorum agreed to welcome 10 refugee families over the course of 5 years, with the first family arriving in September 2016. Appendix 1 details the household make up and the support still required by these families. The plan was to resettle 2 families per year. We have yet to welcome our final family, as the scheme is currently on hold due to the Covid19 pandemic.
- 1.2 There was an option to join other local authorities (LAs) in Hertfordshire to fund the Refugee Council to provide support to the families, however, with its dedicated resources within the Welfare and Sustainment Team, Dacorum Borough Council (DBC) has provided the support directly with the help of our partners in the community and voluntary/faith sector. This has allowed the Council to invest more of the grant funding in the provision of ESOL, (English as a second language), and support to assist the families to integrate. The Home Office guidance gave clear details about the use of the annual funding.

2. Initial Reception Arrangements

- 2.1 Operationally, the responsibility for the resettlement of the refugees sits with the Welfare and Sustainment Team. The Welfare and Sustainment Officer's role is to ensure that Refugees are provided with a dedicated source of advice and support, to provide assistance with registering for benefits and services, and signposting to other advice and information.
- 2.2 Examples of this support includes: Registering with local schools, English language and literacy classes for adults, registering with a local GP, and other healthcare providers in line with identified medical needs, advice around, and referral to, appropriate mental health services and to specialist services for victims of torture as appropriate.
- 2.3 Additionally, the officers provide assistance with access to employment. Bespoke support plans are developed for each family to document and monitor progress and to facilitate their orientation into their new home and area. The team ensures that interpreting services are available and has built up a trusted team in partnership with Hertfordshire's Interpreting service.

3. Provision of Accommodation

- 3.1 An integral part of the resettlement process is the provision of accommodation. The property offered must be available for the arriving Refugees, must meet local authority standards and must be affordable and sustainable.
- 3.2 For this reason, the Council opted to use its own housing stock rather than source accommodation in the private sector. Primarily, consideration was given to the lack of affordable housing in the area, the management of the accommodation, the quality and security of the property and choice of area to place the families. Careful consideration was also given to the location and suitability of properties for families with young school aged children.

4. Current Tenancy Position

- 4.1 With the families arriving, and receiving humanitarian protection visas, it was deemed appropriate to initially provide them with a license rather than a flexible tenancy. With the change to Refugee Status, and following a consultation with the legal team, it was recommended that each existing, and future family, should be given a flexible tenancy.
- 4.2 The flexible tenancies provided each household with more security and rents were charged at normal formula rent, rather than the higher Temporary Accommodation licence levels. In line with the Tenancy Strategy, the minimum term offered by the Council was 5 years so a number of the families have tenancies that are due expire in May 2024. Additionally, due to the ages of two of the households, they have been allocated supported housing properties, which are in lower demand and therefore have a secure council tenancy.
- 4.3 The original report, outlining the various options for housing and support, was presented to CMT and Cabinet in 2015, and anticipated that the requirement would be for a 5-year period, as it was hoped that the families may, in the future, be able to return to Syria. For this reason, the report did not fully consider the option of these families remaining in the UK and their ongoing housing situation after the 5-year period.
- 4.4 The crisis in Syria has continued to escalate with a huge number of Syrians still fleeing homes and villages because of outbreaks of violence. The change to Refugee status, for all the families settled in Dacorum, means that within a month of their 5-year anniversary of arriving in this country, they will either have to apply for Indefinite Leave to Remain or lose their status and along with it any right to healthcare, welfare benefits and support.

5. Alternative Housing Options

- 5.1 An alternative to remaining in DBC housing stock is that families could be supported to move into the private rented sector. Unfortunately, there is a considerable shortage of affordable private homes at the moment, especially where the rent levels would be below the Local Housing Allowance (LHA). Another alternative would be for families to move to cheaper areas away from Dacorum but they would be removed from their existing support networks and the connections they have made in the local area.
- 5.2 The Council's Allocations Policy is currently under review and consultation is underway on the option to reduce the local connection to 5 years in line with neighbouring authorities. With the Indefinite Leave to Remain, a local connection of over 5 years as well as the vulnerabilities and health issues that a number of the families have, means that it would be likely that the families would qualify for points on the housing register and receive a social housing offer.
- 5.3 Should the Council make the decision to terminate their tenancies at the end of the 5-year period, the families would be made unintentionally homeless and would then require intervention from the triage and homeless prevention teams, at a time when they are already under considerable pressure.

- 5.4 A number of the Hertfordshire Local Authorities have used private properties to house families they have resettled through the Syrian Vulnerable Persons Resettlement Scheme (SVPRS). All of these homes have rent levels higher than the LHA and this has caused a considerable financial burden through either, regular applications for Discretionary Housing Payment to top up the housing costs received through Housing Benefit or Universal Credit, or through the Local Authority paying for the top up amount from the funding received from the Home Office.
- 5.5 There is still a lot of media interest in refugees at home and abroad and it remains in local residents' interest to understand what the Council has done in relation to the SVPRS scheme and other schemes, including resettling unaccompanied minors. The Council has delivered an effective and supportive scheme in relation to accepting the 10 families over a 5-year period in conjunction with other LAs.
- 5.6 The Council has recently considered a request from the Home Office to accommodate families of Afghanistan Locally Employed Staff, who assisted with interpreting for the military personnel based in the country. It is considered that these families will be at high risk of reprisals in Afghanistan now that troops are withdrawing from the region. The Council is investigating the option of taking a maximum of four families through this scheme, with the intention of providing a similar type of tenancy, but initially for a period of one year, in line with the program. The exact number of families will be determined based upon capacity and resourcing level that would be required to assist with more complex family make-ups. This would result in a maximum of 14 vulnerable refugee households being accommodated in Dacorum.
- 5.7 Currently the Council has declined to consider Dacorum as an area for resettlement of a wider refugee cohort, on the basis that it has already accommodated a number of families, whereas other districts have declined to take part in either the SVPRS or the Afghan Locally employed staff (LES) scheme.

6. Conclusion

- 6.1 Most of the families have integrated and settled well into the community. The decision to use Council properties was one that provided the Council control over the location of the home, it reduced the cost to the families, to the Council and the public purse, given the higher rent levels in the private sector. This affordability of accommodation has led to some families finding employment and building safe secure homes within their communities.
- 6.2 It is considered that uprooting and requiring these families to move house would have a significant impact on their wellbeing. Properties were selected for these families based on proximity to local services, access to places of worship, schools and health services and in areas where it was felt these families would be able to integrate into local communities. The children are settled and doing well at school, have made friends and met other families locally and the families now feel comfortable in their surroundings and have invested in their homes and gardens. We have had no incidents of hate crime or concerns from residents and have received no complaints about the resettling of these families.

6.3 Requesting families to move, at the end of their 5-year flexible tenancies, could lead to a requirement to offer them housing through the allocations policy or the Council's homeless responsibilities and could significantly disrupt the support networks and positive steps taken by these families. This scheme has received very little negative reaction from residents and currently the Council has confirmed that these 10 SVPRS households and the 4 Afghan Locally Employed staff and their families will be the only resettled families going forward.

7. Recommendations

7.1 The first recommendation of this report is that, at the end of their 5-year flexible tenancy, each family within the Syrian Vulnerable Persons Resettlement Scheme is offered a secure Council tenancy dependant on a successful application of Indefinite Leave to Remain.

7.2 The second recommendation is to delegate approval for the settlement of four families from Afghanistan, to support the Locally Employed Staff Scheme, to the Assistant Director of Housing.

Dacorum BC Community Impact Assessment (CIA) Template

Policy / service / decision

To offer secure tenancies to families in the Syrian Refugee resettlement programme once indefinite leave to remain has been confirmed.

Description of what is being impact assessed

What are the aims of the service, proposal, project? What outcomes do you want to achieve? What are the reasons for the proposal or change? Do you need to reference/consider any related projects?

Stakeholders; Who will be affected? Which protected characteristics is it most relevant to? Consider the public, service users, partners, staff, Members, etc

It is advisable to involve at least one colleague in the preparation of the assessment, dependent on likely level of impact

The aim of the project is to enable Syrian refugees to be remain housed within Dacorum under the resettlement programme to integrate into the local community. Ongoing Support will be provided by the Tenancy Sustainment team who will link with a number of different agencies to provide this support.

The families housed under this project will be impacted positively due to the security of tenure that will be offered, allowing them to further develop links with the local community and continue to contribute to the local area.

It is not felt that any protected groups will be impacted by this decision.

Evidence

What data/information have you used to assess how this policy/service/decision might impact on protected groups?

(include relevant national/local data, research, monitoring information, service user feedback, complaints, audits, consultations, CIAs from other projects or other local authorities, etc.). You should include such information in a proportionate manner to reflect the level of impact of the policy/service/decision.

The Home office and east of England local government association have liaised with local authorities within Hertfordshire to request support to house families under this scheme. They have provided information relating to the risk of remaining within

Syria. There has been no information provided to suggest there will be a negative impact upon protected groups, moreover this project will support vulnerable people included within this project.

Who have you consulted with to assess possible impact on protected groups? *If you have not consulted other people, please explain why? You should include such information in a proportionate manner to reflect the level of impact of the policy/service/decision.*

Consultation has not been conducted in relation to the Syrian Refugee resettlement programme. However views of members have been sought and Dacorum are part of a wider initiative to support this vulnerable group. It is not deemed that this programme will have a negative impact on any protected groups.

Analysis of impact on protected groups (and others)

The Public Sector Equality Duty requires Dacorum BC to eliminate discrimination, advance equality of opportunity and foster good relations with protected groups. Consider how this policy/service/decision will achieve these aims. Using the table below, detail what considerations and potential impacts against each of these using the evidence that you have collated and your own understanding. Based on this information, make an assessment of the likely outcome, **before** you have implemented any mitigation.

- The PCs of Marriage and Civil Partnership and Pregnancy and Maternity should be added if their inclusion is relevant for impact assessment.
- Use “insert below” menu layout option to insert extra rows where relevant (e.g. extra rows for different impairments within Disability).

Summary of impact		Negative impact / outcome	Neutral impact / outcome	Positive impact / outcome
Protected group	<i>What do you know? What do people tell you? Summary of data and feedback about service users and the wider community/public. Who uses / will use the service? Who doesn't / can't and why? Feedback/complaints?</i>			
Age	Families housed under this project will span all age ranges and appropriate housing and support will be provided to meet their needs.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disability (physical, intellectual, mental) <i>Refer to CIA Guidance Notes and Mental Illness & Learning Disability Guide</i>	Members of the families housed have recognised disabilities in relation to the trauma they have faced when fleeing. Counselling has been provided as part of this project and specific child support has been provided to support the transition and integration into the community.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Gender reassignment	Not relevant	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Race and ethnicity	This project specifically focuses on families fleeing Syria under the government Syrian Refugee resettlement programme, and therefore this offer of housing and support is limited to this group. However Dacorum Borough Council will work proactively with the the East of England Local government Association (EELGA) to consider other schemes to resettle refugees in the future.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Religion or belief	As above, this project specifically focuses on Syrian refugees a therefore the religion and beliefs of those families will be considered as part of the support that is provided.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sex	Not relevant	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sexual orientation	Not relevant	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Not protected characteristics but consider other factors, e.g. carers, veterans, homeless, low income, loneliness, rurality etc.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Negative impacts / outcomes action plan

Where you have ascertained that there will potentially be negative impacts / outcomes, you are required to mitigate the impact of these. Please detail below the actions that you intend to take.

Action taken/to be taken <i>(copy & paste the negative impact / outcome then detail action)</i>	Date	Person responsible	Action complete
	Select date		<input type="checkbox"/>
	Select date		<input type="checkbox"/>
	Select date		<input type="checkbox"/>
	Select date		<input type="checkbox"/>
	Select date		<input type="checkbox"/>
	Select date		<input type="checkbox"/>
	Select date		<input type="checkbox"/>
	Select date		<input type="checkbox"/>

If negative impacts / outcomes remain, please provide an explanation below.	
Completed by (all involved in CIA)	Mandy Peters & Oli Jackson
Date	8.7.21
Signed off by (<i>AD from different Directorate if being presented to CMT / Cabinet</i>)	Linda Roberts
Date	08/07/2021
Entered onto CIA database - date	
To be reviewed by (officer name)	
Review date	