



Strategic Planning & Environment

Overview & Scrutiny

Agenda

WEDNESDAY 6 MARCH 2024 AT 7.30 PM

Conference Room 2 - 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 Anderson
Councillor Birnie
Councillor Deacon (Vice-Chairman)
Councillor Gale
Councillor Hobson (Chairman)
Councillor Hobson
Councillor Mitchell

Councillor Patterson
Councillor Pringle
Councillor Riddick
Councillor Santamaria
Councillor Timmis
Councillor Walker
Councillor C Wyatt-Lowe

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

AGENDA

1. **DECISIONS AND ACTIONS** (Pages 3 - 9)
2. **APOLOGIES FOR ABSENCE**
To receive any apologies for absence.
3. **DECLARATIONS OF INTEREST**
To receive any declarations of interest.
4. **PUBLIC PARTICIPATION**
5. **CONSIDERATION OF ANY MATTER REFERRED TO THE COMMITTEE IN
RELATION TO CALL-IN**
6. **Q3 QUARTERLY BUDGET MONITORING REPORT** (Pages 10 - 16)
7. **Q3 PLANNING DEVELOPMENT AND REGENERATION REPORT** (Pages 17 - 23)

8. **Q3 NEIGHBOURHOOD SERVICES PERFORMANCE REPORT** (Pages 24 - 29)
9. **RE-ROUTING OF THE RIVER GADE**
Presentation to be given by the Environment Agency
10. **ALCOHOL RELATED PUBLIC SPACES PROTECTION ORDERS** (Pages 30 - 41)
11. **THE LOCAL PLAN REGULATION 18 FEEDBACK** (Pages 42 - 192)
12. **AFFORDABLE HOUSING SPD** (Pages 193 - 320)
13. **WORK PROGRAMME** (Pages 321 - 325)

Decisions and actions

Dacorum Borough Council

Strategic Planning and Environment Wednesday 7th February

Councillors: Cllr Patterson
Cllr Mitchell
Cllr Wyatt-Lowe
Cllr Riddick
Cllr Timmis
Cllr S Hobson
Cllr Walker
Cllr Deacon
Cllr C Hobson (Chair)

Also in attendance:
Cllr Bromham

Officers: (6)
James Doe – Strategic Director - Place
Stefania Horne – Strategic Director Neighbourhood Services

The meeting began at 20:00

1 MINUTES AND ACTIONS

The Minutes of the last meeting were agreed

Full discussion can be found in the video minutes

2 APOLOGIES FOR ABSENCE

There were apologies for absence from Cllrs Gale, Pringle, Santamaria, Birnie, Anderson, Wilkie and England

3 DECLARATIONS OF INTEREST

None

4 PUBLIC PARTICIPATION

None

5 CONSIDERATION OF ANY MATTER REFERRED TO THE COMMITTEE IN RELATION TO A CALL-IN

None

6 BUDGET REPORTS

The reports were heard during the Joint Budget presentation.

Full presentation can be found in the video minutes.

7 KPI

The reports were heard during the Joint presentation.

Full discussion can be found in the video minutes.

8 WORK PROGRAMME

Action: James to confirm who will be responsible for enforcing unauthorised use of the Nickey Line

Action: LFowell to add National Trust/ Natural England to the work programme

Action: Stefania to share the programme of Play park repairs & Replacements with the SPAE committee.


Action: Ian Ross to provide an update at the March meeting on the Playground refurbishment.

Full discussion can be found in the video minutes.

Strategic Planning & Environment OSC Action Points - Jan

4 th Oct	A response to members as to why there is an air quality monitor in Bennets End when there wasn't previously.	Emma Walker	01/11/23	DBC Zephyrs (Air Quality Monitors) not yet deployed – Northchurch (at the site of the current AQ Analyser), Durrants Hill Road and Queensway. Three HCC Zephyrs (Air Quality Monitors) and they are in Bennett's End Road (request from former PFH) Swing Gate Lane (request from Climate Change and Sustainability officer following request from the local school) and Lawn Lane (Air Quality Management Area).
4 th Oct	Link to Urban Capacity Study to be circulated to committee members.	Sara Whelan	04/10/23	Urban Capacity Study - Strategic Housing Land Availability Assessment - November 2020 (dacorum.gov.uk)
4 th Oct	Committee members to submit any topics for discussion as part of the work programme to the Chair.	Committee	Ongoing	This is a standing action
1 st Nov	To email wording to be included on page 7 of the previous minutes regarding JDoe's response to Cllr Deacon. (Cllr Gale)	Cllr Gale	02/11/23	Received, LF to update minutes - Completed
1 st Nov	To provide exact definition of highways trees to councillors.	IRoss	12/12/23	A highways tree, or roadside tree, is usually a tree located on a grass verge next to a road or with a pavement next to a road. The vast majority of roadside trees are now managed directly by Hertfordshire County Council, although there will be some occasions when roadside trees are managed directly by our tree team, for example if they are on housing land. If there are any enquiries about roadside trees, it is best to talk to HCC directly and the contacts are on our the webpages Report a tree problem (dacorum.gov.uk)
1 st Nov	To confirm the next play area identified for improvement or refurbishment as referred	CDempsey	12/12/23	To confirm the next play area identified for improvement or refurbishment as referred to on page 18 of the report. The following play areas form part of the capital programme

	to on page 18 of the report.			<p>Apsley Lock (HH) Durrants Lane (B) Warners End Upper Valley (HH) Flaunden (HH) Tower Hill (Chipperfield) (KL) Croft Meadow (Chipperfield) (KL) Woodhall Farm (HH) Miswell Lane (T)</p> <p>The following Parks are planned to commence in June 2024; Flaunden, Tower Hill, Croft Meadow and Woodhall Farm</p>
1 st Nov	To confirm with Committee if the Council is working with Butterfly Conservation on the chalk bank at Spring Fields.	IRoss	12/12/23	The main work was completed last year. The seeds grew this summer. Next spring we should see a dramatic improvement in density as more perennials start to grow. We are still working with local volunteers and the Butterfly Conservation Trust, who monitor the site on a regular basis.
1 st Nov	To provide update from Environment Agency regarding proposal on River Gade	IRoss	12/12/23	<p>The Environment Agency now have a fully funded scheme and are mobilising to deliver the proposed river re-routing as per the approved planning consent. The decision was issued on Friday 27 January 2023.</p> <p>DBC Officer representation</p> <p>Representatives of the Environment Agency have been requested to attend the SPAE committee on Wednesday 7 February to update committee members further.</p>
1 st Nov	To add inviting a member from the Environment Agency to a future meeting to provide an update on River Gade	LFowell		Completed
1 Nov	To confirm if the number of fly-tipping incidents have increased or	EWalker	12/12/23	<p>The total number of reported fly tips increased by 14% in comparison to last year's quarterly average.</p> <p>13th June</p>

	decreased			<p>To provide further information on fly-tipping categories</p> <p>E Walker</p> <p>Waste type (FlyCapture data)</p> <p>Animal carcass</p> <p>0</p> <p>Asbestos</p> <p>2</p> <p>Chemical drums, Oil or Fuel</p> <p>0</p> <p>Clinical waste</p> <p>0</p>
1 Nov	To provide quarterly figures for recycling rates over the past 3 years.	JMooteealoo	12/12/23	 Recycle Rates x 3 years.xlsx
1 Nov	To provide update on cost impact of extending green bin collection service	JMooteealoo	12/12/23	This would cost £29453 for one additional collection.
1 Nov	To provide update on issues with footfall counters	JDoe		Diane to provide information early 2024
1 Nov	To provide update on number of vacant retail	JDoe	06/12/23	<i>Please see the below response to an action from the Strategic Planning and Environment Overview and Scrutiny Committee meeting on 1st November regarding Commercial Occupancy. Members asked about occupancy of shops at the Council's</i>

	properties			<p><i>own neighbourhood centres in Dacorum. The data below refers to all commercial property, including neighbourhood shops and other commercial units such as small business premises.</i></p> <p><i>As at 31st October we have over 95.89 % occupancy in our commercial properties, and conversely 4.11% unoccupied, which in numerical terms is 25 properties void at that time.</i></p>
6 th Dec	John Mooteealoo to provide details on if there are savings by starting 2 week later in 2024 compared to 2023	JMooteealoo	20/12/23	<p>24/45 Season to start on 26 Feb 24 and to close on 6 Dec 24. Communication already sent out residents for 24/25 green waste season. To extend the Green Waste service for another cycle (2 weeks) to finish on 20 Dec 24 this would cost in the region of £35K per week, totalling £70K for the 2 week extension.</p> <p>24/45 Season to start on 26 Feb 24 and to close on 6 Dec 24. Communication already sent out residents for 24/25 green waste season. To extend the Green Waste service for another stand alone cycle (2 weeks) ie to start on to finish on 20 Jan 25 and close on 31 Jan 25 this would cost in the region of £70K + £2.5K additional agency training for the 2 week extension</p>
10 th Jan	Cllr Anderson said that he received an update by email. Affinity water to provide more information about if this is available to sign up too.	Affinity Water	17/01/24	<p>Following the Strategic Planning & Environment OSC meeting last Wednesday I have looked into Councillor Anderson's request regarding email updates from Affinity Water. Unfortunately, we do not provide email updates on water levels however we do provide information on our website which can be found here https://www.affinitywater.co.uk/our-water-resources. We also provide further details on each region which can be found here https://www.affinitywater.co.uk/my-water/water-resources.</p> <p>The Environmental Agency report weekly on rainfall and river flow which may also be a useful resource. These reports can be found here https://www.gov.uk/government/collections/water-situation-reports-for-england.</p>
10 th Jan	Mark Dickinson to send link to real time reporting	Affinity Water		<p>Please find attached a link to our website where you can find information on storm discharges</p> <p>https://www.thameswater.co.uk/about-us/performance/river-health/storm-discharge-and-event-duration-monitoring</p>

				on this page you will also find a link to the real time reporting Please feel free to get in touch with any further questions
10 th Jan	LFowell to look at how action can be published so the public can see them	LFowell	30/01/24	I have updated the actions with the information.
7 th Feb	James to confirm who will be responsible for enforcing unauthorised use of the Nickey Line	JDoe		JDoe confirmed he is working on this 27/02/24
7 th Feb	LFowell to add National Trust/ Natural England to the work programme	Lfowell	07/02/24	Completed
7 th Feb	Stefania to share the programme of Play park repairs & Replacements with the SPAE committee.	SHorne		Chased 27/02/24
7 th Feb	Ian Ross to provide an update at the March meeting on the Playground refurbishment	IRoss		Update to be given at March meeting.



Report for:	Strategic Planning and Environment Overview and Scrutiny Committee
Title of report:	Financial Performance Quarter 3 2023-24
Date:	6th March 2024
Report on behalf of:	Cllr Ron Tindall, Portfolio Holder for Corporate & Commercial Services
Part:	I
If Part II, reason:	N/A
Appendices:	Appendix A – General Fund Forecast Outturn Position Q3 2023-24 Appendix B – Projected Capital Outturn Q3 2023-24
Background papers:	None.
Glossary of acronyms and any other abbreviations used in this report:	GF – General Fund HRA – Housing Revenue Account

<p>Report Author</p> <p>Clare Dempsey, Financial Planning and Analysis Manager</p> <p>✉ 📞</p> <p>Clare.Dempsey@dacorum.gov.uk / 01442 228264 (ext. 2264)</p> <p>Responsible Officer</p> <p>Fiona Jump, Head of Financial Services</p> <p>✉ 📞</p> <p>Fiona.Jump@dacorum.gov.uk / 01442 228162 (ext. 2162)</p>	
Corporate Priorities	<p>A clean, safe and enjoyable environment</p> <p>Building strong and vibrant communities</p> <p>Ensuring economic growth and prosperity</p> <p>Providing good quality affordable homes, in particular for those most in need</p> <p>Ensuring efficient, effective and modern service delivery</p> <p>Climate and ecological emergency</p>

Wards affected	All
Purpose of the report:	<p>1. To provide details of the projected outturn 2023-24 as at quarter 3 for the:</p> <ul style="list-style-type: none"> • General Fund • Housing Revenue Account • Capital Programme
Recommendation (s) to the decision maker (s):	<p>1. That Committee note the financial position for 2023-24 as at Quarter 3.</p>
Period for post policy/project review:	The Council's financial position is reported to committee on an ongoing, quarterly basis.

1. Exec Summary:

1.1 The quarter 3 2023-24 financial position of the General Fund is reporting a surplus against budget of £0.236m. This represents a reduction of £0.300m on the surplus reported at quarter 2 (£0.536m). The quarter on quarter change is accounted for by the additional cost pressures being reported since the quarter 2 financial position was presented to Cabinet in November 2023. Key additional costs include:

- additional employee costs within Neighbourhood Operations £0.175m
- additional expenditure on works to trees in the borough £0.080m
- a reduction in income received in relation to services provided to the HRA (HRA recharge) £0.459m

These additional pressure are partly offset by:

- increased investment income £0.203m
- further government grants £0.170m
- reduction in staffing pressures within the Place directorate £0.115m.

2. Introduction:

2.1 This report presents the Council's forecast outturn for 2023-24 as at quarter 3, 31st December 2023, with a focus on changes to the forecast since quarter 2. The report covers the following budgets with associated appendices:

- General Fund revenue position – Appendix A. Across all scrutiny committee areas, a surplus against budget of £0.236m is forecast. Included in this is a pressure of £1.527m against Strategic Planning and Environment services.
- Capital Programme – Appendix B. Strategic Planning and Environment General Fund Budgets are forecasting a pressure of £0.100m as reported in Quarter 1 and re-phasing (programme slippage) to future years of £0.895m.

3. General Fund Position – all Scrutiny Committee Areas

3.1 Appendix A provides an overview of the General Fund forecast outturn position.

3.2 The table below provides an overview by Scrutiny area of the provisional outturn for controllable budgets within the General Fund.

Table 1 Scrutiny Committee	Current Budget £m	Forecast Outturn Quarter 3 £m	Variance		Forecast Outturn at Quarter 2 £m	Movement from quarter 2 to Quarter 3 £m
			£m	%		
Finance & Resources	10.701	11.850	1.149	10.7%	12.689	(0.839)
Strategic Planning and Environment	12.049	13.576	1.527	12.7%	13.033	0.543
Housing and Community	1.953	2.066	0.113	5.8%	1.953	0.113
Total Operating Cost	24.703	27.492	2.789	11.3%	27.817	(0.325)
Core Funding	(24.703)	(27.728)	(3.025)	12.2%	(28.353)	0.625
(Surplus)/ Deficit	0.000	(0.236)	(0.236)		(0.536)	0.300

3.3 Sections 4 below provide further information on the material changes to the Council's General Fund and HRA financial position between quarter 2 and quarter 3.

4. General Fund Position- Strategic Planning and Environment

Table 2 – Strategic Planning and Environment Quarter 3	Current Budget £m	Forecast Outturn £m	Variance	
			£m	%
Neighbourhood Operations	11.310	12.123	0.813	7.2%
Housing & Property	0.053	0.083	0.030	56.6%
People & Transformation	(0.167)	(0.187)	(0.020)	12.0%
Place	0.853	1.557	0.704	82.5%
Total Operating Cost	12.049	13.576	1.527	12.7%

4.1 Neighbourhood Operations

The pressure reported on works relating to trees has increased by £0.080m at quarter 3. The service are working on a backlog of safety works required to trees around the borough. A significant amount of works will be undertaken in quarter 4 2023-24 as the service seeks to maximise contractor capacity during a time of the year that is optimum for undertaking tree maintenance.

Fleet services have seen an increase in works to the Council's fleet which has led to a forecast pressure on fleet repairs and maintenance of £0.052m at quarter 3.

Waste Agency pressures have increased by £0.175m from the reported position at quarter 2. This is due to agency usage being higher over the initial winter period than previously forecast. The service are working closely with Financial Services to monitor their staffing requirements and the associated financial

impact. They are looking to significantly reduce the number of agency per day from the end of January and throughout February.

4.2 Place

At quarter 3 forecast planning income has increased by £0.050m from the position reported in quarter 2, reducing the overall pressure reported against planning income and land charges to £0.400m. Planning fees, which are determined by statute, were increased in January as notified by the government. This appears to have led to more applications being made for smaller planning applications in the period to the end of December.

Place directorate forecast interim cost pressures has reduced by £0.115m in quarter 3 from that forecast at quarter 2. This is associated with delays in recruitment within Place, Communities and Enterprise. The total pressure within the Place directorate relating to interim and restructure costs is £0.139m

5. General Fund reserve transfer requests

5.1 At their March meeting, Cabinet agreed to recommend to Council to approve the following reserve transfer requests:

- £0.100m Funding for Luton Airport Legal costs - £0.050m from the Dacorum Development reserve and £0.050m from the Local Development Framework reserve.
- £0.025m drawdown to fund additional Customer Support Unit (CSU) support for Garden waste renewals from the Management of Change reserve.

6. Capital Programme

6.1 Appendix C shows the projected capital provisional outturn in detail by scheme.

The table below summarises the overall capital outturn position by Scrutiny committee area.

The current budget is the original budget approved by Cabinet in February 2023, plus approved amendments.

The 'rephasing' column refers to projects where expenditure is still expected to be incurred but will now be in 2024-25 rather than 2023-24 ('slippage'), or conversely, where expenditure planned initially for 2024-25 has been incurred in 2023-24 ('accelerated spend').

The 'Variance' column refers to projects which are expected to come in under or over budget and projects which are no longer required.

Table 3- Capital Outturn 2023-24	Current Budget	Re-phasing (To)/from future years	Revised Budget	Forecast Outturn	Variance	
	£m	£m	£0m	£m	£m	%
Strategic Planning and Environment	2.323	(0.895)	1.428	1.528	0.100	4.31%

6.2 General Fund Capital Programme Major Variances

Strategic Planning and Environment capital budgets are reporting slippage of £0.895m. The slippage includes the following items over £0.100m:

- Waste Transfer Site Upgrade works £0.162m - Improvements to the lighting is expected to commence March 2024 with future works being undertaken during 2025/26.
- Fleet Replacement Programme £0.529m - Due to vacancies within the service and a review of requirements further budget is being slipped – a review of the programme is being undertaken in quarter 4 to ensure the programme is on track for 2024/25.
- Chipperfield Common carpark £0.100m - Awaiting approval from secretary of State to allow resurfacing works to commence.

7. Financial implications

7.1 Contained within the body of this report.

8. Legal implications

8.1 There are no direct legal implications arising from this report.

9. Risk implications

9.1 Regular monitoring and reporting on the Council's financial position is one of the key ways in which the organisation manages the potential risk of the weakening of its financial resilience.

10 Equalities, Community Impact and Human Rights

10.1 Community Impact Assessments on Council activities are carried out by relevant services with responsibility for those activities. A separate Community Impact Assessment has not been carried out in respect of this report.

10.2 There are no Human Rights Implications arising from this report.

11 Sustainability implications

11.1 There are no specific sustainability implications arising from this report.

12 Council infrastructure

12.1 The content of this report sets out the implications of the Council's activities for its financial resources for 2023-24.

13 Conclusions

13.1 The forecast position for 2023-24 at quarter 3 for the Strategic Planning and Environment services is a pressure of £1.527m against Council General Fund budgets.

13.2 A forecast position for 2023-24 at quarter 3 is slippage of £0.895m for Strategic Planning and Environment capital schemes.



Dacorum Borough Council

Revenue Budget Monitoring Report for December 2023 (Cost of Services Analysis By Scrutiny Committee)

	Month			Year-to-Date			Full Year		
	Budget £000	Actuals £000	Variance £000	Budget £000	Actuals £000	Variance £000	Budget £000	Forecast Outturn £000	Variance £000
Cost of Services									
Finance and Resources	390	720	330	2,414	5,467	3,053	10,701	11,850	1,149
Housing and Community	195	541	346	891	(133)	(1,024)	1,953	2,066	113
Strategic Planning and Environment	980	1,363	383	7,971	8,346	375	12,049	13,576	1,527
Net Cost of Services	1,565	2,624	1,059	11,276	13,680	2,404	24,703	27,492	2,789
Other Items									
Investment Income	(63)	(475)	(412)	(566)	(3,268)	(2,702)	(755)	(3,807)	(3,052)
Interest Payments and MRP	62	0	(62)	556	429	(127)	741	509	(232)
Parish Precept Payments	0	0	0	1,234	1,234	0	1,234	1,234	0
Government Grants	(141)	(729)	(588)	(1,270)	(6,904)	(5,634)	(1,693)	(1,893)	(200)
Taxation (Council Tax and Business Rates)	(1,563)	1,959	3,522	(14,064)	(24,208)	(10,144)	(18,552)	(18,552)	0
Surplus / Deficit on Provision of Services	(1,705)	755	2,460	(14,110)	(32,717)	(18,607)	(19,025)	(22,509)	(3,484)
Transfers between Reserves / Funds									
Net Recharge to the HRA	(473)	0	473	(4,258)	(242)	4,016	(5,678)	(5,219)	459
Net Movement on General Fund Working Balance	(613)	3,379	3,992	(7,092)	(19,279)	(12,187)	0	(236)	(236)

2023-24-15



CAPITAL PROGRAMME MONITORING BY SCRUTINY COMMITTEE FOR DECEMBER 2023

Scheme	Original Budget	Prior Year Slippage	Adj's, Supps, Virements	Adjustments (Slip. C/F)	In-Year Adjustments	Current Budget	YTD Spend	Projected Outturn	Forecast Slippage	Projected Over / (Under)
General Fund										
Strategic Planning and Environment										
Assistant Director - Place, Communities and Enterprise										
170 Urban Park/Education Centre (Durrants Lakes)	0	134,015	0	(103,915)	(103,915)	30,100	8,625	30,100	0	0
171 The Bury - Conversion into Museum and Gallery	2,570,000	53,150	0	(2,623,150)	(2,623,150)	0	0	0	0	0
	2,570,000	187,165	0	(2,727,065)	(2,727,065)	30,100	8,625	30,100	0	0
Head of Environmental Services										
175 Waste Services IT upgrade	0	80,000	0	0	0	80,000	0	80,000	0	0
176 Wheeled Bins & Boxes for New Properties	100,000	0	0	0	0	100,000	157,612	200,000	0	100,000
177 Resurfacing Works and Building Improvement to Depot	0	60,000	0	0	0	60,000	0	60,000	0	0
178 Waste Transfer Site Upgrade Works	0	262,461	0	0	0	262,461	3,015	100,000	(162,461)	0
179 Fleet Replacement Programme	(312,221)	2,341,332	0	(750,000)	(750,000)	1,279,111	695,027	750,000	(529,111)	0
	(212,221)	2,743,793	0	(750,000)	(750,000)	1,781,572	855,654	1,190,000	(691,572)	100,000
Head of Property Services										
183 Allotment Improvement Programme	0	47,970	0	0	0	47,970	0	17,970	(30,000)	0
184 Stone Works to Charter Tower	15,000	18,000	0	0	0	33,000	0	0	(33,000)	0
185 Nickey Line Bridge Refurbishment	0	50,000	0	0	0	50,000	0	10,000	(40,000)	0
186 Bennetts End Adventure playground - Cabin Roof	24,000	0	0	(24,000)	(24,000)	0	0	0	0	0
	39,000	115,970	0	(24,000)	(24,000)	130,970	0	27,970	(103,000)	0
Head of Neighbourhood Management										
190 Litter Bin Upgrade	85,000	0	0	0	0	85,000	0	85,000	0	0
191 Play Areas & Open Spaces - replace equipment	250,000	137,470	0	(387,470)	(387,470)	0	0	0	0	0
192 Gadebridge Park - Splash Park	70,000	0	0	0	0	70,000	37,382	70,000	0	0
193 Chipperfield Common Car Park Resurfacing	0	200,000	0	0	0	200,000	98,671	100,000	(100,000)	0
194 Water Gardens Fencing	25,000	0	0	0	0	25,000	6,890	25,000	0	0
	430,000	337,470	0	(387,470)	(387,470)	380,000	142,943	280,000	(100,000)	0
Totals: Strategic Planning and Environment	2,826,779	3,384,398	0	(3,888,535)	(3,888,535)	2,322,642	1,007,222	1,528,070	(894,572)	100,000



Strategic Planning and Environment Overview and Scrutiny Committee

Report for:	Strategic Planning and Environment Overview and Scrutiny Committee
Title of report:	Planning Quarter 3 Performance Report 2023-24
Date:	6 March 2024
Report on behalf of:	Cllr Sheron Wilkie, Portfolio Holder for Place
Part:	I
If Part II, reason:	N/A
Appendices:	Appendix 1 – Performance Report
Background papers:	
Glossary of acronyms and any other abbreviations used in this report:	None

Report Author / Responsible Officer
 Sara Whelan – Assistant Director for Planning
 
Sara.Whelan@dacorum.gov.uk / 01442 228250 (ext. 2250)

Corporate Priorities	<ul style="list-style-type: none"> - A clean, safe and enjoyable environment - Building strong and vibrant communities - Ensuring economic growth and prosperity - Providing good quality affordable homes, in particular for those most in need - Ensuring efficient, effective and modern service delivery - Climate and ecological emergency
Wards affected	All

Purpose of the report:	1. To set out the performance outturn for the service for Quarter 3 of 2023-24.
Recommendation (s) to the decision maker (s):	1. That the report is noted.
Period for post policy/project review:	

1. Introduction

- 1.1 This report presents the performance outturn for the Planning service for the third quarter (Oct – Dec) the business year 2023-24. The full performance report is at Appendix 1.
- 1.2 The performance report at Appendix 1 shows a total of 5 indicators. Of the revised Key Performance Indicators, two are departmental performance measures and three are measures that reflect local construction activity. Of the two departmental performance measures, one is green and one is red.

Planning Applications Determined Within Target

- 1.3 The percentage of all planning applications determined within target (DMP01) sits at 81.72%, against a target of 70%. The percentage shows a fractional decrease compared to Q2 (which was 82%). This represents sustained overall good performance from the team, particularly given the ongoing restrictions relating to the Chiltern Beechwoods SAC. However, some caution must be added as this figure includes applications that were granted within an agreed extension of time.
- 1.4 In respect of Major planning applications, 83.3% were determined within 13 weeks (or an agreed extension of time). This is a decrease from 100% recorded last quarter, but remains well above the 60% target. In numerical terms 5 out of 6 Majors were determined in time.
- 1.5 As for Minors and Others, they performed in Q2 as follows, against a 70% target:

MONTH	MINORS (%)	OTHERS (%)
October 2023	78.9	82.3
November 2023	72.0	87.9
December 2023	81.8	84.2
TOTAL Q2	77.6	84.8

- 1.6 As can be seen from the above table the 70% target was exceeded for each month in respect of Minors and Others. Planning Officer capacity has been increased through the recruitment of two new trainees. They will require time to fulfill their potential; however, the outlook looks positive in respect of other applications (i.e. householders). We have also appointed to Lead Planning Officer vacancy which will assist with Minor applications.
- 1.7 The Planning Department was successful in its bid for the Planning Skills Delivery Fund. This has provided the Council with approximately £35,000 to spend on additional capacity in dealing with the planning application backlog. This additional resource, which will focus on those blocked or more complex applications, will also result in a dip in terms of performance as these older applications are determined. It could also likely see a rise in the percentage of applications refused, which could increase the amount of appeal work the team is required to complete.

Enforcement Site Visits

- 1.8 The percentage of all planning enforcement priority site visits (PE04) is 32.1%, against a target of 100%. This matches the 32% seen for Q2. In the previous performance report I wrote, *“We have welcomed an Agency*

Enforcement Officer on Oct 2nd (with the second one due to start on November 13th) as part of the Reserves funding for this service. However, as the additional resource picks up cases previously held in abeyance we are likely to see a further drop in first site visit performance before an improvement in this measure in Q4". Now that the team have both additional Enforcement Officers in place, the number of outstanding first site visits has fallen and Cases are now being visited for the first time in accordance with priority deadlines. As such Q4 will see a significant improvement on this performance measure.

- 1.9 Furthermore, the Enforcement service remain focused on dealing with the most harmful breaches of planning control. A total of 4 formal Notices were served in Q3 (2 Enforcement Notices and 2 Breach of Condition Notices). (In addition, a further 5 Notices have been served in Q4 so far).

Affordable Housing

- 1.10 Indicator DO1 and DO2 – the number of affordable housing starts and the number of completions in the period has been changed to an annual rather than quarterly indicator, as a Local Authority we receive the figures annually. These will be reported in Q4 of each year.

Retail Properties

- 1.11 For indicator CPE01 – the number of retail properties (vacancy rate) for the period – there is no data on this for the period as we are reliant on external parties. This will be reported at the earliest opportunity.

Suitable Alternative Natural Greenspace

- 1.12 SPAE OSC requested a quarterly update on the delivery of SANG in the borough.
- 1.13 In January, Officers met with the Chair and Councillors from Chipperfield Parish Council to discuss the Common and management plan and a range of other issues within the village. Future communication was agreed, with Ian Ross, Head of Neighbourhood Management to attend a Full Parish Council on 12th March. Ian will be progressing all issues related to Secretary of State Applications for works on the Common (these types of works may include car parks, installation of signage and information boards, bollards and fencing). Trees and Woodlands are also meeting with specialist contractors to discuss works to Apostles Pond.
- 1.14 The newly created roles in Clean Safe and Green will be advertised and it is hoped that appointments made in Q1 2024/25. The additional resources will start to deliver the management plan requirements for Bunkers Park to become a SANG site.
- 1.15 Two planning applications have been received for SANG and are currently pending decision;
- 23/02972/MFA Planning application for the change of use from agricultural land to Suitable Accessible Natural Green Space (SANG), together with a vehicular access, car park, paths, fencing and landscaping at Castle Hill Berkhamsted Hertfordshire
 - 23/02508/MFA Planning application for the change of use from agricultural land to a Suitable Alternative Natural Greenspace (SANG) together with provision of a new car park at Haresfoot Farm (Commercial) Chesham Road Berkhamsted Hertfordshire HP4 2SU

2. Options and alternatives considered

- 2.1 Not applicable.

3. Consultation

- 3.1 James Doe – Strategic Director (Place)

3.2 Diane Southam – Assistant Director, Place Communities and Enterprise

3.3 Philip Stanley - Interim Head of Development Management

3.4 Ronan Leydon – Team Manager, Strategic Planning

4. Financial and value for money implications:

Financial

4.1 None arising from decisions on this report though the financial indicators for Planning fees report an under recovery of income against target levels.

Value for Money

4.2 None arising from this report.

5. Legal Implications

5.1 None arising from this report.

6. Risk implications:

6.1 None arising from this report. Risks addressed through service level risk register.

7. Equalities, Community Impact and Human Rights:

7.1 Community Impact Assessment - Not applicable for this report.

7.2 Human Rights – There are no Human Rights Implications arising from this report.

8. Sustainability implications (including climate change, health and wellbeing, community safety)

8.1 None arising from this report.

9. Council infrastructure (including Health and Safety, HR/OD, assets and other resources)

9.1 None arising from this report.

10. Conclusions:

10.1 Not applicable

Appendix 1 - Performance Report (attached separately)

Performance Scorecard SP&E OSC- Development Management & Planning

Measure Code ↑	Measure	Date	Actual	Target	DoT	Performance Trend
DMP01 (Q)	Percentage of all planning applications determined within target (Q)	Dec 2023	82%	70%	✔	
<p>This is a positive performance and the reflection of a team that is now nearly back to full strength. The performance of all three areas (Majors, Minors & Others) are all approximately 80%. For Majors and Minors the use of Extensions of Time will have played a role in achieving these figures due to the need for legal agreements to mitigate the impact on Chilterns Beechwoods (HRA).</p>						
PE04	Percentage of all Planning Enforcement priority site visits completed within target	Dec 2023	32%	100%	?	

Performance Scorecard SP&E OSC - Place, Communities & Enterprise

Measure Code ↑	Measure	Date	Actual	Target	DoT	Performance Trend
CPE01	Retail properties – vacancy rate	Dec 2023				
Data for borough wide retail units is not available for this update. The current vacancy rate for council owned commercial assets is 3.28% with approx. 0.8% of those designated retail.						
CPE02 (Q)	Number of businesses supported by the PCE Team (Q)	Dec 2023	137		✔	



Strategic Planning and Environment Overview and Scrutiny Committee

Report for:	Strategic Planning and Environmental Overview and Scrutiny Committee
Title of report:	Q3 Neighbourhood Operations Services Update
Report on behalf of:	Councillor Robin Bromham , Portfolio Holder for Neighbourhood Operations
Part:	I
If Part II, reason:	N/A
Appendices:	
Background papers:	None
Glossary of acronyms and any other abbreviations used in this report:	NI = National Indicator CSG = Clean, Safe and Green Service

Report Author / Responsible Officer
 Stefania Horne
 Strategic Director, Neighbourhood Operations

✉ 📞
Stefania.Horne@dacorum.gov.uk / 01442 228957 (ext. 2957)

Corporate Priorities	A clean, safe and enjoyable environment Ensuring efficient, effective and modern service delivery Climate and ecological emergency
Wards affected	All
Purpose of the report:	1. To provide Members with the performance report for quarter 3 and progress updates for Neighbourhood operations
Recommendation (s) to the decision maker (s):	1. For information only.
Period for post policy/project review:	

1 Introduction

- 1.1 This report presents the performance outcome for Neighbourhood operations during the third quarter (October to December) of the financial year 2023-24.
- 1.2 The performance report has a total of seven reported indicators. Two reflect a National Indicators; NI 191 for the kilograms of residual waste (non-recycled) produced by each household every year, and NI 192 for the percentage of household waste recycled. The other three are local indicators.
- 1.3 The report also outlines progress on key initiatives and projects.

2 Performance Indicators

WR02 Household Recycling Rate

- 2.1 The indicator measures the materials collected for recycling and composting as a percentage of the total household waste stream. This figure mirrors the National Indicator NI 192. The 'waste data flow' figures that provide quarter 3 recycling % are not available until March 2023, however the provisional recycling rate for the second quarter is 57.1% which is an increase of 3.9% from quarter one and an increase from the previous year, reporting at 53.90% for Q2.

There are seasonal variations in the household recycling rate, and in borough such as Dacorum the amount of green garden waste collected is a key influencing factor during the summer months. The number of residents joining the new subscription service continued to increase during this quarter resulting in the performance, in terms of volume collected.

WR03 Kilograms per household of residual waste collected

- 2.2 This is a measure of the amount of non-recycled household waste collected by weight and mirrors the National Indicator NI 191. The 'waste data flow' figures that we provide DEFRA for quarter 3, amount in Kg per household, is not available until March 2024, however the second quarter the provisional average figure is 95.36 kg per household which is a 11.81 Kg per household decrease from quarter one and decrease of 15.55 kg per household from the preceding year at 110.91 kg per household. The final figure is a cumulative total of the whole year. The provisional annual figure for this is 421 kg per household.

WR01 Reports of missed bins per 100,000 collected

- 2.3 This is a local measure of service performance for Waste Operations based on reports of bins not emptied on their allocated collection day. The figure for Q3 was averaging 103 which is similar year on year with 22/23 Q3 reported average at 104 missed bins, which is one of the lowest figures we had. As we have experienced a much better performance in terms of missed bins for Q2, we are expecting a yearly performance on missed bins that is largely improved.

The reports of bins not emptied on their allocated collection day has remained constant year on year, this is partly due to the small turnover of staff within the waste collection service ensuring a professional and knowledgeable workforce it maintained along with regular monitoring undertaken by the waste supervisors.

CSG02 Percentage of Fly tips collected within the set timescale of 7 days

- 2.4 The Clean, Safe and Green (CSG) service carry out the council's fly tip removal operation.

In Q3, 516 fly tips were reported and 505 (98%) of these were cleared within the 7 day target, which is a positive increase of 4% on Q2 when 486 fly tips were reported and 451 (93%) were cleared within the 7 day target. For comparison in Q3 last year, 350 fly tips were reported and 321 (92%) were cleared within the 7 day target.

The increase in performance is likely due to more efficient performance management/monitoring of this activity now in place, which includes weekly reports from the software Flare allowing CSG management to better monitor and manage resources accordingly. An internal change in the CSG supervisory structure has happened so that one supervisor is now responsible for fly-tip removal rather than it being the responsibility

of area supervisors. The service looking to digitise process in the future which streamline the whole process and hopefully further increase performance.

CSG05 Graffiti Removal – Percentage removed from Dacorum Structures within 7 days

2.5 The Clean, Safe and Green (CSG) service carry out the council's graffiti removal operation.

In Q3, 66 reports of graffiti were received and 62 (94%) were cleared within the 7 day target, which is a decrease of 1% in Q2 where 57 reports of graffiti were reported and 54 (95%) were cleared within the 7 day target. For comparison, Q3 last year, 136 reports of graffiti were received and 125 (92%) were cleared within the 7 day target.

The likely explanation in the reduced number of incidences of reported graffiti in Q3 this year compared to Q3 last year, is likely due to the Council being involved in a pilot with Hertfordshire Police whereby there was a major push on reporting graffiti in relation Operation Ideogram which is part of the National Government Prevent Scheme. This also coincided with the launch of the Council's new digital reporting app. As this involved a focus on reporting graffiti by multiple agencies it meant a higher number of reports. As these were dealt with promptly, the number of repeat incidences has reduced.

ECP 09 – Number of High Risk Food Inspections achieved within the Quarter

2.6 The performance of this measure in Quarter 3 is 92.54%. This is still a significant improvement from the same time last year (Quarter 3 2022/23) when performance was 58.7%. This improvement from last follows from the implementation of the post Covid Food Safety Recovery Plan.

RS01 – Number of Public Space Protection Orders and Littering Fixed Penalties Served

2.7 The number of Public Space Protection Orders and Littering Fixed Penalties Served has decreased from 785 to 751 from Quarter 2 to Quarter 3. Fixed penalties are only offered where sufficient evidence to prosecute has been obtained. Persons who have received a fixed penalty offer can put forward representations to take into account any information that may be pertinent to the alleged offence.

3 Key Projects and progress update

Decarbonisation of Fleet by 2030 programme

3.1 The Decarbonisation of Fleet is part of the wider work in relation to the Climate Emergency Programme. Work for an option appraisal is needed relating to any infrastructure upgrade/development programme. A trial of electric HGV dustcart (Dennis) has taken place to identify vehicle suitable and range requirements that will form part of the alternative fleet provision alongside the need for modernisation.

Herts Waste Partnerships

3.2 Collaborative work continues with Herts Waste Partnerships relating to:

- Review of Simpler Recycling national guidance implications
- Manage bookings for clothes swap equipment / kits including co-ordinating events
- Attend and present and waste related conferences promoting the work of the HWP and seeking collaboration opportunities
- Provide updates and presentations to sector groups, Members and Hertfordshire audiences
- WasteAware website - monthly review of website statistics
- WasteAware website - arrange for promotion of events including those linked to 'national waste weeks'
- Highlight good and interesting practice within the HWP for Partnership wide dissemination (from Info exchange)
- Support the production of evidence-based context for WasteAware social media campaigns
- Respond to resident queries (into the WasteAware inbox) arising from HWP social media activity

3.3 Cupid Green –Waste Transfer site

During the week commencing 12 February the Environment Agency carried out a random inspection of Waste Transfer Site at Cupid Green depot. The site passed the inspection with the auditors stating that is one of the best run sites they have reviewed.

Arboricultural contracts

3.4 Officers have now completed the tender assessment for the Council's new arboricultural contracts. Four lots were let (2x general arboricultural lots, 1x woodland lot and 1x tree planting lot). These new arrangements, along with changes being made to the council's Tree Management Database, should allow works to be dealt with in a more efficient manner and allow better communication with councillors and residents. It is anticipated that the new contracts will go-live in May 2024.

River Gade restoration

3.5 The Environment Agency is working with Dacorum Borough Council and Affinity Water to restore the River Gade at Gadebridge Park, a globally rare and valuable chalk stream. The project will provide multiple benefits, including improved habitats for wildlife, the protection of water resources for both people and the environment, and allowing local residents and visitors to get closer to the river and enjoy nature. Representatives of the Environment Agency will be attending the committee to present a more detailed plan of the works and timelines. It is anticipated work will commence in Spring 2024.

Partnership working

3.6 The CSG and Parks team continue to work in partnership with local groups and the third sector. We are working with Sunnyside Rural Trust on a number of projects including planting schemes, providing litter picking equipment and undertaking a trial restoring older original nameplates from around the borough.

Officers and Sunnyside Rural Trust are also working on a Dacorum Borough entry to Anglia in Bloom (a subgroup of Britain in Bloom). The Anglia in Bloom launch event is in March 2024 and it will focus on the excellent work Sunnyside Rural Trust have been doing in delivering planting schemes on housing land. It will also give the Council an opportunity to showcase sites such as Gadebridge Park walled garden and the Water Gardens.

Green Flag Award

3.7 We have made our annual entry to Green Flag Award – we current hold awards at Canal Fields, Tring Memorial Garden, Water Gardens, Chipperfield Common and Bunkers Park. This year, an additional entry has been made for Gadebridge Park

Playground Tender

3.8 Tenders received and currently being evaluated. Projects will be delivered in two phases, one commencing in June and the second phase commencing in September. A discussion will take place with the successful contractor to see whether any of the programme can be accelerated but still avoiding school summer holidays. A programme of delivery will be provided at the meeting by which time bidders will have been informed of the outcome.

Waste/dog bin mapping exercise

3.9 Clean Safe and Green have now completed an exercise to digitally map all general waste and dog bins in the boroughs. This will now form the basis of an exercise over the next 12 months to ensure we have the right bins in the right place.

Verge Hardening Strategy

3.10 Officer will present an update with the outline principles to committee at the meeting.

Regulatory services

3.10 Officers from Regulatory Service undertake a variety of service requests and dealt with 846 service requests in Q3, the vast majority of which are dealt with informally.

3.11 A company in Hemel Hempstead has been prosecuted for failing to keep an area of land free from waste and allowing bins to overflow regularly in Roydon Court, Hemel Hempstead.

On 22 November 2023, at St Albans Magistrates' Court, Salmicass Ltd pleaded guilty to the breach of Community Protection Notice between November 2022 and June 2023. Salmicass Ltd was ordered to pay a total of £8,280.55, which consisted of a £3,609.0 fine, £3,227.55 costs and a victim surcharge of £1,440.

3.12 The Environmental Crime Officers have been carrying out proactive inspections to ensure businesses had trade waste agreements in place following fly-tipping in the area. 40% of the businesses were unable to provide paperwork during the initial inspection to prove their duty of care. These businesses were provided a Notice to request the information within 14 days.

- 4 Options and alternatives considered**
No options to consider, for information only.
- 5 Consultation**
N/A
- 6 Financial and value for money implications:** N/A
- 7 Legal Implications**
N/A
- 8 Risk implications:**
N/A
- 9 Equalities, Community Impact and Human Rights:** N/A
- 10 Sustainability implications (including climate change, health and wellbeing, community safety)**
N/A
- 11 Council infrastructure (including Health and Safety, HR/OD, assets and other resources)** N/A
- 12 Conclusions:**

In summary, there are positive trends in relation to performance in all areas, following modernisation initiatives that makes services more efficient. A number of positive initiatives are progressing including the implementation of the capital programme for play areas that will provide improvement of the quality of play offer in Dacorum.



Strategic Planning and Environment Overview and Scrutiny Committee

Report for:	Strategic Planning and Environment Overview and Scrutiny Committee
Title of report:	Alcohol related Public Spaces Protection Orders
Date:	6 March 2024
Report on behalf of:	Councillor Tindall, Portfolio Holder for Corporate and Commercial Services
Part:	I
If Part II, reason:	N/A
Appendices:	Appendix A: Maps of areas covered by Alcohol related Public Space Protection Orders Appendix B: Consultation responses
Background papers:	Home Office – Reform of anti-social behaviour powers: Statutory guidance for frontline professionals (section 2.5) (Home Office - Anti-social behaviour powers Statutory guidance for frontline professionals Updated March 2023).
Glossary of acronyms and any other abbreviations used in this report:	PSPO – Public Spaces Protection Order FPNs – Fixed Penalty Notices DPPO – Designated Public Places Order

<p>Report Author / Responsible Officer</p> <p>Mark Brookes, Assistant Director (Corporate and Contracted Services)</p> <p> </p> <p>Mark.brookes@dacorum.gov.uk / 01442 228236 (ext. 2236)</p>
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Corporate Priorities	A clean, safe and enjoyable environment
Wards affected	Hemel Hempstead Town Highfield Berkhamsted Castle, Berkhamsted East and Berkhamsted West Northchurch Bovingdon Flaunden and Chipperfield Boxmoor Apsley and Corner Hall Nash Mills

Purpose of the report:	1. To present the outcome of public consultation on the extension of alcohol related Public Spaces Protection Orders in the Borough. Extension of the orders would continue to provide an additional means of controlling the consumption of alcohol having a detrimental effect on the quality of life for those living and working in Dacorum.
Recommendation to the decision maker:	1. That committee consider the proposal to the re-establishment of the Public Space Protection Orders noted in paragraph 1.4 of the report.
Period for post policy/project review:	Period orders are in effect : 3 years

1 Background:

1.1. Under the Anti-social Behaviour, Crime and Policing Act 2014, local authorities may make orders to prohibit specified activities, and/or require specified activities to be carried on in accordance with certain requirements, within a designated area in the public domain, which may include public highways and footways, parks and open spaces, pedestrianised areas, or similar. Such orders are known as Public Spaces Protection Orders (PSPO). The current orders have been in place since between 2006 and 2007, when they were initially known under previous legislation as Designated Public Places Orders, or DPPOs, and remain valid for three years at a time. The last extension of the orders was agreed by Cabinet in 2021.

1.2. Where an alcohol related PSPO is in force, it is a criminal offence to do anything which is prohibited under the order, or to fail to comply with requirements of the order. Persons guilty of such offences are liable, on summary conviction, to a fine not exceeding level 3 on the standard scale (currently up to £1000). Offences may also be disposed of by way of a fixed penalty notice of up to £100 (currently £88.00), payable to the local authority.

1.3. PSPOs may be enforced by a police officer, Police Community Support Officer, or a person authorised by the local authority for that purpose. The Police and Council have limited resources which can be made available for such enforcement proactively, so it is likely that, if the PSPOs are re-established, the powers will be used reactively in areas where problems arise. The use of external contractors may continue to have a positive impact on the proactive enforcement of these orders where required.

1.4. Until April 2024, the Council have 6 alcohol specific PSPOs in force, maps of which are provided in Appendix A:

- Hemel Hempstead town centre, Gadebridge Park, Old Town, Randall Park
- Berkhamsted and Northchurch
- Bovingdon
- Boxmoor
- Evans Wharf, Aspley Lock
- Frogmore End, Durrants Hill Road

1.6. Prohibitions on alcohol consumption will not apply to any part of a licensed premises, including beer gardens and terraces, with the expectation that the management of those premises will control the consumption of alcohol within the curtilage of their premises, under threat of a licence review if they fail to do so. Public spaces which are licensed for the sale of alcohol (e.g. parks licensed for events) are also exempted at times when alcohol is being lawfully sold there.

1.8. PSPOs may be challenged in the High Court by any person who lives in, regularly works in, or regularly visits a restricted area, within 6 weeks of an Order being made or varied.

1.9. A PSPO enforcement service is now in place.

2 Key Issues/proposals

2.1. The current three year period for the alcohol related PSPOs listed in this report comes to an end on 6 April 2024.

2.1. Prior to making, extending, varying or discharging a PSPO, a local authority must:

- Consult the chief officer of police and the Policing and Crime Commissioner for the applicable area; any community representatives that it is thought appropriate to consult; and the owners/occupiers of land included within the restricted area;
- Publish the draft Order (or details of variation/discharge proposal);
- Notify any parish/town councils within the restricted area, and the County Council;

3 Options and alternatives considered

3.1. No alternative solutions have been suggested or considered since the introduction of the Orders.

4 Consultation and outcome

2.1. A six week consultation was carried out from the 4th January 2024 to 7th February 2024. This was a short and relatively light touch consultation, given that the areas proposed matched those that had previously been protected in this way, without any complaints arising from the use of PSPOs (and historically DPPOs) for this purpose.

2.2. The public consultation was carried out using the Council's 'Let's Talk Dacorum' page on its website. Hertfordshire Constabulary were consulted with directly as required by the legislation alongside Hertfordshire County Council, Environmental and Community Protection, Clean Safe and Green and DENS.

2.3. Environmental and Community Protection responded to support an extension of the Orders, confirming that 20 FPNs had been issued between November 2021 and December 2023, with all being issued in the Hemel Hempstead Town Ward which covers Marlowes, Water Gardens, Market Square and Bridge Street. This response is set out at Appendix B.

No further responses were received.

5 Financial and value for money implications:

5.1. PSPOs are seen as a more cost-effective means of controlling the activities in question than under byelaws, also providing a wider range of enforcement options.

6 Legal Implications

6.1. While a legal process must be followed to make, vary or discharge orders, the option to extend them is a discretionary one.

6.2. PSPOs may be challenged in the High Court by any person who lives in, regularly works in, or regularly visits a restricted area, within 6 weeks of an Order being made or varied.

7 Risk implications:

7.1. There will be risks associated with Council enforcement officers who may be tasked with enforcing the PSPO and appropriate training will need to be maintained, although this burden is now lessened by the use of external contractors to take enforcement action. The Council currently works in partnership with District Enforcement, who are authorised to issue FPNs for breaches of PSPOs, and whose officers have been given defined delegated powers by the Council to carry out this function. They are able to issue FPNs in line with the

alcohol related PSPOs but only if the offender's alcohol consumption is associated with nuisance or anti-social behaviour in that area. Evidence in relation to this approach has been produced during the consultation period and is set out in Appendix B.

7.2. There are also reputational risks in terms of the Council being perceived as enforcing against vulnerable persons and seeking to criminalise certain behaviours which wouldn't normally attract fixed penalty notices or prosecution for non-payment.

7.3. The PSPOs may raise expectations that prohibited behaviours will be eliminated entirely; however due to difficulties in identifying some of the contraventions and taking a proportionate approach to enforcement there will not always be immediate results which will be noticeable to the public.

8 Equalities, Community Impact and Human Rights:

6.1. A Community Impact Assessment has been completed during the consultation period.

6.2. The authority must also consider the extension of restrictions against the rights of freedom of expression (Article 10) and assembly (Article 11) under the European Convention on Human Rights. The proposed extension of restrictions have been considered against the rights in Article 10 and 11 but it is not considered that there will be any infringement on these rights. If there is any infringement it is considered that it is proportionate for the prevention of disorder and crime.

9 Sustainability implications

There are no sustainability implications arising from this report.

10 Council infrastructure (including Health and Safety, HR/OD, assets and other resources)

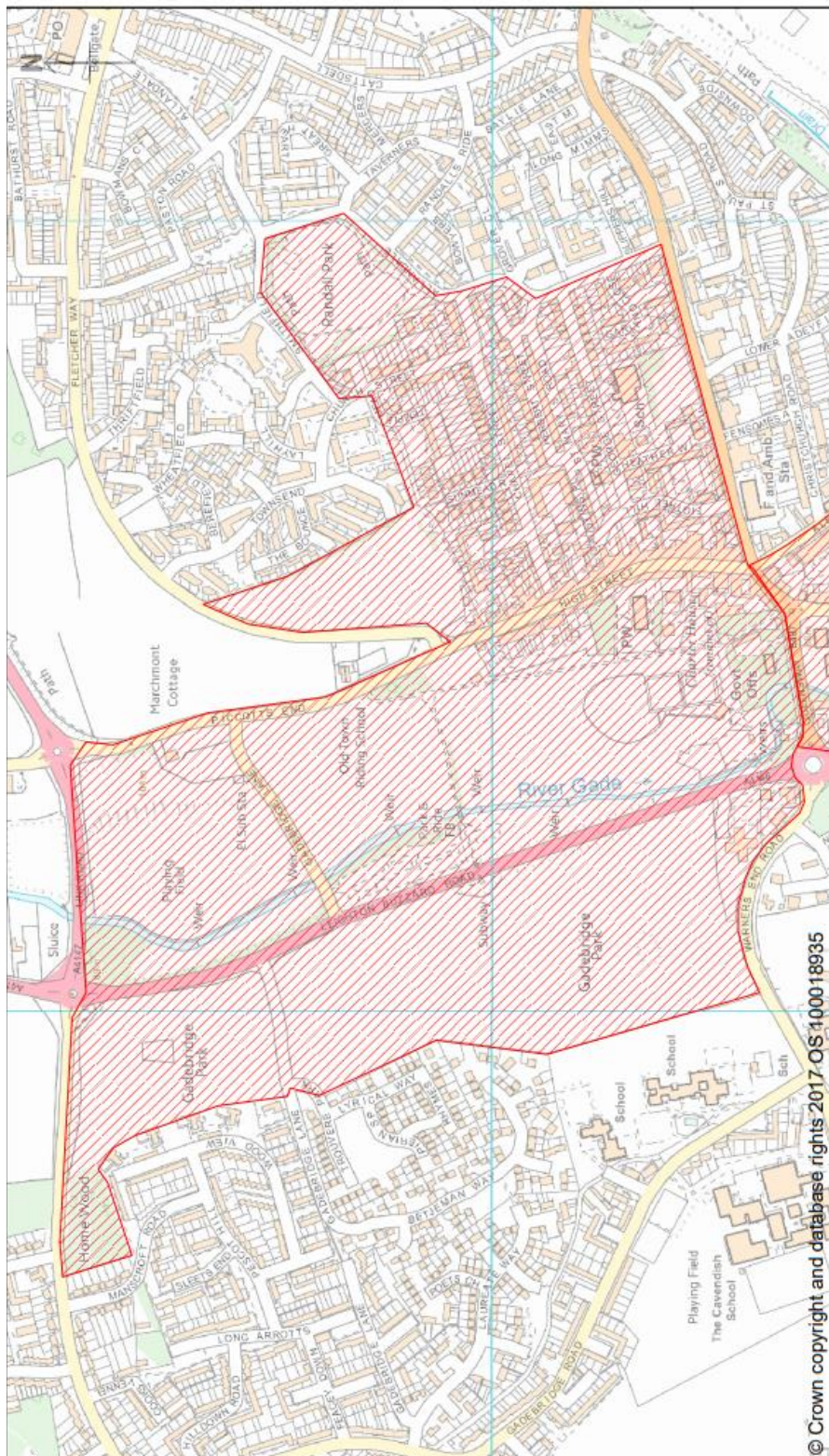
There are no infrastructure implications arising from the report. Council Size Submission to the Local Government Boundary Commission for England

11 Conclusions:

11.1. This report sets out the outcome of the consultation exercise – any decision to extend the orders will be made by Cabinet on 19th March 2024.

MAPS OF AREAS WHERE PUBLIC SPACE PROTECTION ORDERS APPLY

1. Hemel Hempstead Town Centre (North)

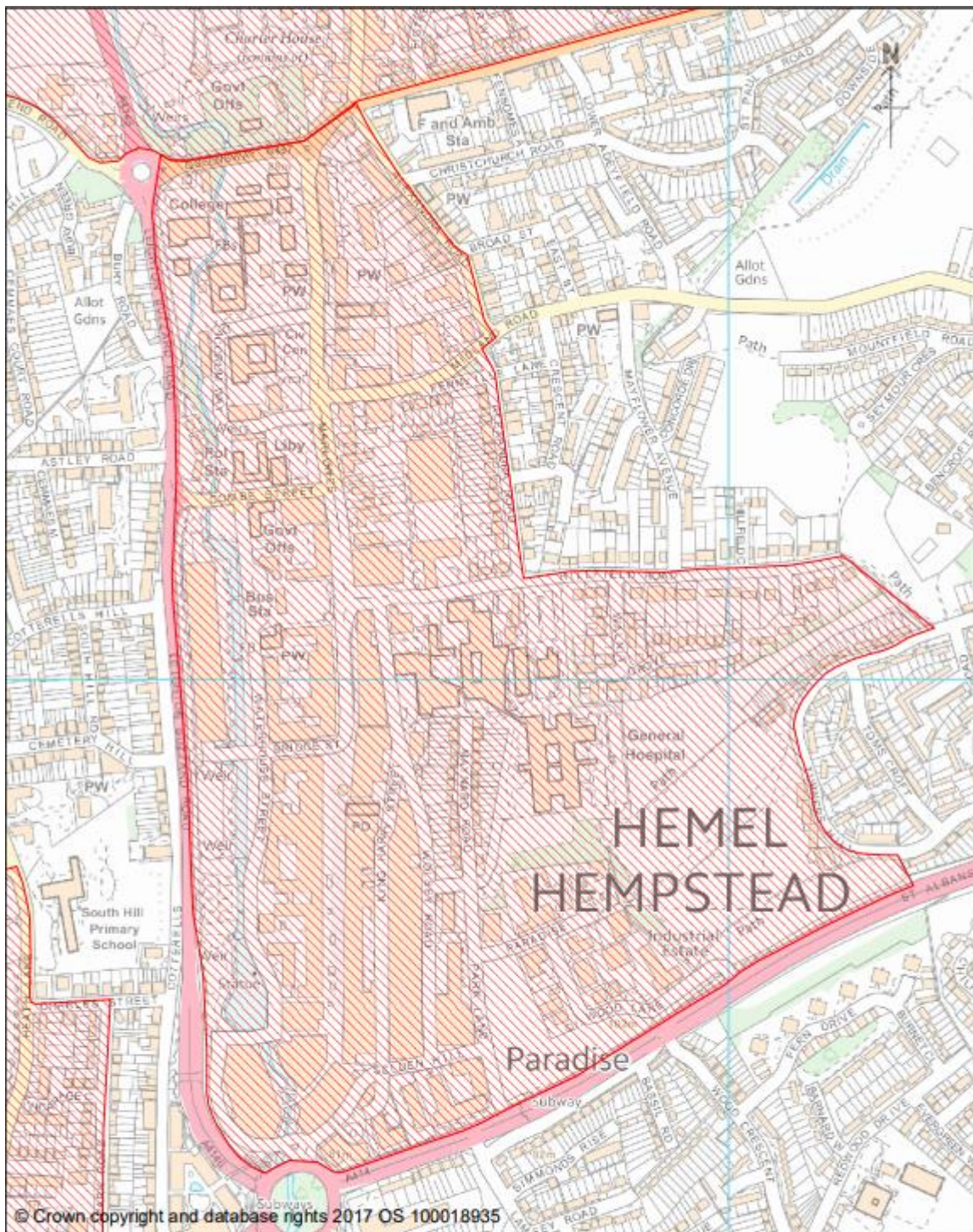


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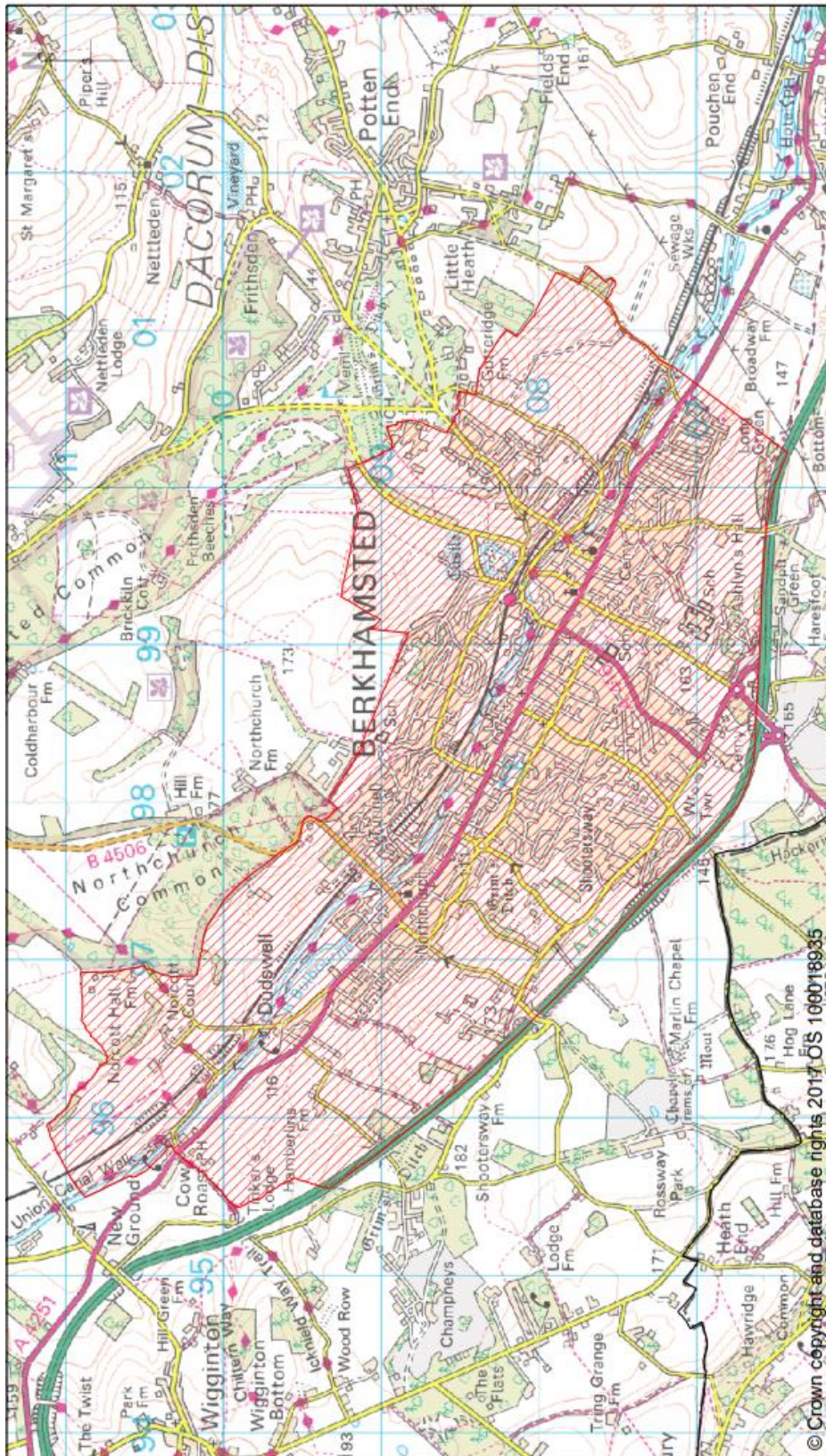
2. Hemel Hempstead Town Centre (South)



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Date: 24/01/2017

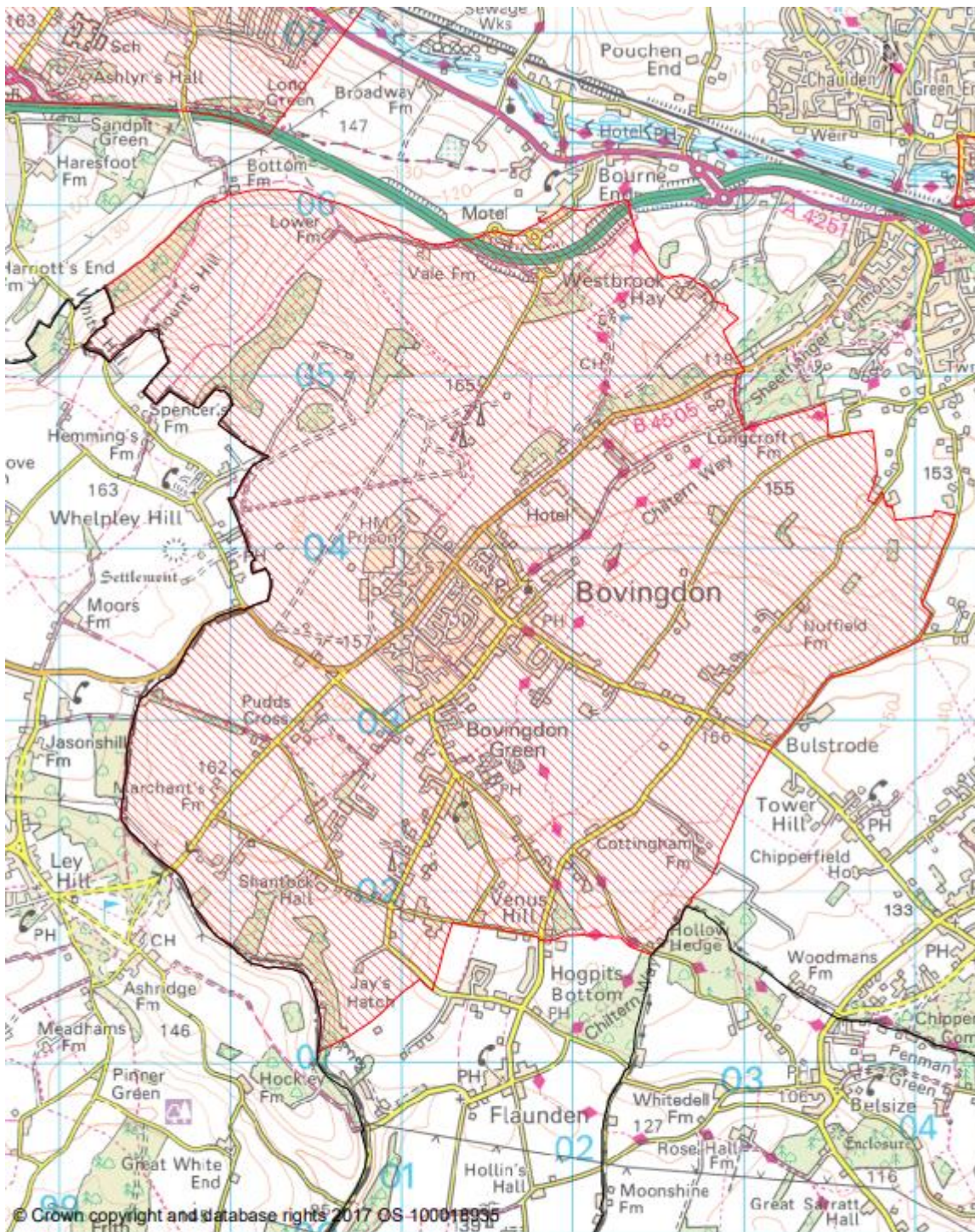
3. Berkhamsted and Northchurch



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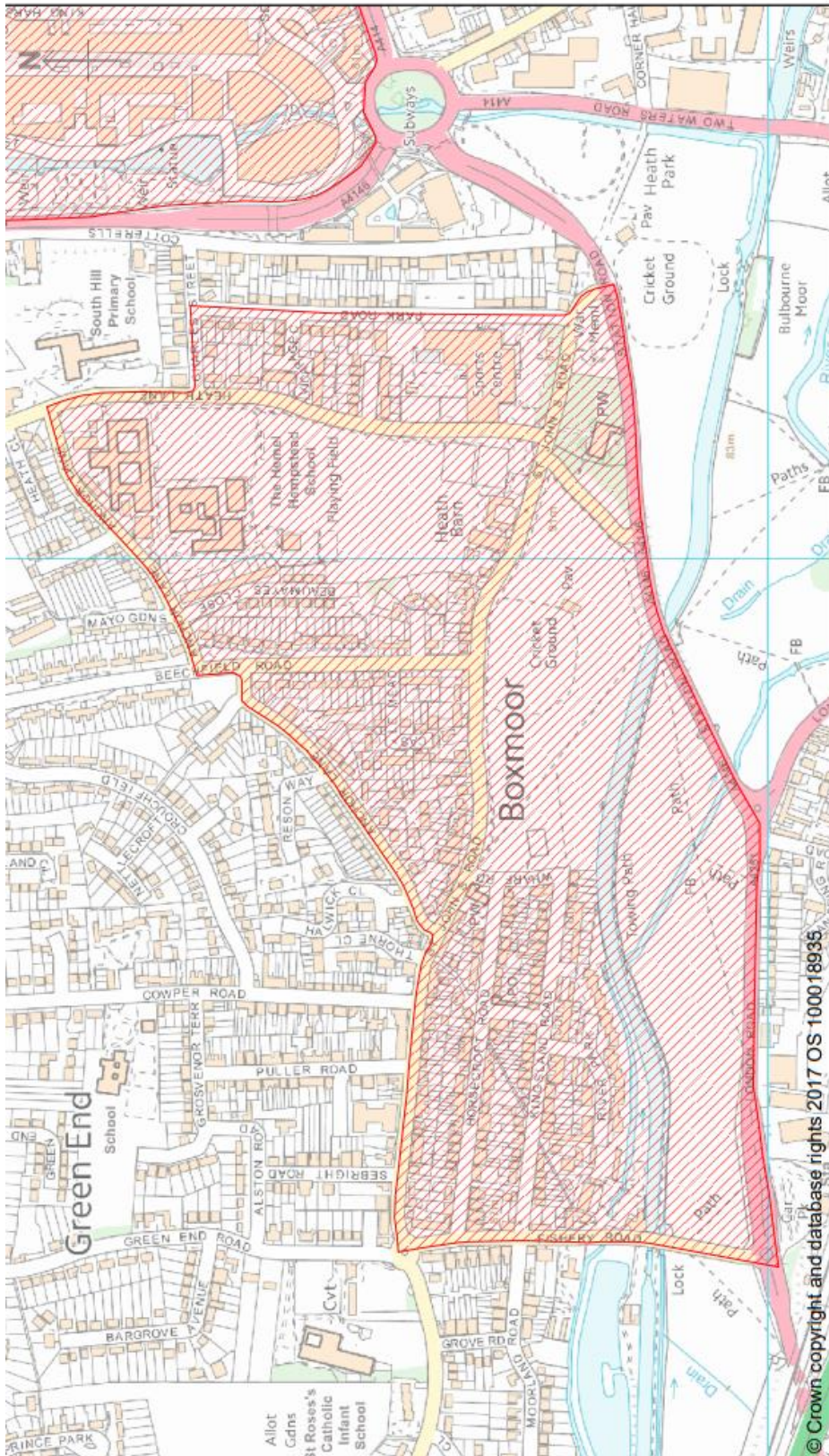
4. Bovington



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5. Boxmoor

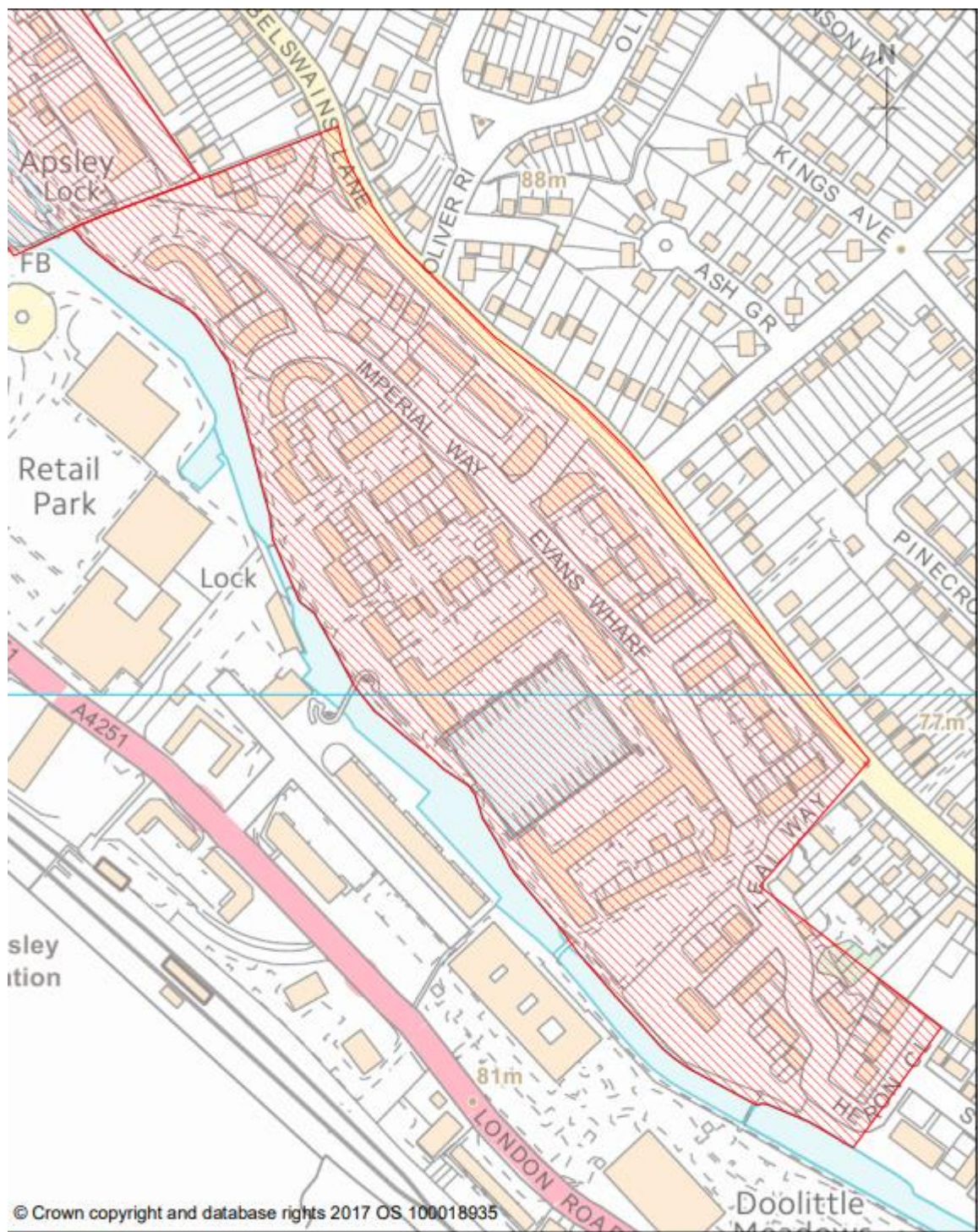


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6. Evans Wharf, Frogmore End/Durrants Hill Road

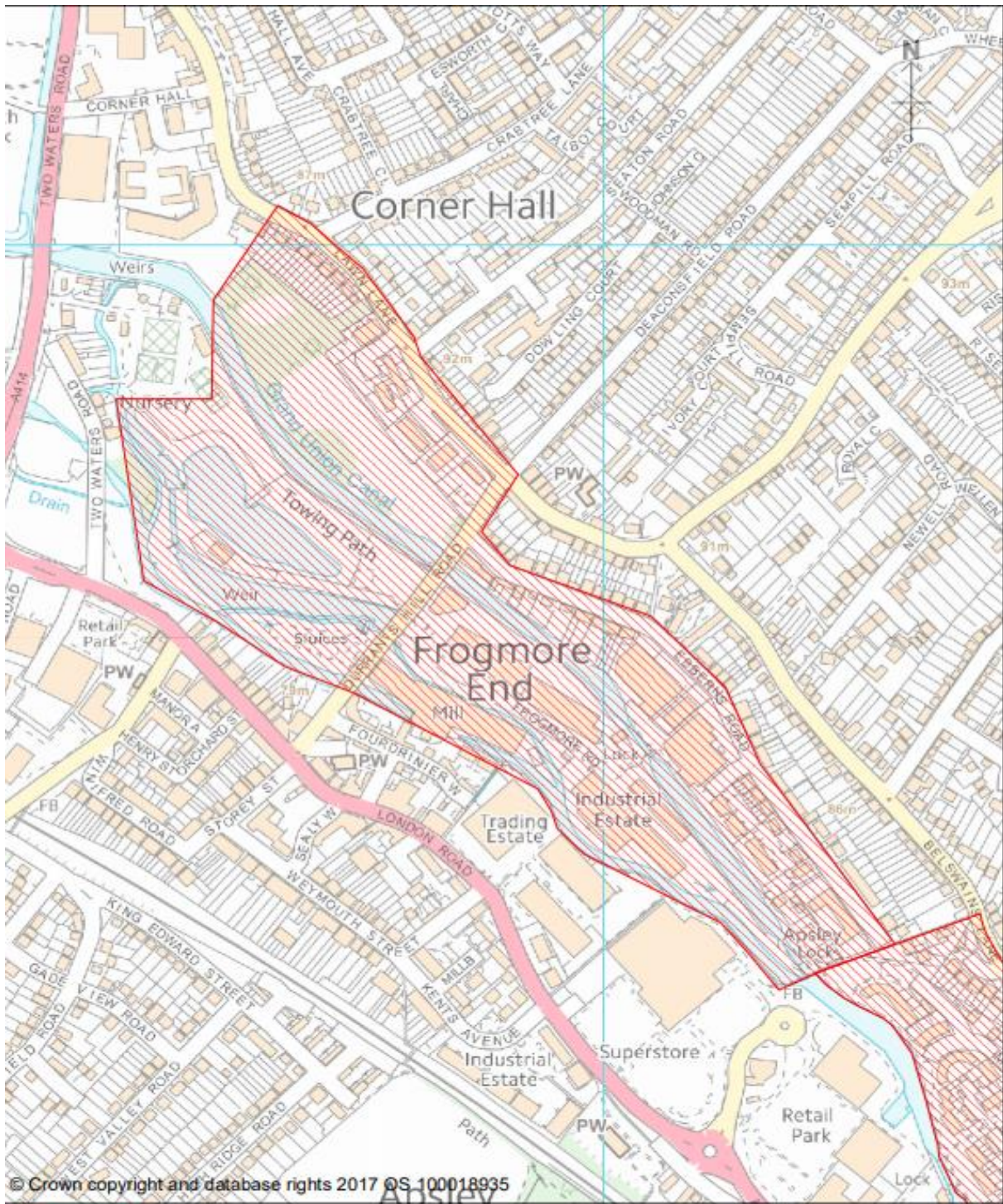


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From: Emma Walker <Emma.Walker@dacorum.gov.uk>
Sent: 24 January 2024 14:38
To: Sally Mcdonald <Sally.Mcdonald@dacorum.gov.uk>
Cc: Licensing Mailbox <Licensing@dacorum.gov.uk>
Subject: Consultation on proposals to extend Alcohol related Public Space Protection orders in the borough of Dacorum - Call for evidence

Hi Sally,

Between November 2021 – December 2023 District have issued 20 FPNs for breaches of the alcohol PSPOs. All FPNs were issued in Hemel Hempstead Town Ward (Marlowes/Water Gardens/Market Square/Bridge Street) and the last being in September 2022.

As an enforcement tool, we have received complaints/requests for targeted patrols/engagement by DE from other council departments such as the Water Gardens Team and Parks & Open Spaces where alcohol related ASB has occurred. I would therefore suggest extending these PSPOs would be useful.

Thanks,

Emma

Emma Walker
Head of Regulatory Services
Environmental and Community Protection | Dacorum Borough Council | The Forum | Marlowes | Hemel Hempstead | Herts | HP1 1DN

Telephone: 01442 228861 | **Email:** emma.walker@dacorum.gov.uk

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Strategic Planning & Environment Overview and Scrutiny Committee

Report for:	Strategic Planning and Environment Overview and Scrutiny Committee
Title of report:	New Local Plan – Revised Strategy for Growth 2024-2040 – Consultation Report
Date:	06/03/2024
Report on behalf of:	Councillor Sheron Wilkie, Portfolio Holder for Place
Part:	I
If Part II, reason:	N/A
Appendices:	Appendix 1 – Local Plan 2024-2040 Revised Strategy for Growth Consultation Report Appendix 2 - RSG 2023 Community Impact Assessment
Background papers:	Revised Strategy for Growth Consultation: https://letstalk.dacorum.gov.uk/hub-page/localplan2023 Report of all responses: https://letstalk.dacorum.gov.uk/survey_localplan2023 Statement of Community Involvement 2019: https://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/statement-of-community-involvement Local Development Scheme 2023: https://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/local-development-scheme
Glossary of acronyms and any other abbreviations used in this report:	DPD – Development Planning Document GFRA – Grove Fields Residents Association LDS – Local Development Scheme LPA – Local Planning Authority 'Pre-submission version' – The finalised version of the emerging Local Plan that the Local Authority intends to submit to the Secretary of State for examination. Regulation 18 – Town and Country Planning (Local Development) (England) Regulations 2012, Regulation 18 Preparation of a local plan Regulation 19 - Town and Country Planning (Local Development) (England) Regulations 2012, Regulation 19 Publication of a local plan SCI – Statement of Community Involvement SLT – Strategic Leadership Team SLT-PH – Strategic Leadership Team – Portfolio Holders

Responsible Officer: Sara Whelan, Assistant Director – Planning

Report Authors: James Wrathall, Corporate Graduate; Keeley Mitchell, Strategic Planning & Regeneration Officer



sara.whelan@dacorum.gov.uk / 01442 228590 (ext. 2590)

Corporate Priorities	The Dacorum Local Plan 2024-2040 promotes the achievement of all the corporate priorities as set out below: <ul style="list-style-type: none">• A clean, safe and enjoyable environment• Building strong and vibrant communities• Ensuring economic growth and prosperity• Providing good quality affordable homes, in particular for those most in need• Ensuring efficient, effective and modern service delivery• Climate and ecological emergency
Wards affected	All wards
Purpose of the report:	1. To present the results of the Regulation 18 consultation on Dacorum’s Revised Strategy for Growth for consideration.
Recommendation(s) to the decision maker (s):	1. That the committee notes this report.
Period for post policy/project review:	This document sets out a summary of the responses received to the Regulation 18 consultation on the Dacorum Local Plan (2024-2040) Revised Strategy for Growth, undertaken in 2023. This will be used to inform further discussions as the final Regulation 19 ‘Pre-Submission’ version of the Local Plan is published later in 2024, in line with the adopted Local Development Scheme. Once the final Local Plan is adopted, a review will be undertaken at least every 5 years, subject to the introduction of new Planning reforms.

1) Introduction/Background:

- 1.1 Local Planning Authorities are legally required to develop and implement a Local Plan to control and plan development, protect important areas and set a vision for communities within their administrative area over at least 15 years. The new Local Plan, once adopted, will replace the Core Strategy (2013), the Site Allocations DPD (2017) and the 'saved' policies from the 2004 Local Plan.
- 1.2 According to Regulation 18, when preparing a Local Plan, the LPA must invite consultation bodies and the wider community to make representations, and take any representation made to them into account, before formally publishing the pre-submission version of the Local Plan under Regulation 19.
- 1.3 An initial 'Issues & Options' Regulation 18 consultation was held in 2017, followed by a second on 'the Emerging Strategy for Growth' full draft Local Plan, in 2020/21. Following consideration of the responses to these consultations, a third Regulation 18 consultation was held from 12pm on Monday 30th October 2023 until 11:59pm on Monday 11th December. This consultation was referred to as the 'Revised Strategy for Growth', and focussed on changes the Council proposed to make to the draft site allocations in the emerging Local Plan.
- 1.4 This consultation received 1,356 responses from residents, businesses, organisations and national bodies.
- 1.5 The Local Plan 2024-2040 Revised Strategy for Growth Consultation Report (Appendix 1) has been prepared to set out the consultation methods and levels of engagement, and to summarise the responses. The responses have been published in full¹, Appendix 1 has been designed to aid in the interpretation of these.
- 1.6 Appendix 1 does not contain the Council's response to the responses received at this stage, as these will be fully considered by Members and officers whilst preparing the 'pre-submission' version of the Local Plan. When the Pre-Submission Local Plan is formally published (expected October 2024 – subject to approval by Members) it will be accompanied by a full 'statement of consultation', setting out the Council's response to comments received to the past consultations, and how the document has been modified to reflect these.
- 1.7 The purpose of this report is to provide the Committee with an initial set of findings and to set out next steps to move the local plan forward. Officers have produced a Consultation Summary Report (Appendix 1) which summarises the main issues arising from the consultation.

2) Key Issues/proposals/main body of the report:

- 2.1 Full details of the engagement methods used by the Council during the Revised Strategy for Growth consultation are set out in section 2.2 of Appendix 1.

¹ The full report of responses can be downloaded from this website:
https://letstalk.dacorum.gov.uk/survey_localplan2023

Appendix 1: Revised Strategy for Growth Consultation Report Structure

2.2 The Consultation Summary Report is structured as follows:

- **Section 1. Introduction:** Introduces the report and explains its structure in greater detail.
- **Section 2. Consultation Report:** Provides an overview of how the Council carried out the consultation in line with the prescribed regulations and the adopted SCI. It sets out the background to the consultation and Local Plan before detailing engagement methods and how representations were received. It also includes a summary of key issues raised by responses.
- **Section 3. Analysis of Responses:** Provides a summary of the main issues that were raised. This is structured by responses to the main survey by settlement area, followed by a brief overview of the optional additional questions. Officers have grouped the issues raised by key organisations and the wider community.
- **Section 4. Next Steps:** Sets out the Council's proposed approach to progressing to the next stage of Local Plan preparation and the timeline for this.
- **Appendix A: Supporting Information:** Contains copies of the consultation material used by the Council to engage with the public.
- **Appendix B: Full Text of Responses:** Contains information on how to access the full text of the responses received.

Level of Response

2.3 1,356 representations were submitted with 1,315 (97%) of these via the new online consultation portal, Engagement HQ, and 41 (3%) by post.

Demographics

2.4 Unlike in previous consultations, use of Engagement HQ granted greater freedom in the gathering of specific information, and so demographic data could be collected from willing respondents. The following statistics are calculated out of those who provided the information to the relevant question:

- **Decade of birth:** More than half of respondents were born before 1970, and 11% were between 1930 and 1949. In contrast just over 5% of respondents were born on or after 1990, with only 0.7% born on or after 2000. This suggests low youth engagement, despite sharing the consultation with schools and attending face-to-face events at youth council meetings and Christmas fairs during the consultation period.
- **Gender:** Slightly more men (50.6%) responded than women (48.1%) with only 0.5% reporting as non-binary or transgender.

- Ethnicity: 89.1% of respondents reported as “White English, Welsh, Scottish, Northern Irish or British”. 5.4% reported as “Other White”, with all other groups between 0 and 0.3%.
- Disability: around 87% of individuals reported no disability, with just under 10% reporting that they did. The majority of individuals with a disability stated that this affected their ability to carry out day to day activities a little, or that it did not affect them at all.

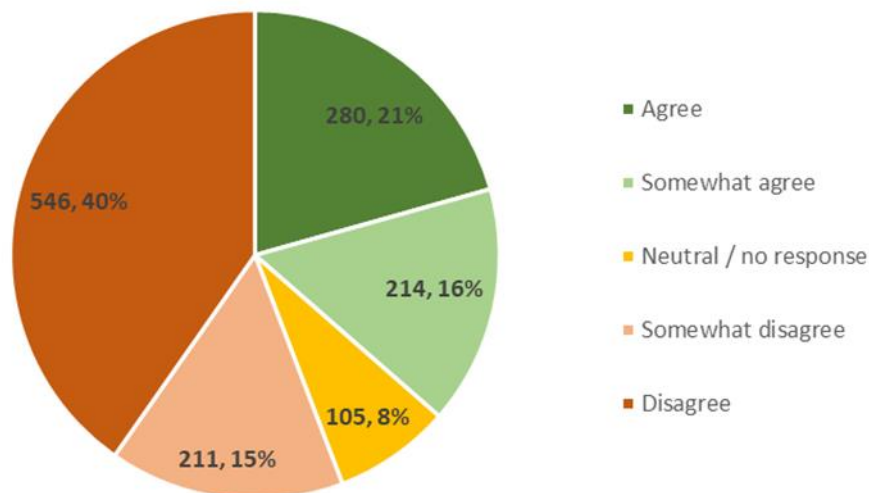
Key Results

2.5 Respondents were able to select which settlement(s) their response related to:

- Whole of Dacorum (243, 17.9% of total responses).
- Hemel Hempstead (562, 41.5%).
- Berkhamsted (488, 36%).
- Tring (292, 21.5%).
- Bovington (43, 3.2%).
- Kings Langley (64, 4.7%).
- Markyate (24, 1.8%).
- Dacorum’s Countryside (221, 16.3%).
- Other (44, 3.2%)

2.6 Respondents were then asked to select how far they agreed or disagreed with the revised strategy for their selected area(s):

Overall Feedback to the Revised Strategy for Growth



2.7 37% of respondents expressed a positive sentiment towards the proposed changes to the strategy for the Local Plan, which is high when compared to previous consultations. The areas of Tring and Kings Langley had a majority in favour of the Revised Strategy for Growth, with just under half of those responding for the whole Borough disagreeing.

2.8 Tring respondents were the most in favour of the Revised Strategy (73.7%), while Hemel Hempstead saw the strongest objections (71.7%).

Infrastructure Priorities

2.9 Question 5 of the survey offered respondents the chance to rank their priorities for infrastructure in the Borough. 402 (29.6%) responded to this question, including 12 postal responses.

2.10 The top five priorities overall were:

- Healthcare (290, 21.4%)
- Green space and play facilities (251, 18.5%)
- The road network (209, 15.4%)
- Public transport (172, 12.7%)
- Community facilities (163, 12%)

2.11 Broken down by settlement, Healthcare remained the priority in each area, with green space and play facilities in second place in all but Markyate, where public transport came second.

2.12 Beyond this, priorities became more varied with each settlement/area. The road network was a third priority for Hemel Hempstead, Kings Langley, the Countryside, and for those that selected 'the whole of Dacorum'. Community facilities was a third priority for Berkhamsted and Markyate, as was public transport for Tring, Bovingdon and the whole of Dacorum.

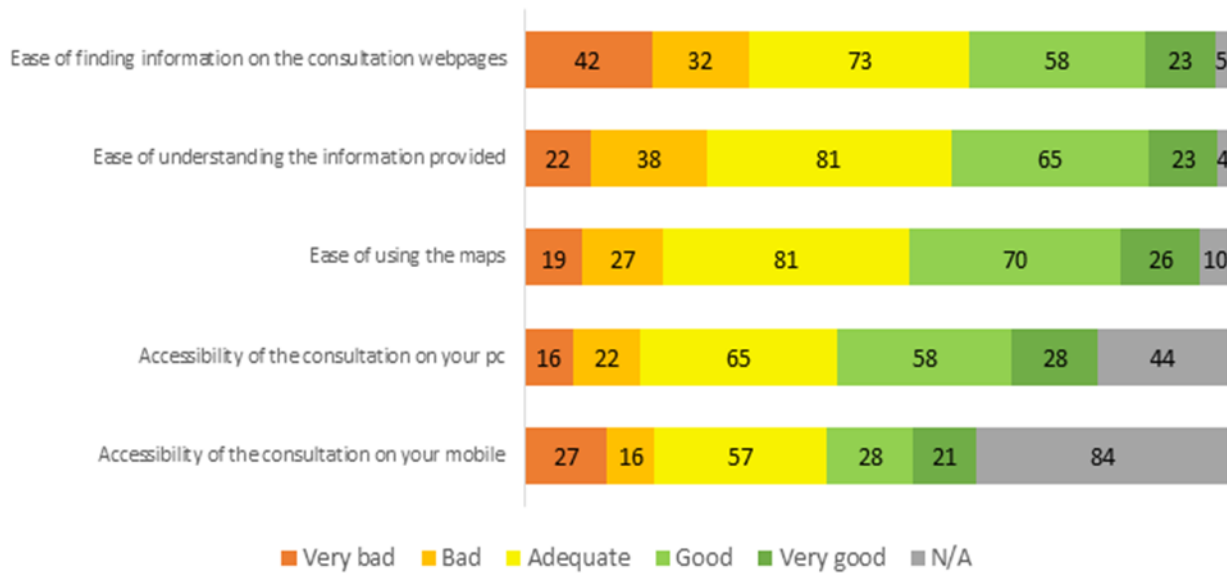
Feedback on the Consultation Process

2.13 Respondents were also asked to submit their feedback on the consultation process. 233 people (17.2% of total respondents) responded to this section.

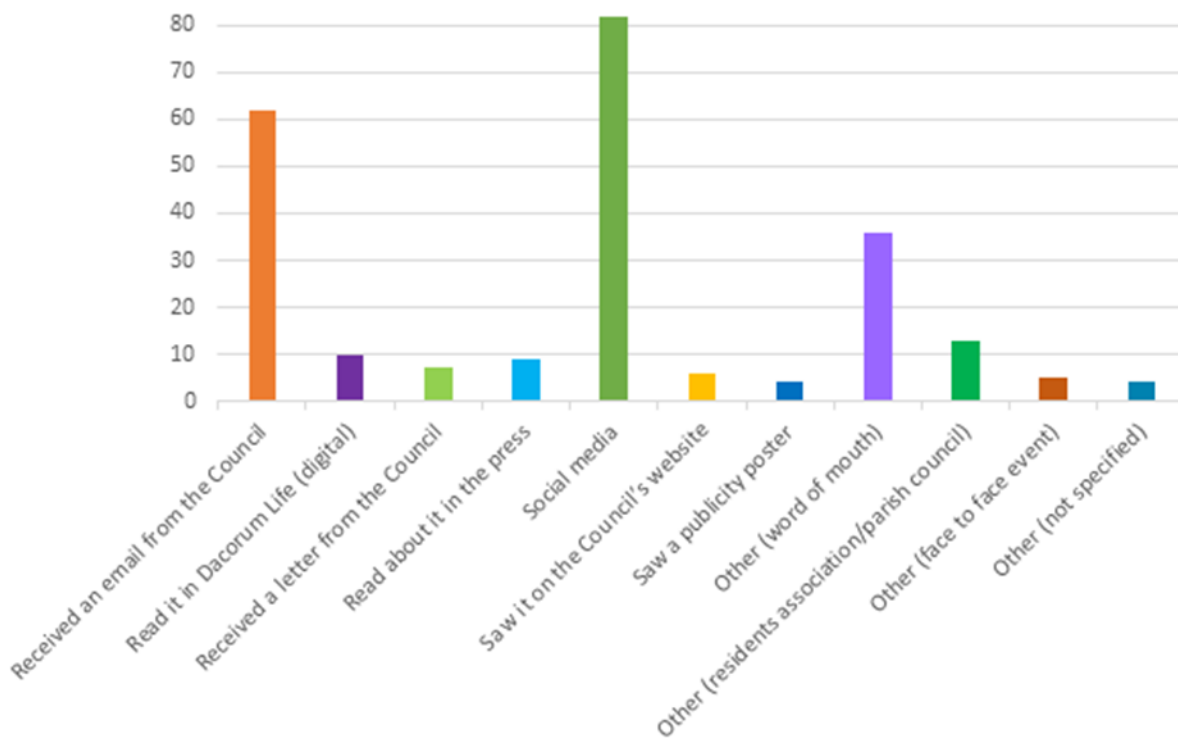
- a) The most positive response was regarding the ease of using the maps, with 11.2% reporting a very good experience, and 41.2% reporting either a good or very good experience. 34.8% found the maps adequate.
- b) The most negative response was regarding the ease of finding information on the webpages, with 31.7% reporting either a poor or very poor experience. Nevertheless, 35.9% reported either a good or very good experience.
- c) 37.8% of respondents had a good or very good experience understanding information on the consultation webpages.
- d) Regarding accessibility on PC (Personal Computer), 36.9% had a good or very good experience.
- e) Regarding accessibility on mobile, 21% had a good or very good experience.

2.14 It should be noted 17.6% reported not using PC and 35.2% reported not using mobile, so among those who did use each medium, the proportion of approval will be larger.

2.15 Issues raised by respondents who required assistance with the consultation platform mainly revolved around not being able to submit more than one response per person. There were also concerns raised that the survey was too simple in comparison to previous exercises.



2.16 Respondents were also asked how they heard about the consultation. 223 responded (17% of respondents) of which over a third (36%) reported hearing about the consultation on social media, with almost a quarter (24%) responding after receiving a notification email from DBC.



Overview of Key Themes and Issues

- 2.17 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.
- 2.18 The following sets out some of the general themes that emerged through the consultation, in no particular order.
- a) Over a third of respondents supported the Revised Strategy for Growth, while a little over half objected. Support was highest in Tring and Kings Langley, where reductions of homes proposed were greatest, and objections were highest in Hemel Hempstead which has received the only increase in allocations.
 - b) Respondents were most concerned about losing green spaces in the Borough and the ability of infrastructure (particularly healthcare and traffic) to cope with the increased housing.
 - c) A large number of respondents welcomed the overall reduction in proposed Green Belt site allocations, however respondents continued to express concern regarding the remaining proposed Green Belt development.
 - d) Conflicting issues were raised between residents of the borough's market towns welcoming the renewed focus on Hemel Hempstead for growth, and residents of Hemel Hempstead requesting that the strategy adopt a more proportionate approach to growth in the Borough.
 - e) Additionally, a number of respondents raised concerns with the development of brownfield sites within Hemel Hempstead and the impacts this would have on existing infrastructure pressures and historic sensitivities in the areas of focus.
 - f) Many residents questioned the ability of infrastructure to accommodate the proposed growth, particularly healthcare, roads and education provision, and requested more certainty into the mechanisms for delivering infrastructure.
 - g) A substantial number of responses made by housing and planning professionals raised concerns with the soundness of the revised strategy and questioned how the council was justifying a reduced target for housing growth against the standard methodology target set by the government.
 - h) Detailed representations were made to the Council from organisations, infrastructure providers, landowners and developers, on 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.
 - i) Please refer to Section 3 and Appendix 1 of the main Consultation Report for the wider analysis of responses, structured by settlement.

Comparison to previous consultations

Number of comments received

	Responses	Respondents
Issues and Options (2017)	22,708	2,376
Emerging Strategy for Growth (2020)	16,237	4,109
Revised Strategy for Growth (2023)	1,356	1,356

2.19 The number of responses to the 2023 consultation were significantly lower as the online platform recorded the completion of the whole survey as one response, whereas the previous consultation software (used in 2020 and 2017) recorded the answer to each question as a response. Respondent numbers overall were also lower than previous consultations, however when applied to each area the following conclusions can be made:

- More respondents commented in relation to Hemel Hempstead in 2023 than in 2020.
- Fewer individuals made comments in relation to Berkhamsted, Tring and the three large villages in 2023 than in 2020.
- The number of individuals commenting about Dacorum's countryside increased in 2023, despite that there were very few changes proposed to the Countryside delivery strategy, and all of the proposals and sites included within the Emerging Strategy remained 'under review'

Comparison of respondent numbers by settlement (2020 and 2023)

Area	Emerging Strategy for Growth Number of respondents ²	Revised Strategy for Growth Number of respondents
Hemel Hempstead	387	562
Berkhamsted	1,494 (including Thakeham campaign)	488
Tring	1,667 (including GFRA petition)	292
Kings Langley	165	64
Bovingdon	109	43
Markyate	83	24
Countryside	160	221
Other	N/A	44
Whole Borough	N/A	243

Area	Emerging Strategy for Growth % of total respondents	Revised Strategy for Growth % of total respondents
Hemel Hempstead	9%	42%
Berkhamsted	36%	36%
Tring	41%	22%
Kings Langley	4%	5%
Bovingdon	3%	3%
Markyate	2%	2%
Countryside	4%	16%

² The data for the Emerging Strategy for Growth has been worked out by creating a total of all responses made to both the relevant Delivery Strategy and for the relevant Proposals and Sites section for each settlement, before being filtered to remove duplicate respondent IDs, in order to create a total of unique respondents per area.

2.20 Although all Local Plans have unique circumstances and challenges, the number of responses received is broadly comparable to other Regulation 18 consultations undertaken within neighbouring and other South West Hertfordshire LPAs

LPA	Regulation 18 Consultation Type	Year	Respondents	% of LPA's 2021 population (respondents)
Dacorum	Issues and Options	2017	2376	1.5%
	Draft Local Plan	2020	4109	2.6%
	Revised Strategy	2023	1356	0.9%
Buckinghamshire	Issues and Options	2022	3439	0.6%
Central Bedfordshire (Adopted 2021)	Issues and Options	2016	785	0.3%
	Draft Local Plan	2017	6828	2.3%
Hertsmere	Proposed Allocations	2018	2100	1.9%
	Draft Local Plan	2021	c. 6200	c. 5.8%
St. Albans	Draft Local Plan	2023	890	0.6%
Three Rivers (results unclear for 2017 issues and options / 2018 & early 2023 allocations)	Draft Local Plan	2021	'Over 2,500'	c. 2.7%
	Revised Strategy	2023	'Over 1000'	c. 1.1%
Watford (Adopted 2022)	Issues and Options	2018	481	0.5%
	Draft Local Plan	2019	890	0.9%

3) Consultation

3.1 This report was considered by the Council's SLT at the meeting on 7 February 2024 and by SLT-PH on 22 February 2024, and any suggested amendments have been taken into account.

4) Financial and value for money implications:

4.1 There are no financial implications arising as a result of this report.

5) Legal Implications

5.1 There are no legal implications arising as a result of this report.

5.2 Regulation 18 of the Town and Country Planning (Local Development) (England) Regulations 2012 places a statutory obligation on the council to consider all representations made during the consultation and take these into account.

6) Risk implications:

- 6.1 As the report is presenting an objective summary of the key issues raised through the recent consultation, officers do not consider there to be any risks arising as a result of this.
- 6.2 The Local Plan has its own detailed risk assessment and this is contained in the adopted Local Development Scheme (2023). This is regularly monitored in accordance with the Council's programme management procedures.

7) Equalities, Community Impact and Human Rights:

- 7.1 A Community Impact Assessment (CIA) was prepared to support the preparation and consultation of the Emerging Strategy for Growth, and was entered into the CIA database prior to the Cabinet meeting on the 20th October 2020. This document was reviewed prior to undertaking the consultation on the Revised Strategy for Growth in 2023, and it was deemed that no major changes were required. The CIA is appended to this report (Appendix 2).
- 7.2 There are no Human Rights Implications arising from this report.

8) Sustainability implications (including climate change, health and wellbeing, community safety):

- 8.1. There are no sustainability implications arising from this report.

9) Council infrastructure (including Health and Safety, HR/OD, assets and other resources:

- 9.1. There are no implications to Council infrastructure arising from this report.

10) Conclusions and Next Steps:

- 10.1 Following the consideration and approval of this report by Scrutiny and its publication, officers will undertake the following tasks:
 - a) Consider further the key issues raised and put in place actions and learning points, where appropriate, to address them;
 - b) Consider if further changes need to be made to the revised strategy in light of comments received, taking account of updated evidence on housing, employment, and other identified needs for the Borough;
 - c) Update its wider evidence base as appropriate to the key issues raised and consider if any additional evidence is needed to inform the pre-submission version of the Local Plan;
 - d) Review and update the suite of policies that were consulted on in through the Emerging Strategy for Growth consultation held in 2020/21, taking account of relevant feedback received at that time as well as through the Revised Strategy for Growth;

- e) Engage with infrastructure providers to clearly define the requirements needed to support growth across the borough, to inform an updated Infrastructure Delivery Plan; and
- f) Engage with Members through the “Task and Finish” group, first meeting scheduled later in March 2024, on the key issues raised and how these will inform the pre-submission version of the Local Plan.

10.2 In line with the LDS (adopted October 2023) the ‘pre-submission’ version of the Local Plan will be published in accordance with Regulation 19 in October 2024, where the community, organisations and statutory consultees will be invited to make representations on the plan. This will be accompanied by the Council’s response to key issues raised and how this has informed the final version of the Local Plan.

10.3 The Local Plan and representations received will then be submitted to the Planning Inspectorate in February 2025, ahead of the June 2025 deadline set by the Government, with a target adoption date of February 2026.



Local Plan 2024-2040

Revised Strategy for Growth

Consultation Report

March 2024

Contents

1. Introduction.....	2
2. Consultation Report	3
2.1 Background.....	3
2.2 Engagement Methods.....	5
2.3 Making Representations	10
2.4 Overview of Responses	10
3. Analysis of Responses.....	15
Introduction.....	15
3.1 Dacorum (Whole of Borough)	16
3.2 Hemel Hempstead	41
3.3 Berkhamsted.....	71
3.4 Tring	84
3.5 Bovingdon.....	92
3.6 Kings Langley	96
3.7 Markyate.....	101
3.8 Countryside.....	104
3.9 Other.....	108
3.10 Infrastructure.....	110
3.11 Evidence Base.....	110
3.12 Consultation Feedback	111
3.13 Call for Sites	112
4. Next Steps	113
Appendix A: Supporting Information.....	114
Appendix B: Full Text of Responses	131

1. Introduction

1.1 The Dacorum Local Plan (2024-2040) Revised Strategy for Growth sets the vision for the future of the Borough up to 2040. It includes a strategy for delivering new homes, jobs, and much needed investment across the borough. It will also provide clarity on how important infrastructure such as schools, transport and health facilities will be delivered.

1.2 The Council are grateful for the time residents, businesses and organisations have spent engaging with this document. This Consultation Report sets out the engagement process in detail, summarises the main issues raised and sets out the Council's next steps.

1.3 This report is structured as follows:

Section 2. Consultation Report: This explains how the Council engaged in the public consultation, in accordance with our Statement of Community Involvement, including the methods we used and the overall level of response.

Section 3. Analysis of Responses: This is where the Council identifies the key points raised in the responses to the consultation and demonstrates how these comments have been taken into account when preparing the final document.

Section 4. Next Steps: This sets out the timetable for the next stage of the new Local Plan.

Appendix A. Supporting Information: This provides copies of the key material used to advertise the consultation. This includes copies of the notification for the consultation and the public notice.

Appendix B. Full Text of Responses: This contains details of where to access full copies of all individual responses made to the consultation. Alternatively, you can view all responses made on the consultation webpage, by visiting ... and selecting the Dacorum Local Plan (2024-2040) Revised Strategy for Growth Consultation section.

2.Consultation Report

2.1 Background

- 2.1.1 The Revised Strategy for Growth was the third 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 and set out to gain views on high level principles and issues facing Dacorum, and from the Emerging Strategy for Growth Consultation, which took place over 13 weeks from 27th November 2002 to 28th February 2021.
- 2.1.2 The Local Plan, when adopted, will cover the period 2024-2040 and replace the Saved Policies in the Dacorum Local Plan 1991-2011, the Core Strategy 2006-2031 and the Site Allocations DPD 2006-2031.
- 2.1.3 The Government expects all Local Planning authorities to have up-to-date Local Plans in place. Having an up-to-date Local Plan will allow the Council to set local standards and requirements for development, which are informed by engagement with the local community, and implement these through its planning decisions.
- 2.1.4 The current adopted Dacorum Local Plan is becoming increasingly out of date, and this causes increased risk of the Council losing control of its planning decisions, mainly through speculative development proposals being granted at appeal. In addition to this, the Government has set a deadline of the 30th June 2025 for all Local Plans to be submitted for examination. Therefore it is important that the new Local Plan is adopted in a timely manner.
- 2.1.5 The consultation on the Local Plan (2024-2040) Revised Strategy for Growth (RSG) was undertaken in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012. The consultation was also carried out in accordance with the requirements set out in the Statement of Community Involvement (SCI), adopted by Dacorum Borough Council in 2019.
- 2.1.6 The consultation sought views and opinions from residents, businesses, and organisations on a draft version of the RSG, with site allocations updated from the Emerging Strategy for Growth (ESG) consulted on in 2020. This follows an extensive programme of engagement which took place in 2017.
- 2.1.7 The statutory public consultation took place for six weeks between 12pm on 30th October 2023 and 11:59pm on 11th December 2023.

2.1.8 The consultation document, copies of the responses received and other associated information can be viewed on our online consultation portal.¹

¹ <https://letstalk.dacorum.gov.uk>

2.2 Engagement Methods

- 2.2.1 Everyone registered on the Council’s Strategic Planning consultation database at the time of the consultation start date was notified of the consultation by e-mail, or by post mail when registered as preferred. This includes specific (statutory), general and other consultation bodies, alongside the wider community.²
- 2.2.2 The Council sent a separate notification of the consultation by e-mail, with promotional assets as appropriate, to 16 Town and Parish Clerks within the Borough, 10 elected County Councillors for Dacorum, all 51 Dacorum Council members, and the Council’s Senior and Corporate Leadership Teams.
- 2.2.3 We used a variety of engagement methods to advertise the consultation. Full details of the methods and levels of engagement are listed below. The figures stated below refer to the documents provided in Appendix A: Supporting Information.

Website/Digital

New Dacorum Local Plan page	5,033 visits
‘Evidence base for the new single local plan’	775 visits
News story – ‘Consultation for revised draft Local Plan gives you the chance to shape Dacorum’s future’	470 visits
‘Past consultations for the New Local Plan’	412 visits
All Local Plan related pages	Total: 6,690 visits
‘Let’s Talk Dacorum’ consultation platform page views (30/10/2023-12/12/2023)	1,315 contributions 18,373 visits
Think Hemel	News releases uploaded to website during and after consultation period.
Banner on DBC homepage	For duration of consultation
Email footer promoting consultation	Available to all staff for internal/external communications

Notifications (figures 2 and 3)

Dacorum Borough Council Local Plan - Revised Strategy for Growth Consultation Notification	Email via Let’s Talk Dacorum to all registered participants on 30 th October 2023	1,326 Individuals and Organisations (open rate 107.3%) ³
‘Last chance to have your say’ Dacorum Local Plan (2024-2040) Reminder	Email via Let’s Talk Dacorum to all registered participants on 7 th December 2023	2,185 Individuals and Organisations (open rate 70.1%)

² As set out in Part A, Section 3: ‘Who We Consult’ of the SCI: <https://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/statement-of-community-involvement>

³

Dacorum Borough Council Local Plan - Revised Strategy for Growth Consultation Notification	Email from Strategic Planning to statutory consultees who had not re-registered with Let's Talk Dacorum on 2 nd November 2023 ⁴	31 Individuals and Organisations
Dacorum Borough Council Local Plan - Revised Strategy for Growth Consultation Notification	By post to those who re-registered to the postal database.	44 Individuals

Public Notice

Hemel Gazette (figures 5 and 6)	Published 30 th October 2023
Hemel Today website (figure 7)	Published 30 th October 2023

Press/Media

All press releases were sent to all media contacts on the DBC Communications team's media database.

Media releases were sent on:

- 27th October, announcing Full Council approval of consultation.
- 30th October, announcing start of consultation.
- 22nd November, announcing midway point.
- 7th December, reminding about the impending deadline on 11th December.
- 19th December, to say "thank you" for taking part and to explain next steps.

Publications

The consultation featured in:

- Dacorum Life Newsletter on 2, 16, 24 and 30 November; 7 and 21 December 2023 (figure 8): 12,337 subscribers.
- Business Update, on 15 and 30 November 2023: 2,331 subscribers.
- Dacorum Climate Action Network (DCAN) Newsletter, on 4 December 2023: 3,225 subscribers.
- Housing Matters, on 2 November 2023: 5,676 subscribers.

Social Media

DBC Facebook	12,000 followers (approx.)
DBC X (formerly Twitter)	8,979 followers

⁴ Prior to the launch of this consultation the Council migrated to a new consultation database and invited 6,586 individuals to re-register via email, and an additional 1,930 via post on 3rd October 2023. As the formal notification was issued to those registered with the new database on 30th October 2023, the council were clear in this notification if respondents required extra time to submit their response this would be accommodated.

DBC LinkedIn	5,277 followers
DBC Instagram	1,794 followers
Think Hemel LinkedIn – shared DBC post	306 followers

- Regular posts on DBC social media channels for the duration of the consultation gave instructions on how to take part, linked to the ‘Let’s Talk Dacorum’ page, and gave regular updates.
- ‘12 Days of Dacorum’ feature on Facebook, X and Instagram saw a daily post promote the consultation and highlight a location in the Borough every day, 30th November to 11th December.

Programmatic Advertising campaign (with Council Advertising Network Digital)

This included adverts on Facebook and a wide range of digital media sites and garnered 837,205 impressions (views) with 4,708 clicks over two weeks (27th November to 11th December).

Broken down by age of viewers:

- 13-17: 46,973 (5.6%)
- 18-24: 62,174 (7.4%)
- 25-34: 130,970 (15.6%)
- 35-44: 144,827 (17.3%)
- 45-54: 143,078 (17.1%)
- 55-64: 131,192 (15.7%)
- 65+: 127,934 (15.3%)

Local Plan Summary Video (online – YouTube)

Video available to view throughout consultation and promoted extensively via social media and embedded on dedicated Local Plan webpage: nearly 900 views.

Hard Copy Documents

Hard copies of documents were made available for public inspection throughout the whole consultation period at the three deposit points listed within the SCI:

- The Forum, Hemel Hempstead
- Berkhamsted Civic Centre
- Victoria Hall, Tring

Hard copies of documents were also made available for the public in the reference section of the seven libraries located in Dacorum during their normal opening hours:

- Adeyfield Library
- Berkhamsted Library
- Bovingdon Community Library

- Hemel Hempstead Library
- Kings Langley Community Library
- Leverstock Green Community Library
- Tring Library

Hard copies of documents were also provided to all 16 Town and Parish Councils in the Borough.

Exhibition stand

Pull-up banners, leaflets, etc. were set up in the Forum reception, for residents and staff.

Bookmarks

1200 seeded bookmarks were produced and distributed at various public events attended by the Local Plan team. Bookmarks bore the 'Let's Talk Dacorum' web address and a QR code.

Stakeholder toolkits

These contained digital versions of A3 and A4 posters for the Local Plan, A5 flyers, press release, campaign letter, a guide to access consultation materials, and social media assets.

These were sent to a number of organisations across the Borough, as well as to DBC Members, senior officers and to Parish Councils.

Dacorum Borough Council's Elected Members

- Notified 51 Dacorum Elected Members by e-mail.
- Notified 10 Hertfordshire County Councillors for Dacorum by e-mail.
- Members' news: Notified of consultation using the weekly e-newsletter on the ...

Public events

DBC officers working on the Local Plan were present at the following public events with informational and promotional materials on the local plan consultation and engaged with members of the public in attendance.

Christmas Fairs:

- 18th November - Hemel Christmas Lights - Marlowes - 11am-6pm
- 25th November - Tring Christmas Festival - Victoria Hall - 3:30pm-8:30pm
- 26th November - Berkhamsted Festival of Lights - High Street - 3:30pm-6pm

Forum Events:

- 20th November - Dacorum Climate Action Network Annual Conference - 6pm-9pm
- 29th November - Housing Open Day - 3pm - 7pm

Parish/Town Council Meetings / Community Meetings:

- 6th November – Bovingdon Parish Council - 7:30pm

- 16th November – Redbourn Parish Council - 7:30pm
- 20th November - Great Gaddesden Parish Council - 7:30pm
- 27th November – Grovehill Community Centre - 7:30pm
- 4th December - Woodhall Farm Community Centre - 7:30pm
- 4th December - Tring Town Council

Youth Councils:

- 15th November - Tring Youth Council – Tring Town Hall - 4pm
- 23rd November - Dacorum Youth Council - Bennett's End Youth Centre - 6pm-8pm
- 30th November - Berkhamsted SWAN Project - Ashlyns School - 3:20pm

2.3 Making Representations

2.3.1 Feedback on the Local Plan 2024-2040 – Revised Strategy for Growth was invited as a survey on the engagement portal, “Let’s Talk Dacorum”.

2.3.2 The comments form could be completed using our online consultation portal. The portal was advertised by providing a hyperlink in a variety of locations, including on the Council’s Local Plan webpage, as part of consultation notifications and within other advertisements for the consultation. The portal provided the option of comments on the draft RSG, as well as supplementing responses with additional material.

2.3.3 If it was not possible to make comments directly on the consultation portal, responses could also be accepted by post to:

Strategic Planning, The Forum, Marlowes, Hemel Hempstead, HP1 1DN.

2.3.4 For those making comments by post, a downloadable and editable comments form (see figure 9) was provided on the Local Plan web page. This could be printed out and posted as a letter. Copies were also made available at libraries across the borough.

2.4 Overview of Responses

2.4.1 The following sections provide a high-level summary of the number of responses received, and the demographics of respondents. This is followed by an overview of key themes arising from the responses as a whole.

Level of Response

2.4.2 The consultation received a total of 1,356 comments. 1,315 of these responses were made directly within the online consultation portal. 41 responses were received via post. Two communications were also received from MPs relating to concerns from constituents in Hemel Hempstead and Berkhamsted respectively. The MPs letters were responded to directly.

Sources of Traffic

2.4.3 The number of visits to the online consultation portal between the consultation dates are as follows:

	Visits to All Pages	Visits to Survey	Responded to Survey
Direct (typing the URL directly into the address bar / QR code)	6,118	2,992	820
Social Media	5,118	1,059	98
Email campaigns from Let’s Talk Dacorum	1,572	783	210

Dacorum Website	810	432	105
Search Engine searches	284	131	50
Referrals (Links on any other non-government website.)	256	121	31

Demographics

2.4.4 Demographic data was optionally collected in the registration process for users of Engagement HQ. Data was collected on respondents' date of birth, gender, ethnicity and disability. This is the first time the Council has recorded demographic data for a consultation of this nature.

2.4.5 The following tables include breakdowns of these categories accordingly, considering the full total of 1356 responses, including those by respondents who chose not to or did not have the option to submit demographic data.

2.4.6 Only the 1,315 respondents using the online survey had the option to provide demographic data. Out of these, 703 respondents chose not to answer additional demographic questions on registration (54.9% of respondents).

Table 1: Decade of birth of respondents

Decade of birth	Number	Percentage (of total responses)	Percentage (of respondents to this question - 538)
<i>Did not provide demographic information</i>	744 (includes 41 postal responses)	54.7	-
Not given	74	5.5	-
Mistaken*	17	1.3	3.2
2000 onwards**	4	0.3	0.7
1990-1999	25	1.8	4.7
1980-1989	78	5.8	14.5
1970-1979	115	8.5	21.4
1960-1969	125	9.2	23.2
1950-1959	115	8.5	21.4
1940-1949	54	4.0	10
1930-1939	5	0.4	0.9

* Officers have assumed this on the basis that an individual born on the registered year of birth would not possibly be able to respond and the only explanation would be an error registering the date.

**you must be at least 13 years of age to register on 'Let's Talk Dacorum' without permission from a parent/guardian.

2.4.7 The median age of respondents (at the time of their response) was 56 years old, this is higher than the median age of the borough - 40 years old (census 2021).

Table 2: Gender of Respondents

Gender	Number	Percentage (of total responses)	Percentage (of respondents to this question - 603)
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<i>Did not provide demographic information</i>	744	54.7	-
Not given	9	0.7	-
Agender	0	0	0
Male	305	22.5	50.6
Female	290	21.4	48.1
Non-Binary	2	0.1	0.3
Transgender Female	0	0	0
Transgender Male	1	0.1	0.2
I use a different term	0	0	0
Prefer not to say	5	0.4	0.8

Table 3: Ethnicity of Respondents

Ethnic Group	Number	Percentage (of total responses)	Percentage (of respondents to this question - 578)
<i>Did not provide demographic information</i>	744	54.7	-
Not given	34	2.5	-
Bangladeshi or British Bangladeshi	0	0	0
Chinese or British Chinese	0	0	0
Indian or British Indian	2	0.1	0.3
Pakistani or British Pakistani	2	0.1	0.3
Other Asian or British Asian	0	0	0
Black or Black British - African	0	0	0
Black or Black British – Caribbean	1	0.1	0.2
Other Black, Black British or Caribbean	1	0.1	0.2
Mixed White and Asian	2	0.1	0.3
Mixed White and Black African	0	0	0
Mixed White and Black Caribbean	1	0.1	0.2
Other Mixed	3	0.2	0.5
Arab	0	0	0
Kurdish	0	0	0
Latin American	0	0	0
Turkish	0	0	0
White English, Welsh, Scottish, Northern Irish or British	515	38	89.1
White Irish	4	0.3	0.7
White Gypsy or Irish Traveller	0	0	0
White Roma	0	0	0

Other White	31	2.3	5.4
Prefer not to say	16	1.2	2.8

Table 4: Respondents with a physical or mental health condition(s) or illness(es) lasting or expected to last for 12 months or more, and how this affects their ability to carry out day to day activities:

Physical or mental health condition(s) or illness(es) lasting or expected to last for 12 months or more	Number	Percentage (of total responses)	Percentage (of respondents to this question - 578)
<i>Did not provide demographic information</i>	744	54.7	-
Not answered	11	0.8	-
No	525	38.7	87.4
Yes, this affects their ability to carry out day to day activities a lot.	8	0.6	1.3
Yes, this affects their ability to carry out day to day activities a little.	29	2.1	4.8
Yes, prefer not to say how this affects their ability to carry out day to day activities.	2	0.1	0.3
Yes, this does not affect their ability to carry out day to day activities at all.	20	1.5	3.3
Prefer not to say	17	1.3	2.8

Table 5: Most Common Post Codes of Respondents

Post code	Number	Percentage
HP4	447	33
HP23	241	17.8
HP1	188	13.9
HP2	186	13.7
HP3	119	8.8
WD4	37	2.7
AL3	10	0.7
Other	101	7.4
Did not answer	27	2

Overview of Key Themes and Issues

2.4.8 The detailed responses are summarised in Section 3 (Analysis of Responses) and a full list of responses made can be found in **Appendix B**.

2.4.9 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.

2.4.10 The following sets out some of the general themes emerging, in no particular order. Please refer to Appendix 1 for a wider summary of key themes and issues:

- Over a third of respondents supported the RSG, while a little over half objected. Support was highest in Tring and Kings Langley, where reductions were greatest, and objections were highest in Hemel Hempstead which has received the only increase in allocations.
- Respondents were most concerned about losing green spaces in the Borough and the ability of infrastructure (particularly healthcare and traffic) to cope with the increased housing.
- A large number of respondents welcomed the overall reduction in proposed Green Belt site allocations, however respondents continued to express concern regarding the remaining Green Belt development.
- Conflicting issues were raised between residents of the borough's market towns welcoming the renewed focus on Hemel Hempstead for growth, and residents of Hemel Hempstead requesting that the strategy adopt a more proportionate approach to growth in the Borough.
- Additionally, a number of respondents raised concerns with the development of brownfield sites within Hemel Hempstead and the impacts this would have on existing infrastructure pressures and historic sensitivities in the areas of focus.
- Many residents questioned the ability of infrastructure to accommodate the proposed growth, particularly healthcare, roads and education provision, and requested more certainty into the mechanisms for delivering infrastructure.
- A substantial number of responses made by housing and planning professionals raised concerns with the soundness of the revised strategy and questioned how the council was justifying a reduced target for housing 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.

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

3. Analysis of Responses

Introduction

This section of the report summarises the key themes emerging from the responses.

The main part of this summary focuses on responding to the settlement specific issues raised and is structured as follows:

- 3.1 Dacorum (Whole of Borough)
- 3.2 Hemel Hempstead
- 3.3 Berkhamsted
- 3.4 Tring
- 3.5 Bovington
- 3.6 Kings Langley
- 3.7 Markyate
- 3.8 Countryside
- 3.9 Other (please specify)

Please note that respondents could select multiple areas to comment on through the survey. General issues raised (where applicable) are summarised under section 3.1. For the remaining sections only settlement specific issues raised in responses have been included.

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

- **Specific Bodies:** also referred to as 'Statutory 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.

This is followed by a brief analysis of the responses made to the optional questions participants could choose to answer in addition to the main survey. These are structured under the following headings:

- 3.10 Infrastructure Priorities
- 3.11 Evidence Base
- 3.12 Consultation Feedback
- 3.13 Call for Sites

Full text of the responses to the consultation can be found in **Appendix B** of this document.

3.1 Dacorum (Whole of Borough)

- 3.1.1 Survey respondents had the option to select to which settlement area their response related. 243 responses (17.9%) selected Whole of Dacorum, of which 8 were postal responses.
- 3.1.2 Of these, 91 (37.4%) said they 'agreed' or 'somewhat agreed' with the proposal, while 121 (49.8%) 'disagreed' or 'somewhat disagreed' and 31 (12.8%) were neutral.
- 3.1.3 Survey respondents had the option to select their five infrastructure priorities. For those respondents who selected Whole of Dacorum, their top five priorities were:
- | | |
|------------------------------------|--------------|
| 1) Healthcare | 55 – (22.6%) |
| 2) Green space and play facilities | 49 – (20.2%) |
| 3) The road network | 39 – (16.0%) |
| Public transport | 39 – (16.0%) |
| 5) Community facilities | 33 – (13.6%) |
- 3.1.4 This ordering for “Whole of Dacorum” responses was almost identical to that of the overall responses, unsurprisingly, although “Public transport” was slightly more prioritised.
- 3.1.5 Consultation responses have been grouped according to the type of respondent: specific bodies (whom the Council is legally obliged to consult), general bodies (any other response submitted on behalf of an organisation), and wider community (responses from individuals).

Specific Bodies

- Affinity Water notes that a number of proposed developments sites are located within an Environment Agency groundwater SPZ corresponding to groundwater abstraction locations and Pumping Stations.
 - Affinity Water would normally ask for conditions that minimise risks to public water supply when considering plans for new developments within SPZ1s and encourage developers to engage with them in the early stages of development to ensure there is no impact on public water supply.
 - These include risks from construction works causing contamination including turbidity, or changes to surface water infiltration.
 - Eight sites are noted as located within SPZ1s: Berkhamsted Civic Centre, Civic Centre Site, North Hemel, Old Town, Town Centre Opportunity Area Broad Location, Watling Street Truck Stop, London Road, West Hemel Hempstead.
 - Affinity Water have identified several areas where their mains apparatus intersects sites for future (re)development of existing sites. No development

will be permitted within a specified distance of these services. Where there is potential to affect the existing water network, they expect these impacts to be fully considered and for developers to discuss these with them early in the process.

- Ten sites are noted as having significant critical mains apparatus within their boundaries: NCP Car Park Hillfield Road, Station Gateway, North Hemel HGC, Two Waters/ London Road Junction, Land at Turners Hill, Old Town, Mill Bank Lane, Berkhamsted Civic Centre, South of Berkhamsted, and Watling Street Truck Stop.
 - The demand increase due to the Dacorum Borough Council Domestic sites will be approximately 6.2 Ml/day (13,777 domestic units) with pressures at the critical points in the network due to the new developments such that major reinforcements will be required. This normally means new pipelines although in some cases new pumping stations will also be required.
 - Affinity Water have a number of reinforcement schemes either newly completed or in the pipeline to help transfer water for developments, for resilience and protecting chalk streams. However, it is still likely, due to this growth, that there will be ongoing requirement to carry out some reinforcements to our existing infrastructure. All proposed reinforcements will aim to recover the current level of service and the loss of capacity in the network due to the additional load imposed by all projected development.
 - However, nearby Local Authorities are also projecting a significant increase in demand which can influence the nature and pace of planned infrastructure required in the area for future growth. Therefore, Affinity Water strongly encourage early engagement on plans for future development, to ensure they can effectively plan for the impacts of the associated increase in demand. All projections of infrastructure capacity are subject to developers and customers reducing their PCC (Per Capita Consumption) in accordance with our WRMP (Water Resources Management Plan) through the development of water-efficient buildings and encouraging customers to save water.
 - Affinity Water encourage every local authority to have a water-use target set for new development of 110 litres per person per day or less. Plans for new developments should therefore include this requirement.
 - For new developments they also expect the use of water-efficient fittings and fixtures such as rainwater harvesting, rainwater storage tanks, water butts, green roofs, and water efficient appliances in all new developments.
- The Canal & River Trust want the Council to acknowledge their waterways as significant blue/green infrastructure within the Local Plan and as part of the historic environment, the character, cultural and social focus of the plan area.
 - The C&RT notes the important role of the Grand Union Canal and the Tring reservoirs in delivering aspirations for sub-regional and local accessibility particularly in increasing walking for local trips, such as those of Hertfordshire County Council to complete a high-quality active travel route between Watford and Apsley for which funding will be sought.

- The C&RT believes the Council should promote the towpath as an active Travel Route throughout the plan, with site allocations to contribute to its improvement where appropriate. As overall growth proposed would place additional burdens onto the waterway infrastructure, works to towpaths would be necessary to address the extra traffic, as well as safety upgrades for reservoirs. Improved wayfinding, signage, access and water recreational facilities would also need to be provided and funded.
- Central Bedfordshire Council supports the redistribution of allocations to Hemel Hempstead as sustainable, to reduce pressure on infrastructure in smaller settlements and protect the greenbelt, AONB and SAC.
 - CBC would appreciate clarification to reasons for deletion other than overlaps with other sites, planning permission or being under construction.
 - CBC notes that the reduction in housing targets is considerable and not justified and considers it inappropriate for providing additional levels of uncertainty for neighbouring authorities regarding unmet need.
 - CBC supports the SANG approach.
- The Chilterns Conservation Board (CCB) provide the following summary:
 - CCB recommend that the AONB Boundary Review is also acknowledged as a matter that will run in parallel with the progression of the plan and potentially influence its content.
 - CCB request clarification on the spatial arrangement of the dwellings within the HGC area, with a graphic comparing 2020 and 2023 proposals.
 - CCB request greater discussion of the SANG area to be associated with the HGC proposal.
 - CCB request greater discussion and consideration of the Land East of Tring decision.
 - CCB supports the LPA's reappraisal of housing numbers and their distribution when local considerations and constraints are taken into effect. CCB notes that the new section 245 of the 11 Levelling Up and Regeneration Act (LURA) considerably bolsters the legal duty to conserve and enhance the AONB.
 - CCB notes the lack of a specific strategy or future policy reassurance on Chalk Streams and their protection within section 41 of the Natural Environment and Rural Communities Act 2006 and as dealt with in the AONB Management Plan 2019-2024.
 - The Chiltern Beechwoods SAC mitigation strategy is wholly supported, and the LPA is commended for its delivery. The Council's adherence, indeed, exceedance, to these SANGs mitigation is also commended.
 - CCB would propose to comment on detailed development management policy wording at subsequent stages as such detail is anticipated.
- The Defence Infrastructure Organisation (DIO) Safeguarding Team note that DBC is washed over by safeguarding zones associated with RAF Halton, specifically aerodrome height and birdstrike safeguarding zones. Depending on the statutory

safeguarding zone within which a site allocation or proposed development falls, different considerations will apply.

- These safeguarding zones that would apply to each of the potential development sites identified.
 - Bk01: Land South of Berkhamsted - RAF Halton (birdstrike safeguarding zone).
 - Tr01: Dunsley Farm - RAF Halton (birdstrike safeguarding zone).
 - Cy04: Haresfoot Campus, Chesham Road, Berkhamsted - RAF Halton (birdstrike safeguarding zone).
- The MOD may also have an interest where development is likely to have any impact on operational capability, usually by virtue of the scale, height, or other physical property of a development. Examples include:
 - Solar PV development.
 - Wind turbines.
 - Any development over a height of 50m above ground level.
- East of England Ambulance Service NHS Trust (EEAST) confirm that there will be an increased requirement for ambulance facilities necessitated by the planned housing and population growth arising over the period 2024 - 2040 and beyond.
 - Population increase, deprivation, and longer life expectancies will all impact on the level of ambulance service demand, in respect of both emergency and non-emergency patient transport services.
 - EEAST requires developer funding to mitigate the impacts on its already at-capacity services from the population increase associated with planned housing growth.
 - Based on EEAST's activity rates and experience from other local authority areas within the East of England, they consider that a developer funded 'standard charge' of £340 per dwelling is necessary to fund the increased operational capacity.
 - EEAST acknowledges that the planned housing sites may be the subject of viability testing and would be content to be flexible in its approach to the level of funding to be secured for ambulance service infrastructure & facilities, on a site-by-site basis as necessary.
 - EEAST will assess on its merits each future resident-led planning application to determine the likely funding required. The funding would be secured via a planning obligation and/or the Community Infrastructure Levy (CIL) charging process, as appropriate.
 - EEAST welcomes the draft Local Plan's commitment to ensure necessary infrastructure and services are integrated into new developments, and endorses its approach, including the preparation of an updated Infrastructure Delivery Plan (IDP).
 - EEAST require the Council to reflect in the next Regulation 19 version of the draft Local Plan and in the updated Infrastructure Delivery Plan the need for developer-funded ambulance facilities.

- The Environment Agency (EA) make the following comments:
 - The EA note that the Level 1 Strategic Flood Risk Assessment (SFRA) for South West Hertfordshire, which should be reviewed on a rolling basis, is now 5 years old. The Council must review its modelling to ensure that development is being driven by accurate data.
 - The EA confirms an SFRA will be required for all sites within the flood plain.
 - Development of a surface water management plan is recommended for a local authority to satisfy its legal obligation to prevent surface water flooding.
 - The EA recommend that any developments required to complete an Environmental Impact Assessment conduct a site-specific water cycle study as part of their evidence base.
 - The EA make a number of detailed comments on the sustainability appraisal and habitats regulations assessment.

- Great Gaddesden Parish Council welcomes the reduction in housing but object to any Green Belt release, particularly when no exceptional justifying circumstances are provided. The parish council request that local housing needs are prioritised as opposed to national.

- Hertfordshire Constabulary could not find any reference to the emergency service facilities or supporting these organisations in the revised local plan.
 - They note that the Local Plan needs to give consideration to the facilities for the police and other emergency services, and how they will be affected by the increased demand on their services and the expansion of Hemel to the North and the East. This may need to be considered for section 106 funding to ensure emergency services' facilities can be improved to meet demand.
 - Hertfordshire Constabulary also request consultation by the Council on safety and security in neighbourhoods when designing new planned communities, in particular HGC, and that the Council bear in mind access for emergency vehicles.

- Hertfordshire County Council (HCC) refer to the necessity of Section 106 and CIL funding to deliver County ran services on a number of allocations and welcome a discussion with Dacorum Borough Council on how access to developer contributions will function under a new Local Plan.
 - HCC state that they will need to reconsider any redrafted development management policies prior to Regulation 19.
 - Transport services' previous comments on the plan's overall policies and sites remain as there have been no major change to HCCs overall approach to plan making in terms of transport. Further transport work will be required and should be evident in site specific policy and correlate to an IDP.
 - Ecology service primarily refer back to their response to the 2020 Regulation 18 Consultation asides from sites NEW1 and NEW2.
 - Lead Local Flood Authority services state that the Sequential Test must now consider all sources of flood risk (previously, sequential testing only applied to

- fluvial flood risk). Therefore, the Council may wish to update the SFRA and sequential testing to inform site allocations. For avoidance of doubt, the sequential test should consider all sources of flooding including fluvial (Flood Zone 2/3), ordinary watercourses, pluvial (surface water) and groundwater.
- Lead Local Flood Authority SuDS services cannot accept below-ground attenuation on greenfield sites. All greenfield sites will also be required to restrict discharge to greenfield rates and volumes. Brownfield sites should seek to discharge at greenfield rates and volumes and can and should make use of above-ground SuDS and will need justification where not possible. All sites must consider the SuDS hierarchy in the choice of SuDS features (e.g. basins, permeable paving, and attenuation tanks). All sites should conduct ground investigations including confirmation of groundwater levels and infiltration rates.
 - Public Health services attach guidance on healthy places and state that across the plan new housing sites should be delivered in accordance with healthy places principles.
 - Education services attach a detailed statement and refer to SEND requirements increasing by 15% every year from 2015 to 2021. HCC continues to focus on addressing the identified priorities of the Special School Place Planning Strategy 2020-2023 and state that solutions to meet the needs of pupils with SEND cross LPAs and contributions may be sought across LPAs for individual projects. S106 (or CIL) will be needed proportionately to fund the delivery of new provision as required.
 - Early Years services state that S106 or CIL will need to be made available to fund the wider childcare and nursery requirements for the plan.
 - Adult Care services attach a detailed note on older people's accommodation.
 - Services for Young People will seek to increase services available to young people in accordance with their Service Priority Themes. S106 or CIL will need to be made available to fund increased service capacity.
 - Libraries services state that S106 or CIL will need to be made available to fund an increase in resources at existing libraries.
 - Minerals and Waste Planning Authority (MWPA) services have provided comments on individual sites in the Revised Strategy for Growth relating to the safeguarding of minerals and waste infrastructure and of sand and gravel deposits and the management of waste arising from the demolition and construction of built development.
- Hertfordshire Local Enterprise Partnership and Herts Innovation Quarter raised the provision of Key Worker housing and query how the new Local Plan addresses this.
 - HLEP and HIQ welcome the draft Local Plan for measured and controlled growth to the benefit of its residents, businesses and visitors.
 - HLEP and HIQ believe that more could be made of Hemel Hempstead's strategic location close to London and UK strategic road network and relatively close to four international airports.

- Historic England identify in their response that there is a lack of detailed and proportionate historic environment evidence to support the new Local Plan, contrary to paragraphs 31 and 35 of the NPPF, and recommend the production of Heritage Impact Assessments for sites in close proximity to heritage sites.
 - HE emphasises that paragraph 32 of the NPPF makes it clear that significant adverse impacts should be avoided wherever possible, and alternative options should be pursued. Only when these impacts are unavoidable should suitable mitigation measures be proposed. Further details are provided below.
 - HE refers the Council to their Advice Note 3 'The Historic Environment and Site Allocations in Local Plans' for more information.
 - HE strongly recommends that HIAs are prepared for large strategic sites (such as HH01/HH02: North Hemel) or for sites where there are heritage issues, for instance, a highly graded heritage asset either on-site or in proximity, with more evidence expected for larger sites or more important heritage issues.
 - HE highlights that although sites may seem relatively unrestricted from a historical environmental perspective, their limited size could potentially pose challenges for mitigation, and this could affect their capacity.

- Little Gaddesden Parish Council believes the strategy will cause harm to villages in the north of the borough, particularly regarding traffic, and requests that Policy CS7 development protections as in the Core Strategy (2013) is carried forward.

- Luton Council do not have any comments to make on the revised strategy.

- Natural England agree with the screening in of all sites within the Chilterns Beechwoods SAC 12.6km Zone of Influence (ZOI) as part of Habitats Regulations Assessment.
 - Natural England state that the Plan should include a SANG strategy that broadly details how each allocation will deliver its SANG provision. This should include a map identifying existing and future SANG sites within Dacorum, their potential capacity and catchments for new development, and consideration of how proposed SANG connects with the wider landscape to maximise the benefits for people and nature. This could also consider the supply and demand of biodiversity units for Biodiversity Net Gain (BNG).
 - Natural England would welcome a specific policy to protect rare chalk stream habitats within the Borough and encourage opportunities for their enhancement and restoration while considering the watercourses metric for BNG, which requires a 10% Net Gain for streams and watercourses.
 - Natural England agrees with the conclusions of the preliminary Appropriate Assessment (AA) for the Chilterns Beechwoods SAC, including that adverse air quality impacts cannot be ruled out at this stage.
 - Natural England also agree with the preliminary AA conclusions with respect to the South West London Waterbodies.
 - Natural England note that air quality modelling is in progress along the B4506 and would appreciate early sight of the results of this modelling in order to

inform discussions around potential mitigation options, should the modelling suggest that mitigation is required.

- National Highways East Region's (NHER) principal interest is in safeguarding the operation of the M1, specifically junctions 8 and 9, and junction 20 on the M25.
 - NHER notes the Department of Transport's (DfT) revised Circular 01/2022 - Strategic Road Network and the delivery of sustainable development ('the Circular') which sets out how interactions with the Strategic Road Network (SRN) should be considered in the making of local plans.
 - NHER recommends the Council consult with them on any potential site that may impact the SRN in the area, so that they can appropriately assess it in line with DfT Circular 01/2022. The applicant/developer may need to identify suitable mitigation measures (if required).
 - NHER expects developments to submit a Transport Assessment (TA) or a Transport Statement (TS) along with a Travel Plan (TP) during statutory consultation.
 - The cumulative impact of the proposed site allocations needs to be assessed in line with the Circular for understanding the likely traffic impacts on the SRN in the area in terms of capacity and safety and identifying any possible mitigation measures (if required).
 - NHER wishes to continue to liaise with the Council and neighbouring authorities on the Local Plan to understand which sites the Council will allocate and the potential impacts of these on the SRN.
 - NHER would expect the evidence base to be detailed within Regulation 19.
 - NHER refers to the SRN in and around Hemel Hempstead, Markyate and Kings Langley.
 - NHER notes that the Council will prepare and submit an Infrastructure Delivery Plan in support of the Regulation 19 consultation. NHER want the Council to consult on any infrastructure proposals identified for the SRN to understand the impacts, cost and potential trigger points of when the infrastructure would be required within the plan period. They encourage the Council to engage early with them to identify any infrastructure required on the SRN.
 - NHER advises a joined-up approach to consultation for any developments that have an impact on neighbouring Local Authorities. NHER and the Council are already doing this, which they welcome.
 - National Highways will actively work with Dacorum to develop and draft a Statement of Common Ground (SoCG) to deal with any strategic cross boundary issues as the Local Plan progresses.

- Nettleden with Potten End Parish Council (NWPEPC) disagrees with the revised strategy, while welcoming the reduction in total housing numbers and the focus on urban areas, they object to further release of any Green Belt land. The parish council also reject the term 'Local Housing Need' and request a statement of Dacorum's internal housing needs. The parish council also note that the plan lacks a transport

strategy.

- NHS Hertfordshire and West Essex Integrated Care Board (HWE ICB) supports the draft local plan and is committed to work alongside the Council to ensure investment is directed to health provision in Hemel Hempstead.
 - NHS HWE ICB would welcome engagement with the upcoming updated Infrastructure Delivery Plan (IDP), regarding health priorities and their Estates Infrastructure Strategy.
 - Due to significant planned housing growth, HWE ICB and partners will deliver more joined-up care and explore opportunities for primary and community healthcare hubs.
 - HWE ICB will seek to ensure health facilities are on a level footing with education and public transport regarding funding.
 - HWE ICB notes that any delay in the adoption of the plan or subsequent changes to housing targets will impact its long-term health planning. As the revised plan is 'at risk' of rejection regarding its soundness, the HWE ICB are concerned about the effect of such a rejection on their long-term plans.
 - HWE ICB supports redistribution to Hemel Hempstead as creating more accessible and connected settlements which are healthier to live in.
 - HWE ICB notes no reference to previously identified on-site medical provision in the Hemel Garden Communities Position Statement or Framework Plan. Dacorum Borough Council and St Albans District Council should align their plans on health infrastructure to avoid NHS needs falling unaddressed.
 - There is some capacity in individual surgeries in Dacorum, but all Primary Care Networks and settlements as a whole are currently constrained with limited ability to accept new patients.
 - HWE ICB details recent, ongoing and proposed investments in primary care infrastructure across Dacorum. HWE ICB will seek developer contributions to offset forward investment, through Section 106 agreements or CIL.
 - HWE ICB provides indicative costs per metre squared for mental health and community health service developments.
 - HWE ICB notes that large parts of the West Hertfordshire Teaching Hospitals Trust are in extremely poor condition and is planning significant redevelopment.

- NHS Property
 - NHS Property encourage that flexibility be granted to the NHS via the wording of any planning policy aimed at preventing the loss or change of use of community facilities and assets, where healthcare is included within this definition.
 - NHS Property state that health facilities should be put on a level footing with affordable housing and public transport improvements when securing and allocating S106 and CIL funds, in order to enable the delivery of vital NHS projects.

- They also recommend specific policy requirements to promote healthy developments.
- St Albans City & District Council (SADC) looks forward to continuing productive Duty to Cooperate work with Dacorum Borough Council (DBC).
 - SADC welcomes the DBC draft Local Plan consultation, especially the approach to Hemel Garden Communities.
 - SADC proposes a plan period ending in 2041, as per NPPF paragraph 22.
 - SADC supports and looks forward to further discussion about the approach to Affordable homes, including potential impacts on viability and deliverability and Hemel Garden Communities.
 - SADC supports the recognition that windfall plays a significant part in housing delivery. They look forward to further discussions about how the Council has derived the windfall figures.
 - SADC notes the lower housing approach and raises concerns that DBC does not appear to be meeting the Standard Method figure for calculating Local Housing Need of 1,018 homes per annum in full. SADC does not currently consider that it has any capacity to support DBC in meeting its housing need.
 - DBC will need to be able to evidence that it has fully explored all reasonable options for meeting its housing need within the Borough. This includes, as also previously raised, within the land beyond the Green Belt and the Area of Outstanding Natural Beauty in northwest Dacorum. This full exploration is in the context of the rest of South West Herts, including St Albans City & District in particular, being fully bounded by the Green Belt.
 - SADC would welcome discussions about the DBC approach to NPPF paragraph 69 (a) during the approach to the Regulation 19 Publication stage.
- Thames Water (TW) have reviewed the sites in the latest consultation document and appended high level comments in relation to the potential sewerage infrastructure implications (see relevant responses to the settlements).
 - Overall, changes to the growth strategy are unlikely to result in significant changes to impacts on sewage infrastructure. Localised network upgrades are likely to be required and will need to be delivered ahead of the occupation of development.
 - TW are keen to work closely with the Council to understand the level of development that will come forward and where this will be in the district.
 - TW welcome early engagement over any potential changes to proposed allocations or the quantum of development proposed through the new Local Plan, so this information can be used to inform future growth plans.
- Three Rivers District Council (TRDC) note that the standard method as resulting in a local housing need calculation of 1,023 homes per year in Dacorum, although the revised growth strategy shows a further reduction to 900 homes per year from 950 in the previous growth strategy.
 - TRDC support the spatial distribution strategy 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.

- TRDC notes the government's intention to overhaul the planning system and asks to be kept informed of any changes relating to the new NPPF as DBC progresses.
- TRDC is committed to continuing with ongoing discussion and continued collaboration with regard to local planning matters through the Duty to Cooperate process.
- Watford Borough Council (WBC) notes the number of dwellings planned for in the 'revised strategy' has reduced by 15% while housing planned for in Hemel Hempstead has increased.
 - WBC acknowledges the difficulty local authorities are experiencing in trying to meet the nationally set standard method and share the belief that the process produces inappropriately high housing targets for many areas.
 - WBC recognises that 88% represents a very high proportion of this need being met within the 'revised strategy'. However, to justify the proposed level of housing relative to the standard method, exceptional circumstances will need to be demonstrated in accordance with paragraph 61 of the NPPF.
 - WBC makes clear that there is no suitable or available capacity within Watford to assist DBC in meeting the shortfall in housing proposed.
 - WBC has been working constructively with DBC on the development of the Local Plan and will continue to do so and welcomes continued collaboration on the South West Hertfordshire Joint Strategic Plan.

General Bodies

- Adrian Cole FRICS Ltd notes:
 - That reduced housing levels risk the plan being found unsound.
 - Identified sites are generally those owned by DBC and HCC at the expense of private landowners.
 - No reference to individual SANG provision.
 - No specific policy or sites for Retirement Schemes.
- Armstrong Rigg Planning, on behalf of Barratt David Wilson Trading Ltd and Taylor Wimpey, notes the time being taken to produce a new Local Plan, and states that the plan period should be extended to 2042, that housing growth should align with the Standard Method figure, and thus that all deleted allocations, including their site HH21 West Hemel Hempstead, be reinstated.
- Bidwells on behalf of Vistry Group and Crest Nicholson stresses concerns that continued under delivery of housing may worsen affordability within the Borough, limit job creation, and marginalise those who cannot afford their own home and those in need of specialist housing such as older people.

- Bidwells notes that the NPPF states that the minimum number of homes planned should align with the Standard Method.
 - Bidwells advocates for the plan period to be extended to 2042.
 - Bidwells is concerned about the impact of unmet need from London and neighbouring boroughs.
 - Bidwells notes that a housing land supply buffer will further increase the minimum housing and so more land should be allocated for release from the Green Belt and development.
- The British Driving Society and British Horse Society welcomes the use of more brownfield sites in Hemel Hempstead the reductions in development plans in smaller settlements.
 - BDS/BHS states that all planning approvals should support the Council's Climate Emergency declaration, suggesting that paragraph 1.2 be amended to include: 'Maximise the support of measures to reduce climate change'.
 - BDS/BHS states that planning approval should mandate for all homes and commercial buildings: heat pumps and/or solar panels; that all buildings have south-facing roofs; electric vehicle charging points, and necessary electric grid upgrades to be funded by S106 and/or CIL contributions.
 - BDS/BHS states that developers who purchased land at agricultural valuations and then sold it on for development should be requested to subsidise affordable homes planned on the site.
- Butterfly Conservation – Hertfordshire and Middlesex Branch notes that 35 butterfly species are resident or common migrants in Dacorum, but overall populations are severely depleted.
 - BC-HMB notes that 12 species have died out in Dacorum in the last century (1 in 4) while common butterfly numbers are declining by approximately 2% a year across the UK. Many moth species are suffering a similar decline.
 - Seven butterfly species in Dacorum are specially protected and loss of habitat to development is one of the primary threats to butterfly populations.
 - BC-HMB states that White-letter Hairstreak in particular should have its habitat requirements considered at every site.
 - BC-HMB notes that wildflower meadows have declined by 98% over the last century and thus the Council ought to step up creation of meadows, channelling development away from sites with the most wildlife value, enhancing biodiversity elsewhere, and improving connectivity between enclaves.
 - BC-HMB thus welcomes the removal of site allocations around smaller towns and villages but would prefer still further reductions in overall development.
 - BC-HMB demands that sites designated as Local Nature Reserves or Wildlife Sites automatically be considered as Red in the SHLAA.
- Carter Jonas on behalf of Apsley Developments Limited considers the proposed plan unsound for not fully meeting the Borough's housing needs.

- CJ notes that windfall has been calculated by assessing past delivery trends, without demonstrating that past trends are still applicable or repeatable.
 - CJ points out that lapsed planning permissions should be removed from the calculation of sites with planning permission.
 - CJ refers to the delivery of only four affordable dwellings delivered through rural housing schemes over a 14-year period, an acute lack of family-sized dwellings, and the ONS housing affordability ratio for Dacorum of 13.9.
- CBRE is representing Landhold Capital on behalf of European Property Ventures (Hertfordshire) Ltd (EPV) regarding the promotion of Barnes Lane, KLang021R.
 - EPV considers the local plan inappropriate and not in accordance with national policy, being overly reliant on windfall sites, and impacting the delivery of affordable housing and the affordability of housing more generally by reducing the quantum of planned development.
- The Chiltern Society welcomes reduced housing numbers but is concerned about affordable housing rates, water supply, sewerage, SANGs, sustainable transport, shortages of GPs, emergency healthcare provision, local school space, and traffic at peak times, alongside increased pressure from Hemel Garden Communities and its impact on quality of life, biodiversity and natural beauty.
 - The Chiltern Society is primarily concerned that housing numbers could be reduced further to 50% of the Standard Method, as in Three Rivers District.
 - Secondly, the Chiltern Society notes housing allocated close to the Chilterns AONB boundary, particularly Hemel Garden Communities, and believes that the resulting harm to the AONB would be too extensive to be mitigated.
- Community Action Dacorum (CAD) emphasises the importance of access to community provision and believe in greater emphasis on building community spaces in the Local Plan (noting only one current clear example).
 - CAD approves of the proposed level of affordable housing, but requests sustainable integrated travel solutions to reduce unsustainable rates of car usage and parking.
 - CAD also prioritises accessibility for disabled and older people to access shops and community facilities, alongside walking and cycling provision.
- The Council for the Protection of Rural England (CPRE) has significant concerns about the quantity of Green Belt allocated for development, that high levels of growth stick too close to Standard Method figures, insufficient consideration of brownfield-sites, Hemel Garden Communities and its impact on the Chilterns AONB, affordable housing, weak environmental protections, the Chiltern Beechwoods SAC exclusion zone and SANG, water supply and chalk streams, and waste water management.
 - CPRE points to paragraph 11, footnote 7 of the NPPF regarding the allocation of housing in protected land and the use of out-of-date data.
 - CPRE casts doubt on the label of “sustainable development” to describe the plan, particularly regarding requirements of the Environment Act 2021.

- CPRE notes the Chalk Stream Restoration Strategy 2021's findings that the Gade chalk river has 48% of recharge capacity removed from its aquifer for the public water supply, compared to 32% for the Ver, 28% for the Bulbourne, while 10% is the target figure for sustainable abstraction.
- CPRE calls for an explicit SANG policy, requiring a new onsite SANG for each new greenfield development over 50 dwellings and reachable by foot.
- The Dacorum Environmental Forum (DEF) calls for fewer homes per annum, guided by the Borough's needs, with all development on the Gade Valley to be prohibited and greenfield development on plateau land to be minimal.
 - DEF calls for extensive, managed wildlife corridors to link all areas of Natural Green Space.
 - DEF calls for a net-zero and sustainable transport strategy in place of the Sustainability Appraisal.
 - DEF notes a lack of improvement works to alleviate traffic congestion and improve air quality.
 - DEF notes no strategy for increasing domestic water supply and alleviating existing strain on aquifers.
 - DEF takes issue with the use of the Standard Method for housing targets.
 - DEF supports the reduction of housing allocations in the market towns of Berkhamsted and Tring but objects to its reallocation to Hemel Hempstead.
- Dacorum Sports Network (DSN) notes the lack of an Infrastructure Delivery Plan (IDP) accompanying the consultation document while current facilities cannot supply increased demand due to lack of space.
 - DSN proposes sports hubs as allocations within the IDP as more sustainable than ad hoc football pitch and play space provision in new developments, with specific plan for individual communities.
 - DSN notes sport-specific sites and opportunities for development in Hemel Hempstead, Tring and Berkhamsted (see below).
- DLP Planning Ltd represents Taylor Wimpey regarding the Bv01 site Grange Farm and believes there are no exceptional circumstances that justify undershooting the Standard Method, especially given unmet need in neighbouring areas.
 - TW notes that 36% of the claimed housing supply is reliant on unallocated and windfall sites. It says the risks of this reliance should be mitigated by consenting planning applications wherever possible.
 - TW notes that the Revised Strategy does not adequately identify or provide for the need for older persons' housing.
- Emery Planning on behalf of Keepmoat Homes objects to the revised strategy on the grounds that more houses are needed to meet the Borough's assessed housing need and that government guidance does not support such reduction in targets.

- Extinction Rebellion (XR) Tring calls for new developments to be carbon neutral throughout development, with passive house standards adopted and renewable energy promoted.
 - XR Tring expresses concerns regarding air quality in urban areas, biodiversity, health inequalities, climate change adaptation and mitigation, upcycling of resources, sustainable transport, and water pollution and supply.

- Tring & Berkhamsted Labour Party requests that social housing be built in the early stages of the plan period, at a rate of 80% and close to public transport and facilities.
 - T&BLP requests that social housing be close to public transport and facilities as residents of social housing are less likely to own car.
 - T&BLP notes that building far from public transport leads to more traffic, inconveniences older people, and causes social exclusion.
 - T&BLP desires carbon neutral, higher density, green construction with EV charging, and passive house standards.

- Extinction Rebellion (XR) Tring and T&BLP both state that if Green Belt is built on, over 50% should be designated for green infrastructure and/or SANG, with existing semi-natural ecosystems protected or expanded for Biodiversity Net Gain.
 - XR Tring and T&BLP request protections and expansions for natural habitats with new habitats to be created through rewilding and migratory corridors, such as a wildlife crossing over the A41 or an extension of the buffer woods alongside the A41.

- Fairfax Strategic Land (Hemel) Ltd makes several objections to the Local Plan and proposes a variety of changes to policies:
 - The Local Plan should cover the period 2023-2042.
 - Provision should be made for at least 19,323 dwellings during the plan period (2023 to 2042), at a minimum of 1,017 dwellings per annum.
 - The housing target should be based on a level (not stepped) trajectory.
 - Land west of Leighton Buzzard Road, Hemel Hempstead should be included as an allocation for approximately 390 dwellings and a 70-bed care home.

- GUCE and Transition Town Berkhamsted (TTB) welcome prominent mention in the Revised Strategy of climate change, sustainability and green issues.
 - GUCE and TTB support the overall reduction in new houses compared with the previous consultation, particularly in the Green Belt.
 - GUCE and TTB are concerned about housing to be built in the rural area outside Hemel Hempstead but would welcome it if it brings regeneration and improves the prospects of people living in Hemel Hempstead.
 - GUCE welcomes a greater emphasis on the prospects for community energy and network heating from renewable energy, for example the opportunity for community heating for the Range/CarpetRight site relating to Frogmore Paper Mill, and harnessing chalk aquifer boreholes in Kings Langley.

- GUCE and TTB consider it imperative that whole-life net-zero buildings is included as part of a Local Plan, particularly for affordable housing, with higher standards for insulation, heating, energy generation etc is needed, evidence is required for net-zero.
- GUCE and TTB note that the BRE (Building Research Establishment) has shown that the cost for purpose-designed zero carbon building is only 2% and only 5% for traditional designs, compared to 20% for retrofitting.
- The Hertfordshire Gardens Trust/The Gardens Trust state that settings of heritage assets must be considered before sites are finally allocated.
- Herts & Middlesex Wildlife Trust note that three of the retained or amended sites include Local Wildlife Sites (LWS) within their boundary, namely:
 - HH01/02: Varney's Wood
 - Bk01: Long Green
 - Tr01: Cow Lane Farm Meadows
- H&MWT notes several other sites located near or adjacent to an LWS, namely HH03/04, HH08, HH09, HH11, HH17, NEW2 and Bv01. Future development of all these sites should have regard to the wildlife value of the nearby LWS and ensure that they are enhanced, not harmed.
- Hightown Housing Association (HHA) believes the Local Plan should seek fully to meet the housing need, and particularly the full supply of affordable housing.
 - Hightown Housing Association stresses that local people on low incomes, who can only rent, must rely on homes within their local authority and so a supply of secure rented homes is vital.
 - Hightown Housing Association itself notes signs of historic undersupply in the Borough: tight qualifying criteria, full registers, homelessness, falling rates of homeownership.
 - Hightown Housing Association notes from the SA that many rejected sites are in sustainable locations and identifies the main housing supply constraint as recreational pressure on the Chiltern Beechwoods SAC.
 - Hightown Housing Association commends smart alternatives to the traditional formula-based approach to SANG, as a less constraining way to protect Ashridge.
 - Hightown Housing Association state that the Revised Strategy should fully meet housing need.
 - Hightown Housing Association also suggest the use of the Grand Union Canal as a SANG site.
- The Home Builders Federation (HBF) considers the revised strategy unsound and unjustified in the context of local housing need and the housing crisis.
 - The HBF believes the Council has not properly assessed the impact of not meeting housing needs and thus shortfall will see affordability and the supply

- of affordable housing continue to worsen, and more people living in overcrowded or substandard accommodation.
- The HBF notes that higher growth scenarios will have a much more positive effect on biodiversity in the long term compared to the Council's preferred approach, thus outweighing negative impacts.
 - The HBF believes location in the AONB is insufficient cause to dismiss sites.
 - The HBF expects the Council to meet housing need regardless of public opinion.
 - The HBF proposes extending the plan period to at least 2042 to ensure that its policies look ahead for at least 15 years (paragraph 22 of the NPPF).
 - The HBF points to paragraph 69 of the NPPF, that the LPA should deliver 10% of its housing requirement on sites of one hectare or less that the local plan or brownfield register have identified, and thus not form part of the windfall supply.
- Icen Projects represents Millbank Land, seeking to bring forward residential development at land at Bulbourne Park, Tring, and in strong disagreement with the changes made to the Local Plan, stating that removal of previously considered deliverable sites, strongly indicates that the Council cannot demonstrate the exceptional circumstances required to meet more of its housing needs.
 - Millbank Land states that the standard method for calculating housing need should be the starting point for the Council to meet its housing needs.
 - Millbank Land notes no clear and evidenced justification for the Council's departure from the standard method nor any exceptional circumstances.
 - Millbank Land notes no consideration for the borough's unmet needs in the wider housing market area close to London.
 - Millbank Land believe redistribution to Hemel Hempstead will see its housing market saturated and unable to cater for all housing needs.
 - J&J Design notes that its client, New Gospel Hall Trust, has a current need to identify an additional site for a new place of worship and anticipate the need for a further site in the Borough within the LP period to 2038. The Trust do not sub-let their halls for other secular activities, including any social or recreational uses.
 - NGH Trustees agree that growth must be proportionate with infrastructure but are concerned to ensure that there is an adequate supply of new housing, including for families, to provide for the needs of existing and future residents of the Borough.
 - NGH Trustees note that high-density and high-rise flats concentrated around transport hubs risk creating future problem areas and are not appropriate for families and the elderly.
 - NGH Trustees note the importance of social, recreational and cultural facilities needed by both existing and proposed new communities as set out in NPPF (2023) paragraphs 92 and 93, including places of worship and other community facilities.

- Les West planning promotes Bk07 (Lockfield, Northchurch), on behalf of CALA Homes Ltd.
 - CALA considers the revised plan contrary to national guidance in the NPPF.
 - CALA takes issue with the reliance on un-evidenced windfall figures.
 - CALA believes the Council has a duty to satisfy the calculated needs, regardless of public opinion or objections, and should have gone to Regulation 19 following the 2020 consultation.
 - CALA believes the reduction of housing targets will not stand up to scrutiny.
 - CALA is surprised to see no information on a proposed trajectory of housing delivery over the plan period.

- McLoughlin Planning on behalf of DB Land & Planning Consultancy objects to the revised strategy, particularly the lowered housing requirement.
 - DBLP would prefer for the implications of this reduction in housing numbers to have been laid out in a housing table within the document.
 - DBLP notes that the Standard Method should be a minimum figure for housing, and thus considers the proposed reduction contrary to national guidance and neither a justified strategy, nor positively prepared.
 - DBLP notes that the Cabinet Report presented to members on 17th October 2023 stated that the Council at that stage lacked evidence to justify taking an alternative to the standard method figure.
 - DBLP does not consider the Council to have considered national guidance on AONB and Green Belt properly in citing them as reasons for a lower target, noting that AONB does not prevent development and that Green Belt should be reviewed and re-evaluated.

- Montagu Evans, on behalf of Angle Property (RLP Rectory Farm) LLP, who have an interest in KL02, considers the Revised Strategy unsound for several reasons.
 - Angle Property considers the Revised Strategy to fall substantially short of the Objectively Assessed Housing Need (OAHN) requirement for Dacorum, without providing sufficient justification to demonstrate why the Council cannot achieve this, nor an updated Green Belt Review that supersedes the findings of the version used both to form the evidence base of the Emerging Strategy and as the basis for the deletion of site allocations in the Revised Strategy.
 - Angle Property notes that the Revised Strategy is significantly reliant on Windfall sites, leaving it at risk of falling further behind the OAHN target.
 - Angle Property recommends a lower windfall allowance and a greater number of site allocations to ensure housing delivery is genuinely plan-led.
 - Angle Property considers the focusing of housing delivery in existing urban areas likely to skew housing mix towards one- and two-bedroom homes within higher density development, which is likely to be exacerbated by the removal of draft allocations from the Green Belt, which could deliver more and larger, family-sized housing to meet local need.

- Angle Property believe the Council should therefore revisit opportunities for allocating additional suitable land (such as at KL02).
- MSC Planning Associates Ltd considers the reduction in housing numbers as down to public opinion primarily and partly due to pressures of large sites' requirements for SANGs for which there is no strategy.
 - MSC notes most allocations seeming to come from existing assets and the reuse of buildings, whereas long-term land will be required for expansion.
 - MSC supports upgrading rail facilities and access and suggests compulsory purchase of the surrounding site to facilitate comprehensive development.
- The National Trust supports the revised proposals for housing delivery and amendments made to allocations in order to protect the Chilterns Area of Outstanding Natural Beauty, The European Protected habitats at Ashridge and the Green Belt. The National Trust note that it is important that appropriate policies are included in the Local Plan to address and mitigate the recreational impacts of new development on the Chilterns Beechwoods SAC (including land owned by the National Trust). In particular, the requirements for Gateway sites should be set out.
- Nexus Planning is promoting Bk05 (Blegberry Gardens, Shootersway) for reallocation on behalf of Crest Nicholson Partnerships and Strategic Land.
 - Based on the Sustainability Appraisal, Crest Nicholson suspects the decision to undershoot the target was pre-decided and not based on evidence and testing of higher targets.
 - Crest Nicholson notes that as the uncapped housing requirement is even higher than the Standard Method the current plan will not address affordability, while the house price/earnings ratio is currently 13.86 (the 14th highest in England outside of London).
 - Crest Nicholson worries that the plan may be found unsound if other LPAs do not agree to take on the unmet need.
 - Crest Nicholson cites the risks of increased homelessness if affordability is not addressed, as well as impacts on Council Tax revenues.
- North East Hertfordshire Swift Group and the Swifts Local Network: Swifts & Planning Group request a policy that requires one integrated swift brick and one integrated bat brick for any new dwelling or development built.
 - The Swifts Local Network notes that most Local Plans approaching adoption now include such a requirement (e.g. the London Borough of Tower Hamlets, Richmond-upon-Thames, and Wiltshire).
 - They note that the NPPG Natural Environment 2019 states the benefit to wildlife of swift bricks, bat boxes and hedgehog highways. The government has also confirmed in their March 2023 Biodiversity Net Gain (BNG) consultation response that "species features" such as swift bricks must be specified in addition to the national legal requirement for 10% BNG which does not include them.

- They note that existing nest sites for building-dependent species should also be protected where possible, and mitigation provided where lost.
- PJB Planning promotes Bk11 (Billets Lane) for Scarth Ltd as a sustainable brownfield development of 40 dwellings.
 - PJB Planning highlights concerns about the increase in windfall allowance and use of greenfield land. It references specific paragraphs of the NPPF that the Revised Strategy allegedly fails to address.
- Pegasus Group represents Taylor Wimpey in requesting Bk06 (Land East of Darr's Lane) be reallocated as a safeguarded or reserved site.
 - TW points out that 4000 respondents from the previous consultation only make up 2.6% of the Borough's population, many of whom would have vested interests.
 - TW believes that the plan period should cover 2026-2041 and increase the housing requirement.
- Phase 2 Planning on behalf of Gleeson Developments notes that the revised Local Plan seeks to reduce the number of new homes to below that suggested by the Standard Methodology based on public opinion rather than a coherent rationale.
 - P2P believes that achieving the Standard Method figure would not have significant adverse impacts on the Green Belt, as previous Green Belt studies identified significant parcels with only moderate Green Belt performance, whilst strongly performing parcels have pockets that could be released without significant impacts.
 - P2P notes that plan papers did not set out adverse impacts of a reduction in housing e.g. fewer homes available for local families, higher house prices, less provision of affordable housing, further pressure on rural services.
 - P2P consider the plan unsustainable by stifling land supply, adversely impacting health and prosperity of other settlements, and forcing people to live further afield from family, friends and jobs.
- Roebuck Land and Planning Ltd on behalf of Hallam Land Management (HLM) objects to the new Local Plan for reducing housing growth below the standard method based on exceptional circumstances based on the Chilterns AONB and Green Belt but no demographic considerations, and it risks being found unsound.
 - HLM notes that the Council has not demonstrated a rolling Five-Year Housing Land Supply, and that the proposed supply, being reliant upon HGC and large tracts of urban land in active use, has a high risk of delay.
 - HLM argues that the location of Hemel Hempstead station supports further housing allocations on the west side of the town.
 - HLM does not consider brownfield sites identified as realistic regarding their current use value, attractiveness for non-housing or commercial use, viability for redevelopment as housing, and complex landownership.
 - HLM believes more land must be released from the Green Belt to assuage unreliable brownfield sites and to reach the standard method figure.

- HLM supports the decrease in housing provision at Berkhamsted and Tring.
- HLM considers reliance on the projected scale of windfall delivery unrealistic.
- Ryan & May on behalf of Redrow Homes Ltd (Harrow Estates Division) (Harrow) considers changes to the local plan unsound as not positively prepared, justified, effective, or consistent with national policy, while adjacent boroughs are unable to accommodate unmet need.
 - Harrow notes that the Council's evidence base demonstrates how it can meet in full the housing needs of Dacorum while balancing other strategic and environmental considerations.
 - Harrow cites the Council's evidence to argue development of scale on the edge of the Borough's major settlements, including Tring would enable timely delivery of community facilities and infrastructure and maximise affordable housing.
 - Harrow notes undue reliance upon high-density urban brownfield sites, including those with questionable viability and availability, and an unrealistic and not evidenced windfall allowance.
 - Harrow notes that evidence shows exceptional circumstances exist to justify releasing land from the Green Belt since there are insufficient sites within the urban area and not affected by major constraints.
 - Harrow object that evidence given at the Marshcroft (Land East of Tring) inquiry is not accurately reflected or fairly assessed, only reporting housing benefits resulting from development of the site, not the biodiversity net gain in excess of 35% and the wider socio-economic benefits to the Borough and local community estimated by the developer. The plan does not acknowledge the absence of any technical or environmental constraints to the delivery of the site, and incorrectly suggests in the SHLAA that access is constrained.
- Savills on behalf of Bellway Homes Ltd (North London) (Bellway) are very disappointed by the reduction of planned housing delivery below Standard Method.
 - Bellway notes no buffer in the proposed housing requirement to take into account an increase in minimum housing need over the duration of the plan nor to overcome potential deliverability issues with the identified sites, as required by the NPPF (paragraphs 74-75).
 - Bellway considers the quantum of proposed residential development under the Revised Strategy for Growth to be insufficient to meet the minimum housing need and in conflict with the NPPF.
 - Bellway believes the Local Plan should propose a greater amount of residential development in Dacorum and reduce its reliance on windfall.
 - Bellway supports focused growth in Hemel Hempstead but feel that the other settlements in the borough should deliver a higher proportion of the homes, particularly on brownfield or currently underutilised sites.
 - Bellway encouraged the Council to regularly review its proposed housing mix to ensure it reflects up-to-date housing need throughout the plan period.
 - Bellway does not believe the plan strategically addresses affordable housing.

- Bellway suggests that Policy DM2 be updated to allow the plan to consider financial viability assessments when assessing affordable housing obligation.
 - Bellway supports the approach set out in Policy DM20.
 - Bellway proposes amendments to Policy SP12 to allow for windfall residential development in rural areas.
- Savills representing Taylor Wimpey argues that allocated sites should have their housing potential optimised as much as possible to take into account constraints affecting much of the Borough's area and the higher housing requirement.
- Silversaw Ltd have instructed CBRE to comment on the importance of sufficient contingency built into the Local Plan to ensure that reliance on Hemel Hempstead does not compromise other objectives, that the plan 'be sufficiently flexible to adapt to rapid change' as in paragraph 11 of the NPPF.
- Stantec is representing Croudace Homes regarding Rossway Farm (Bk08).
 - Croudace doubts the efficacy of the consultation, noting that the changes to the plan are not fully supported by updated topic papers and assessments.
 - Croudace notes that the plan lacks a vision for the area and an overarching framework for the Borough as required by NPPF paragraphs 15 and 20.
 - Croudace recommends the plan period be extended to 2042.
- Thakeham Group are concerned that the lack of evidence used to justify the change to the growth strategy will result in the Plan being found unsound at Examination.
 - Thakeham is concerned about the reduction in planned housing below the Standard Method, and the significant reduction in affordable housing.
 - Thakeham questions the reduction of the plan period.
 - Thakeham objects that focussing most development in Hemel Hempstead is disproportionate and removes the choice of where to live.
 - Thakeham advocates for fairer distribution to support infrastructure.
 - Thakeham notes an updated transport study is needed to assess the suitability of the Hemel Hempstead strategy.
 - Thakeham calculates that over 4000 households across the plan period will fail to have their affordable housing need met. It also notes a shortfall of 711 dwellings compared to the 2013 Core Strategy.
- The Crown Estate, as majority landowner across the HGC programme area, confirm strong in-principle support for the Regulation 18 Local Plan 'Revised Strategy', but state that evidence to support the approach to deliver a lower housing target will be a key element in an Inspector finding the plan sound at Examination and welcome continued collaboration with the council.
- Tring and Berkhamsted Labour Party advocate for the prioritisation of social housing, its increase from 20% to 80% of allocations, prioritisation of brownfield over Green Belt and farmland, more building closer to bus and rail transport, greater commitment

and detail on environmental and infrastructure issues, and sustainability requirements for green construction to achieve net zero development.

- Turley on behalf of Ainscough Strategic Land (ASL) in relation to Land at the Former Marsworth Airfield ('Lukes Lane', LMar003R) does not believe the plan is fit for purpose, risking inappropriately significant harm to sustainability.
 - Turley notes that Local Housing Need should form the starting point for authorities in determining the minimum number of homes needed and developing strategic policies and does not consider the spatial constraints of the AONB and Green Belt unique, while there is no demographic basis for undershooting the LHN.
- Vincent and Gorbing on behalf of Berkeley Homes (East Thames) (BHET) make responses in relation to their site HH09 and believe that Local Housing Need should be met in full with greater urban capacity particularly at Hemel Hempstead.
 - BHET considers the increased reliance on windfall as risking the delivery of housing over the plan period and compound the increasing affordability issues and success of the plan in implementation.
 - BHET notes no analysis for SANG and is concerned as the strategy relies on maximising the number of homes delivered on previously developed land where there is no opportunity to provide on-site SANG.
 - Without SANG brought forth, BHET believes the Plan will be found fundamentally unsound as a proportion of its sites will not be deliverable.
- Wildlife & Countryside Link encourages the Council to be ambitious in implementing a biodiversity net gain target above the National minimum requirement of 10%, as several councils which have targets in place or emerging targets in Local Plans for 20% BNG or above.
- Woolf Bond Planning on behalf of Fairfax Strategic Land objects to the reduced level of housing provision, noting that the target should be based on a level trajectory in line with the Standard Method.
 - Fairfax states that the Local Plan should cover the period 2023 to 2042.
 - Fairfax advocates for Land west of Leighton Buzzard Road, Hemel Hempstead to be included as an allocation.

3.1.6 Wider Community

- Across the Borough there was large support for the reduction of housing targets, particularly in Tring, Northchurch and Kings Langley, with support for the removal of Rectory Farm and Land East of Tring. Many felt, however, that the reduction was insufficient, and supported an approach similar to Three Rivers District Council's.

- Many similarly felt that the transfer of more housing growth to Hemel Hempstead was sensible and sustainable.
- Meanwhile, many others felt that growth in Hemel Hempstead was now disproportionate especially in areas adjoining Apsley, Woodhall Farm, and Grovehill.
- Many were also concerned about St Albans City and District Council's plans to build to the east of Hemel Hempstead, particularly by Leverstock Green.
- Many supported the increased protection of the Green Belt and the Chilterns AONB provided by the reduced housing requirements, with some supporting more brown-field building and keen on regeneration of Hemel Hempstead town centre.
- Some others were concerned about the plans for more housing in the town centre, for a range of reasons, such as a perceived increase in troublesome residents.
- Some welcomed and supported the planned increase in the provision of social and affordable housing, while many others felt a target of 80% was more appropriate.
- Some mentioned concerns relating to examples of privately developed homes that had remained empty and had struggled to sell due to high costs.
- Many requested that more houses be built, rather than flats, with strong objections particularly to any planned high-rise development in the vicinity of Boxmoor and Hemel Hempstead Station.
- Some felt the plan was too weak on net zero and lacked a strong sustainability vision or requirements.
- Some requested greater support for electric vehicles such as charging points.
- Similarly, some stressed the Council's declaration of a climate emergency and the necessity of conserving the natural environment of the Borough.
- Some wished to see greater improvements to local walking and cycling infrastructure.
- Many expressed strong disagreements with the planned HGC expansion north of Hemel Hempstead for a range of reasons including traffic, flood risk, water strain on the Gade, impact on the heritage and character of Piccotts End, impact on the AONB and its setting, particularly in the Upper Gade Valley, the loss of valuable agricultural land, and its distance from the town centre and train station.
- Some called for all developments to be located close to existing public transport.

- Many expressed their objections to Bk01 (South of Berkhamsted) for similar reasons to those summarised below in the Berkhamsted section.
- Many expressed concerns about harm to the Green Belt, demanding that all brownfield sites possible be developed before greenfield, with empty buildings prioritised. Particular concerns were the loss of agricultural land, threats to biodiversity and wildlife, especially bats and birds, and urban sprawl affecting rural and village character.
- Some also expressed concern about the Chiltern Beechwoods SAC and the impact of greater visitors from new developments.
- Some felt that Biodiversity Net Gain offered inadequate protections and that more should be actively done to protect and enhance existing green spaces.
- The major concerns were to do with infrastructure, particularly regarding healthcare, Hemel Hempstead hospital, GP provision, dental care, education, parking (especially in town centres), air pollution, sewerage, and water pollution, particularly from sewage entering the canals and rivers.
- Particular concerns were voiced about the chalk streams of the Borough and the risks of their pollution and over-extraction for new developments.
- The largest concern regarded increased traffic across the Borough as a result of new developments, particularly within Hemel Hempstead, the Gade Valley, and Apsley (notably along London Road) and the resulting air and noise pollution.

2.4.9 Public Engagement

On 20th November, the Dacorum Climate Action Network annual conference was held at the Forum in Hemel Hempstead, attended by 95 internal and external attendees, with a Local Plan stall and officers present. Feedback received from attendees such as Sustainable Tring included:

- A requirement that solar panels and heat pumps be installed on all new developments.
- That, going forward, land in public ownership should be a priority for development.

3.2 Hemel Hempstead

- 3.2.1 Survey respondents had the option to select to which settlement area their response related. 562 responses (41.5%) selected Hemel Hempstead, of which 7 were postal responses.
- 3.2.2 Of these, 121 (21.6%) said they 'agreed' or 'somewhat agreed' with the proposal, while 403 (71.7%) 'disagreed' or 'somewhat disagreed' and 38 (6.7%) were neutral.
- 3.2.3 Survey respondents had the option to select their five infrastructure priorities. For those who respondents selected Hemel Hempstead, their top five priorities were:
- | | |
|------------------------------------|-----------------|
| 1) Healthcare | – 145 – (25.8%) |
| 2) Green space and play facilities | – 126 – (22.4%) |
| 3) The road network | – 113 – (20.1%) |
| 4) Public transport | – 82 – (14.6%) |
| Education | – 82 – (14.6%) |
- 3.2.4 This ordering was not dissimilar from the survey's overall infrastructure priority results, apart from 'Education' which was slightly more prioritised regarding Hemel Hempstead relative to other settlements. Healthcare remains a clear priority.
- 3.2.5 Consultation responses have been grouped according to the type of respondent: specific bodies (whom the Council is legally obliged to consult), general bodies (any other response submitted on behalf of an organisation), and wider community (responses from individuals).
- 3.2.6 A number of comments have been received about Hemel Hempstead from the wider community. These have been separated into general responses and responses about key areas considered in the revised strategy.

Hemel Hempstead (whole town)

3.2.7 Specific Bodies

- Great Gaddesden Parish Council questions the ranking of Hemel Hempstead in the Sustainability Appraisal ranking for air quality, historic environment, and transport.
- The following services within Hertfordshire County Council made comments with regards to the revised strategy for Hemel Hempstead as a whole:
 - Transport services agreed that Hemel Hempstead provides greater opportunities for access to sustainable travel facilities. They stated the new allocations in Hemel Hempstead will require a robust evidence base for transport in Hemel Hempstead before the next stages of plan making.

- Lead Local Flood Authority notes that all sites must consider the SuDS hierarchy and should also conduct ground investigations including confirmation of groundwater levels and infiltration rates.
- Waste services confirm that the existing recycling facility at Eastman Way Hemel Hempstead has been recognised in the 'Local Authority Collected Waste Spatial Strategy, Recycling Centre Annex (Updated 2022)' as too small to deal with current or future demand, and that the current facility's size significantly restricts the ability of vehicles to use the site effectively.
- Public Health services commented that new housing sites should be delivered in accordance with healthy places principles.
- Education (Mainstream) services noted that the Town Centre Hospital Site should be of a sufficient size to provide 3FE (three forms of entry) but required clarity as to deliverability of the site to give confidence that this can be brought forward at the right time. A further primary school site, capable of accommodating up to 2FE, is required in the Two Waters area to mitigate the level of development proposed across this area. The inclusion of two new secondary school sites in North Hemel is also supported, although it is currently deemed that these sites would only be required to accommodate 8FE each, as opposed to the 10FE sizes outlined in the consultation documents. Remaining potential future demand would be expected to be met through current and projected capacity and expansion of existing schools.
- Childcare services commented that nine new childcare provisions for 0-2 years should be provided to mitigate upcoming demand. For nursery (3-4 years), new provision will be made at new primary schools to meet demand for this service. To mitigate the new requirement for wraparound childcare for children aged 5-11 (required by September 2026), HCC will seek developer contributions towards resource costs, but confirm that additional facilities will not need to be provided.
- Adult Care Services state that, although a number of sites within Hemel Hempstead (aside from HH01 and NEW1 Riverside) are not large enough to meet the threshold for the inclusion of housing for older people or disabled people, the inclusion of this based on size alone will not meet the recognised need in the area, and provision should be considered on smaller sites.
- Services for Young People will seek to increase service provision in accordance with service priority themes. S106 or CIL will need to be made available to fund increased service capacity.
- Fire and Rescue services note the possibility that HCC may need to re-locate the fire station at Hemel Garden Communities and Two Waters in the long term to ensure 10-minute coverage across the HGC site.
- Library services are not looking to open any new library provision and confirm that increases in capacity would be sought by reconfiguring resources at Hemel Hempstead and increasing resources at Adeyfield and Leverstock Green. S106 or CIL will be needed to fund increase in resources at libraries within Hemel Hempstead.

- The Hertfordshire Local Enterprise Partnership and Hertfordshire Innovation Quarter believe there should be greater reference to Hemel Hempstead's strategic location by London, airports and the M1, within the new Local Plan.
 - HLEP and HIQ suggest the following changes to the Hemel Hempstead strategy:
 - Paragraph 2.3: a short description about what Garden Town status means, and the possible benefits or implications.
 - Paragraph 2.13: a short description of the emerging Maylands Masterplan and broadly what it entails.

- Nash Mills Parish Council (NMPC) notes that a large number of parish residents commute by train, and so are concerned about the number of cut services, the condition of the rolling stock, lack of carriages during busy periods, and potential safety risks associated with overcrowding.
 - NMPC also notes the major impact caused by development within Hemel Hempstead and question if Watford is the best location to focus hospital services, and so recommends Hemel Hempstead and St Albans Local Plans assess the impact of the current WHHT redevelopment proposal.
 - NMPC has concerns about the impact of building works, particularly in the Apsley area, which is already gridlocked at multiple times of the day, with no apparent mitigation or consideration of this in the plan.
 - NMPC fears traffic calming measures in the new proposed Kings Langley Local Plan may create a 'rat run' route through Nash Mills as the fastest alternative route from the M25 to central Hemel Hempstead, noting no measures currently in place or suggested to mitigate this.
 - NMPC welcomes an extension to Bunkers Park as part of SANG (Suitable Alternative Natural Green Space) but urges DBC to consider the increase in parking provision and width restrictions on Bunkers Lane necessary to mitigate any increased traffic.
 - NMPC notes the lack of A&E provision and limited Urgent Care provision.
 - NMPC questions how existing water supplies will sustain the level of development suggested for Dacorum, Three Rivers and St Albans Districts, alongside concerns regarding potential flooding and rainwater run-off.
 - NMPC notes no reference to Network House in the allocations in the plan.

- Nettleden with Potten End Parish Council disagrees with the use of the term 'Local Housing need' when the need is based on a national requirement and questions the ranking of Hemel Hempstead and HGC in the Sustainability Appraisal.

- NHS Herts & West Essex Integrated Care Board will seek a financial contribution towards the relocation of Grovehill Medical Centre.

3.2.8 General Bodies/Other Organisations

- Armstrong Rigg on behalf of Barratt David Wilson Trading Ltd and Taylor Wimpey UK Ltd object to the plan and request HH21 West Hemel Hempstead's reallocation.

- Bidwells on behalf of Felden Park Farms, the owners of HH16, supports its proposed allocation for employment and is willing to resubmit background evidence, in order that it be identified as “Retained” and not “under review”.
- Bidwells on behalf of Vistry Group and Crest Nicholson regarding land south of Red Lion Lane, Nash Mills, advocates for its reallocation and objects to the Council’s findings that the site is at a higher risk of surface water flooding, instead citing an Environment Agency study stating that the site is at low risk. It is argued that the neighbouring Local Wildlife Site and Abbots Hill Park would not be impacted by development.
- British Driving Society and British Horse Society state that interventions recommended within the Rights of Way Improvement plan should be implemented within the new Local Plan, and that all new active travel routes proposed by new developments should automatically become bridleways or preferably restricted byways linking to the existing public right of way network.
- The Box Moor Trust promote four areas for Suitable Alternative Natural Greenspace (SANG):
 - Bovingdon Brickworks (16.85ha) SAN – noting that this wildlife site has lots of scenic beauty and the Trust consider a SANG would enhance the user appearance and accessibility at the site and keep new footfall off rare vegetation. This is considered regarding the proposed allocation at Bv01 adjacent to the site.
 - Sheethanger Common and Bury Wood (27.22ha) SANG- stating that there is currently not an obvious circular route at this time, however the area should be considered if the Westbrook Hay SANG is successful.
 - Roughdown Common (10.05ha) SANG – although the response notes that initial routes were not considered long enough by Natural England, and that the Trust will review this at a later date.
 - Westbrook Hay (63.2ha) SANG – currently under discussion with the Council.
- They also continue to promote three areas for housing development.
- Claremont Planning, representing Landhold Capital on behalf of European Property Ventures (Hertfordshire) Ltd, is concerned about the reduced housing requirement and the lack of a five-year housing land supply and considers the plan unsound.
 - EPV requests that the plan reflect the updated NPPF regarding Green Belt releases.
 - EPV condemns reliance on windfall sites as against national policy expectations that the development be plan-led.
 - EPV states that the Council has failed to promote a comprehensive SANG strategy to assist in meeting both current and future housing requirements.
 - EPV notes the high unaffordability of properties in Dacorum is noted, and thus encourages housebuilding encouraged to increase supply.

- EPV believes the Council should revisit the safeguarding of land for development.
- Define Planning & Design Ltd on behalf of Bloor Homes supports the recognition of Hemel Hempstead as the most sustainable settlement in the Borough.
 - Bloor Homes suggests that the plan period be extended.
 - Bloor Homes states the importance that housing supply in the plan period is maximised, especially in the context of the national housing crisis and the acute affordability issues within the area.
 - Bloor Homes have also identified land for potential use as SANG, stating that it can meet the relevant requirements:
 - it comprises agricultural land / woodland / other natural spaces which has the potential to be converted into high quality public open space;
 - it is capable of delivering a 2.4-kilometre circular walking route that does not cross itself;
 - it is by its location and character very 'natural' in its feel, with limited built development (i.e. housing or other buildings) visible from within the land; and
 - it can be secured for a period of at least 80 years.
- Dacorum Sports Network (DSN) proposes several sport-specific opportunities:
 - Athletics: DSN proposes the relocation of Jarmans Park to a new site in HGC, potentially as a high-quality multi-sport facility.
 - Baseball: DSN proposes the expansion of Herts Baseball Club into adjacent HGC land.
 - Multi-sports centres: DSN proposes a large sports hall with a large swimming pool and gym space to make up for a shortage in Hemel Hempstead.
- Geraint John Planning on Behalf of Cityheart Ltd, in conjunction with London & Continental Railways and Network Rail, suggest that an increased reliance on allocations, as opposed to windfall, should be favoured, whilst evidence suggests that existing planning permissions have not been built out to their full extent.
- GUCE would welcome new housing if it brings regeneration and improved prospects for residents, as well as more emphasis on the provision for community energy and network heating from renewable sources and whole life net-zero buildings.
- Lansdown comments in relation to their promoted site Chaulden Lane (Rural 115L) and notes that the increased expected delivery of dwellings on brownfield and urban sites within one town suggests the plan risks failing to plan appropriately for a suitable mix of dwellings, including family housing.
- McLoughlin Planning on behalf of DB Land & Planning objects to the increase in housing at Hemel Hempstead and argues that this would compromise the ability of settlements elsewhere to expand and grow, impede the maintenance of local

facilities and services through managed growth, and reduce the supply and availability of housing in a mixture of locations.

- Nexus Planning on behalf of Crest Nicholson wonders if the Hemel Hempstead housing market can handle the allocated 82% of housing.
 - Based on Lichfields' Start-to-Finish Report, Crest Nicholson does not believe planning permission and construction of all buildings on these strategic sites can be completed by the end of the plan period.
 - Crest Nicholson also doubts whether windfall is correctly estimated, noting that windfall in Hemel Hempstead alone would make up 15% of the entire planned requirement. As most brownfield is permissioned or allocated, it considers it unlikely that high rates of windfall can be maintained.

- Phase 2 Planning on behalf of Gleeson Developments state that significant dependence on Hemel Hempstead to deliver the majority of new development (c.80%) is not sustainable.
 - Gleeson believes this strategy will deprive other settlements of affordable housing and economic benefits, and limit choice and access for those seeking homes outside Hemel Hempstead.
 - Gleeson raises concerns regarding deliverability as concentration of housing in Hemel Hempstead will see competition for the same market.
 - Gleeson raises potential impacts on the health and prosperity of other settlements, and on travel patterns if people are forced to live further from existing family, friends, and jobs.

- Roebuck Land and Planning Ltd on behalf of Hallam Land Management (SHLAA site 78, land north of Polehanger Lane) supports the focus on Hemel Hempstead in principle, but stresses that allocations must be deliverable.
 - HLM believe there is a strong argument for further housing allocations on the west side of Hemel Hempstead to capitalise on its greater rail accessibility.

- Thakeham Group objects that focussing most development in Hemel Hempstead is disproportionate and removes the choice of where to live.
 - Thakeham notes an updated transport study is needed to assess the suitability of the Hemel Hempstead strategy.

- Transition Town Berkhamsted would welcome new Green Belt housing in Hemel Hempstead if it brings with it regeneration and improves residents' prospects.

- Vincent and Goring on behalf of Berkeley Homes (East Thames) or BHET make responses in relation to their site HH09:
 - BHET supports the greater focus on Hemel Hempstead as the most sustainable location within the Borough and believes maximising urban capacity could play a greater role in delivering the proposed development.

- Woolf Bond Planning on behalf of Fairfax Strategic Land considers the proposed strategy for Hemel Hempstead unjustified, regarding delivery and need for affordable homes, and inconsistent with national policy for not boosting housing delivery.
 - Fairfax notes no reference to the impact of sites where redevelopment is only feasible once existing occupiers have vacated or been provided with alternative accommodation, re sites HH11, HH13, HH17, NEW1 and NEW2.
 - Fairfax notes several sites where it is essential that the existing activities are retained on or very close to the existing site HH03 and HH08.
 - Fairfax notes the existing value of brownfield sites will impinge upon their ability to address affordable housing needs, with reference to the viability case submitted regarding the National Grid site.
 - Fairfax asks the Council to be realistic in its expectations for delivery, especially where dependent upon others for delivery on infrastructure, particularly regarding HH01.

3.2.9 Wider Community

- The most common theme raised by the community was healthcare facilities.
 - Most responses simply referred to the lack of service provision on the current hospital, stating that the levels of new growth should be considered by the NHS when assessing need for future facilities.
 - Some raised questions on the proposed allocation HH03 Hospital (current allocation MU1), regarding the level of service provision and whether this would meet the levels of demand, particularly if so much of the land was to be allocated for homes. Responses also cast doubt on funding for development.
 - Most comments regarding the new proposal affecting site HH05 Market Square proposed an arts, cultural and leisure space instead, or the reinstatement of the historic market, rather than a health campus.
 - Other responses questioned the proposal's value for money and the impact on the Water Gardens. One comment suggested retaining the NCP Car Park site (HH07) to serve the proposed health campus.
 - Lastly, several individuals questioned the level of service provision feasible on this site and requested clarification on the definition of a 'health campus'.
- The wider community's next greatest concern was the impact of high levels of housing growth on existing traffic and congestion levels in Hemel Hempstead.
- Among general infrastructure concerns, comments particularly focused on the provision of education, as well as access to dentists, GP appointments, emergency services, and the provision of utilities.
- Several respondents raised questions on why development has been deleted from Berkhamsted, Tring and Kings Langley, with some advocating that a more proportionate approach should be employed across the Borough.

- Concerns were raised about loss of access to the countryside, public open space and wildlife.
- Concerns were raised regarding provision of affordable, particularly social housing.
- Comments were raised that too many high-rise buildings and flats were built instead of family homes.
- Comments were also made regarding availability of parking and road capacity.

Hemel Garden Communities (HH01)

3.2.10 Specific Bodies

- The Canal & River Trust makes general reference to Hemel Garden Communities within their response, stating that development of this scale would likely result in an increase in the use of the canal and towpath.
 - C&RT states that Hemel Garden Communities should recognise the benefits of access to the canal and actively look for ways to increase and improve upon these, such as improvements to the towpath to develop it as a more sustainable transport route, while supporting provision for water-based recreation and improved access to facilities.
 - C&RT also specifically references site HH01, regarding mitigation and improvement to the towpath via S106 or CIL, and that this should be specifically referenced within the site-specific requirements.
- The Chilterns Conservation Board believes Hemel Garden Communities (HH01 and HH02) requires greater work and that its increase by 1,000 dwellings presents potential problems to both the setting of the AONB and the delivery of the higher number, alongside the delivery of a high-yielding SANG.
 - CCB notes that a large part of the northern boundary of HH01/02 falls within the setting of the AONB with greater work required to resolve these issues.
- The Environment Agency makes the following comments on site HH01:
 - HH01 is located upon the Ver water body, which is currently significantly impacted by pollution from urban surface water run-off. Proposals for this site must prevent further deterioration of this water body or its associated elements, by mitigating potential increase in surface water run-off.
 - Infiltration drainage, deep or shallow, likely poses a high risk to groundwater. Therefore, SuDS proposals may require a permit.
 - The Household Waste Recycling Centre must be outside of Source Protection Zone 1 to be in line with Groundwater protection positions.
 - Any proposals should include appropriate risk assessments and should not negatively impact groundwater quality.

- The following services within Hertfordshire County Council made comments with regards to site HH01:
 - Historic Environment services note that HH01 would likely require a pre-determination desk-based assessment, geophysical survey, trial trench evaluation, with Historic Environment input on any masterplan.
 - Lead Local Flood Authority notes that the site is well-suited to above-ground SuDS, with discharge restricted to runoff rates and volumes, while a source control approach should be followed. It is noted that multiple medium-high risk surface water flow paths cross the site.
 - The Waste Disposal Authority welcomes the continued provision of safeguarded land within the North Hemel Growth Area for a recycling centre and state that S106 or CIL will need to be made available to fund this.
 - Education (Mainstream) confirms that based on the revised growth scenario, two of the four 3FE (three forms of entry) primary schools at North Hemel should be master planned within the first phase. The inclusion of two new secondary school sites in North Hemel is also supported, but at this time it is deemed that these sites would only be required to accommodate 8FE each.
 - Early Years services state five new childcare provisions (ages 0-2) will be needed on site, including provision beyond the plan period, with new nursery provision (ages 3-4) at new primary schools on the site.
 - Adult Care Services recommends the inclusion of either three extra-care settings comprising of 70-80 self-contained units in each facility or one larger mixed tenure Integrated Retirement Community, and two 70-80 bed nursing home and 8 supported living units for people with disabilities on this site.

- Hertfordshire Local Enterprise Partnership and Herts Innovation Quarter state that the plan should include a description of what 'Garden Town Status' entails.

- Historic England states that a detailed Heritage Impact Assessment will be necessary prior to allocating site HH01 to confirm suitability, assess development capacity and establish criteria to mitigate harm. Historic England's recommendation is that effects of development are uncertain at this stage.
 - Historic England notes that HH01 is in the vicinity of two Scheduled Monuments and is located adjacent to the Piccotts End Conservation Area which includes one Grade I listed building, one Grade II* listed building, and five Grade II listed buildings.
 - Historic England strongly advises a master-planning exercise or Concept Framework prior to any planning application and recommends that work should be informed by and reflect the findings of the detailed Heritage Impact Assessment, and that this should be stipulated within planning policy.

- Little Gaddesden Parish Council raise a number of issues in relation to the impact of the Hemel Garden Communities proposal, including traffic, road capacity (particularly the B440 and the Water End bridge), loss of recreation space, damage to the

Ashridge protected site, damage to the Chilterns AONB, pressure on the water supply and the impact this will have on the chalk streams.

- Natural England make the following comments:
 - Natural England states that, where SANG has an additional function or dual purpose of protecting the Chilterns Landscape setting, further design will be necessary to maintain landscape integrity and its interest features.
 - A Visual Impact Assessment for the SANG sites will be expected to accompany this and Natural England welcome the opportunity to review the Landscape Visual Impact Assessment for North Hemel and provide further detailed landscape advice within their response.
 - Development within HH01 may adversely impact ancient woodland within its boundary, notably through recreational pressure. The Council should consider site specific policies requiring alternative natural greenspaces (ANGs) to mitigate for potential recreational effects on ancient woodland.
 - There should be additional clarification within the HGC position statement on page 32 of the Hemel Garden Community Position Statement to distinguish between SANG and SAMM.

- Nettleden with Potten End Parish Council notes inconsistent use of the term 'Hemel Garden Communities' across the consultation, referring to the development site HH01/02, to the “growth area” (the land both to the north and east of Hemel including that in SADC), and sometimes to the whole town.

- NHS Herts West Essex Integrated Care Board has requested early, on-site health provision be made in either North Hemel Hempstead or East Hemel Hempstead, otherwise North Hemel will significantly impact existing at-capacity practices.

- Redbourn Parish Council raises concerns regarding the Hemel Garden Communities development, particularly with regards to development on this site closing the gap between Redbourn and Hemel Hempstead.
 - RPS also raises concerns with the overall deliverability of the programme (referencing a draft trajectory published with the St Albans Regulation 18 consultation).
 - RPC also request that Redbourn Neighbourhood Plan be considered, particular with regards to design and the natural environment.

- Three Rivers District Council believe Hemel Garden Communities was justified as the focus for most growth in the 2020 growth strategy, and its ability to take on 10% growth in the revised plan is justified too, as it is a significant urban extension project with a greater range of planned facilities and services.

3.2.11 General Bodies/Other Organisations

- British Driving Society and British Horse Society believe there should be stronger protection of the remaining Green Belt outside of HH01 site area to prevent sprawl and protect the AONB.
 - BDS/BHS note that the proposed movement corridor will decrease ease of access to current rights of way.
 - BDS/BHS also note several existing quiet lanes within HH01 will be lost, so new and amended off-road routes for all vulnerable and equestrian road users will be required to provide ease of access to the rights of way network.

- Butterfly Conservation – Hertfordshire and Middlesex Branch notes that HH01 will require a full ecological survey before any designation is confirmed, as the site adjoins a Local Nature Reserve.
 - If development proceeds, the BC-H&MB request a green corridor linking to the local nature reserve, and expansion of the site itself.
 - BC-H&MB also note that due to the soil type on site HH01 there are opportunities to enhance habitats for local grassland species.

- The Council for the Protection of Rural England (CPRE) is primarily concerned about the promotion and expansion of HGC during and beyond the plan period.
 - CPRE considers the promotion of HGC by the Crown Estate, a public body, entirely inappropriate and contrary to Ministerial statements in favour of Green Belt and AONB maintenance.
 - CPRE notes serious concerns over transport, sewerage and water supply, particularly impacts on the Chiltern Beechwoods SAC and the River Gade chalk stream.
 - CPRE notes their recent study showing only 5% of housing built on Green Belt sites was “social housing”, less than planned in all cases. Meanwhile, it claims developers frequently revise downwards levels of affordable housing.

- The Dacorum Environmental Forum expresses strong concern at the development of Green Belt land and the threat posed by urban sprawl to unique character areas, biodiversity and wildlife sites, particularly in the Gade Valley.

- Dacorum Sports Network calls for a plan to take advantage of the scale of HGC and provide new sporting hubs in association with country parks and to fulfil open space and community centre requirements.

- Define Planning & Design Ltd on behalf of Bloor Homes Ltd welcome the commitment to the Hemel Garden Communities Project
 - The early delivery of Bloor’s land within HGC would facilitate delivery of key infrastructure and support further growth in the north of Hemel Hempstead.
 - Bloor Homes recommends that the local plan contain as much structure and detail as possible, to ensure early delivery of key elements of the scheme.

- Bloor Homes recommends a minor adjustment to the site requirements to refer to the delivery of “a minimum of 2,500 homes” during the plan period, with the remainder to be delivered beyond.
 - Bloor Homes states that some flexibility may be required in drawing the allocation boundary depending on other findings, particularly SANG.
- DLP Planning on behalf of Taylor Wimpey, McCarthy & Stone and Whiteacre Ltd comments that reliance on HH01 to meet the bulk of the Council’s housing need puts significant pressure on the remaining allocations to deliver early in the plan period.
- Herts & Middlesex Wildlife Trust note that Varney’s Wood, within HH01, is Ancient Woodland and is required to be retained within the site, recommending a buffer of at least 15m from the woodland in future planning for the site.
- James Holmes Planning Ltd supports the allocation of site HH01 and promotes an area of land known as ‘Land Adjacent to Oatfield House’ for residential development as part of the wider redevelopment of HGC.
 - As the site is self-contained, they believe it could be developed separately from the remainder of the strategic allocation, early in the plan period, and that this should be given very significant weight in considerations.
- Kitewood Estates Ltd agrees with the combined allocation approach for North Hemel and that more homes can be delivered within the Plan period up to 2040.
 - Kitewood states that their land is suitable and that its development in the short to medium term is achievable due to an absence of technical concerns.
 - Kitewood also states that whilst there are no availability issues with their land, the Council should continue to collaborate with landowners and developers.
 - Kitewood mentions that they control around 140 acres of land north of HH01 that can offer the flexibility required to deliver extensive SANG, with an additional 10 acres potentially suitable for development.
- Lansdown notes that although HH01 will produce a significant proportion of family homes, it is likely to face delivery issues due to the need to provide substantial infrastructure prior to development. This would delay the delivery of a suitable and balanced range of dwelling types and sizes that could instead be offset by including other smaller and medium sites in the short term.
- Leverstock Green Village Association (LGVA), regarding HH26, comments on the junction of Green Lane and Westwick Row being prone to flooding, exacerbated by the Kincup Avenue estate.
 - LGVA regards 80 developments as overdevelopment of the area and believes HH26 should be incorporated into HGC plans to retain green space.
 - LGVA notes that Westwick Row is narrow prefers access from Green Lane.
 - LGVA wishes for design to be sympathetic to the adjacent Oakwood Estate.

- The National Trust supports the focus of new housing deliver on a new garden community at Hemel Hempstead, noting the improvements this can deliver.
- Quod on behalf of Pigeon (Hemel Hempstead) Ltd welcomes the recognition of Hemel Hempstead's and HGC's significant role in delivering sustainable growth for the Borough, the removal from the Green Belt and Pigeon welcomes the Council's proposal to bring forward the delivery of homes on the site within the plan period.
- Roebuck Land and Planning Ltd on behalf of Hallam Land Management (SHLAA site 78, land north of Polehanger Lane) states that the delivery at HGC is highly uncertain.
 - HLM notes no delivery trajectory and believes the allocation has been increased without justification of how the additional units and required infrastructure can be delivered.
 - HLM notes no currently live planning application, although development at this scale would be expected to have a long lead in time for delivery.
 - HLM has assessed timescales and, assuming an outline planning application could be made in 2025, the first implementable housing could be expected in 2029-2030, with 2500 dwellings to be built in the remaining 10 years.
 - HLM expects that after the first year of production, each parcel within the allocation could deliver 35 dwellings per annum from each sales outlet, and so 7 sales outlets would be necessary.
 - HLM expects robust justification and a delivery trajectory if the increase in delivery of North Hemel is to be accepted, to show how the associated housing and supporting infrastructure can come forward concurrently.
- Strutt & Parker on behalf of the Gaddesden Trust makes a number of comments and suggestions regarding safeguarding and protecting the Chilterns AONB, stating that they do not object to the principal allocation, but state that appropriate landscape and heritage mitigation should be included within site specific policies.
 - Trustees are also promoting Land at Thrift Wood to the east of Leighton Buzzard Road as a potential SANG site with ancillary battery storage.
- The Crown Estate, as majority landowner across the HGC programme area, supports the full inclusion of HGC within the Plan period to 2040, recognising that this will facilitate its comprehensive planning, design and implementation with better alignment of the governing cross-boundary local plan policy framework.
 - The Crown Estate also supports the inclusion of site HH26 and suggests that it is allocated for development in the first five years of the plan period.
 - The Crown Estate writes on behalf of Pigeon Investment Management, Bloor Homes and Kitewood Estates to support the local plan, specifically HH01/02, with no strong view on the reduction of housing numbers but encouraging all efforts to ensure evidence is sound and robust.

3.2.12 Wider Community

- Responses directly referencing impacts on Piccotts End mainly raised issues of increased congestion, historic character, flooding, healthcare provision, chalk-streams and access to the countryside.
- Responses received referencing impacts on Woodhall Farm mainly raised concerns regarding provision of GPs, schools, and dental and hospital facilities.
 - Congestion was another key theme, with a lack of confidence that public transport and walking/cycling proposals would resolve these issues.
 - Responses also raised concerns about a loss of wildlife and access to countryside, and the impacts this would have on health and wellbeing.
 - A few comments referenced the distribution of development across the Borough and the impact of development on property values.
- Responses referencing Grovehill referred to hospital services, impacts on wildlife, health and wellbeing, congestion, GP provision, access to the countryside and the potential loss of allotments. Particular concern was raised regarding historic fluvial routes near Grovehill Playing fields and concerns about flooding in these areas.
- Responses from individuals in nearby rural settlements (Little Gaddesden, Great Gaddesden and Potten End) raised issues with the capacity of local roads (mainly the B440) and the bridge at Water End, impacts on congestion within the villages and on the Chiltern Beechwoods SAC and the AONB and their settlements' historic character, issues with water supply, and the impact of increased abstraction on chalk streams.
 - Several residents of Little Gaddesden proposed designating land to the south of Church Road, opposite the church and fields as protected open space.
- Several comments were raised by residents of Leverstock Green regarding the neighbouring site HH26 re issues of congestion, the impact of the proposals within the draft St Albans Local Plan, issues with access onto Green Lane (instead preferring access from Westwick Row), school capacity, the provision of public open space, and the design of new homes, expected to be in keeping with local character.
- A number of comments raised concerns with the HGC proposal as a whole. These comments mainly queried why housing within the St Albans local plan could be built close to Hemel Hempstead Borough as the infrastructure burden would fall on Dacorum, and why other towns in Dacorum have had growth reduced whilst Hemel has increased. These comments also referenced congestion, school provision, road capacity and hospital services, and the loss of agricultural land and countryside.
- A number of suggestions for provision on the site were made:
 - An outdoor sports centre and swimming pool.
 - Social value provision.

- Cycle routes between villages and the train station.
- New facilities for sports like padel and pickleball, both indoors and outdoors.
- A new larger and more sustainable rackets sports club venue.
- A network of green links to connect Fields End, Gadebridge Park, the Gade Valley, Howe Grove, and Margaret Lloyd Park, connecting Keens Fields via the Nickey Line and Cambrian Way, then connecting these via a replanted verge on Link Road back to Howe Grove via an improved Aycliffe Drive subway.

Two Waters Opportunity Area

3.2.13 Specific Bodies

- The Canal & River Trust raise a number of site-specific matters in relation to the Two Waters area, including that:
 - Sites HH08 and HH09 should be specifically required to provide mitigation and improvement to the towpath via Section 106 or CIL.
 - A S106 agreement (as previously agreed regarding a planning application for the site) would continue to be necessary for the development of HH10.
 - Improvements to the access to the canal & towpath, as for HH10, are required for the development of site HH11.
 - Public realm enhancement at Boxmoor Wharf would be welcomed, provided it fits the industrial heritage of the canal and former wharf use, and car parking remains available for access to the canal.
 - HH13 should provide adjacent towpath improvements to tie in works funded by adjacent S106.
 - For sites HH11 and HH13, opportunities for access points and water-based recreation facilities should be explored with C&RT and local sports groups.
 - For the development of site NEW2 to be acceptable, the towpath should be widened, resurfaced and its access and wayfinding improved.
 - C&RT states that, although it would be beneficial to include detailed considerations or site requirements for all allocations, the requirements for site NEW2 in particular should clearly set out the need to consider and mitigate impacts on the canal corridor, in terms of towpath use, ecological impacts, Biodiversity Net Gain, drainage, and structural integrity. Opportunities such as utilising the canal water for heating/cooling should be explored prior to a grant of planning permission.
- The Environment Agency makes the following comment on site NEW2:
 - The EA states that this site will require a Flood Risk Assessment and would require evidence to avoid adverse impact on the main river. Vulnerable development should be positioned away from the Gade/Grand Union Canal.
 - The EA notes that any development within 8 metres of a main river will require a Flood Risk Activity Permit from the Environment Agency.

- Development within 20m of the GUC will require mitigation to ensure the area's biodiversity is not impacted. For development within 10m of the river, Biodiversity Net Gain must be considered.
 - Any development should protect and enhance the chalk stream priority habitat and a WFD assessment will be required for any application.
 - This site is located in the Gade (from confluence with Bulbourne to Chess) water body, which is already impacted by pollution from urban surface water run-off. Any new development must ensure against further deterioration of this water body or its associated elements, by mitigating any potential increase in surface water run-off is mitigated against.
 - The EA states that development should install/plant buffer zones, to protect the rivers' associated elements from deterioration and to enhance mitigation.
 - The EA expects this development to deliver enhancements to its neighbouring stretch of river and the Council engages early with the EA on this.
 - Any proposals should include appropriate risk assessments and should not negatively impact groundwater quality.
- The following services within Hertfordshire County Council made comments with regards to sites within the Two Waters Opportunity Area:
 - Transport services note that NEW2 has potential for highly sustainable transport development and should have a site-specific policy to ensure this. Proximity to the Air Quality Management Area means maximising uptake of sustainable modes and minimising car trips will be especially important.
 - Ecology services note that the site is adjacent to a local wildlife site and otters are recorded in the area, while bats may roost in the buildings. Any ecological appraisal should include an assessment of the site for otters and the Grand Union Canal should be protected from adverse ecological effects and increased artificial lighting, e.g. by buffering the north-east boundary with trees and shrubs to provide a contiguous green corridor with the adjacent habitats along the towpath and canal itself, alongside considering integrated bat and bird boxes within any new buildings.
 - Historic Environment services note that:
 - HH10 would likely require a conditioned trial trench evaluation.
 - HH11 would likely require a pre-determination heritage statement and desk based assessment.
 - HH13 would likely require a pre-determination desk-based assessment and paleo-environmental assessment re river deposits.
 - NEW2 is likely to require a conditioned watching brief.
 - Lead Local Flood Authority (SuDS) notes that above-ground SuDS should be used for large brownfield sites (HH09 and NEW2) and large greenfield sites (HH16) with discharge restricted to greenfield rates and volumes. For site HH08, above-ground SuDS should be used as far as practicable, and discharge restricted to greenfield runoff rates and volumes. For small brownfield sites such as HH10, discharge should be restricted as close as

possible to greenfield rates and volumes. If greenfield rates and volumes are not possible, significant betterment will be required.

- Lead Local Flood Authority (Flooding) notes that:
 - Site HH09 is at low risk of flooding, with one area of high risk on London Road on the northeast corner.
 - A large extent of HH11 Two Waters North is at flood risk from surface water and close to Flood Zone 2. LLFA notes that potential development would require significant mitigation, reducing development potential. LLFA strongly recommends that development, especially residential, is not located within Flood Zone 2 or areas at risk of surface water flooding.
 - Most of HH13 Frogmore Road is at medium-high risk of surface water flooding and close to Flood Zone 2, so LLFA is worried that potential development of this site would require a significant amount of flood mitigation which would likely reduce its development potential. The service recommend that any future applicants consult the LLFA and EA for pre-application regarding sites HH11 and HH13 considering the high flood risk on site.
 - The car park at NEW2 is at high risk of surface water flooding from surface water, with Flood Zone 2/3 at the north of the site.
- Education services note that a primary school site, capable of accommodating up to 2FE (two forms of entry) and compliant with HCC's land specification, is required in the Two Waters area to mitigate the level of development proposed across this area. Without a new primary school site, HCC would not be confident of being able to meet the yield arising from this area locally and could not support that part of the growth strategy.
- Historic England recommend a heritage impact assessment be undertaken for site HH11 as it adjoins four Grade II listed buildings and one Grade II* listed building. Historic England also advise a Heritage Impact Assessment for site NEW2 as it is near to several listed buildings and impact development could impact their setting.
- Kings Langley Parish Councils welcome the development of brownfield sites. However it raises serious concerns regarding development along the A4251 corridor between Hemel Hempstead and the Apsley Mills Retail Park, due to traffic, potential pollution, and infrastructure capacity and delivery.
 - KLPC also notes the lack of public open space available within the area and raises concerns on the recreational impact on the Moors.
- Nash Mills Parish Council raise concerns regarding the impact of development in Apsley, which may be exacerbated by provisions in the adopted Kings Langley Neighbourhood plan to introduce traffic calming measures, leading to a 'rat run' through the parish for a faster alternative route to the M25.
 - NMPC raises recent issues with water supply and concerns with regards to flooding and adequate run off provision.

- Lastly, NMPC notes no reference to the Apsley Two development in the plan.
- Natural England make the following comments:
 - Natural England requires consultation on sites HH08, HH09, HH10, HH11, HH16, NEW1 and NEW2 as these sites fall within the Impact Risk Zone (IRZ) for Roughdown Common SSSI in order to assess impacts and the provision of mitigation measures if required.
 - Natural England also states that sites HH08, HH09, HH11 and HH16 have PHI deciduous woodland either on or adjacent to the proposed site.
 - Natural England expects strong adherence to policy NEB5 and implementation of pollution prevention measures for sites HH11 and NEW2 as these have a primary chalk stream along the red line boundary.
 - Natural England notes that development within HH16 has potential to adversely impact ancient woodland within its boundary, in particular through recreational pressure. The Council should consider site specific policies requiring alternative natural greenspaces (ANGs) to mitigate.
 - *Natural England states that site HH11 is located within a proposed area of search which Natural England is considering as a possible boundary variation to the Chilterns Area of Outstanding Natural Beauty (AONB)⁵.*
- NHS Hertfordshire West Essex Integrated Care Board (NHS HWE ICB) notes that the planned 1,950 new homes will significantly impact local GP services, particularly Lincoln House and Bennetts End, and so would like to reserve an option for a new on-site health facility within the Two Waters Opportunity Area.

3.2.14 General Bodies/Other Organisations

- Bidwells is representing Felden Park Farms, the owners of HH16, supporting the proposed allocation for employment and willing to resubmit background evidence again, in order that HH16 be identified as “Retained” and not “under review”.
- The Box Moor Trust submitted responses to the call for sites process:
 - The Trust object to the deletion of HH12 from the plan. They note that their original application for a land transfer was rejected by DEFRA. However, it believes that when another opportunity for a land exchange plot becomes available (which could be at any time) they have capacity to fast track an exchange application.

⁵ Please note additional clarifications from Natural England are being sought by officers with regards to this.

- The Trust also promote the site 'Friend at Hand', whilst noting that the site is below the usual accepted size for sites, however the Trust state that this could provide dwellings suitable for on-site agricultural workers, and (subject to discussions with a neighbour) a new access to the estate's headquarters.
- Boyer Planning on behalf of W Lamb Ltd promote their site 'Land at Shendish Manor', and state that:
 - The Council should seek to meet the objectively identified Local Housing Need for the Borough using the Standard Method.
 - The Land at Shendish Manor, Apsley, is not subject to any absolute constraints to development.
 - The Land at Shendish Manor is sustainably located within the main town Hemel Hempstead and is well-placed to deliver new homes with associated infrastructure and community facilities.
 - The site can deliver a 2FE Primary School which would support the Council's regeneration objectives in the Two Waters Opportunity Area.
 - Utilising land that is within the control of the site promoter a bespoke SANG solution can be provided outside of the site boundary.
 - Agreement has been reached in principle with an adjoining landowner to the west, to accommodate the provision of an additional vehicular access to the site via Shearwater Road (in addition to improving London Road). There are also further secondary vehicular access points and a number of public footpaths on the site.
- Carter Jonas on behalf of Apsley Developments Ltd states that in order to reduce acute affordability concerns within the Borough, it is critical that housing supply is boosted, with future provision on the edges of settlements, like Shendish Manor and Fairfields, on the edge of Hemel Hempstead, to accommodate access to jobs and sustainable travel, where provision can occur over the short to medium term.
- Geraint John Planning on behalf of Cityheart Ltd regarding HH08 Station Gateway makes representations in conjunction with the landowners of the site London and Continental Railways and Network Rail, anticipating that pre-application discussions on their site will take place in 2024.
 - Cityheart Ltd believes the site is suitable for higher densities of between 460 and 530 units and heights up to 14 storeys.
 - Cityheart Ltd believes site uses should be led by demand for floorspace.
 - Cityheart Ltd supports regeneration of the station and car park through consolidation of existing facilities and provision of a multi-storey car park.
- GUCE specifically mentions the potential opportunity for community heating for site NEW2 Apsley Mills Retail Park, relating to Frogmore Paper Mill, and harnessing chalk aquifer boreholes in Kings Langley.

- MSC Planning believes a comprehensive strategy for the Two Waters Gateway is necessary, to remove and upgrade the range of disconnected shops in the locality.
- Roebuck Land and Planning Ltd on behalf of Hallam Land Management (SHLAA site 78, land north of Polehanger Lane) notes a lack of clarity whether Network Rail and London Continental Railways have selected a development partner for site HH08.
 - HLM notes planning permission for a 16-storey tower on site HH10 has now lapsed (4/03441/15/MFA), with viability of development at this scale on a contaminated site is questionable.
 - HLM notes HH11 remains in active use with five separate landownerships and a number of occupiers, and no evidence that this has passed the sequential test.
 - Allocation of Site NEW2 is unfathomable as the retail park is in active use.
- Royal London Asset Management have written in support of the Two Waters Opportunity Area and the allocation of Apsley Mills Retail Park, noting that the site, with fairly conservative height, could deliver c.550 residential dwellings. They wish to see the TWOA have high density growth aspirations to protect greenfield.
- Vincent and Gorbing on behalf of Berkeley Homes (East Thames) (BHET) promotes their site HH09 and considers that the allocation should be increased to 490 dwellings and notes that imposing a 30% affordable housing on the Hemel Hempstead Gasworks site would prevent the site coming forward.

3.2.15 Wider Community

- Most comments regarding the Two Waters Opportunity Area came from Boxmoor.
 - Comments primarily reference some proposals' building heights, with concerns that these would be out of character with the surrounding moors.
 - Another concern was the impact of further densification on congestion.
 - Other respondents stated that there was an overprovision of flats in the area and there should be more family homes.
 - Some were concerned with levels of healthcare and education provision.
- Several comments were raised regarding the impacts on Apsley.
 - The main concerns raised were congestion and associated air pollution.
 - This was closely followed by concerns on the lack of education and healthcare (mostly GP) provision and a lack of parking in the area.
 - Specific comments were also raised with regards to Roughdown Common SSSI and the impact on wildlife in this area.
- Several residents raised concerns on Kings Langley, mainly referring to congestion and air quality, infrastructure provision, and a lack of public open space within the

area as a whole and within brownfield developments.

- A number of comments were raised regarding impacts on road capacity in Hemel Hempstead, healthcare provision (hospital), and local schools. Several residents also expressed disappointment at the loss of well-used retail space.
- Lastly comments from across Hemel Hempstead, and from Apsley, Boxmoor and Nash Mills in particular, were made about rail capacity, noting that currently some services are overcrowded with too few coaches or irregular services at peak times.
- It was suggested during the call for sites to retained site HH16 (currently under review) as open space, as they border with Roughdown Common SSSI and should be managed as an extension of this area. However, another resident stated that this area should be used for housing as opposed to development near Red Lion Lane, as it is closer to stations.

Hemel Hempstead Town Centre

3.2.16 Specific Bodies

- The Environment Agency made the following comments on site NEW1:
 - This site would require a Flood Risk Assessment and evidence to ensure no adverse impact occurs to the River Gade, away from which vulnerable development should be sequentially positioned.
 - Any development within 8 metres of the River Gade will require a Flood Risk Activity Permit from the Environment Agency.
 - If this development is within 20m of the river, riparian zone management will be required to support the Water Framework Directive (WFD).
 - The EA notes that other mitigation measures may be required as the overshadowing of this area by tall rise buildings impacts the biodiversity of the site, and the natural function of the river is heavily modified.
 - Development should protect and enhance the chalk stream priority habitat.
 - Submission of a WFD assessment will be required as part of any application.
 - Development must not contribute to any further deterioration of the River Gade or its associated elements.
 - This development should either maintain or improve existing rates of surface run-off from the site, lest it becomes a source of pollution to the water body.
 - The EA would encourage any development to install planting buffer zones, to protect the rivers from deterioration and enhance existing mitigation.
 - Due to proximity of the River Gade, the EA expect development to provide for ecological surveys, to create a picture of the watercourse's ecological status, and identify how development will mitigate against deterioration.
 - The EA expect this development to enhance its neighbouring stretch of river and recommend early engagement with the EA to facilitate this.

- Proposals should include appropriate risk assessments and not negatively impact groundwater quality.
- The following services within Hertfordshire County Council made comments with regards to sites within the town centre:
 - Transport services state that clarification/evidence will be required to support the expansion of the car park on the NEW1 site. The site is potentially very sustainable, despite constraints to walking and cycling accessibility that the site will need to overcome, notably the route to Hemel Station.
 - Ecology services note that the River Gade and associated riparian habitats run through the NEW1 site and should be protected from adverse ecological impacts and increased artificial lighting. The potential for roosting bats in buildings is noted, if suitable roosting features are present. Site requirements should consider enhancement measures for the river and its margins.
 - Historic Environment services note that:
 - HH03 would likely require a pre-determination desk-based assessment.
 - HH06 would likely require a conditioned strip, map, and record.
 - NEW1 would likely require a pre-determination desk-based assessment and paleo-environmental assessment re river deposits.
 - Lead Local Flood Authority (SuDS) notes that sites HH03 and HH04 are large brownfield sites, well-suited to above-ground SuDS if restricted to greenfield runoff rates and volumes. For sites HH05, HH06 and HH07, above-ground SuDS should be used as far as practicable, with discharge at greenfield runoff rates and volumes.
 - Lead Local Flood Authority (Flooding) note that:
 - HH03 has several small areas of mid-high surface water flood risk.
 - HH04 has a significant high-risk surface water flow path crossing the south of the site from the west before ponding in Orchid Drive. Managing and attenuating this flow path may be difficult.
 - HH05 has a low risk of surface water on site apart from the eastern and western boundaries.
 - HH06 has a mostly low risk of surface water on site, with small areas of medium-high risk on the north, west and southeast edges of the site. Flood Zones 2 and 3 are on the western edge.
 - NEW1 contains large areas of high surface water flood risk to the west and east and contains a recorded flood incident. The surface water will require significant mitigation. The River Gade flows through the site and has an associated area of Flood Zone 2/3.
 - Adult Care services recommend the inclusion of one extra-care setting comprising of 70-80 self-contained units at site NEW1.
- Historic England state in their response that any aspirations to 'maximise building height' within the town centre must be balanced against the New Town's design.

- Historic England strongly recommend that the Council undertake a tall buildings study for the town centre to ensure that densification and high-rise development respects and does not harm the historic environment.
- Historic England comments in relation to specific town centre sites:
 - Historic England object in principle to allocation of HH05 Market Square and strongly advise that HH05 should be deleted, stating that the market square forms an important part of the setting of the Grade II Registered Water Gardens, representing the correlation and juxtaposition of hard and soft public open spaces, while the Market Square itself is an important part of the New Town's urban design. Historic England prefer use of the site as enhanced public realm enlivened by active frontages and supporting greater public use.
 - Historic England recommends a Heritage Impact Assessment for site HH06 as it is near the Grade II Registered Water Gardens, adjacent to one Grade II* listed building and four Grade II listed buildings.
 - Historic England also recommend a Heritage Impact Assessment for site HH07 as it contains the Grade II listed 'Rowland Emmet Mosaic' and is immediately adjacent to the Grade II Registered Water Gardens. Redevelopment of this site would necessitate the removal and relocation of the Rowland Emmet Mosaic, which would require listed building consent.
- Nash Mills Parish Council believe the proposals for a town centre hospital would not resolve current issues of traffic and poor public transport access.
- Natural England make the following comments:
 - Natural England note that site HH03 has PHI deciduous woodland either on or adjacent to the proposed site.
 - Natural England expect strong adherence to policy NEB5 and pollution prevention measures for site NEW1 as it contains a primary chalk river.
- NHS Hertfordshire West Essex Integrated Care Board (NHS HWE ICB) notes that the planned 1,750 new homes will significantly impact the sole local GP service, Fernville Surgery, and so would like to reserve an option for a new on-site health facility within the Town Centre Opportunity Area, either as a branch surgery or by relocating Fernville Surgery to a larger site.
 - NHS HWE ICB supports the allocation of HH03 for 450 dwellings and requests the boundary is revisited to include the northern field of Paradise Fields to allow the accommodation of primary school provision.
 - NHS HWE ICB is committed to collaborate with the Council in exploring the viability and securing the delivery of an Integrated Health Campus at HH05 Market Square, to expand healthcare services and improve the vitality of the town.

3.2.17 General Bodies/ Other Organisations

- AViD (Arts Venue in Dacorum) request that HH05 Market Square be earmarked as an arts venue to support regeneration of the town centre, else Hemel Hempstead may become the largest urban area in Hertfordshire yet lack an arts venue. AVID note that their campaign, when initiated in 2016, was backed by a petition of c.3000 signatures and attach this as evidence to support their response.
- The Council for the Protection of Rural England (CPRE) supports a more imaginative and innovative regeneration of the town centre to reduce pressure on open countryside and accommodate small households and new business.
- The Dacorum Environmental Forum notes a lack of proposals to rejuvenate the town centre and suggests that HH05 Market Square be retained for cultural and social use to aid regeneration and reduce out-of-town traffic for leisure purposes.
- DLP Planning on behalf of Taylor Wimpey, McCarthy & Stone and Whiteacre Ltd comments that the Council should ensure town centre sites meet deliverability tests if they are included within the 5YHLS.
- DSBG HH Riverside Ltd wishes to reaffirm the availability and suitability of the Riverside Shopping Centre site, stating that Riverside presents significant opportunities to redevelop and improve the existing asset and public realm, whilst ensuring that existing commercial uses and their benefits remain.
- Hertfordshire Gardens Trust states that site NEW1 Riverside has the potential to harm the setting of the Water Gardens, and so the type of development, its height and massing should take the setting of the Water Gardens into account.
- MSC Planning believes the Town Centre approach will not work without a comprehensive master plan and control of corresponding assets.
- Roebuck Land and Planning Ltd on behalf of Hallam Land Management (SHLAA site 78, land north of Polehanger Lane) comments that the deliverability of site HH03 is linked to a new hospital hub, however there is no clear timescale regarding site availability, while the healthcare campus would only be delivered late in the Plan period.
 - HLM also comments that site NEW1 is unfathomable, as the site is intensively developed and actively used for hotel, retail and leisure uses.
- CBRE on behalf of Silversaw notes that town centre regeneration sites can be complicated, and it will potentially be unviable to bring forward policy-compliant levels of affordable housing. Therefore, reliance on town centre regeneration sites is considered a risky cornerstone for a delivery strategy.

3.2.18 Wider Community

- Most comments on the town centre noted the decline of retail in the area.
- Some agreed with redevelopment to reflect changes in shopping habits, while others supported the use of unused retail space to be used for housing.
- Others disagreed with the proposed loss of retail, services and parking at NEW 1 Riverside to make way for housing, stating that this would cause further decline.
- Several respondents agreed that HH05 Market Square should be allocated as an arts venue / leisure space due to its attractive location and community history.
- Some comments referred to the proposed health campus, announced separately to this consultation, and felt that:
 - The Market Square would be forever lost, and the health campus would not enliven the town.
 - The existing hospital should be upgraded instead.
 - The square is too small to accommodate the required level of provision.
 - The role of a new health campus was unclear and confusing.
- Some expected a high level of private sector investment to support town centre leisure and nightlife options to accompany residential conversions.
- One respondent was concerned that the town centre would need more facilities for children in the area to support a growing residential population, such as low-cost entertainment or another adventure playground.
- Some stated that the town centre should be made more affordable to allow small businesses to trade and referred to rents being too high.
- Some suggested that the town centre pedestrianisation be reversed, but others suggested that, in areas of high density, shared spaces between pedestrians and vehicles are hazardous.
- A number of suggestions were made by the wider community, including:
 - Exploring international best practice for town centre densification, to serve as a hub to support the surrounding neighbourhoods.
 - Introducing sustainable transport connections such as bike schemes, scooters and an easy hop-on bus route.
 - Creating a purpose-built bus and taxi hub.
 - Having a dedicated drop-off/pick-up space.
 - Providing more seating, public toilets, lighting and security cameras.

- Establishing a Dacorum museum in the town centre.
- A significant proportion of suggestions related to site HH05 Market Square, in addition to allocating it as an arts venue, including:
 - Using the area for community events, weekly markets, and various specialist markets, such as vintage/antiques, farmers produce, plants, etc., and potentially working in partnership with the Sunnyside Rural Trust.
 - Developing the perimeter of the square with 2/3-storey apartments with ground-level activity and using the square as a green space.
 - Reinstating the large Christmas tree which previously featured.
 - Introducing greater controls on shops on the site to provide healthier food.

Maylands

3.2.19 Specific Bodies

- The Environment Agency comments regarding site HH18 that it is located on the Ver water body, which is already polluted from urban surface water run-off. Therefore, new development must mitigate against further deterioration of this water body and any proposals should include appropriate risk assessments and not negatively impact groundwater quality.
- The following services within Hertfordshire County Council made comments with regards to site HH17 within the Maylands:
 - Historic Environment services note the site would likely require a conditioned watching brief.
 - Lead Local Flood Authority (SuDS) state that above-ground SuDS should be used as far as practicable with discharge restricted to greenfield rates and volumes.
 - Lead Local Flood Authority (Flooding) note the site is indicated to include moderate areas at high risk of flooding from surface water, which to mitigate additional attenuation volume may be required.
 - Hertfordshire County Council make detailed comments on site HH18, but this site already has resolution to grant planning permission.
- Hertfordshire Local Enterprise Partnership and Herts Innovation Quarter believe there should be greater reference to the Maylands Masterplan within the document.
- NHS HWE ICB notes the impact that development of Cupid Green Depot will have on several GP practices in the vicinity and will seek a financial contribution to either Grovehill Medical Centre relocation or any other premises' capacity improvement.

3.2.20 General/Other

- Quod, on behalf of Aviva Life and Pensions UK Limited, welcomes the continued protection of Maylands Business Park as an employment area.
- Roebuck Land and Planning Ltd on behalf of Hallam Land Management (SHLAA site 78, land north of Polehanger Lane) comments that allocation of site HH17 Cupid Green Depot would require relocation of the active refuse site.
 - HLM notes that the HGC position statement includes the provision of such facilities, but lacks clarity, timescales or an overall delivery strategy.

3.2.21 Wider community

- A specific comment was raised about the lack of consideration for parking for LGVs.
- Several respondents noted levels of congestion exiting Maylands onto the M1 motorway and the capacity of the junction.
- Several comments referred to unused space and employment buildings within the Maylands, stating that these should be used to meet the housing need, rather than building on Green Belt sites. Others complained that recent residential development within the Maylands have had a detrimental impact on traffic and pollution.
- Some responses welcomed the provision of additional employment at Maylands.

Other areas within Hemel Hempstead

3.2.22 Specific

- The Canal & River Trust notes that they were not consulted on the relevant planning application for the HH21 site, despite advising that the site would result in increased use of the towpath which would require mitigation.
- The Environment Agency comments regarding site HH22 that it is located by the River Gade which already has poor ecological status. This development must not contribute to any further deterioration of the river or its associated elements, none of which are currently significantly impacted by urban run-off. Therefore, surface run-off rates from this development should either be maintained or improved.
- The following services within Hertfordshire County Council made comments with regards to sites within the wider area of Hemel Hempstead:
 - Historic Environment services comment on site HH23 that it would likely require a pre-determination desk-based assessment, earthwork survey, geophysical survey, and trial trench evaluation, while site HH26 is likely to require a pre-determination trial trench evaluation.

- Lead Local Flood Authority (SuDS) notes that large greenfield sites (HH22, HH23) and large brownfield sites (Grovehill NDP) are well-suited to above-ground SuDS. For HH22 a source control approach should be used while for site HH26 above-ground SuDS must be used. Discharge for all sites must be restricted to greenfield rates and volumes.
- Lead Local Flood Authority (Flooding) notes that site HH22 has a high-risk surface water flow path crossing the site, while site HH26 is at low risk of flooding but Kingcup Way to the north is high-risk, where records exist of extensive property flooding from 2014 soon after it was developed.
 - The Grovehill NDP is overall at low risk of flooding although some areas of medium-high surface water risk should be managed.
- Historic England request that a Heritage Impact Assessment for site HH23 as it partially falls within the Hemel Hempstead Old Town Conservation Area and is immediately adjacent to a number of listed buildings.
- Nash Mills Parish Council welcomes an extension to Bunkers Park as part of SANG provision but urges DBC to consider that increased usage would exacerbate the need for parking provision and would like to request width restrictions on Bunkers Lane to mitigate the increased traffic.
- Natural England states that sites HH22 and HH23 are located within a proposed area of search considered as a possible boundary variation to the Chilterns AONB.

3.2.23 General/Other

- Butterfly Conservation – Hertfordshire and Middlesex Branch made detailed comments on a number of sites, referring primarily to the Strategic Housing Land Availability Assessment Update (2023):
 - Sites HH21 (LA3 – Permissioned) and HH22 (LA1-Retained) should include provisions for a green corridor, including provision for chalk grassland.
 - Site HH23 (LA2-Retained) will need special attention to assess its existing biodiversity prior to development proceeding.
 - The group’s detailed comments on a number of other sites not included within the Revised Strategy as proposed allocations (Hemel101R, Hemel102R, Hemel104R, Hemel110R and Hemel113R) are noted.
- Bidwells represents the landowner of Flamsteadbury Farm in Redbourn, a proposed allocation within the St Albans Local Plan, with small areas within Dacorum Borough, and requests their release from the Green Belt to assist in the delivery of housing.
- Lansdown makes several comments relating to the strategy and their site, Chaulden Lane (Rural 115L), objecting to the assessment of the strategic Green Belt parcel including this site, and submitting a supplementary transport note on site access.

- Planning Potential state that the Council's allocation for site HH27 requires updating, and that removal of the allocation, now a permissioned site, does not take into account that the site's southern portion remains vacant and should be reallocated.
 - Planning Potential represents a client with interest in the land and aware of market demand for uses outside of 'retail and leisure' envisaged for the site.
 - Planning Potential recommends that the allocation be amended or expanded to reflect market trends and consider a wider range of potential uses (e.g. small-scale retail, or alternative non-industrial employment uses).
- Progress Planning on behalf of Clovercourt (Sarratt) Ltd promotes their site 'Land at Shaffold Knoll Farm' as part of the Call for Sites, noting that the site is unconstrained by flood risk, heritage and landscape. The response notes that dwelling numbers and mix is a matter for future consideration.
- Roebuck Land and Planning Ltd, representing Hallam Land Management, promotes Site 78 (Polehanger Lane) on the basis of good sustainability performance and ability upon review to provide 16ha of on-site SANG with provision for an event space/cafe, land for biodiversity net gain enhancement adjacent to Halsey Field, a new primary school, a community square and transport hub, and new routes for all transport modes. RLP argues for more development to the west of Hemel Hempstead to capitalise on closer rail links, and states that assessment of their site within the updated evidence is inaccurate.
- Woolf Bond Planning on behalf of Fairfax Strategic Land objects to the omission of 'Land West of Leighton Buzzard Road' as a housing allocation, stating that the site would contribute towards housing need, including 40% affordable housing, in excess, £8 million of S106 contributions and £3 million of CIL contributions.

3.2.24 **Wider Community**

- Two comments were made about LA3 regarding transport concerns and anti-social behaviour from the traveller site.
- One comment stated that LA2 should be retained as public open space, with development focused within the town centre itself to assist to assist regeneration.
- Responses were raised about current neighbourhood centres within Hemel Hempstead requiring revitalisation, improved shops and community buildings, and improved transport links with the train station from Grovehill and Highfield.

3.2.25 In addition to this, several comments from the wider community mentioned the Hemel Hempstead strategy in passing while referring to Berkhamsted and/or Tring.

- Most generally supported providing less housing within the market towns of Berkhamsted and Tring, often referring to the benefits to Hemel Hempstead of further growth, such as more affordable housing and investment in infrastructure.
- The remaining responses disagreed with the increased focus on Hemel Hempstead, referencing the need for affordable housing in the Borough's villages.

3.3 Berkhamsted

3.3.1 Survey respondents had the option to select which settlement area their response related to. 488 responses (36%) selected Berkhamsted, of which 7 were postal responses.

3.3.2 Of these, 162 (33.2%) said they 'agreed' or 'somewhat agreed' with the proposal, while 311 (63.8%) 'disagreed' or 'somewhat disagreed' and 15 were neutral (3.1%).

3.3.3 Survey respondents had the option to select their five infrastructure priorities. For those who respondents selected Berkhamsted, their top five priorities were:

- | | |
|------------------------------------|----------------|
| 1) Healthcare | – 96 – (19.7%) |
| 2) Green space and play facilities | – 80 – (16.4%) |
| 3) Community facilities | – 61 – (12.5%) |
| 4) The road network | – 59 – (12.1%) |
| 5) Education | – 58 – (11.9%) |

3.3.4 This ordering was not dissimilar from the survey's overall infrastructure priority results, apart from 'Community facilities and 'Education' which were slightly more prioritised regarding Berkhamsted. Healthcare remains a clear priority.

3.3.5 Consultation responses have been grouped according to the type of respondent: specific bodies (whom the Council is legally obliged to consult), general bodies (any other response submitted on behalf of an organisation), and wider community (responses from individuals).

3.3.6 Specific Bodies

- Aldbury Parish Council welcomes the reduction in planned housing at Berkhamsted, for the sake of traffic and pressure on Ashridge.
- Berkhamsted Town Council believes it is premature to designate Green Belt land for construction before the building industry is ready and doubts the claim that 40% locally affordable housing will be provided as Berkhamsted is a high-cost area.
 - BTC notes a Master Plan will be required with upgrades to drainage, sewage treatment and water supply.
 - BTC doubts whether the planned 900 houses per annum can be achieved, as completions have rarely exceeded 600 dwellings a year since 2006, with windfall accounting for 60%.
 - BTC cites Minister for Housing and Planning, Brandon Lewis' June 2016 letter that "support of local people" should be requisite for Green Belt adjustments.
 - BTC request safeguards that development will meet the local housing needs, with appropriate infrastructure to integrate development of Bk01 into the town,

and biodiversity net gain. Reliance on windfall, by backland and garden infill, is considered to undermine the character of the area.

- BTC believes the policy of 40% affordable housing in a high-cost housing area is untenable, leaving Bk01 likely to fail as the development of its Green Belt would not be outweighed by the benefit to the community.
 - BTC believes Berkhamsted's infrastructure is not fit for purpose for current needs, let alone future housing.
 - BTC provides detailed specifications for what should be required of Bk01.
 - BTC approves of the increased distribution to Hemel Hempstead. Where Green Belt is to be released without meeting the Local Housing Need, residents will have reasonable justification to contest the policy.
 - The current affordability ratio is in excess of 13 (dwelling cost/household income), while over 30% of housing rental in the Town is excessive.
 - BTC cites the consultants' report for their Neighbourhood Plan, noting that 40% affordable housing will see only 340 affordable units over the plan period, while the report indicates local need as 40 affordable units a year.
 - BTC notes that, as Berkhamsted households are increasing in age with a marked decline in ages 25-34, with over 65s set to represent about 50% of the population by 2040, there should be an increase in the proportion of single and three-bedroom dwellings planned.
 - BTC states that hilltop flats in Bk01 should be restricted to two storeys.
 - BTC remains unconvinced why some smaller sites were deleted which could come forward for feasible delivery.
- The Chilterns Conservation Board acknowledges that Land south of Berkhamsted (BK01) sits away from the AONB on the north side of the town, but care is required.
 - Dacorum Councillor Lara Pringle enthusiastically supports the plan.
 - The following services within Hertfordshire County Council made comments with regards to the revised strategy for Berkhamsted:
 - Transport services noted that the 'package of infrastructure' outlined in the plan will need to be identified through the preparation of a suitable evidence base. Delivery of the required mitigations must be secured through policy.
 - Historic Environment services note Bk01 would likely require a pre-determination desk-based assessment (below ground). From an above-ground historic environment perspective, the site is within a Locally Registered Park and Garden and associated with the Grade II* Listed Ashlyns Hall. These concerns will need to be addressed.
 - Lead Local Flood Authority (SuDS) notes that Bk01 is well-suited to above-ground SuDS. Discharge must be restricted to greenfield rates and volumes.
 - Waste Services state that HCC plans to reconfigure and increase the number of containers at Berkhamsted recycling centre to increase capacity.
 - Education services calculate proposed development in Berkhamsted equates to approximately 2.95FE (forms of entry) of demand. The Bk01 school site is

only required to be 2FE, not 3FE. They would expect to meet the balance of potential future demand through school expansion, with the existing identified education zone adjacent to Bridgewater Primary School retained to enable expansion if required. At the secondary phase, future demand is assumed to be meetable within existing schools, and retention of the existing education zone may support the deliverability of an expansion scheme.

- Early Years services note new childcare (0-2 years) provision is required, with nursery 3-4 and wraparound childcare 5-11 to be met at primary schools.
 - Adult Care Services recommend the inclusion of one extra-care setting comprising of 70-80 self-contained units on this site.
 - Services for Young People will seek to increase services available to young people in accordance with their Service Priority Themes.
 - Library services would increase resources at Berkhamsted Library to increase capacity.
- Historic England notes all deletions and permissions and requests a Heritage Impact Assessment for site Bk01, given the proximity of Grade II and II* listed Ashlyns Hall.
 - Kings Langley Parish Council makes one reference to Berkhamsted, implying that one primary school is insufficient for a claimed 1,264 new dwellings.
 - Parul Dix of Northchurch Parish Council objects on the grounds of loss of natural green space, wildlife, the increased risk of flooding, limited GP services, school waiting lists, exclusion from secondary school catchment areas, additional traffic, exacerbated by frequent road closures between Northchurch and Berkhamsted.
 - Northchurch Parish Council as a whole supports the plan and states their approval for deletions in Tring and Berkhamsted which would have impacted Northchurch.
 - NPC welcomes all proposals to build new primary schools as well as the planned regeneration of Hemel Hempstead.
 - NPC describes traffic through Northchurch as too high and exacerbated by development.
 - NPC is liaising with the Environment Agency on the state of the chalk streams, particularly the River Bulbourne.
 - NPC stresses that Northchurch is not to be considered part of Berkhamsted.
 - Natural England make the following comments:
 - Natural England states that the allocation of site Bk01 is largely acceptable but notes that it includes deciduous/priority woodland habitat.
 - Natural England states that Bk01 is located within a proposed area of search which for a possible boundary variation to the Chilterns AONB.
 - NHS HWE ICB notes that Manor Street Surgery already operates in cramped conditions, and so would like to reserve an option for a new health facility at Bk01

and would seek a financial contribution to improve capacity at Manor Street Surgery.

- Three Rivers District Council note that reliance on Bk01 could mean losing some flexibility in housing supply in terms of the timing, spread and variety of sites, especially as the allocated site performs poorly concerning the Green Belt.

3.3.7 General Bodies/Other Organisations

- Adrian Cole FRICS Ltd states that the deletion of Shootersway sites will not remove the pressure for development, and that restricting growth to larger sites, such as Bk01, removes house buyers' choice for properties on smaller, more individual sites.
- Berkhamsted Schools Group proposes Haslam Field as a housing allocation, noting that its promotion of Haresfoot Campus for sports provision is dependent on Haslam Field's allocation for housing.
 - BSG criticises the focus on substantial longer-term sites, which may take years to obtain full permission and require substantial infrastructure provision, as adding to the short-term housing crisis.
 - BSG critiques the estimation of windfall sites and risks of town cramming, noting that Berkhamsted's windfall allowance is given as 275 homes, despite the Council acknowledging limited availability of vacant brownfield sites.
 - BSG considers political reasoning to lie behind the changes to the plan, which it believes could see the plan rejected at inquiry.
 - BSG rejects the use of SANG as a determining criterion for allocations.
 - BSG believes that Berkhamsted, the second largest town in the Borough, can accommodate more growth, to reduce pressure on Hemel Hempstead.
- Berkhamsted Castle Trust have promoted their concept of a 'People's Park', centred on Berkhamsted Castle and involving surrounding land east and north of the castle. The Trust have commissioned LUC for the purposes of assembling land and investigating potential status as a SANG/Gateway site.
- Berkhamsted Citizens Association somewhat agrees with the proposed plan and offered no comment.
- Berkhamsted Raiders approves of lower housing requirements but urgently requests additional 3G facilities to allow all-weather activities, as rain often cancels matches.
 - Berkhamsted Raiders requires independent facilities, as high costs, limited provision and their reliance on schools and community areas restrict their ability to serve children in the community.
- Bidwells on behalf of Vistry Group advocates for the reallocation of Pea Lane, Northchurch, to meet the housing supply shortfall, objecting to its exclusion on the grounds of lying entirely within the Chilterns AONB, arguing that it would have no

visual or physical impact on neighbouring settlements and would safeguard the wider countryside from further encroachment. Reallocation of Bk06, East of Darrs Lane, is also supported as part of comprehensive development of west Berkhamsted.

- Bidwells on behalf of Jarvis Homes object to the deletion of Edgeworth House from the plan and maintain that it could bring forward either a care home or market and affordable housing without undue harm to the Open Land designation or the heritage asset of Edgeworth House itself.
- Berkhamsted Residents Action Group (BRAG) strongly disagrees with the revised local plan and fully endorses CPRE's conclusions, taking issue with the Council's approach and instead supporting Three Rivers District Council's approach, not to comply with the Standard Method, while rejecting the inclusion of Bk01 in the plan.
 - BRAG believes the plan is not consistent with NPPF guidance by prioritising Green Belt development over brownfield in Berkhamsted, rejecting two previously included brownfield sites and allegedly disregarding previous inspectors' conclusions that Bk01 fulfils criteria for full Green Belt protection.
 - BRAG says Bk01 is misleadingly described as 'brownfield' and 'urban'.
 - BRAG says distance from Berkhamsted town centre and the site's topography, previously cited as reasons for exclusion from the plan, make it unsuitable, while its ridgetop location is visible from the Chilterns AONB.
 - BRAG is concerned for the impact on the Grade II* listed Ashlyns Hall, as well as implications for access up Swing Gate Lane which is steep and bookended by primary schools. BRAG believes the proposed Chesham Road to Swing Gate Lane connection would not be able to meet road standards.
 - BRAG argues that the site's topography makes sustainable transport expectations unrealistic, with no provision in the Sustainable Transport Plan for new such routes into town.
 - BRAG notes that Berkhamsted already suffers from poor air quality, which will be exacerbated without mitigation by the local plan, as will water pollution and detriment to sewage disposal and the water supply.
 - BRAG notes no additional GP or care provision, and that the need for a new school would better be served by a new secondary school in Northchurch.
 - BRAG admires the 40% affordable housing target but believes it will not be fulfilled by Taylor Wimpey and that house prices in the area render truly affordable housing almost impossible.
 - BRAG argues for more smaller homes to suit the aging demographic.
 - Lastly, BRAG takes issue with the consultation as insufficient.
- Berkhamsted Sports Grounds Charitable Association somewhat disagrees and notes a lack of additional planned provision of sports pitches.
- Bridgewater School Berkhamsted supports the revised plan.

- Butterfly Conservation – Hertfordshire and Middlesex Branch makes detailed comments on several sites.
 - The group notes that Bk01 includes a local wildlife site, which should be excluded from development. An ecological survey of the entire site should be undertaken to assess biodiversity and consider opportunities to enhance and expand the existing wildlife site.

- The Chiltern Society welcomes the reduction in planned housing in Berkhamsted but is concerned about infrastructure, especially healthcare, roads, and education.

- The Council for the Protection of Rural England (CPRE) is particularly concerned about the density of planned development in Berkhamsted (which it calculates at almost twice the proposed density for Hemel Hempstead, Bovingdon and Tring), the sensitive ridge-top location of Bk01, and further strain on infrastructure.

- Dacorum Heritage Trust made no comment but somewhat agreed with the plan.

- Dacorum Sports Network notes a lack of a sports solution for Berkhamsted and the removal of the Bulbourne Cross proposal which DSN previously supported. DSN calls for additional indoor sports halls and the expansion of gymnastics facilities.

- DHA Planning promotes Ivy House Lane (Berk026R) on behalf of Premier Property Acquisitions, as a solution to shorter-term housing provision on smaller sites.
 - DHA takes issue with the calculation for windfall development, arguing Berkhamsted has capacity within its urban boundary for another 275 homes.
 - DHA notes that Berk026R's site capacity is closer to 100 dwellings than the 129 mentioned in the SHLAA.
 - DHA argues that, despite bordering the AONB, the site makes no major contribution to its setting, and that its development would represent infill within existing boundaries and not compromise Green Belt integrity.
 - DHA notes that access can be provided by three potential entries, and so is less constrained than described in the SHLAA.

- DLP Planning Ltd represents Taylor Wimpey regarding the Bv01 site Grange Farm.
 - TW claims 1264 new homes are planned for Berkhamsted, which puts greater pressure on other allocations to deliver earlier, and so the Council should issue planning applications wherever and as soon as possible.

- GUCE welcomes mention of climate change, sustainability, and green issues, as well as the reduction of new houses in the Green Belt.
 - GUCE wants more emphasis on community energy, network heating and whole-life net-zero buildings, especially for affordable housing, at minimal cost increase.

- Herts & Middlesex Wildlife Trust note that the site requirements for Bk01 do not refer to the presence of a Local Wildlife Site within the site allocation. Development of the site must ensure that its wildlife value is enhanced, not damaged.
- Les West Planning promotes Bk07 (Lockfield, Northchurch) for reallocation, on behalf of CALA Homes Ltd.
 - CALA describes the SHLAA assessments of Bk07 as inaccurate and misleading, noting that Bk07 was first identified for development in 1998.
 - CALA notes that the site is outside the AONB, has no impact on the AONB in distant views, does not adjoin any other Green Belt part, is bounded strongly by the railway line, and was strongly recommended in the 2016 SHLAA.
 - CALA objects to the assertion that 23.9% of the site lies within the 500m SAC Exclusion Zone, arguing that the railway impedes walking distances.
 - CALA affirms that the site lies entirely within Flood Zone 1 up to the Canal banks, and thus it would be erroneous to claim serious flood risks.
- Landowners of Edgeworth House are in favour of the plan and its redistribution to Hemel Hempstead and away from other Green Belt sites, but they wish to see their site, Edgeworth House, no longer designated as Open Land and instead considered for housing. They object to undershooting the housing requirement and reliance on windfall sites, and particularly that all brownfield sites in Berkhamsted have been removed while one greenfield site remains.
- MSC Planning considers changes to the Berkhamsted strategy as entirely due to public opinion.
- Newsteer is promoting Bk09 (Bank Mill Lane) for reallocation in the Local Plan, on behalf of Angle and Land Developments, Signature Senior Lifestyle and Beechcroft Developments, as a much-needed care home and retirement complex.
 - Newsteer notes a major shortfall of over 1000 care bed spaces in the Borough by 2036 were identified in the SW Herts LHNA identifies.
 - Newsteer rejects concerns about impacts on traffic on Shootersway, as the site is located in the northeast of Berkhamsted.
 - Newsteer argues that the site would enable older people to downsize and thus free up many family homes in Berkhamsted.
 - Newsteer notes that by nature it will have no impact on school capacity.
- Nexus Planning is promoting Bk05 (Blegberry Gardens, Shootersway) for reallocation on behalf of Crest Nicholson Partnerships and Strategic Land.
 - Based on statements made in the Emerging Strategy, Crest Nicholson believes the Revised Strategy would fail to ensure necessary infrastructure or maintain the viability of Berkhamsted and its town centre.

- Pegasus Group represents Taylor Wimpey in requesting Bk06 (Land East of Darr's Lane) be reallocated as a safeguarded or reserved site.
 - TW notes that in 2020, the Council stated in the Emerging Plan that “no single constraint is severe enough to render the site [Bk06] unsuitable”.
 - TW states that the site would be unsuitable for a secondary school.
 - TW says it has undertaken detailed masterplanning to deal with the sensitivity of Grim's Ditch and views from the AONB, while providing its own SANG.

- Savills representing Taylor Wimpey supports the proposed allocation of Bk01, but wishes to see Bk04 reinstated, which would aid in reaching the housing target while retaining a green corridor buffering the A414.
 - TW considers Berkhamsted well placed to take on strategic responsibilities and meet development needs, having taken virtually no strategic planned housing growth for more than 20 years, while Hemel Hempstead is reaching saturation point.
 - Meanwhile, TW agrees that focusing development on Bk01 will help to control the impact of development on the rest of the town.

- Stantec is representing Croudace Homes regarding Rossway Farm (Bk08).
 - Croudace seeks to have its site reintroduced to the plan, so the plan can be found sound, as its inclusion cannot be considered 'disproportionate growth'.

- Swing Gate School Governors are concerned about the development of Bk01 due to current levels of congestion on Swing Gate Lane and the danger posed to children, which would be exacerbated by construction.
 - Governors consider southeast Berkhamsted as oversupplied with primary school places, while secondary school places at Ashlyns are under pressure.

- Thakeham Group promotes its site, Land East of Berkhamsted (Bulbourne Cross).
 - Thakeham argues that the plan lacks evidence for the reduction in housing in Berkhamsted.
 - Thakeham requests evidence for housing needs up to 2040 and proposes growth in Berkhamsted, Tring, and Bovington – including East Berkhamsted.
 - Thakeham argue that the allocation of growth to Hemel Hempstead is disproportionate, while Berkhamsted receives only one site.

- The Tring & Berkhamsted Labour Party consider Bk01 unsuitable for transportation and that a new road will be needed while a bus service is unlikely to work and traffic emissions pose a risk to schoolchildren on Swing Gate Lane.
 - T&BLP notes that the current proposal threatens Long Green woodland, the Long Green/Sugar Lane byway, and Gardenfield Lane bridle path.
 - T&BLP suggests a wildlife overpass across the A41, with forest extension to reduce air and sound pollution.

- T&BLP doubts the completion of on-site primary school and community facilities.
- Warner Planning on behalf of Griggs Homes believes all brownfield sites, including Haresfoot Farm, should be used.
 - Griggs welcomes the recognition of Berkhamsted's suitability for sustainable growth and the increased windfall potential but believes that Berkhamsted's windfall opportunities are underestimated.
 - Griggs would welcome the allocation of Haresfoot Campus as Cy04.
- The BFI does not wish for its site in Berkhamsted to be deleted from the local plan.
 - The BFI states that it is unsustainable for them to retain the site.
 - The BFI notes that the site is not greenfield, makes minimal contribution to the Green Belt, and that heritage impacts are mitigable, thus being the only site in Berkhamsted with limited or no constraints in the SHLAA.
- PJB Planning promotes Bk11 (Billets Lane) for Scarth Ltd as a sustainable brownfield development of 40 dwellings.
 - PJB Planning questions the deletion of Site Bk11 without a clear justification.
 - PJB Planning also supports retaining Site Cy01 for various reasons, including making more brownfield commercial sites available for housing.

3.3.8 Wider Community

- A large number of public responses were received from Berkhamsted, particularly objecting to the South of Berkhamsted allocation (Bk01).
- Many, particularly in Northchurch and along Shootersway, were happy to see planned development reduced in those areas and other Green Belt sites.
- Others felt that the planned growth was disproportionate, representing an increase of over 10%, especially if concentrated in one part of town.
- Some suggested reducing the housing in Bk01 and spreading it over smaller brownfield sites in Berkhamsted or planning more housing in Hemel Hempstead.
- Many objected to the planned development of greenfield, with no brownfield sites allocated, and specified for reallocation many brownfield sites proposed in 2020.
- Bk01 in particular was described as a sensitive site both for the Chilterns AONB and for the Chiltern Beechwoods SAC, highly visible from across the valley and on the approach to Berkhamsted, as well as being valuable arable land.
- Other factors cited in opposition to Bk01 were:

- Access: the site is located up Swing Gate Lane, which is steep and thus impedes access on foot and by bike. Meanwhile, the presence of two schools (Swing Gate and Thomas Coram) at either end was noted for increasing foot and car traffic along it, with on-road parking a further impediment.
 - Safety: many concerns were raised that cars travel already too fast on Swing Gate Lane within Upper Hall Park, posing a serious risk to schoolchildren.
 - Education: many felt no need for a third primary school in the area, and feared Ashlyns School would be overloaded and shrink its catchment further.
 - Distance: many felt the site's location 2km from the town centre was a further impediment to non-car travel and would prevent the new development from integrating into Berkhamsted proper, while doubting that new on-site facilities would divert journeys to the town centre.
 - Developer: several objected to Taylor Wimpey in particular, citing doubts about affordable housing fulfilment previously at Bearroc Park, Shootersway.
 - Some believed that the new houses would not sell, particularly to locals.
 - Heritage: several expressed concern about the impact of the development on the Grade II* listed Ashlyns Hall.
 - Green space: many felt that Berkhamsted needs more green spaces and more protection for its existing green space, so objected to a greenfield site.
- The greatest concerns were raised regarding infrastructure, particularly regarding:
 - Healthcare: many reported they were unable to access GPs, dentists, or a nearby hospital, as well as social care for older residents.
 - Education: many felt that Northchurch and Shootersway were in much greater need of a new school and that Ashlyns School was already at capacity, with no current need for a new primary school.
 - Parking: several expressed concern at their current difficulties in finding parking in the town centre.
 - Public transport: several expressed concern about public transport, particularly that the bus service needed improvement and the rail station and trains would be overloaded.
 - Traffic: by far the largest concern, many reported traffic along the High Street, and the two primary proposed access routes to Bk01, Chesham Road and Swing Gate Lane. Several felt that a proposed link road from Chesham Road had been made impossible by the Ashlyns Grove development.
 - Flooding and drainage: many expressed concerns that building on greenfield would exacerbate flooding issues, with flooding and overflowing sewage reported on London Road between Swing Gate Lane and Cedar Road.
 - Several expressed a desire that all new homes be built to high sustainability standards and include thermal heat pumps.
 - Several also stressed that the water table and aquifers were already at their limit, with concerns about the River Bulbourne and Grand Union Canal.

- Many expressed concerns at the impact of development on local wildlife, particularly the mature woodland between the south of the site Bk01 and the A41, described by several as a “green lung” protecting the settlement from air and noise pollution, as well as being home to diverse and endangered wildlife such as skylarks.
- Many expressed concerns at the prospect of increased pollution in Berkhamsted, particularly air pollution from car traffic, as well as pollution of the chalk streams by sewage, and noise pollution from cars and construction.
 - Many mentioned the reported 3770 hours of sewage released into the river by Thames Water at Bulbeggars and voiced concerns about water pollution.
- Some expressed desire and need for a new sports and leisure centre in the town.
- Many strongly expressed their desire for more social housing and truly affordable housing, with guaranteed delivery, noting that developers had previously paid contributions in place of fulfilling the agreed quota.
- Many voiced with the consultation, particularly feeling that there had been insufficient publicity, a poor choice of timing in the busy lead-up to Christmas, that the survey had been difficult to respond to, and that it had not fulfilled the statutory requirements of a full consultation.
- Many respondents wrote in specifically to note their support for the response by Berkhamsted Residents Action Group (BRAG) as well as the CPRE, with a group of respondents from Ashlyn’s Grove also expressing their objections.
- Many claimed that the Council and the Inspector of the 2013 Core Strategy had previously rejected development of the Bk01 site for many of the above reasons and expressed confusion at the apparent reversal of this decision.
- During the Call for Sites, one resident proposed the council consider land south of the A41 near Berkhamsted. Another resident re-promoted draft allocations Bk09, Bk11 and Bk13 which were proposed to be deleted.

3.3.9 Public Engagement

On 30th November, Council officers attended an event coordinated by SWAN Youth Project in Ashlyns School, Berkhamsted, including ten students from the school, providing a presentation of the plan, with a focus on allocation Bk01 South of Berkhamsted, and recording feedback from the students.

- Students suggested that the proposed community centre to be built on Bk01 contain a games room and community library, with café facilities, health clinic and mental health support particularly for younger people and loneliness support for older people.

- They suggested that the developer could work with local charities to staff and operate the centre, and engage young people as volunteers.
- They suggested the developer fund apprenticeships in building work, library management, animal care and park management.
- They suggested it function as a multi-generational centre, with creches and daycare for toddlers and babies in the morning, space for young adults to study and gather in the afternoon, and as a venue for older people in the evening.
- Students suggested that services and facilities, such as chemists, supermarkets and cornershops, should be provided locally in the community centre and ground floor of the focal buildings, to encourage walking and reduce traffic.
- Students requested that the site and its amenities be funded by the developer for several decades.
- Students emphasised the importance of cycling, with the provision of safe off-road secondary cycle routes.
- Students requested additional local bus provision, as well as free bus transport for older people from Bk01 to the town centre.
- Students stressed the value and importance of greenery and countryside to the character of Berkhamsted.
 - They were keen that the SANG for Bk01 should have a small, accessible and non-concreted carpark primarily for disabled visitors, with bike racks, cycling facilitated on site, and ramps.
 - They were keen to preserve the greenery and woodland of Bk01 and avoid the loss of habitats, suggesting that new wildlife areas be allocated and proposing an animal sanctuary for endangered species and young people to volunteer at, potentially supplementing the one veterinarian in Berkhamsted.
 - Students wanted more parks and secluded open spaces with benches.
 - Students were concerned about flooding and keen for the site Bk01 to include SuDS and ponds, noting that the canal is unclean and unpleasant.
 - Students proposed foresting the area around the proposed ponds or replacing some ponds with proposed park areas to support the dogwalkers and joggers who currently use the site.
- Students suggested that housing should be affordable for locals and avoid becoming a commuter town with new peripheral communities not integrated with locals.
 - Students noted the limited carpark at Berkhamsted Station and were concerned that the distance of the site from the station would lead commuters to drive into town and worsen air pollution.
- Students noted interested in a new secondary school to serve Berkhamsted, particularly in Northchurch, noting that Ashlyns School was also oversubscribed, leading students often to be left out
 - Students suggested that a nursery or daycare be provided within the on-site primary school.
 - Students suggested the developer fund expansion of the sixth form at Ashlyns School to support greater demand.

- Students stressed the importance of disabled access and accessible design, including for on-site parks, with consideration of the gradient.
- Students requested play areas for younger children near the primary school site.
 - Students wanted spaces specifically for children aged 10 to 16, including swings, football pitches, a soft-surface circular running track, tennis courts, and table tennis.
 - Students also support regular charity events or centres and youth groups which facilitate socialising and learning.

3.4 Tring

3.4.1 Survey respondents had the option to select which settlement area their response related to. 292 responses (21.5%) selected Tring, of which 4 were postal responses.

3.4.2 Of these, 215 (73.7%) said they 'agreed' or 'somewhat agreed' with the proposal, while 60 (20.6%) 'disagreed' or 'somewhat disagreed' and 17 (5.8%) were neutral.

3.4.3 Survey respondents had the option to select their five infrastructure priorities. For those who respondents selected Tring, their top five priorities were:

- | | |
|------------------------------------|----------------|
| 1) Healthcare | – 74 – (25.3%) |
| 2) Green space and play facilities | – 58 – (19.9%) |
| 3) Public transport | – 52 – (17.8%) |
| 4) Community facilities | – 47 – (16.1%) |
| 5) Walking and cycling | – 41 – (14.0%) |

3.4.4 This ordering shared the same top two priorities as the overall survey results, but 'Public transport', 'Community facilities' and 'Walking and cycling' were particularly prioritised for Tring. Healthcare remains a clear priority.

3.4.5 Consultation responses have been grouped according to the type of respondent: specific bodies (whom the Council is legally obliged to consult), general bodies (any other response submitted on behalf of an organisation), and wider community (responses from individuals).

3.4.6 Specific Bodies

- Aldbury Parish Council (APC) welcomes reduced housing in Tring and Berkhamsted, with less impact on local traffic and pressure on Ashridge.
 - APC wishes to see sustainable travel and SANG proposals for site Tr01 expanded on within the plan.
 - APC also states that any SANG should be close to the site and wishes to see explicit reference to mitigation, alongside guidance for developing new SANG
- Historic England notes that Tr01 is located between a Grade II Registered Park (Tring Park) and the (non-registered) parkland associated with the Grade II listed building Pendley Manor.
 - Historic England requests a Heritage Impact Assessment for the site to determine its suitability and establish any necessary development criteria to mitigate potential harm.
 - Historic England also makes detailed comments on site considerations:
 - Any assessment should consider the views from the Grade II* listed buildings (The Mansion and The Clock House) within Tring Park and

assess visibility of the site from the Summerhouse (Grade II), the western extent of the Charles II Ride, and Stubbings Wood.

- Design of the site should consider setback along Cow Lane and London Road to preserve openness, retain view corridors (where possible), and limit building heights.
- Historic England advises undertaking a masterplanning exercise or Concept Framework before submitting a planning application. This work should be informed by and reflect the findings of the detailed Heritage Impact Assessment, and this requirement should be stipulated in site-specific policy.
- The Chilterns Conservation Board acknowledges that Dunsley Farm Tring (TR01), now amended, has potential to avoid any negative impact on the AONB.
- The Environment Agency states that any proposal for site Tr01 should include appropriate risk assessments and should not negatively impact groundwater quality.
- The following services within Hertfordshire County Council made comments with regards to the revised strategy for Tring:
 - Transport services state that connectivity to the station remains a priority to enhance sustainable travel choices for Tring and would support allocation of land and a policy for enhanced transport infrastructure to achieve this.
 - Historic Environment services state that Tr01 would likely require a pre-determination desk-based assessment and geophysical survey.
 - Lead Local Flood authority states that Tr01 is well-suited to above-ground SuDS and discharge must be restricted to greenfield rates and volumes. Tr01 is at low risk of flooding apart from a large surface water flow path in the middle of the site, which has associated flooding incidents on Cow Lane. The LLFA has identified Tring as a surface water flood risk hotspot.
 - Waste services plan to reconfigure and increase the number of containers at Berkhamsted recycling centre to increase capacity.
 - Education services state that the primary school site at Dunsley Farm is only required to deliver 2FE (forms of entry) of provision (2.03ha) as opposed to the 3FE size (3ha) listed within the consultation. At the secondary phase, future demand is assumed to be meetable within the existing school through expansion. Additional land will need identifying and safeguarding to ensure future expansion can be delivered.
 - Early Years services note one new childcare provision (0-2 years) is required, with nursery 3-4 and wraparound childcare 5-11 to be met at primary schools.
 - Adult Care Services note that they would support an allocation for specialist older persons housing at site Tr01.
 - Libraries services would increase capacity by reconfiguring and adding an Open Plus system and increasing resources at Tring Library. S106 or CIL will need to be made available to fund an increase in capacity at Tring library.

- Natural England make the following comments:
 - Natural England states that Tr01 lies within the Impact Risk Zone (IRZ) for Oddly Hill and Tring Park SSSI. Natural England expect to be consulted on developmental plans for this allocation so that they can assess impact pathways and provide comments on avoidance and mitigation measures to avoid increased damage to the site's interest features.
 - Natural England states that site Tr01 is located within a proposed area of search for a possible boundary variation to the Chilterns AONB.

- NHS Herts and West Essex Integrated Care Board (HWE ICB) notes the impact on Rothschild House practice from the Dunsley Farm allocation and so would seek a financial contribution to increase capacity there.

- Scotia Gas Network confirms that the upstream medium-pressure network has the capacity to support Tr01. If the site was instead connected to the nearby low-pressure infrastructure, then some reinforcement may be required.

- Tring Town Council make the following comments:
 - TTC supports the amended allocation at Dunsley Farm, provided that:
 - No other housing development occurs on the deleted sites or other large sites in the area.
 - The site's sensitivities (set out in The Landscape Report by Huskisson Brown dated June 2021) are respected, with significant landscape addition to the London Road boundary and appropriate landscaping to soften development and reduce impact of view from the High Scarp.
 - TTC supports education use on Tr01, and suggests additional provision of a sixth form college, to release space at Tring School, which is at capacity.
 - TTC would agree to an employment site on Tr01 provided it were limited to what was Use Class B1 (now contained in Use Class E) as the site is not appropriate for very large units or for HGV's. On this basis, it may be that the employment site could be reduced in size.
 - TTC suggests that Tr04 should be shown as office use as per the planning permission given to Cala Homes.
 - TTC recommends that Green Belt should be extended north-west to Wilstone and Long Marston, to compensate for the loss of Green Belt elsewhere, and to protect Tring Rural Parish.

- Wigginton Parish Council broadly welcomes the revised strategy for Tring and strongly supports removal of Tr03 and Tr02.
 - WPC states that the visual impact of future development from Wigginton escarpment should be minimised and views from the Twist, Wigginton and Ridgeway footpath protected. Development should use the local vernacular as recommended by the Chilterns Buildings Design Guide.

3.4.7 General Bodies/Other Organisations

- Adrian Cole FRICS Ltd queries the impact of a potential decision by an inspector to approve the Land East of Tring Appeal on the Local Plan.
- Butterfly Conservation – Hertfordshire and Middlesex Branch notes that Tring is the most sensitive area for butterflies in the Borough, with all seven of the Section 41 species present in areas of countryside around the town.
 - Butterfly Conservation agrees that the wildlife site on Tr01 should not be developed, and state that it is important for proposals on the site to focus on improving existing wildlife areas, enhancing habitats elsewhere on the site, and creating a green corridor.
 - Butterfly Conservation states that a green corridor would be crucial for species to move between Tring Park and Aldbury Nowers/Ashridge Estate.
 - Before confirming any allocation, a comprehensive ecological study should be conducted and Butterfly Conservation requests to be consulted on any proposals on the site going forward.
 - Butterfly Conservation notes the same principles should apply for Tr02 and Tr03 due to the significance of the town as a whole.
- Carney Sweeney on behalf of Lidl support the Council's recognition that Tring site TR04 Site is "actively promoted for non-residential use", and request that the site is allocated for a food store in the emerging Local Plan, which will fulfil the Council's identified need for further convenience floorspace in the town.
- Carter Jonas on behalf of the Generator Group promotes Land south of Aylesbury Road.
 - The Generator Group notes that the Council is not meeting local housing need, and states that Tring is a sustainable and accessible community where housing should be focused.
 - The Group state that their site, Tr01 would deliver approximately 235 homes, open and play space, enhanced pedestrian and cycle links, and potentially a school or care accommodation.
 - The Group notes that Tr01 is within the Chilterns AONB but does not exhibit any special qualities, being severed by the A41 from the wider landscape and thus could accommodate sensitively designed residential development.
 - The Group also notes that the site's Green Belt and contribution to the AONB would have weakened since the development of LA5.
- The Council for the Protection of Rural England (CPRE) is concerned about the development of Dunsley Farm as a Green Belt site and the strain on infrastructure.

- Clark Contracting Limited has promoted their site 'Pitstone Quarry' for Suitable Alternative Natural Greenspace (SANG), and notes that the site is in the process of being extracted and restored to be used as SANG (subject to planning permission).
- Cullercoats Landholdings are promoting land located at the meeting point of Station Road and Cow Lane (Tr-h4) for a small-scale scheme to deliver a dedicated cycle/footpath to connect Station Road and Cow Lane, and gifting of a parcel of woodland immediately to the south of the Sports Clubs which would enhance Pendley Sports' facilities and benefit the wider community as part of an improved green infrastructure.
- Dacorum Sports Network, in conjunction with Tring Sports Forum, proposes the eastern half of Tr01 is allocated for sport to complement and enhance the Cow Lane facilities, namely for rugby and football, as well as squash and bowls.
 - DSN notes that the Cricket and Tennis Clubs also adjoin the west of the site and could expand into the Tr01 allocation.
- Emery Planning states that the proposed growth for Tring is too low, and will exacerbate affordability issues in the town, arguing that the plan should allocate at least 2,700 dwellings for this settlement.
 - Emery Planning promotes Tr04 Land north of Icknield Way, Tring (Waterside Way) for 300 homes, arguing that it relates well to the existing town and welcoming discussions on increasing the proportion of affordable housing.
 - Emery Planning notes that its site is not constrained by the AONB or other constraints and questions the assessment of the Green Belt parcel as strong, noting that other sites assessed 'strong' have previously been allocated.
- Grove Fields Residents Association, on behalf of 585 local residents, welcomes the exclusion of the Land East of Tring site for reducing the impact on the Green Belt and the AONB and considers the size of the housing proposed for Tring far more commensurate with its current size.
 - GFRA considers Tr01 Dunsley Farm a superior choice for new residents, and less reliant on cars than Marshcroft Village, Tr02 and Tr03, so therefore more likely to encourage pedestrian access to the town's shops and facilities.
- Herts & Middlesex Wildlife Trust welcomes the reduction in the site capacity of Tr01 in order to protect the Local Wildlife Site but is concerned that the wildlife site is retained within the boundary of the housing allocation.
 - The Trust insists that development of the site must ensure that the wildlife value of the meadows is enhanced, not harmed.
- Icen Projects on behalf of Millbank Land promotes their land at Bulbourne Park as a deliverable and sustainable site which is well-linked to the existing settlement of Tring would be able to come forward early in the plan period and which could be allocated

with limited harm to the Green Belt and landscape, supported by evidence submitted in February 2021, and is not in need of significant infrastructure works.

- MSC Planning considers the Tring strategy poor for not concentrating development in and around Tring Station or upgrading links to the A41.
- Pegasus Group on behalf of L&Q Estates believes the plan is not meeting Tring's needs and promotes New Mill as an unconstrained site with minimal impact on the Green Belt and the landscape.
 - L&Q Estates requests a discussion with the Council regarding alternative options for SANG provision in order to re-instate the site.
- Ryan and May on behalf of Harrow Estates comments that the evidence base suggests that housing needs can be fully met, but there is too much reliance on urban brownfield sites with no family homes or affordable housing.
 - Harrow says evidence suggests that there is a housing crisis in Tring, with more homes needed for working aged people and worsening affordability.
 - Harrow notes that analysis of Tr03 in the sustainability appraisal disregards its affordable housing, biodiversity net gain, and socio-economic benefits.
 - Harrow suggests amending the plan to include Tr03, the SA to reflect inquiry evidence, and amending the SHLAA to remove highway concerns.
- Sustainable Tring (ST) supports reduced housing allocations but would like to see improved community facilities and greater consideration of the climate emergency.
 - ST wants new housing in Tring to be carbon neutral, with offsetting towards local renewable energy (not tree planting), in-built biodiversity measures and on-site electricity generation considered.
 - ST notes that Tr01 Dunsley Farm is agricultural land and considers its allocation contrary to the Land Use Framework that seeks to maintain food production.
 - ST suggests that the Sunnyside Rural Trust is offered some land.
 - ST would like to see greater support for biodiversity in Tring.
 - ST would like greater clarity on plans for Cow Lane Farm, such as further work to understand its special wildlife status and potential as a strategic wildlife corridor, enhancing nature by 20%, improving habitats for pollinators, and considering the historical context of Grade II Jeacock's Orchard.
 - ST expresses concern regarding the planning application for The Dairy and associated buildings on Cow Lane.
 - ST would like to see small business units/workshops, a primary school, improved walking/cycle access, a community farm, and other innovative community resources such as a repair shed, gallery, venue, sports facility or library on the site.

- Tring Tornadoes notes no mention of new sports provision and wants Cow Lane Farm allocated as an expanded sports hub for use by Tring Tornadoes, and local cricket and rugby clubs, in order to address current and future shortfalls.
 - Tornadoes suggest that Tring Parish Council should develop a neighbourhood plan, which Tornadoes could take a lead on, if funded.

- Tring & Berkhamsted Labour Party requests that social housing be built in the early stages of the plan period, at a rate of 80% and close to public transport and facilities.
 - T&BLP notes that Dunsley Farm (Tr01) is Green Belt and would prefer brownfield development such as upon sites in Berkhamsted.
 - T&BLP states that Tr06 could provide 100 social housing dwellings close to facilities, which would be preferred to a supermarket.
 - T&BLP states that Miswell Lane and Icknield Way (Tr05) could deliver 100 social housing homes, before the Green Belt at Tr01 is considered.
 - T&BLP notes that a density of 100 dwellings per hectare can be achieved on brownfield, compared with 31 dph on Dunsley Farm. Social housing should be close to public transport and facilities as less likely to own car.
 - T&BLP requests protections and expansions for natural habitats with new habitats to be created through migratory corridors, such as a wildlife crossing over the A41 or an extension of the buffer woods alongside the A41.

- Extinction Rebellion Tring and T&BLP both state that if Green Belt is built on, over 50% should be designated for green infrastructure and/or SANG, with existing semi-natural ecosystems protected or expanded for Biodiversity Net Gain
 - As with Sustainable Tring, Extinction Rebellion Tring and T&BLP both convey residents' desire for a community hub including a repair shed, exhibition space, a community farm, workshops, and sports facilities.
 - Extinction Rebellion Tring and T&BLP would both prefer retention of a large portion of Tr01 for green infrastructure, preserving trees and hedgerows.

- Tring Park Cricket Club requires an additional cricket pitch on the field adjacent to the club to accommodate existing and future increasing demand.
 - TPCC is considering a joint venture with Tring Tennis Club for an indoor cricket and tennis centre, and they are concerned that development on Dunsley Farm could prevent any future expansion of the clubs.

- Tring Tennis Club currently experiences pressure on its courts so it would like to offer padel tennis and pickleball and would also like land adjacent to the club for 2 indoor courts (also for pickleball) and 2 padel tennis courts. TTC suggests that these could be in a multi-sports building with indoor cricket, and other sports such as netball.

- Tring Art Group has submitted proposals for a community hub at Tr01 which could include an art gallery, community cinema, meeting room, workshop facilities, shop/café, community halls, a plaza, and artisan studio pods for hire.

- The Group believes that Tring is well placed to host a creative hub, and Tr01's central location and available land would make this an appropriate site.
- Vincent & Gorbing on behalf of Hertfordshire County Council Property is promoting site Tr01 Dunsley Farm.
 - HCC welcomes the provision of older persons' accommodation and the site's reduced scale reflecting Cow Lane Farm's biodiversity.
 - HCC requests a new fire and rescue station on the site, noting that the existing station could provide windfall housing.
 - HCC notes that a 2ha land take is necessary for a 2FE primary school.
 - HCC expects DBC to secure contributions from other major development sites for provision of any infrastructure requirements provided by HCC that go beyond what would make the development itself acceptable.

3.4.8 Wider Community

- There was strong agreement to the revised level of growth proposed in Tring, with many respondents also stating their support for deleting Land East of Tring as an allocation from the Plan.
- However, it was felt that the new homes and Dunsley Farm would still require infrastructure such as education and health facilities, appropriate low-rise design, retention of the existing local wildlife site, hedgerows and its countryside feel, sustainable homes, and community provision
- Specific needs raised for Tring included:
 - More social and affordable housing and opportunities for first-time buyers.
 - Sustainable transport provision, including new pedestrian and cycle routes and more public transport, with improved connections to the train station.
 - Highway measures to reduce town centre congestion.
 - Preservation of independent shops and an additional supermarket.
- Other respondents did not support the allocation of Dunsley Farm due to the impact on the AONB and associated views, Green Belt, the countryside, infrastructure, traffic congestion and character of the town.
- Some opposed the strategy of increasing growth in Hemel Hempstead and felt that more new homes should be built in Tring to reduce pressure on Hemel Hempstead.
- A resident within the call for sites suggests the inclusion of land between Grove Road and Northfield Road as public open space.

3.5 Bovingdon

3.5.1 Survey respondents had the option to select which settlement area their response related to 43 responses (3.2%) selected Bovingdon, of which 3 were postal responses.

3.5.2 Of these, 15 (34.9%) said they 'agreed' or 'somewhat agreed' with the proposal, while 22 (51.2%) 'disagreed' or 'somewhat disagreed' and 6 (14%) were neutral.

3.5.3 Survey respondents had the option to select their five infrastructure priorities. For those who respondents selected Bovingdon, their top five priorities were:

- 1) Healthcare – 10 – (23.3%)
- 2) Green space and play facilities – 10 – (23.3%)
- 3) Public transport – 9 – (20.9%)
- 4) The road network – 7 – (16.3%)
- 5) Drainage and flood prevention – 6 – (14.0%)

3.5.4 This ordering was not dissimilar from the survey's overall infrastructure priority results, and the small sample size limits useful analysis. Healthcare remains a clear priority. However, 'Public transport' and 'Drainage and flood prevention' were notably prioritised, which appears to be a pattern across the smaller settlements.

3.5.5 Consultation responses have been grouped according to the type of respondent: specific bodies (whom the Council is legally obliged to consult), general bodies (any other response submitted on behalf of an organisation), and wider community (responses from individuals).

3.5.6 Specific Bodies

- Cerda, on behalf of Bovingdon Parish Council, raises concerns about the expansion of Bovingdon Brickworks (Cy02) in relation to policies DM16, DM17, and SP11.
 - BPC notes that the allocation would be remote and detached and would cause harm to the Green Belt by encroaching into open countryside and filling a crucial visual and spatial gap.
 - BPC recognise that no exceptional circumstances justify this allocation.
- The Environment Agency requires development at Bv01 Grange Farm to prevent harm to the Gade water body and any increase in surface water run-off, use effective SuDS interventions to mitigate it, include risk assessments, and not affect groundwater quality.
- The following services within Hertfordshire County Council made comments with regards to the revised strategy for Bovingdon:

- Transport services note that the development level proposed in Bovingdon is not large enough to contribute meaningfully towards service improvements on the currently limited public transport provision.
 - Historic Environment services note that sites Bv01 and Bv02 would likely require pre-determination desk-based assessment, geophysical survey, and trial trench evaluation.
 - Lead Local Flood Authority states that sites Bv01 and Bv02 are suitable for above-ground SuDS. A large flow path at Bv01 causes flooding west of the site, so mitigating the flow path would reduce this risk. This site is being consulted by the LLFA. Bv02 has low flood risk, but the existing pond poses a surface water risk. Properties on Hyde Lane have experienced past flooding.
 - Education services consider managing the potential growth at the primary level challenging. HCC does not view the 230-home scenario as unsound (noting that existing planning applications allow for up to 316 homes), but the service acknowledges that creating additional primary school places in the village may be difficult due to current constraints. Furthermore, the growth in the village could displace children in the Two Waters area, highlighting the importance of locating a new primary school there. Planning for secondary schools in Bovingdon occurs in conjunction with Hemel Hempstead.
 - Early Years services note no new childcare provision required. New nursery provision 3-4 will be made at the new primary school to meet demand.
 - Library services would increase capacity by increasing resources at Bovingdon Library. S106 or CIL will need to be made available to fund an increase in resources at Bovingdon library.
- Historic England state that Bv01 and Bv02 fall within the wider setting of several designated assets comprising three Grade II listed buildings and a Scheduled Monument, and request that a Heritage Impact Assessment is undertaken to confirm suitability and to inform any development criteria that may be necessary to mitigate harm resulting from the development.
 - NHS Herts & West Essex ICB note that site Bv01 will impact GP provision at Archway and Longmeadow in Bovingdon, the latter being a branch of Kings Langley Surgery which plans to expand and reconfigure their building to increase capacity and alleviate pressures in Bovingdon. A financial contribution is sought for this.
 - Natural England state that sites Bv01 and Bv02 are located within a proposed area of search considered for a possible boundary variation to the Chilterns AONB.

3.5.7 General Bodies/Other Organisations

- Butterfly Conservation – Hertfordshire and Middlesex Branch said the following:
 - Bv01 – This site is within 10 meters of a wildlife site and one of the best locations in Herts for the *Dingy Skipper*, a rare species protected by section 41 of the NERC, and their habitat requirements need special consideration. A

full ecological survey is essential. If development proceeds there should be appropriate provision for the creation and enhancement of further *Small Blue*, *Dingy Skipper* and *Small Heath* habitat.

- Bv02 – This site is currently a mixed habitat including a mosaic of grassland, scrub, mature trees, and pond. It is within 400 meters of an existing Dingy Skipper colony (a s41 species). It is likely to have high biodiversity and should be subject to a full ecological assessment prior to confirming its allocation for development.
- Community Action Dacorum noted that references to building community spaces should be made explicit, and at present the Scout building in Bovingdon is the only community space mentioned.
- DLP Planning on behalf of Taylor Wimpey, notes 230 new homes planned in Bovingdon by 2040, a 5% decrease from the 2020 proposal.
 - TW recommends the Council consider ways in which to bring retained sites in Bovingdon forward as early as possible to address shortfalls.
 - TW suggests that the allocation be increased to 186 dwellings, including Extra Care units and community uses, to match the application (23/02034/MFA). This would optimise land use as HCC does not require or support a school on Grange Farm.
- OSP Architecture on behalf of the landowners of Hempstead Road, Bovingdon, promote their site for residential development and public open space, stating that the site is free from significant constraints and can deliver several sustainability benefits.
- Phase 2 Planning on behalf of Gleeson Developments argues that developing Duckhall Farm instead of Grange Farm would have less impact on the Green Belt.
 - Gleeson argues that Duckhall Farm is closer to village facilities, and can provide additional benefits such as SANG, and a track connecting Bovingdon to Little Hay. Comparatively, it also reduces traffic in the village centre.
- Pegasus Group on behalf of Taylor Wimpey notes that the Council should reconsider and re-evaluate discounted sites in Bovingdon, which can sustain higher growth, such as Homefield which can accommodate 120-130 homes, along with a community facility and parking.
 - TW notes that HCC Highways has confirmed safe access via Green Lane.
 - TW states that releasing Homefield from the Green Belt would not greatly affect its purposes, and that the landscape sensitivity is low.
 - TW offers SANG in Dacorum.
 - TW suggests that an on-site over-provision of car parking could address the lack of parking on the High Street and mitigate concerns of conflict with existing on-street parking on Green Lane.
 - TW suggests that Homefield could safeguard land for healthcare, community facilities, or other local needs identified through community engagement,

justifying its release from the Green Belt for housing development.

3.5.8 Wider Community

- Community members felt that Bovingdon does not have capacity for the large number of new dwellings proposed. In particular this would have an impact on:
 - The High Street, which is already very busy and has inadequate parking, leading to parking on pavements and congestion on nearby streets;
 - Heath facilities, where an extra GP practice would be needed;
 - Education facilities, with insufficient primary school space for the level of growth and pressure on secondary schooling as well;
 - The character of the village, changing it to a small town.
- Some community members felt that Grange Farm should not be built on as it would result in urban sprawl, change of character, loss of Green Belt (and establish a precedent for further loss in future), recreational pressure on the Box Moor Trust reserve, highway safety issues, an increase in local traffic and traffic on wider connecting routes. They also noted that the site is within a flood zone.
- Other concerns stated that:
 - The plan has not considered the planning application for 54 units at Bobsleigh Inn nor the opportunity for brownfield development on Bovingdon Airfield;
 - The Green Belt boundary should be adjusted to align with minor development that has taken place within it; and
 - An additional direct link road to the A41 is needed from Bovingdon.

3.6 Kings Langley

- 3.6.1 Survey respondents had the option to select to which settlement area their response related. 64 responses (4.7%) selected Kings Langley, of which 2 were postal responses.
- 3.6.2 Of these, 40 (62.6%) said they 'agreed' or 'somewhat agreed' with the proposal, while 20 (31.3%) 'disagreed' or 'somewhat disagreed' and 4 (6.3%) were neutral.
- 3.6.3 Survey respondents had the option to select their five infrastructure priorities. For those who respondents selected Kings Langley, their top five priorities were:
- | | |
|------------------------------------|----------------|
| 1) Healthcare | – 14 – (21.9%) |
| 2) Green space and play facilities | – 13 – (20.3%) |
| 3) The road network | – 10 – (15.6%) |
| 4) Public transport | – 9 – (14.1%) |
| 5) Emergency services | – 7 – (10.9%) |
| Drainage and flood prevention | – 7 – (10.9%) |
- 3.6.4 This ordering was very similar to the survey's overall infrastructure priority results, and the limited sample size limits useful analysis, but 'Emergency services' and 'Drainage and flood prevention' were notable priorities for Kings Langley.
- 3.6.5 Consultation responses have been grouped according to the type of respondent: specific bodies (whom the Council is legally obliged to consult), general bodies (any other response submitted on behalf of an organisation), and wider community (responses from individuals).

3.6.6 Specific Bodies

- The Canal & River Trust notes that, in relation to site KL02: Rectory Farm, they have provided detailed comments on a planning application for the site, and that the Local Plan now proposes it to be deleted as an allocation.
- Kings Langley Parish Council (KLPC) agrees with the current proposals for the Parish and make the following points:
 - The Parish Council agrees with the proposals for the area, supporting the proposed deletion of draft allocation KL02 and the continued exclusion of Shendish Manor (SHLAA 2023 ref. Hemel117R) and Wayside Farm (SHLAA 2023 ref. KLang019R) in the Local Plan as allocations for development.
- Nash Mills Parish Council believe that the traffic calming measures proposed in the Kings Langley Neighbourhood plan could exacerbate traffic within Nash Mills by creating a 'rat run' route through the parish as the fastest alternative route.

- The Herts and West Essex Integrated Care Board states that Kings Langley Surgery and Haverfield Surgery will be affected by housing growth in Three Rivers District, near Kings Langley and Abbots Langley.
 - Haverfield Surgery in Kings Langley relocated in March 2020, noting that this project factored in some forecasted housing growth.
 - An Outline Business Case has been approved in principle to extend and reconfigure Kings Langley Surgery premises, to enable the practice better to cope with existing pressures and absorb some additional growth.
 - However, the ICB notes that this proposal is dependent on additional land being leased or purchased from the Council.

- Three Rivers District Council make the following comments:
 - TRDC welcomes no Green Belt allocations in Kings Langley and the deletion of the Rectory Farm site.
 - TRDC notes that capacity issues with the M25/A41 junction are a mutual issue in Dacorum and Three Rivers and it is recognised that growth in both authority areas will potentially have an impact on capacity on this network.
 - TRDC is committed to modelling and assessment of the junction and will ensure that any identified impacts can be mitigated and managed appropriately.
 - TRDC stated that suitable and achievable measures to improve capacity will be included in the Three Rivers Infrastructure Delivery Plan (IDP).

3.6.7 General Bodies/Other Organisations

- CBRE on behalf of Silversaw Ltd, in respect of their land interest at the rear of Hill Farm (SHLAA site KLang011R), recognises the importance of relieving recreational pressure on the SAC and notes that Kings Langley is the settlement furthest from the SAC and does not appear in visitor surveys as a major 'starting point' for trips there.
 - In contrast, Silversaw supports the justification for reduction of sites in Berkhamsted and Tring as areas more affected by the SAC exclusion zone.
 - Silversaw considers the delivery of 4 homes a year during the plan period at odds with the suitability of Kings Langley to accommodate more housing and at odds with the NPPF, paragraphs 15 and 16.

- Claremont Planning is representing Landhold Capital on behalf of European Property Ventures (Hertfordshire) Ltd (EPV), promoting KLang021R (Barnes Lane).
 - EPV believes that KLang021R would assist in meeting house needs, provide benefit close to the village centre, and with the A41 would provide a strong and defensible Green Belt boundary to the west of the settlement.
 - EPV believes that Kings Langley should have had housing retained, as in Bovingdon, as it is higher up the settlement hierarchy and more sustainable.

- EPV notes the high unaffordability of properties in Dacorum, and thus states that housebuilding should be encouraged to increase supply.
- EPV encourages the Council to revisit safeguarding land for development and to review all Green Belt land, particularly at Kings Langley, including the promoted site, Barnes Lane, and previously assessed land to the south, KLang011R.
- Montagu Evans, on behalf of Angle Property (RLP Rectory Farm) LLP, who have an interest in KL02, considers the Revised Strategy unsound for several reasons.
 - Angle Property disagrees with the Revised Strategy in its assessment that the approach to Kings Langley is consistent with the size, character, and the limited practical development opportunities available. Rather, Angle Property cites Appendix C of the SHLAA Update (October 2023 – page 125) which notes site allocation KL02 remains suitable, available and achievable.
 - Angle Property believe the Council should therefore revisit opportunities for allocating additional suitable land (such as at KL02).
- Kings Langley & District Residents Association (KLDRA) agree with the current proposals for Kings Langley, including the removal of Rectory Farm as a development site, proposing that the whole greenfield area at Rectory Farm should be provided to the community as a recreational area.
 - KLDRA is greatly concerned about the effect of large-scale development between Kings Langley and Apsley, along the A4251 corridor, and the potentially high volume of additional traffic which would have an increased pollution impact upon Kings Langley
 - KLDRA welcomes the development of brownfield sites, but notes a lack of publicly accessible green spaces and requests more such amenities in and around settlements throughout Dacorum.
 - KLDRA requests that adequate infrastructure be provided before, or at the same time as, new houses are built with clear definition and guarantees.
- DLP Planning Limited note at the 75% decrease from the proposal in 2020 down to 68 new homes in Kings Langley.

3.6.8 Wider Community

- Some residents submitted repeat comments, which we reflect in the comments below, particularly in relation to the level of development along the A4251 corridor and associated congestion, pollution and infrastructure issues.
- There was support for the more balanced and appropriate level of growth, protecting the Green Belt and wildlife habitats, retaining Kings Langley's historic character, removing the Rectory Farm allocation (KL02), keeping Shendish and

Waynes Farm excluded from the plan, and focusing on brownfield sites.

- Respondents considered the revised local plan is much improved and balancing the needs for housing and the existing communities, countryside and AONB.
- Respondents agreed with focusing development around market towns where more appropriate infrastructure is available.
- Nevertheless, other respondents considered the level of housing in the Revised Strategy excessive and damaging to an already urbanised borough, proposing instead that the amount of housing should be minimal and on brownfield land only.
- Some respondents requested that the emerging strategy be set firmly within the context of the emerging South West Hertfordshire Joint Strategic Plan with future policies and proposals for the village determined in close co-operation with Three Rivers District Council.
- Many respondents supported the Council pushing back further on the housing target as Three Rivers District Council has done.
- There was support for protecting the Green Belt around the village to prevent Kings Langley coalescing with Apsley and Nash Mills as well as urban sprawl towards Leavesden and Abbots Langley.
- Some responded that the Local Plan should ensure more sufficient housing is built to meet the needs of a growing population, particularly in a sustainable location such as Kings Langley.
- Some proposed retaining the Rectory Farm site for open uses e.g. growing food or amenity / recreational space, to prevent the amalgamation of settlements and protect the character of Kings Langley.
- Some raised concerns regarding infrastructure, noting insufficient local parking, the doctors surgery at capacity, poor rail services, and the lack of a hospital.
- Concerns were raised regarding the water supply supporting more growth, given that the chalk stream aquifer is already overextracted, and is harming the River Gade.
- Some noted that draft Local Plan had not appeared to address a number of issues that are dealt with in the Strategic Housing Land Availability Assessment report.

- Some stated that the Plan should require new on-site SANG provision for every new greenfield development larger than 50 dwellings.
- Objections were raised to the development of Apsley Mills Retail Park for 500 homes with fears that it would result in additional congestion and loss of retailing, and that the height and density would be overwhelming for the area.
- Some stated that the Revised Strategy should prioritise social over market housing, development should be close to transport hubs, and that there must be a stronger commitment to sustainable development and green infrastructure.
- Some noted that Kings Langley is more capable of absorbing growth than Berkhamsted, as the latter sits in a steep sided valley, is densely built-up, congested and already has inadequate infrastructure.
- Some stated that the Revised Strategy gives insufficient consideration to County Council owned land at Wayside Farm, Kings Langley.
- A suggestion was made to use Nuckett Wood as SANG in order to ensure it is properly maintained.

3.7 Markyate

3.7.1 Survey respondents had the option to select which settlement area their response related to. 24 responses (1.8%) selected Markyate, of which 3 were postal responses.

3.7.2 Of these, 8 (33.3%) said they 'agreed' or 'somewhat agreed' with the proposal, while 13 (54.2%) 'disagreed' or 'somewhat disagreed' and 3 (12.5%) were neutral.

3.7.3 Survey respondents had the option to select their five infrastructure priorities. For those who respondents selected Markyate, their top five priorities were:

1) Healthcare	– 8 – (33.3%)
2) Public transport	– 7 – (29.2%)
3) Drainage and flood protection	– 5 – (20.8%)
Community facilities	– 5 – (20.8%)
Education	– 5 – (20.8%)

3.7.4 This ordering differed significantly from the overall survey results, although the very limited sample size should be noted as not representative. 'Healthcare' remained the clear priority, as borough-wide, but 'Public transport' and 'Drainage and flood protection' were notably prioritised, as in other smaller rural settlements in the Borough.

3.7.5 Consultation responses have been grouped according to the type of respondent: specific bodies (whom the Council is legally obliged to consult), general bodies (any other response submitted on behalf of an organisation), and wider community (responses from individuals).

3.7.6 Specific Bodies

- Markyate Parish Council
 - The Parish Council approves of the reduction in proposed development.
 - The Parish Council raise the importance of access to the Hicks Yard site is as far from the Hicks Road/A5183 junction as possible.
 - The response also states that the provision of adequate parking will be required due to high car ownership in the village – which is already causing increased on-street parking which results in safety concerns and increased congestion.
 - The Parish Council recommends a parking stress test be conducted ahead of development to limit impacts.
- The Hertfordshire and West Essex Integrated Care Board raise few comments on Markyate specifically but note that the Markyate branch of the Rothschild House Surgery (served by primary care network 'Alpha') was recently refurbished and

extended as part of an NHS capital funded project in 2019 to serve Markyate and surrounding rural villages. They also note that the creation of primary care networks is intended to reduce demand on GP services by providing more integrated community care.

- *Natural England state that site Mk03 is located within a proposed area of search which Natural England is considering as a possible boundary variation to the Chilterns Area of Outstanding Natural Beauty (AONB)⁶.*

3.7.7 General Bodies

- Bidwells on behalf of Mr Roger Smith and the Lyell Trustees note that development is necessary for the sustainability of villages and that Markyate Village School is undersubscribed, and make the following comments in relation to their site, Cotton Spring Farm:
 - Comments state that the site would not harm the wider Green Belt purposes.
 - It is noted in the response that development of Cotton Spring Farm, alongside the London Road site, there would be opportunity to create a bypass around the village to take pressure off London Road and the high street. Therefore, they recommend that the allocation for Mk01 should be re-instated.
 - The response notes that the land will provide new affordable homes, green infrastructure and biodiversity net gain, alongside onsite SANG which could be used to alleviate pressure on high density sites in Hemel Hempstead.
- DLP Planning on behalf of Taylor Wimpey McCarthy Stone and Whiteacre Ltd notes that 75% of the growth proposed in Markyate in 2020 has been removed, and that 58% of its 2023 need is reliant on unallocated sites.
- McLoughlin Planning on behalf of DB Land & Planning Consultancy objects to the revised strategy and to the deletion of Mk01:
 - McLoughlin Planning argue that evidence supports the site's release from Green Belt, which would present an ideal opportunity to deliver rural housing not subject to any other prohibitive environmental designation.
 - McLoughlin Planning does not believe "local infrastructure" and congestion concerns cited for de-allocation are supported by evidence.
 - McLoughlin Planning is not convinced that Mk03 will come forward for development and argue that Mk01 instead will address the shortfall in supply, particularly in the next five years.

⁶ Please note that officers are awaiting further clarification from Natural England with regards to this, as the site is within the built area of a settlement.

- McLoughlin Planning promotes the reallocation of Mk01 for at least 150 dwellings, with its suitability evident throughout the Emerging Plan process.
- MSC Planning support the removal of Markyate land from the strategy to counter ribbon development and traffic increase but notes no SANG availability in the area and the lack of a comprehensive plan for the village.

3.7.8 Wider Community

- Respondents who selected Markyate were most concerned about how the planned development across the Borough would affect existing infrastructure and felt there had not been enough planning for this, particularly regarding Hemel Hempstead, which they felt had received an unfair redistribution of new homes.
- Respondents also called for social housing and affordable rents to be prioritised.
- A response to the call for sites from a resident stated that the proposed deleted sites in Markyate should be re-instated to allow local people to remain within their area.
- Another resident proposed the building of a new town on the area of countryside surrounding Markyate between the M1 and Watling Street, as opposed to HH01.

3.8 Countryside

- 3.8.1 Survey respondents had the option to select which settlement area their response related to. 221 responses (16.3%) selected Dacorum's Countryside, of which 4 were postal responses.
- 3.8.2 Of these, 77 (34.9%) said they 'agreed' or 'somewhat agreed' with the proposal, while 124 (56.1%) 'disagreed' or 'somewhat disagreed' and 20 (9%) were neutral.
- 3.8.3 Survey respondents had the option to select their five infrastructure priorities. For those who respondents selected Dacorum's Countryside, their top five priorities were:
- | | |
|------------------------------------|----------------|
| 1) Healthcare | – 53 – (25.8%) |
| 2) Green space and play facilities | – 43 – (22.4%) |
| 3) The road network | – 33 – (20.1%) |
| Education | – 33 – (20.1%) |
| 5) Drainage and flood protection | – 30 – (13.6%) |
- 3.8.4 This ordering was not largely dissimilar from the survey's overall infrastructure priority results, but 'Education' and 'Drainage and flood protection' were notably prioritised for Dacorum's Countryside. Healthcare remains a clear priority.
- 3.8.5 Consultation responses have been grouped according to the type of respondent: specific bodies (whom the Council is legally obliged to consult), general bodies (any other response submitted on behalf of an organisation), and wider community (responses from individuals).
- 3.8.6 A number of comments within this section referred to one of the six main settlements, therefore to avoid duplication, these comments have been summarised within their relevant section.

3.8.7 Specific Bodies

- The Canal & River Trust continues to promote a site at Wilstone (Wils004R). They also wish to continue discussions with the Council with regards to identifying SANGs on Trust land. They wish the towpath to be promoted as an active Travel Route.
- Great Gaddesden Parish Council notes that the plan ignores the effect on rural areas surrounding HH01, with no commitments to invest in rural village infrastructure to cope with increased traffic and water supply and disposal.
- The Hertfordshire Innovation Quarter and Hertfordshire Local Enterprise Partnership support the retention of employment sites Cy01 to Cy04, subject to the Council's review of employment sites, within the Countryside strategy.

- Historic England states that a heritage impact assessment will be needed for site Cy02, as it is southwest a Scheduled Monument, and for site Cy03 as it is adjacent to a Grade II listed building and with the setting of other Grade II listed buildings.
- Little Gaddesden Parish Council request to have the land on the south side of Church Road from Bowls Club car park to hedge beyond the church and fields to south as designated Local Green Space.
- Nettleden with Potten End Parish Council states that the revised strategy fails to consider the cumulative impacts of development on rural areas, with regards to traffic, secondary school provision, and water supply and disposal. The parish council raised that consultation methods selected by the council disenfranchise rural residents.

3.8.8 General Bodies/Other Organisations

- AECOM promote Land at Delmer End Lane and Singlets Lane, Flamstead (SHLAA 2023 Ref. Flam001R and Flam003R), on behalf of the landowners Pennard Bare Trust, and state that these sites would provide comprehensive infill to Flamstead with minimal negative impacts on Green Belt.
- Box Moor Trust continue to promote land at Bourne End Field, which was provided to the trust as Exchange Land and is used for grazing. The trust state that the land does not provide the amenity benefit they aspire to achieve and believe that development of this site would support greater engagement with their beneficiaries the area.
- E H Smith (Holdings) Ltd supports the continued consideration of Cy02 Bovingdon Brickworks as an employment allocation and note that responses have been received from DBC Policy and HCC Highways in support of the planning application proposals.
- The Gaddesden Estate is promoting a site at Bridens Camp site to deliver a small number of dwellings. The estate notes that the site is within a ribbon of existing development and would form a logical infill along Red Lion Lane.
- Lambert Smith Hampton (LSH) on behalf of Plato Estates Ltd reiterate the suitability of their site (SHLAA 2023 Ref. CRoa001R) for development as a care home, specialist older persons housing or a 100% affordable housing scheme due to its location near to transport links. They also note the site does not have a high landscape quality and is well screened, as well as demonstrating a lack of agricultural value, limited contributions to the Green Belt. LSH argue that the SHLAA fails to assess potential sites within the AONB.

- Michael Sparks Associates on behalf of Akira Eesa Developments Ltd suggest the inclusion of Land East of Upper Bourne End Lane for employment development, specifically smaller to medium sized units, and argue that the approach taken by the SHLAA 2023 to screen out sites based on designations is unsatisfactory.
- The National Trust promote the designation of land at Hill Farm for a Gateway site within the Dacorum Local Plan. They note that a gateway site is an innovative and emerging concept with regards to avoidance and mitigation measures at Ashridge, and state that this site can create an attractive alternative to Ashridge that deflect users away from there, reducing recreational pressures as a result. The trust note that this will deliver.
 - A visitor hub to serve a catchment of at least 12.6km, which will provide a café and education facility and community space.
 - A substantial area of new, high quality open space for the public to visit and enjoy in perpetuity.
 - Enabling public access to mature woodland and providing a mixture of experiences.
 - Play and recreational opportunities for children of all ages and abilities that is of a suitable scale and in keeping with the natural feel of the site.
 - New high-quality signage.
 - Sustainable land management and conservation practice.
- Pegasus Group on behalf of Westmorland Limited promote land south of Old Watling Street for the use as a truck stop. The response sets out proposals which include junction improvements, to alleviate existing safety concerns and conflict points, and sets out improvements to the layout and capacity at the A5183/Chequers Hill junction.
- Rectory Homes make the following comments in relation to their site (SHLAA 2023 Ref. Wils002 Grange Road and Site Wils003 Lock Field) state that development of their sites would result in logical and sustainable growth of Wilstone, and that this will accommodate growth to help meet local needs. They also recommend that:
 - The northwest of Dacorum suitable is outside of the Green Belt and AONB, making this area suitable for small-scale growth that can develop quickly with less impact environmentally.
 - Rectory homes recommends the Council identify more small-and-medium-sized sites, with a proportion redirected to rural areas to sustain and revitalise local services and communities.
- Turley on behalf of Ainscough Strategic Land confirms that their site 'Land at the Former Marsworth Airfield' (SHLAA 2023 Ref. LMar003) remains available and suitable for development, and state that Marsworth Airfield should be allocated as an alternative to the release of Green Belt land. The updated SHLAA does not contain an assessment of the site itself within Appendix C, so the rationale for exclusion is unknown. Turley requests the council engage actively with Buckinghamshire Council.

- Welchman Planning state that their site 'Land at Iona, Vicarage Road' was previously discounted for being too small (SHLAA Ref, PEnd002R), and states that this approach is inconsistent with the NPPF's requirement to identify at least 10% of the housing requirement as small sites.

3.8.9 Wider Community

- Infrastructure was the primary concern, particularly traffic, healthcare and the hospital, and education, with GP services and public transport provision also of concern. Water End bridge and the Leighton Buzzard Road were frequently cited as areas of congestion, with concerns about 'rat-runs' developing through rural villages.
- There were strong concerns about the loss of Green Belt land, especially adjacent to the Chilterns AONB, with the risk of increased stress on the Chilterns Beechwoods SAC. Many called for brownfield sites to be prioritised over Greenfield development.
- Similarly, there were strong concerns about loss of wildlife and natural environment in rural areas, particularly north of Hemel Hempstead.
- There was particular concern regarding Piccotts End and a fear that it would be absorbed by site HH01, its character changed, and its conservation area damaged. Many called for there to be no building in the Gade Valley.
- There was concern about building on arable land and an apparent lack of consideration for agriculture.
- There was strong concern about stress on the water table and pollution of the chalk streams, particularly the Gade. There was also concern about flooding and drainage issues caused by new developments, especially around Piccotts End.
- Air pollution from increased traffic was another major concern, as was noise pollution to be caused by construction in rural areas.
- There was insistence on the need for more social housing and truly affordable housing.

3.9 Other

3.9.1 Survey respondents had the option to select which settlement area their response related to. 44 responses (3.2%) selected Other, of which 2 were postal responses.

3.9.2 Of these, 17 (38.6%) said they 'agreed' or 'somewhat agreed' with the proposal, while 22 (50%) 'disagreed' or 'somewhat disagreed' and 5 (11.4%) were neutral.

3.9.3 Locations and topics respondents denoted as "Other" included: Apsley, Ashridge, Bourne End, Boxmoor, Buckinghamshire, Chiltern Beechwoods, Chipperfield, Flamstead, Grovehill, health services HGC, the Hospital, Housing Need, infrastructure, Leverstock Green, Little Gaddesden, Nash Mills, Northchurch, Potten End, Redbourn, SANG, Shendish Manor, St Albans, Station Gateway, Sustainability Assessment, Tring Rural Villages, Woodhall Farm.

3.9.4 Consultation responses have been grouped according to the type of respondent: specific bodies (whom the Council is legally obliged to consult), general bodies (any other response submitted on behalf of an organisation), and wider community (responses from individuals).

3.9.5 Where appropriate, specific, other and general bodies who selected 'other' have had their response re-categorised within the most appropriate section of this document for the purposes of summarising responses and reducing duplication.

3.9.6 Specific Bodies

- Buckinghamshire Council acknowledge there hasn't been a request to meet unmet needs from Dacorum, however confirm there is no current scope within Buckinghamshire to meet potential unmet needs from the Dacorum area. They also note that there is a need to continue engagement on any education provision implications in the Aylesbury / Tring and Chesham / Bovingdon areas.

3.9.7 General / Other Bodies

- Bidwells is representing Richard Blair of Flamsteadbury Farm in Redbourn, with small areas within Dacorum Borough, requesting that it be released from the Green Belt so it can assist in the delivery of housing.
- Pegasus Group on behalf of Pennard Bare Trust submit Land West of Redbourn to this Local Plan consultation and Call for Sites process (this site is included as a draft allocation within the St Albans City and District Local Plan). The landholding includes a triangular parcel (0.17 hectares) to the West of Redbourn and to the East of the M1 Motorway which falls within the boundary of Dacorum Borough Council as shown on

the submitted Site Location Plan. They state that this site is capable of supporting both SADC and DBC in addressing local housing needs.

3.9.8 Wider Community

Key issues raised by the wider community include:

- General concerns raised by the wider community relate to the provision of infrastructure, particularly hospital, GP, roads, education and dental services.
- A number of comments made reference to the loss of green space and questioned the impact of development on wildlife, landscape. The Chilterns AONB and Ashridge.
- There were also concerns raised with regards to coalescence of settlements and a loss of settlement identity – primarily relating to Leverstock Green.
- Concerns were raised with regards to housing affordability in the area.
- Raised a need for more leisure and sports provision.

3.10 Infrastructure

3.10.1 Respondents were given the option to select up to 5 infrastructure priorities for the Local Plan.

3.10.2 398 Respondents (29.6%) responded to this question, including 12 postal responses.

3.10.3 Overall, the top five priorities were:

1)	Healthcare	290	21.4%
2)	Green space and play	251	18.5%
3)	The road network	209	15.4%
4)	Public transport	172	12.7%
5)	Community facilities	163	12.0%

3.10.4 The remainder were:

6)	Education	160	11.8%
7)	Walking & cycling	146	10.8%
8)	Emergency services	118	8.7%
9)	Drainage & flood	115	8.5%
10)	Waste & recycling	76	5.6%
11)	Indoor & outdoor sports	64	4.7%
12)	Arts & culture	43	3.2%
13)	Other*	39	2.9%
14)	Digital communications	29	1.7%

3.10.5 *Other responses included the countryside / Green Belt, Homes, Employment provision, Allotments, Renewable energy, Water supply, Sewerage, The town centre and retail, Road safety provisions, Historic Environment, Community Heating, Mature hedgerows and trees, Parking, Open Space and Farmland.

3.11 Evidence Base

3.11.1 This question received 76 responses via the online survey. Detailed responses received on the updated evidence studies will be considered by the council and specialists (where applicable) prior to the publication of the Regulation 19 Local Plan.

3.12 Consultation Feedback

3.12.1 233 people (17.2%) gave feedback on the survey and consultation platform, “Let’s Talk Dacorum”.

Ease of finding information on the consultation webpages:

Very Poor	Poor	Adequate	Good	Very Good	N/A
18%	13.7%	31.3%	26%	9.9%	2.1%

Ease of understanding information on the consultation webpages:

Very Poor	Poor	Adequate	Good	Very Good	N/A
9.4%	16.3%	34.8%	27.9%	9.9%	1.7%

Ease of using maps:

Very Poor	Poor	Adequate	Good	Very Good	N/A
8.2%	11.6%	34.8%	30%	11.2%	4.3%

Accessibility on PC:

Very Poor	Poor	Adequate	Good	Very Good	N/A
6.9%	9.4%	27.9%	24.9%	12%	17.6%

Accessibility on mobile:

Very Poor	Poor	Adequate	Good	Very Good	N/A
11.6%	6.9%	24.5%	12%	9%	35.2%

Respondents were also asked how they heard about the consultation.

Social Media	80
Other	57
Received an email from the Council	54
Dacorum Life (digital) e-newsletter	10
Read about it in the press	9
Received a letter from the Council	5
Saw a publicity poster	4
Council’s website	4

Total responses: 223 (17% of total respondents).

Social media was the most common way respondents heard about this consultation, based on the data received in this survey, with over one third of respondents (36%) reporting. Almost a quarter of respondents (24%) responded after receiving a notification email from Dacorum Borough Council.

3.13 Call for Sites

3.13.1 This question received 46 responses via the online survey, with:

- a. 21 sites promoted for public open space/suitable alternative natural green space;
- b. 25 sites promoted for housing;
- c. 4 for employment;
- d. 3 for gypsy and traveller site; and
- e. 14 for 'other' including but not limited to:
 - Care home and age restricted accommodation
 - Sports hub
 - Small scale retail and leisure / alternative employment uses not appropriate for traditional employment areas.
 - Education facilities
 - Truckstop expansion
 - Battery Storage / PV/Solar farm
 - Mixed use new settlement including: housing, a rural enterprise hub, primary school, community uses and public open space.

3.13.2 However, as many respondents used the main survey (question 3 and 4) to promote land for development also, responses to this question have been considered within their respective settlement (sections 3.1-3.9 of this document) for the purposes of summarising to ensure consistency.

4. Next Steps

The Council has reviewed all representations made, and summarised the key issues raised to the Revised Strategy for Growth public consultation.

The Council will undertake the following tasks as a result:

- Consider if further changes need to be made to the revised strategy in light of comments received, taking account of updated evidence on housing, employment and other identified needs for the Borough;
- Update its wider evidence base as appropriate to the key issues raised;
- Consider if any additional evidence is needed to inform the pre-submission version of the Local Plan;
- Review and update the suite of policies that were consulted on in through the Emerging Strategy for Growth consultation held in 2020/21, taking account of relevant feedback received at that time as well as through the Revised Strategy for Growth;
- Engage with infrastructure providers to clearly define the requirements needed to support growth across the borough, to inform an updated Infrastructure Delivery Plan; and
- Engage with members through the “Task and Finish” group on the key issues raised and how these will inform the pre-submission version of the Local Plan.

A pre-submission version of the Local Plan will be published in October 2024, for submission by mid-2025. This will be accompanied by the Council’s response to key issues raised and how this has informed the final version of the Local Plan.

Appendix A: Supporting Information

Digital

Figure 1: Consultation Portal

The online consultation portal can be viewed here:

<https://letstalk.dacorum.gov.uk/hub-page/localplan2023>

Notification

Figure 2: Email Notification from Engagement HQ.

[NEW CONSULTATION ON THE DACORUM LOCAL PLAN \(2024-2040\) – REVISED STRATEGY FOR GROWTH](#)

This notification 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 next stage of the Dacorum Local Plan 2024-2040. This focused consultation, called "Revised Strategy for Growth", responds to key issues raised by communities during late 2020 and early 2021. Once adopted, the new Local Plan will replace the Core Strategy and Site Allocations Development Plan Document (DPD) and the 'saved' policies from the 2004 Local Plan.

Other supporting documents and evidence are also available, including a Sustainability Appraisal. The Council is also running a 'Call for Sites' as part of this consultation, focused on identifying new public open spaces in the Borough.

When can I comment?

The Council is inviting comments on the Revised Strategy for Growth, from 12 pm on Monday 30 October 2023. Comments must be received before 11:59 pm on Monday 11th December 2023.

How do I have my say?

We would request you submit your comments online via letstalk.dacorum.gov.uk

If this is not possible, you can also respond by post (see address below). The survey can be downloaded and printed from www.dacorum.gov.uk/localplan

Please note we will be unable to accept written comments provided without a name and an address. All comments received to this consultation will be made public and cannot be treated anonymously.

Where can I view the consultation?

All information and documents relating to the consultation are available to view on our new consultation portal: letstalk.dacorum.gov.uk

A printable version of the consultation document and the sustainability appraisal is also viewable as a hard copy at:

- Borough Council offices during [normal opening hours](#):
 - The Forum, Hemel Hempstead, HP1 1DN
 - Berkhamsted Civic Centre, HP4 3HB
 - Victoria Hall, Tring, HP23 6AA
- All public libraries within the Borough during [normal opening hours](#).

Where can I speak to officers about the Local Plan?

You can ask the team questions online at Let's Talk Dacorum. Officers will also be attending the following public events during the consultation period:

- Hemel Hempstead Christmas Lights switch-on (Marlowes): Saturday, 18 November 2023
- Tring Christmas Festival (Victoria Hall): Saturday, 25 November 2023
- Berkhamsted Festival of Light (Berkhamsted High Street): Sunday, 26 November 2023

Further information

Please contact the Strategic Planning team if you have any questions or require more information via letstalk.dacorum.gov.uk.

Yours sincerely,

Sara Whelan
Assistant Director for Planning
Dacorum Borough Council

Figure 3: Notification Letter sent by Post.

Date: 30/10/2023
Your Ref:
Our Ref: Dacorum Local Plan 2023
Contact: Strategic Planning
Email: Strategic.planning@dacorum.gov.uk
Direct line: 01442 228000



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 [REDACTED],

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100% recycled paper

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 - Victoria Hall, Tring, HP23 8AA
- All public libraries within the Borough
Opening times: www.hertfordshire.gov.uk/services/Libraries-and-archives/Library-opening-hours/Library-opening-hours-and-locations.aspx

Where can I speak to officers about the Local Plan?

You can ask the team questions online at Let's Talk Dacorum. Officers will also be attending the following public events during the consultation period:

- Hemel Hempstead Christmas Lights switch-on (Marlowes): Saturday, 18 November 2023
- Tring Christmas Festival (Victoria Hall): Saturday, 25 November 2023
- Berkhamsted Festival of Light (Berkhamsted High Street): Sunday, 26 November 2023

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 228000
Address: Strategic Planning, Dacorum Borough Council, the Forum, Marlowes, Hemel Hempstead, Hertfordshire. HP1 1DN.

Yours sincerely,



Sara Whelan
Assistant Director for Planning
Dacorum Borough Council



100% recycled paper

Figure 4: Notification sent to Town and Parish Councils in the Borough.

Dear Town/Parish Clerk,

NEW CONSULTATION ON THE DACORUM LOCAL PLAN (2024-2040) – REVISED STRATEGY FOR GROWTH

This notification 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 next stage of the Dacorum Local Plan 2024-2040. This focused consultation, called "Revised Strategy for Growth", responds to key issues raised by communities during late 2020 and early 2021. Once adopted, the new Local Plan will replace the Core Strategy and Site Allocations Development Plan Document (DPD) and the 'saved' policies from the 2004 Local Plan.

Other supporting documents and evidence are also available, including a Sustainability Appraisal. The Council is also running a 'Call for Sites' as part of this consultation, focused on identifying new public open spaces in the Borough.

When can I comment?

The Council is inviting comments on the Revised Strategy for Growth, from 12pm on Monday 30 October 2023. **Comments must be received before 11:59pm on Monday 11th December 2023.**

How do I have my say?

We would request you submit your comments online via letstalk.dacorum.gov.uk.

If this is not possible, you can also respond by post (see address below). The survey can be downloaded and printed from www.dacorum.gov.uk/localplan.

Please note we will be unable to accept written comments provided without a name and an address. All comments received to this consultation will be made public and cannot be treated anonymously.

Where can I view the consultation?

All information and documents relating to the consultation are available to view on our new consultation portal: letstalk.dacorum.gov.uk.

A printable version of the consultation document and the sustainability appraisal is also viewable as a hard copy (during normal opening hours) at:

- Borough Council offices

- Opening times: <https://www.dacorum.gov.uk/home/do-it-online/contact-us>

- The Forum, Hemel Hempstead, HP1 1DN
- Berkhamsted Civic Centre, HP4 3HB
- Victoria Hall, Tring, HP23 6AA

- All public libraries within the Borough

- Opening times: www.hertfordshire.gov.uk/services/libraries-and-archives/library-opening-hours/library-opening-hours-and-locations.aspx

Hard copies of the printable version of the consultation document and the sustainability appraisal will be delivered to all Town and Parish Councils in the Borough to be held as reference copies.

Where can I speak to officers about the Local Plan?

You can ask the team questions online at Let's Talk Dacorum. Officers will also be attending the following public events during the consultation period:

- Hemel Hempstead Christmas Lights switch-on (Marlowes): Saturday, 18 November 2023
- Tring Christmas Festival (Victoria Hall): Saturday, 25 November 2023
- Berkhamsted Festival of Light (Berkhamsted High Street): Sunday, 26 November 2023

Further information

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

Yours sincerely,

Sara Whelan
Assistant Director for Planning
Dacorum Borough Council

Public Notice

Figure 5: Front Page of Hemel Hempstead Gazette & Express, 30/10/2023

Gazette & Express

hemeltoday.co.uk Visit us online for breaking news

Serving Hemel Hempstead, Berkhamsted & Tring since 1858

Wednesday, November 1, 2023 £1.50

WIN
a Peaky Blinders weekend
in the Black Country

PLUS!
CLAIM A VISUAL
COMPANION
BOOKLET

SEE
INSIDE
FOR
DETAILS



Cllr Simy Dhyani and tenant Linda James cut the ribbon at the official opening of the Wiltone development. Image submitted.

New homes

Six new council homes have been welcomed with a ribbon-cutting ceremony

The two and three-bedroom houses will be provided for social rent and come with energy saving measures to cut household bills

PAGE 15

News



Pickleball star claims bronze PAGE 3

News



Debut novel from Hemel man PAGE 13

Lady Gardeners

Call Kelly today for a free quote.

All aspects of gardening, landscaping and fencing work carried out. Weeding, Digging, Pruning, Grass Cutting, Hedges Trimmed, Trees Pruned, Jungles Cleared & All rubbish taken away.

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LADY LANDSCAPES

Call Kelly today for a free quote.

• DECKING • FENCING • GRAVEL/SHINGLE
• TURFING • PATIOS • JET WASHING • GARDEN DESIGN

Call: 07747 510546 or 01908 887 295

ALL ASPECTS OF LANDSCAPING AND TREE WORK UNDERTAKEN

Figure 6: Public Notice in the Hemel Hempstead Gazette & Express Newspaper.

10 | GAZETTE

PUBLIC NOTICES

PLANNING NOTICES



**Dacorum Local Plan
2024-2040**

**Revised 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 next stage of the Dacorum Local Plan 2024-2040. This focussed consultation, called 'Revised Strategy for Growth', responds to key issues raised by communities during late 2020 and early 2021. Once adopted, the new Local Plan will replace the Core Strategy and Site Allocations Development Plan Document (DPO) and the 'saved' policies from the 2004 Local Plan.

To find out more please visit www.dacorum.gov.uk/localplan or letstalk@dacorum.gov.uk.



SCAN ME

When can I comment?

The Council is inviting comments on the Revised Strategy for Growth, between 12pm on **Monday 30th October 2023** and 11:59pm on **Monday 11th December 2023**.

Where can I view the consultation?

All information, documents and survey relating to the consultation are available:

- to view online on **Let's Talk Dacorum** letstalk.dacorum.gov.uk
- hard copies are available to view (during normal opening hours) at:
 - o Borough Council offices in the borough (during normal opening hours)
 - o <https://www.dacorum.gov.uk/home/do-it-online/contact-us>
 - o Public libraries within the borough
 - o www.hertfordshire.gov.uk/services/Libraries-and-archives/Library-opening-hours/Library-opening-hours-and-locations.aspx

How do I have my say?

We would request you submit your comments through our new online engagement portal, **Let's Talk Dacorum**. Alternatively, completed surveys can be submitted by post (see 'Further Information' below).

Where can I speak to officers about the Local Plan?

You can ask the team questions online at **Let's Talk Dacorum**. Officers will also be attending the following public events during the consultation period:

- Saturday, 18 November 2023 – Hemel Hempstead Christmas Lights switch-on
- Saturday, 25 November 2023 – Tring Christmas Festival (Victoria Hall)
- Sunday, 26 November 2023 – Berkhamsted Festival of Light

Further information

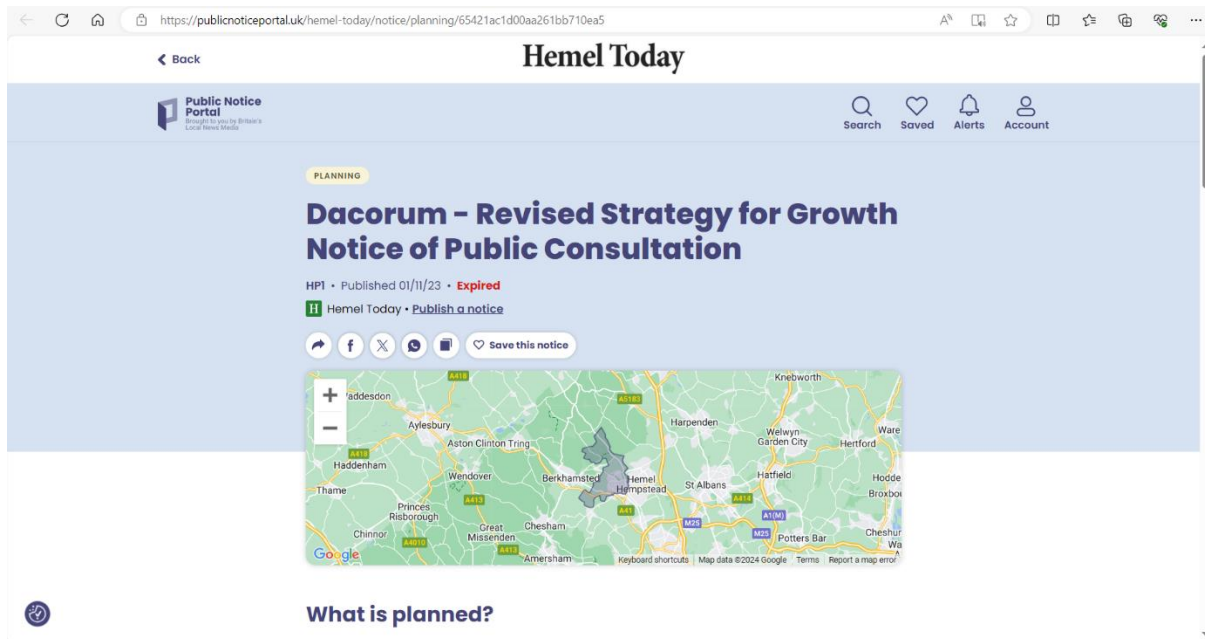
Please contact the Strategic Planning team if you have any questions or require more information:

Email: strategic.planning@dacorum.gov.uk

Phone: 01442 228000

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

Figure 7: Public Notice on the Hemel Today online news, published 30th October 2022. The full text of the notice is viewable on the public notices web page.⁷





⁷ <https://www.hemeltoday.co.uk/public-notices>
<https://publicnoticeportal.uk/hemel-today/notice/planning/65421ac1d00aa261bb710ea5>

Publications

Figure 8: 'Dacorum Life' Digital Newsletter Article

Hard Copy Documents

Figure 9: Survey form

 <p>Dacorum Local Plan Revised Strategy for Growth 2024-2040</p> <p>Consultation Survey form</p>	 <p>Shaping growth in Dacorum</p>
---	--

*Please return to Dacorum Borough Council, by 23:59pm Monday 11 December 2023
Comments received after this time will not be considered.*

By online engagement platform: if you have internet access, it is recommended that you make your representations online at:

<https://letstalk.dacorum.gov.uk>

Alternatively you can respond by completing this form and returning by post to:

Strategic Planning and Regeneration, Dacorum Borough Council, The Forum, Marlowes, Hemel Hempstead, Herts HP1 1DN

We will not accept comments made by email.

If you have any queries, please contact the Strategic Planning Team on 01442 228000.

This survey needs to be read in conjunction with the Revised Strategy for Growth 2024-2040 consultation documents.

You do not need to answer every question - just those that are relevant to you or that you have a view on.

Personal Details

Please note that * denotes mandatory fields

Individual's Personal Details		Agent's Details (if applicable)	
Title	<input type="text"/>		<input type="text"/>
Name*	<input type="text"/>		<input type="text"/>
Organisation	<input type="text"/>		<input type="text"/>
Address *	<input type="text"/>		<input type="text"/>
Post Code *	<input type="text"/>		<input type="text"/>
Telephone No.	<input type="text"/>		<input type="text"/>
Email	<input type="text"/>		<input type="text"/>

(This is the Council's preferred method of contact)

Please note: Your name and comments will be made available for public inspection (your address, telephone number and email address will not be made public) and therefore cannot be treated as confidential. Your name and address must be completed for your comments to be considered.

Local Plan Revised Strategy for Growth 2024-2040

Question 1: Where does your response relate to?

(Please tick all that apply)

<input type="checkbox"/>	Hemel Hempstead
<input type="checkbox"/>	Berkhamsted
<input type="checkbox"/>	Tring
<input type="checkbox"/>	Bovingdon
<input type="checkbox"/>	Kings Langley
<input type="checkbox"/>	Markyate
<input type="checkbox"/>	Dacorum's Countryside
<input type="checkbox"/>	Dacorum (whole of borough)
<input type="checkbox"/>	Other (please specify below):

Local Plan Revised Strategy for Growth 2024-2040

Overall feedback on changes to the strategy

Question 2: To what extent do you agree or disagree with the proposed changes to the strategy?

(Please select one answer)

<input type="checkbox"/> Agree	<input type="checkbox"/> Somewhat agree	<input type="checkbox"/> Neutral	<input type="checkbox"/> Somewhat disagree	<input type="checkbox"/> Disagree
--------------------------------	---	----------------------------------	--	-----------------------------------

Please use this space if you would like to provide further overall feedback on the proposed changes.

(Please enclose any supporting documents you wish to add)

Local Plan Emerging Strategy for Growth 2020-2038

Infrastructure

Question 3: When thinking about the future what are the five most important things to you?

(Please select up to five options)

<input type="checkbox"/>	Arts and culture
<input type="checkbox"/>	Community facilities (including libraries, village halls, youth groups and social care)
<input type="checkbox"/>	Digital communications (broadband, etc.)
<input type="checkbox"/>	Drainage and flood protection
<input type="checkbox"/>	Education provision (including early years, primary and secondary, and SEND)
<input type="checkbox"/>	Emergency services (including police, fire, and ambulance)
<input type="checkbox"/>	Green space and play facilities
<input type="checkbox"/>	Healthcare (including GP provision, hospital care and mental health services)
<input type="checkbox"/>	Homes and jobs
<input type="checkbox"/>	Indoor and outdoor sports facilities
<input type="checkbox"/>	Public transport (including buses and trains)
<input type="checkbox"/>	Road network
<input type="checkbox"/>	Walking and cycling routes
<input type="checkbox"/>	Waste and recycling
<input type="checkbox"/>	Other (please specify below)

Evidence Base

Question 4: What evidence would you like to comment on?

(Please tick all that apply)

<input type="checkbox"/>	Sustainability Appraisal
<input type="checkbox"/>	Habitats Regulations Assessment
<input type="checkbox"/>	Strategic Housing Land Availability Assessment ("SHLAA")
<input type="checkbox"/>	Viability Study
<input type="checkbox"/>	Hemel Garden Communities Position Statement

What comments would you like to make on the selected evidence?

Local Plan Emerging Strategy for Growth 2020-2038

Feedback on Consultation Process

Question 5: How did you hear about this consultation?

(please select the main way you heard)

	Read about it in Dacorum Life (digital) - weekly e-newsletter
	Read about it in the press
	Received a letter from the Council
	Received an email from the Council
	Saw a publicity poster
	Saw it on the Council's website
	Social media
	Other (please specify below)

Question 6: Please rate your experience of taking part in this consultation.

	Very good	Good	Adequate	Poor	Very poor	N/A
Ease of finding information on the consultation webpages						
Ease of understanding the information provided						
Ease of using the maps						
Accessibility of the consultation on your pc						
Accessibility of the consultation on your mobile						

Local Plan Emerging Strategy for Growth 2020-2038

Call for Sites

If you are looking to promote land for development in Dacorum and want to see it allocated in the new Local Plan, please submit your information below.

At present, the Council is putting a specific call out for **Suitable Alternative Natural Greenspace**, or "**SANG**" for short. This is the term given to greenspaces that are created or enhanced with the specific purpose of absorbing recreation pressure that would otherwise occur at National Sites, such as Ashridge Commons and Woods SSSI (i.e. Ashridge Estate). New SANGs can be created, or existing greenspaces enhanced to create a SANG, in order to absorb the level of additional recreation pressure associated with new development.

Further information is available at [https://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/new-single-local-plan/chilterns-beechwoods-special-area-of-conservation/chilterns-beechwoods-special-area-of-conservation-\(sac\)---mitigation-strategy](https://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/new-single-local-plan/chilterns-beechwoods-special-area-of-conservation/chilterns-beechwoods-special-area-of-conservation-(sac)---mitigation-strategy)

A good SANG should include the following key principles:

- Agricultural land / woodland / other natural spaces which has the potential to be converted into high quality public open space.
- It must be capable of delivering a 2.4-kilometre circular walking route that does not cross over itself.
- It should be very 'natural' in its feel, with limited built development (i.e. houses or other buildings) visible from within the land.
- It must be secured for a period of at least 80 years.

What would you like to promote the site for? (tick all that apply)


(Please provide a map with your site clearly outlined)

<input type="checkbox"/>	Public Open Space / Suitable Alternative Natural Green Space
<input type="checkbox"/>	Housing
<input type="checkbox"/>	Employment
<input type="checkbox"/>	Retail
<input type="checkbox"/>	Gypsy and Traveller Site
<input type="checkbox"/>	Other (please specify below):
Location / Address of the site:	

Local Plan Emerging Strategy for Growth 2020-2038

Please provide any further information you wish to add.

(Please enclose any supporting documents you wish to add)



Appendix B: Full Text of Responses

You can view all responses made on the consultation webpage, by visiting our consultation portal: https://letstalk.dacorum.gov.uk/survey_localplan2023⁸

- To view the full text to all responses made: [Revised Strategy for Growth Consultation - Report of Responses](#) (22.4 mb)
- To view full copies of postal responses and supporting documents please see [Annex 1 to the main report](#). (19.4 mb)

8

Please note that responses made to the consultation cannot be amended within the online system.

Dacorum BC Community Impact Assessment (CIA)

Policy / service / decision

Dacorum Local Plan 2024-2040 Revised Strategy for Growth

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

Dacorum Local Plan 2024-2040 Revised Strategy for Growth.

This consultation is being carried out 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. This CIA focusses on the overarching development principles and the public engagement that is essential to this part of the local plan process

The requirement to prepare a Local Plan is set out in Section 13 Planning and Compulsory Purchase Act 2004 as amended, and Regulation 10A of the Town and Country Planning (Local Planning) Regulations 2012 requires Local Plans to be reviewed every five years.

Once adopted, the Local Plan will affect anyone who lives in, studies in, works in, visits, or has an interest in Dacorum, such as:

- The community (residents, businesses, voluntary and specialist groups (i.e. residents associations))
- Those who engage in planning matters in Dacorum
- Parish, Town and County Councils (including those surrounding Dacorum)
- Interested developers, landowners and agents
- Statutory consultees and various partners
- Council staff and elected members

The consultation carried out as part of the preparation of the Local plan, in accordance with the council's adopted Statement of Community Involvement (SCI) and Local Development Scheme (LDS) and this will involve the community and other organisations and interested parties at different stages of plan preparation.

The Local Plan seeks to promote social inclusion and ensure that all people (including vulnerable groups) have access to the services and opportunities that they may need such as housing, employment, public transport and community facilities (e.g. education, health and local shopping). This will work towards meeting the public sector equality duty as the needs of these individuals are being incorporated into the Local Plan.

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 CIA has been prepared following an iterative process. This involved identifying the likely impacts arising from each draft policy and then considering these impacts as positive, negative or neutral in light of the thrust of the relevant policy. This was set against known facts, information and evidence gathered from the Council's robust evidence base which underpins the Local Plan and which relates specifically to the protected characteristics listed in the Equality Act 2010.

Recommendations on ways by which the negative impacts could be removed or mitigated and the positive impacts strengthened were then sought. The draft policies affected are then reconsidered and re-examined again in the same iterative process until they emerge with no known negative impacts and became more acceptable.

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.*

This version of the Plan is informed by the previous consultation stages as outlined below and evidence studies. In terms of the consultation on the Issues and Options consultation in 2017, and the Emerging Strategy for Growth Consultation in 2020, all consultees including organisations and individuals on the Council’s consultation database were emailed directly and notified on the consultation process. The following bodies which represent the interest of the protected groups were e mailed directly:

- 45 Clubs and societies
- 15 Community network groups
- 10 Disability groups
- 11 Ethnic minority groups
- 3 Local strategic partnership groups
- 18 Voluntary organisations

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>			

<p>Age</p>	<p>The consultation on the revised strategy for growth will be undertaken using a combination of digital and non-digital methods.</p> <p>Participants are required to be above the age of 13 to register on the corporate 'let's talk dacorum' consultation platform, however participants under this age are permitted to register with the consent of a parent or guardian.</p> <p>Although the Revised Strategy is not specifically consulting on draft policies, the consultation is undertaken with the assumption that the draft policies proposed in 2020 are retained (subject to further technical work). The following policies were assessed to have a positive impact on this protected group in 2020:</p> <ul style="list-style-type: none"> • Policy SP13 Delivering High Quality Design • Policy DM9 Housing for Older people • Policy DM42 crime and security • Policy DM61 education • Policy DM63 Open space • Policy DM64 community facilities 	□	□	☒
<p>Disability (physical, intellectual, mental)</p> <p><i>Refer to CIA Guidance Notes and Mental Illness & Learning Disability Guide</i></p>	<p>The corporate consultation platform 'Let's Talk Dacorum' is compliant with WCAG 2.1 guidelines.</p> <p>Although the Revised Strategy is not specifically consulting on draft policies, the consultation is undertaken with the assumption that the draft policies proposed in 2020 are retained (subject to further technical work). The following policies were assessed to have a positive impact on this protected group in 2020:</p> <ul style="list-style-type: none"> • Policy DM10 Accessible and adaptable housing 	□	□	☒

	<ul style="list-style-type: none"> Policy SP13 Delivering High Quality Design 			
Gender reassignment	The Revised Strategy for Growth is neutral with regards to gender-reassignment or gender identity.	☐	☒	☐
Race and ethnicity	<p>Although the Revised Strategy for Growth is not specifically consulting on draft policies, the consultation is undertaken with the assumption that the draft policies proposed in 2020 are retained (subject to further technical work). The following policies were assessed to have a positive impact on this protected group in 2020:</p> <ul style="list-style-type: none"> DM13 Existing Accommodation for Travelling Communities DM14 Gypsies and Travellers <p>With the exception of Gypsy & Travellers housing needs, the plan is considered to be neutral in terms of race.</p>	☐	☐	☒
Religion or belief	<p>Although the Revised Strategy for Growth is not specifically consulting on draft policies, the consultation is undertaken with the assumption that the draft policies proposed in 2020 are retained (subject to further technical work). The following policies were assessed to have a positive impact on this protected group in 2020:</p> <p>Policy DM64 community facilities</p>	☐	☐	☒
Sex	The Revised Strategy for Growth is considered to be neutral with regards to biological sex.	☐	☒	☐



Sexual orientation	The Revised Strategy for Growth is considered to be neutral with regards to sexual orientation.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Not protected characteristics but consider other factors, e.g. carers, veterans, homeless, low income, loneliness, rurality etc.	Once adopted, the Local Plan will have a Borough Wide influence on all those who reside or interact with the area. This includes businesses, local services, Parish and Town Councils, councillors, landowners and developers, charities and interest groups.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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	
n/a	Select date		<input type="checkbox"/>	
If negative impacts / outcomes remain, please provide an explanation below.				

n/a	
Completed by (all involved in CIA)	Keeley Mitchell (Strategic Planning and Regeneration)
Date	25/09/2023
Signed off by (<i>AD from different Directorate if being presented to CMT / Cabinet</i>)	
Date	
Entered onto CIA database - date	
To be reviewed by (officer name)	Keeley Mitchell
Review date	TBC (CIA will be updated at the next stage of Local Plan preparation, currently proposed to begin in October 2024)



Strategic Planning And Environment Overview and Scrutiny Committee

Report for:	Strategic Planning and Environment Overview and Scrutiny Committee
Title of report:	Interim Affordable Housing Supplementary Planning Document: Draft for Public Consultation
Date:	6 March 2024
Report on behalf of:	Councillor Wilkie, Portfolio Holder for Place
Part:	I
If Part II, reason:	N/A
Appendices:	Appendix 1: Interim Affordable Housing Supplementary Planning Document: Draft for Public Consultation Appendix 2: Community Impact Assessment
Background papers:	None
Glossary of acronyms and any other abbreviations used in this report:	SPD: Supplementary Planning Document

<p>Responsible Officer: Sara Whelan (Assistant Director, Planning)</p> <p>Report Author: John Chapman (Strategic Planning and Regeneration Officer)</p> <p> </p> <p>Sara.whelan@dacorum.gov.uk / 01442 228950 (ext. 2950)</p>

Corporate Priorities	<p>A clean, safe and enjoyable environment</p> <p>Building strong and vibrant communities</p> <p>Ensuring economic growth and prosperity</p> <p>Providing good quality affordable homes, in particular for those most in need</p>
Wards affected	ALL
Purpose of the report:	To present the draft Supplementary Planning Document (SPD) to the Committee as part of the

	programme for sign-off, culminating in a public consultation on the document.
Recommendation (s) to the decision maker (s):	That the draft Supplementary Planning Document (SPD) be submitted to Cabinet on 21 May 2024, with a recommendation that it be approved for public consultation purposes.
Period for post policy/project review:	

1 Introduction/Background:

1.1. The Council’s adopted planning policies on affordable housing are set out in the Core Strategy (2013) and Site Allocations Development Plan Document (2017):

https://www.dacorum.gov.uk/docs/default-source/strategic-planning/adopted-core-strategy-2013.pdf?sfvrsn=80753a9e_2

https://www.dacorum.gov.uk/docs/default-source/strategic-planning/dacorum-site-allocations-statement-june-2017.pdf?sfvrsn=d63a3c9e_10

1.2. The table below shows the key points in these policies:

Policy	Key points
Core Strategy Policy CS18 (mix of housing)	<ul style="list-style-type: none"> • Provide a choice of homes, including affordable housing.
Core Strategy Policy CS19 (affordable housing)	<ul style="list-style-type: none"> • Requires 35% affordable housing. • At least 75% of affordable homes should be for rent. • 100% affordable housing on rural sites.
Core Strategy Policy CS20 (rural sites for affordable homes)	<ul style="list-style-type: none"> • Encourages small-scale schemes for local affordable homes at selected small villages.
Site Allocations Policies LA1-LA6 (one policy for each local allocation)	<ul style="list-style-type: none"> • 40% affordable housing required on six key sites called local allocations.

1.3. Supplementary guidance on Dacorum’s planning policies for affordable housing is currently provided by the following documents:

- Affordable Housing Supplementary Planning Document (September 2013)
https://www.dacorum.gov.uk/docs/default-source/planning-development/affordable-housing-spd-2013-nbsp-.pdf?sfvrsn=5b39f89f_0
- Affordable Housing SPD - Clarification Note (revised March 2022)
https://www.dacorum.gov.uk/docs/default-source/strategic-planning/affordable-housing-spd-clarification-note-update-march-2022.pdf?sfvrsn=119e079e_4

- 1.4. There is a need to replace these documents by a new Supplementary Planning Document (SPD), for the following main reasons:
1. To ensure that rented affordable housing is genuinely affordable for households in need of such housing.
 2. To take account of changed Government guidance on affordable housing, including the introduction of First Homes.
 3. To provide updated and expanded guidance on how our planning policies for affordable housing should be applied.
- 1.5. A draft new SPD has been produced for consultation purposes and is appended to this report (see Appendix 1). It is recommended that the draft SPD is referred to Cabinet on 21 May 2024 (after the 'purdah' period), with a recommendation that it be approved for public consultation purposes.

2 Draft Interim Affordable Housing SPD

- 2.1 The purpose of the new SPD is to supplement our existing planning policies on affordable housing. It cannot change these policies. Revised planning policies on affordable housing will be included in the new Local Plan.
- 2.2 The new SPD is referred to as 'Interim', as it will be operational only until the new Local Plan is adopted. At that time it is envisaged that an updated Affordable Housing SPD will also be adopted, to supplement the new Local Plan's affordable housing policies.
- 2.3 There are six parts to the SPD (see paragraph 1.11 in the draft SPD for further information):
- Part 1: Introduction and policy context
 - Part 2: Affordable housing qualifying sites and overall affordable housing percentage
 - Part 3: Different affordable housing tenures
 - Part 4: Affordable housing mix, design and layout
 - Part 5: Considering planning applications
 - Part 6: Other considerations
- 2.4 The draft SPD is a lengthy and technical document, because it needs to cover a wide range of issues. However, in practice, only some sections in the SPD will be relevant in the consideration of any planning application.
- 2.5 To obtain an overview of the SPD, please see the Executive Summary or the slightly longer 'key guidance' at the start of each section.
- 2.6 There are several references in the draft SPD to the South West Hertfordshire Local Housing Needs Assessment (2020). However, an updated version of the Local Housing Needs Assessment is now close to completion. Before going to Cabinet, the SPD will be amended to reflect the new Local Housing Needs Assessment. A few other minor changes may be made to the SPD prior to Cabinet. For example, the text on review mechanisms (paragraphs 25.13-25.19) has been expanded as requested by the Strategic Leadership Team on 7 February, but may be amended further once internal consultation is completed.

3 Options and alternatives considered

3.1 The alternative to having a new SPD is to continue using the existing SPD and Clarification Note (see paragraph 1.3 above). However, these documents do not provide comprehensive guidance on all the key planning issues relating to affordable housing and in some respects they are out-of-date.

4 Consultation

4.1 Consultation has been carried out with the following Council teams:

- Strategic Housing and Regeneration
- Housing Needs
- Supported Housing
- Legal
- Development Management
- Infrastructure Planning and Developer Contributions

4.2 The draft SPD has been considered by the Council's Strategic Leadership Team and at a Strategic Leadership Team/Portfolio Holders meeting.

5 Financial and value for money implications:

5.1 Other than the cost of undertaking public consultation, the draft SPD has limited financial implications for the Council.

6 Legal Implications

6.1 The draft SPD supports the relevant policies of the adopted Core Strategy and is fully consistent with changes to National Policy since its adoption.

7 Risk implications:

7.1 Without a new SPD, the Council will be in a much weaker position to obtain the optimum affordable housing offer on housing developments, including:

- The amount of affordable housing.
- Affordable rented housing that is genuinely affordable.
- An appropriate mix of affordable housing types, tenures and sizes.

8 Equalities, Community Impact and Human Rights

8.1 A Community Impact Assessment (CIA) is prepared to support the Interim Affordable Housing SPD (see Appendix 2).

8.2 There are no Human Rights Implications arising from this report.

9 Sustainability implications (including climate change, health and wellbeing, community safety)

9.1 There are no sustainability implications arising from this report.

10 Council infrastructure (including Health and Safety, HR/OD, assets and other resources)

10.1 There are no implications to Council infrastructure arising from this report.

11 Conclusions and Next Steps

11.1 This report explains why a new Interim Affordable Housing SPD is needed and presents a draft for the Committee's considerations. Following the consideration and approval of this report by Scrutiny and its publication, officers take on board any recommendations made by Scrutiny ahead of the report being presented to Cabinet on 21 May. If approved by Cabinet, then the draft Interim Affordable Housing SPD will be published for public consultation.

11.2 There will be a four week period of public consultation on the draft SPD. It will follow the standard process for consultation on draft SPDs, in accordance with relevant legislation and our adopted Statement of Community Involvement.

11.3 Officers will give careful consideration to all comments submitted on the draft SPD. A revised version of the SPD will then be submitted to Members in the summer, with a recommendation that the SPD be adopted by Cabinet. It will then be a material planning consideration, which the Council will take into account when deciding planning applications for housing development.

11.4 Following public consultation, the draft SPD will be updated and finalised taking account of comments received. A consultation report will be prepared that summarises issues and feedback received through the public consultation. Both documents will be presented to Scrutiny as part of the process for formally adopting the SPD later this year.

11.5 Once the SPD has been adopted, it will be a material planning consideration, which the Council will take into account when deciding planning applications for housing development.

APPENDIX 1

**INTERIM AFFORDABLE HOUSING
SUPPLEMENTARY PLANNING DOCUMENT**

DRAFT FOR PUBLIC CONSULTATION

MARCH 2024



Social rented housing at Magenta Court, London Road, Apsley, Hemel Hempstead



CONTENTS

FOREWORD	4
EXECUTIVE SUMMARY	5
PART 1: INTRODUCTION AND POLICY CONTEXT	14
1. INTRODUCTION	14
2. NATIONAL PLANNING POLICY CONTEXT	17
3. DACORUM PLANNING POLICY CONTEXT.....	19
4. OTHER RELEVANT COUNCIL DOCUMENTS	23
5. NEIGHBOURHOOD PLANS IN DACORUM	25
PART 2: QUALIFYING SITES AND OVERALL AFFORDABLE HOUSING PERCENTAGE.....	27
6. WHICH DEVELOPMENTS SHOULD PROVIDE AFFORDABLE HOUSING?	28
7. OVERALL AFFORDABLE HOUSING PERCENTAGE	31
PART 3: DIFFERENT AFFORDABLE HOUSING TENURES.....	33
8. DIFFERENT AFFORDABLE HOUSING TENURES - OVERVIEW	33
9. PERCENTAGE SPLIT BETWEEN DIFFERENT TYPES OF AFFORDABLE HOUSING.....	37
10. SOCIAL RENTED HOUSING	40
11. AFFORDABLE RENTED HOUSING	42
12. AFFORDABLE PRIVATE RENT IN BUILD TO RENT SCHEMES.....	45
13. FIRST HOMES.....	48
14. SHARED OWNERSHIP.....	51
15. RENT TO BUY	54
16. AFFORDABLE HOUSING ON SCHEMES FOR OLDER PEOPLE	56
17. EXCEPTION SITES	61
PART 4: AFFORDABLE HOUSING MIX, DESIGN AND LAYOUT	66
18. HOUSING SIZE MIX FOR AFFORDABLE HOUSING	66
19. DESIGN AND LAYOUT OF AFFORDABLE HOUSING	70
20. DISTRIBUTION AND PHASING OF AFFORDABLE HOUSING.....	73
21. ACCESSIBLE AND ADAPTABLE HOMES.....	75
22. SUSTAINABLE HOMES.....	78
PART 5: CONSIDERING PLANNING APPLICATIONS.....	79
23. SUBMITTING A PLANNING APPLICATION	79
24. VACANT BUILDING CREDIT	83
25. VIABILITY.....	85
26. OFF-SITE AFFORDABLE HOUSING PROVISION OR FINANCIAL CONTRIBUTION.....	88

27.	SECTION 106 AGREEMENTS.....	91
PART 6: OTHER CONSIDERATIONS		96
28.	FUNDING, REGISTERED PROVIDERS AND COMMUNIUTY INFRASTRUCTURE LEVY RELIEF ...	96
29.	MONITORING AND REVIEW.....	99
APPENDIX 1: WEB LINKS TO DOCUMENTS.....		100
APPENDIX 2: GLOSSARY		104
APPENDIX 3: DACORUM’S AFFORDABLE HOUSING POLICIES.....		109
APPENDIX 4: AFFORDABLE RENTS IN DACORUM		111
APPENDIX 5: LOCAL CONNECTION CRITERIA FOR AFFORDABLE HOUSING		116

FOREWORD

<Portfolio holder(s) statement to be added in due course>

Supplementary guidance on Dacorum's planning policies for affordable housing is currently set out in the following documents:

- Affordable Housing Supplementary Planning Document (September 2013)
- Affordable Housing SPD - Clarification Note (revised March 2022)

There is a need to replace these documents by a new Supplementary Planning Document (SPD), for the following main reasons:

1. The Council wishes to ensure that rented affordable housing is genuinely affordable for households in need of such housing.
2. To take account of changed Government guidance on affordable housing, including the introduction of First Homes.
3. To provide updated and expanded guidance on how our planning policies for affordable housing should be applied.

Therefore, the Council has prepared this draft new SPD for public consultation purposes. Please let us know your views on the draft SPD by xxxx 2024. [Details of consultation and how to respond to be added.](#)

We will give careful consideration to all comments submitted on the draft SPD before finalising the new guidance. The new SPD will then replace the 2013 and 2022 documents. It will be a material planning consideration which we will take into account when deciding planning applications for housing development.

EXECUTIVE SUMMARY

PART 1: INTRODUCTION AND POLICY CONTEXT

1. Introduction

The Interim Affordable Housing Supplementary Planning Document (SPD) supplements the Council's planning policies on affordable housing.

The Council will use the SPD when deciding planning applications for housing development.

The SPD reflects changed Government guidance, clarifies the operation of our policies and seeks to ensure that rented affordable housing is genuinely affordable.

2. National planning policy context

The Council must take account of Government guidance on affordable housing and any future changes to it. The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. The Government's Planning Practice Guidance notes (PPGs) provide additional, more detailed guidance to supplement the NPPF.

Government guidance states that on major housing developments, at least:

- 10% of homes should be for affordable home ownership, subject to certain provisos and exemptions; and
- 25% of the affordable homes should be First Homes.

3. Dacorum planning policy context

The Council's adopted planning policies on affordable housing are summarised below. This SPD supplements these policies:

Policy	Key points
Core Strategy Policy CS18 (mix of housing)	<ul style="list-style-type: none">• Provide a choice of homes, including affordable housing.
Core Strategy Policy CS19 (affordable housing)	<ul style="list-style-type: none">• Requires 35% affordable housing.• At least 75% of affordable homes should be for rent.• 100% affordable housing on rural sites.
Core Strategy Policy CS20 (rural sites for affordable homes)	<ul style="list-style-type: none">• Encourages small-scale schemes for local affordable homes at selected small villages.
Site Allocations Policies LA1-LA6 (one policy for each local allocation)	<ul style="list-style-type: none">• 40% affordable housing required on six key sites called local allocations.

The Council is preparing a new Local Plan, but we are still working to the adopted affordable housing policies when considering planning applications for housing development.

4. Other relevant Council documents

The Council has published some other documents relevant to affordable housing in Dacorum:

- Delivering for Dacorum: Corporate Plan 2020-2025.
- Shaping the future of Dacorum: Our Growth and Infrastructure Strategy to 2050.
- Homes for the Future: Housing Strategy 2019-2021 (new strategy due 2024).
- Housing Allocations Policy.
- Tenancy Strategy.

5. Neighbourhood plans in Dacorum

Progress on neighbourhood plans in Dacorum is shown below. The Grovehill, Kings Langley and Bovington plans include guidance on housing needs:

- Grovehill, Hemel Hempstead (made)
- Kings Langley (made)
- Bovington (submitted for examination)
- Great Gaddesden (work started)
- Berkhamsted (work started)

PART 2: QUALIFYING SITES AND OVERALL AFFORDABLE HOUSING PERCENTAGE

6. Which developments should provide affordable housing?

An element of affordable housing will be required on:

- Major developments throughout Dacorum (i.e. sites for 10 or more homes; or with a site area of 0.5 hectares or more).
- Sites for 6-9 homes in the Chilterns Area of Outstanding Natural Beauty.

The affordable housing should be provided on-site, unless off-site provision or a financial contribution is justified in terms of section 26.

7. Overall affordable housing percentage

On sites where affordable housing is required, the proportion of affordable housing should be as follows:

Type of site	Affordable housing percentage
1. All, except those covered by rows 2 and 3 below	35%
2. Local allocations	40%
3. Rural exception sites and First Homes exception sites	100%, subject to section 17 below

The amount of affordable housing will be reduced or waived, only where fully justified.

PART 3: DIFFERENT AFFORDABLE HOUSING TENURES

8. Different affordable housing tenures - overview

Government guidance splits affordable housing into:

- Affordable housing for rent
- Affordable home ownership

The main types of affordable housing likely to be provided in Dacorum are as follows:

Affordable housing for rent	<ul style="list-style-type: none"> • Social rent • Affordable rent • Affordable private rent in build to rent schemes
Affordable home ownership	<ul style="list-style-type: none"> • First Homes • Shared ownership • Rent to buy

Any proposals for other types of affordable home ownership will be treated on their merits.

9. Split between different types of affordable housing

The Core Strategy states that at least 75% of the affordable homes should be for rent, but we must also take account of Government guidance that:

- At least 10% of affordable homes should be for affordable home ownership.
- At least 25% of the affordable homes should be First Homes. The remainder of the affordable housing tenures should reflect the proportions in the local plan policy.

This results in the following split:

Affordable housing for rent	At least 56%
Affordable home ownership	No more than 44%

The Council favours the following percentage split between First Homes and other types of affordable home ownership, whilst recognising that it may not be possible to deliver shared ownership housing in flats:

Affordable home ownership (total)	No more than 44%
First Homes	25%
Other types of affordable home ownership, usually shared ownership and/or rent to buy	Up to 19%

10. Social rented housing

Social rented homes are generally owned by local authorities or registered providers. Rents are usually lower than for affordable rented homes.

The Council supports social rented housing, as can be seen by its own new build council house programme. We will encourage registered providers to build social rented housing, where possible.

11. Affordable rented housing

Government guidance requires affordable rented housing to be at least 20% cheaper than local market rates and for landlords to be registered providers.

The Council's priority is to ensure that affordable rented housing is genuinely affordable. Our starting point will be that rents should be 60% of median market values (including service charges), subject to viability. Such housing is called 'Dacorum Affordable Rent'

Rents should remain at around 60% of median market rents during the lifetime of this SPD, unless convincing evidence is brought forward to justify higher rents.

12. Affordable private rent in build to rent schemes

Build to rent housing is purpose built housing that is typically 100% rented out. The normal form of affordable housing in such schemes is 'affordable private rent'.

Government guidance states that 20% of homes on build to rent schemes should generally be for affordable private rent and rents on these homes should be at least 20% below local market rents.

As with other housing, the Council will expect the proportion of affordable homes in build to rent schemes to be 35% (40% on local allocations).

The approach in section 11 on Dacorum Affordable Rent can apply equally to affordable private rent.

When considering planning applications, we will bear in mind that Government guidance encourages flexibility.

13. First Homes

First Homes are discounted open market sale units, which will be the main type of affordable home ownership. Key requirements are that:

- First Homes must be discounted by a minimum of 30% against the market value.
- They are sold to first time buyers with a household income no more than £80,000.
- The first sale price must not exceed £250,000 (after applying the discount).
- First Homes should account for at least 25% of affordable homes, except in certain circumstances.

Most First Homes in Dacorum are likely to be flats. Therefore, in order to secure a broad mix of house sizes for affordable home ownership, 25% (and no more) of the affordable homes should be First Homes (unless the scheme is exempt from providing First Homes).

Eligibility for First Homes should comply with the Council's Local Connection Policy, once it is approved.

14. Shared ownership

Shared ownership housing enables households to purchase a share in a home with a mortgage, whilst paying rent on the rest. Purchasers can buy additional shares when they can afford to do so.

Despite the introduction of First Homes, shared ownership housing should form up to 19% of the affordable housing.

Most shared ownership homes should be houses with 2 or 3-bedrooms.

The total monthly costs (mortgage payments and rent) should be lower than renting or purchasing a similar home on the open market.

Applicants for shared ownership housing should comply with the Council’s Local Connection Policy, once it is approved.

15. Rent to buy

Rent to buy housing is available initially for affordable rent, but can later be converted to outright ownership or shared ownership. There must also be an agreed length of tenancy, followed by an option to buy or rent again.

Eligibility for rent to buy housing will be assessed against the Council’s Local Connection Policy, once it is approved.

16. Affordable housing on schemes for older people

Government guidance states that local authorities should plan to meet the full range of housing needs for older people. Local evidence shows a substantial need for additional affordable extra care housing and care home bedspaces.

The Council’s approach towards affordable housing on different types of housing for older people is summarised below:

Type of housing	Affordable housing requirements on open market developments
Age-restricted general market housing	On-site provision of affordable housing.
Retirement living or sheltered housing	Affordable housing required through on-site provision, off-site provision or financial contribution.
Extra care housing or housing-with-care	Affordable housing required through on-site provision, off-site provision or financial contribution.
Residential care homes and nursing homes	Affordable bedspaces not required.

17 Exception sites

Exception sites can be permitted outside settlement boundaries as exceptions to normal planning policy (on land not allocated for housing).

Our approach towards the three types of exception sites is summarised below. Also, with rural exception sites and First Homes exceptions sites, a need for affordable housing must be established and the housing restricted to people with a strong local connection.

(i) Rural exception sites

The Council supports appropriate proposals in Aldbury, Chipperfield, Flamstead, Long Marston, Potten End, Wigginton and Wilstone.

A small element of open market housing will be permitted only if necessary to make a scheme viable.

(ii) First Homes exception sites

These sites deliver primarily First Homes, but can include a small proportion of open market housing if necessary to ensure viability, or other types of affordable housing if justified by evidence. Long Marston and Wilstone are the only acceptable places for such housing.

(iii) Community-led developments

These developments are provided by a not-for-profit organisation, primarily to meet the housing needs of its members and the wider local community.

The Council will support proposals in Long Marston and Wilstone which comply with Government guidance.

PART 4: AFFORDABLE HOUSING MIX, DESIGN AND LAYOUT

18. Housing size mix for affordable housing

Based on local evidence, the Council is seeking an overall housing size mix broadly as shown below, but will amend the split if justified by more up-to-date information:

Bedrooms	Social/affordable rented housing	Affordable home ownership	Open market housing
	%	%	%
1	30	25	5
2	35	40	20
3	25	25	45
4+	10	10	30

The housing size mix will be negotiated by the Council on a site by site basis and will vary accordingly.

The Council will request that all new homes are built to the nationally described space standards.

Affordable housing should usually be designed to accommodate two adults in one bedroom and two children in each further bedroom.

19. Design quality

Housing developments including affordable housing should comply with guidance from the Government and Homes England, the Council’s planning policies and other relevant Council documents, including the Strategic Design Guide SPD.

As with all housing, affordable housing should be built to a high standard of design and amenity. In particular, the Council will expect a tenure-neutral design approach, so that it is not possible to distinguish between the affordable and open market housing.

20. Distribution and phasing of affordable housing

The Council will consider the distribution of social rented, affordable rented and shared ownership housing across a development on a site by site basis. In particular:

- The affordable housing should be fully integrated into the overall scheme layout, in clusters proportionate to the size of each site or phase and not usually exceeding 20 dwellings.

- The affordable housing should be indistinguishable from the open market housing.
- There should be an appropriate degree of separation between nearby affordable housing clusters.

On larger sites which will be developed in phases, there should be between 25% and 50% affordable housing in each phase.

21. Accessible and adaptable homes

In the light of the Building Regulations, Government guidance and local evidence, the Council's approach towards adaptable and accessible homes is as shown below:

Social and affordable housing, where the Council is responsible for allocating or nominating a person to live in the housing	Require 100% of homes to M4(2) accessible and adaptable standards and 10% to M4(3)(2)(b) wheelchair accessible standard, unless this is not possible for viability or other reasons. Ground floor flats should have level access to a wetroom, with a shower instead of a bath.
Other housing schemes	Encourage 100% of homes to M4(2) standards and 5% of market homes to M4(3)(2)(a) wheelchair adaptable standard.

22. Sustainable homes

Council policy states that new development will comply with the highest standards of sustainable design and construction possible. Government guidance requires new development to be planned for in a way that reduces greenhouse gas emissions and minimises energy consumption.

New development in Dacorum should comply with the above. The Council will encourage higher levels of energy efficiency and sustainable design and construction than required by the Government.

PART 5: CONSIDERING PLANNING APPLICATIONS

23. Submitting a planning application

The Council encourages the submission of a wide range of information on affordable housing at the pre-application stage. This should include a draft schedule of accommodation, covering matters such as the number of affordable homes and the tenures and housing size mix of the affordable housing.

Any information on affordable housing not provided at the pre-application stage should be included in the outline or full planning application.

An 'Affordable Housing Plan' should be submitted with planning applications, to help the Council assess the proposals against our affordable housing policies and this SPD.

24. Vacant building credit

Government guidance states that where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount, subject to certain provisos.

The Council's methodology to calculate vacant building credit is based on this guidance.

25. Viability

Government guidance states that the role for viability assessment is primarily at the plan making stage. It is up to the applicant to demonstrate that a viability assessment is needed at the application stage.

Any concerns an applicant has about viability should be discussed with the Council early in the development process. Should an agreement not be reached, a viability assessment will be required.

Viability assessments should accord with Government guidance and reflect best practice guidance.

The Council will seek review mechanisms where it would not be viable to comply with our affordable housing policies when planning permission is granted, but where it may become so during the course of the development.

26. Off-site affordable housing provision or financial contribution

Affordable housing should be provided on-site unless off-site provision or an appropriate financial contribution in lieu can be robustly justified.

Off-site provision or a financial contribution may be acceptable in certain other circumstances at the Council's discretion. Off-site provision will be accepted only if developers are able to deliver the affordable housing on a suitable site elsewhere.

The financial contribution should be at least broadly equivalent to the cost of re-providing the land for affordable housing on another site.

27. Section 106 agreements

The Council will secure affordable housing requirements through a legal agreement or unilateral undertaking.

The heads of terms of the Section 106 agreement should be considered at the pre-application stage and the agreement must be completed before planning permission is issued.

The Council has produced a draft S106 model agreement, which includes standard clauses to secure affordable housing. However, each agreement will be drawn up on a case by case basis. With some types of affordable housing, a bespoke agreement based on the model agreement will be needed.

PART 6: OTHER CONSIDERATIONS

28. Funding, registered providers and CIL relief

Funding

Homes England provides grant funding to support the capital costs of developing affordable housing for rent or sale in certain circumstances.

Registered providers and partnership working

The Council works with registered providers and the private sector to maximise affordable housing development in Dacorum. Registered providers are best placed to manage most affordable housing developments.

Developers should have a registered provider on board early in the development process.

Community Infrastructure Levy relief

The Community Infrastructure Levy (CIL) liability may be reduced for developments containing social rented housing that meets the criteria in the CIL regulations.

29. Monitoring and review

The Council will monitor and keep under review this Affordable Housing SPD, to ensure the delivery of affordable homes.

Information on the delivery of affordable housing is reported annually in the Authority Monitoring Report.

If necessary this SPD will be updated, but it will be replaced by a new SPD when the Council adopts the new Local Plan.

PART 1: INTRODUCTION AND POLICY CONTEXT

1. INTRODUCTION



Affordable rented and shared ownership housing at Invicta Court, Marlowes, Hemel Hempstead (Hightown Housing Association)

Key guidance

The Interim Affordable Housing Supplementary Planning Document (SPD) supplements the Council's planning policies on affordable housing. These policies can be found in the following documents, which form part of the Dacorum Local Plan:

- Core Strategy
- Site Allocations Development Plan Document

Core Strategy Policy CS19 (the main affordable housing policy) sets a target for 35% of new homes on qualifying sites to be affordable homes. The Site Allocations document requires 40% affordable housing on six key sites called 'local allocations'.

The Council will use the SPD when deciding planning applications for housing development.

The SPD reflects changed Government guidance, clarifies the operation of our policies and seeks to ensure that rented affordable housing is genuinely affordable.

What is affordable housing

- 1.1 Homes England's Fact Sheet 9 'What is affordable housing' provides a clear and concise introduction to affordable housing:

<https://www.gov.uk/government/publications/new-homes-fact-sheet-9-what-is-affordable-housing/fact-sheet-9-what-is-affordable-housing>

- 1.2 This fact sheet provides an overview of the types of affordable housing in England, why these homes are needed and who might live in an affordable home.

Purpose of this supplementary planning document

- 1.3 The Interim Affordable Housing Supplementary Planning Document (SPD) supplements the Council's planning policies on affordable housing. These policies are found in the following documents, which form part of the Dacorum Local Plan:

- Core Strategy (adopted September 2013)
- Site Allocations Development Plan Document (adopted July 2017)

- 1.4 Core Strategy Policy CS19 is the main planning policy on affordable housing. It sets a target for 35% of new homes on qualifying sites to be affordable homes. The Site Allocations document requires 40% affordable housing on six key sites called 'local allocations'. Section 3 below gives more information on our affordable housing policies. It also indicates which policies are supplemented by the guidance in this SPD.

- 1.5 Paragraph 14.28 in the Core Strategy states that an Affordable Housing Supplementary Planning Document (SPD) will provide a broad indication of priorities and will be used to guide decisions on the housing mix. Individual cases will be affected by the mix of affordable housing needed, as well as site and design considerations. Paragraph 14.38 adds that detailed guidance on viability, commuted payments, eligibility criteria for the occupation of affordable housing and other matters will be provided in supplementary guidance and advice.

- 1.6 This SPD is a material planning consideration, which the Council will take into account when deciding planning applications for housing development. Following the adoption of this SPD, the Council must take account of any relevant new Government guidance that is issued. Any such guidance may take precedence over some aspects of the SPD.

- 1.7 The SPD takes account of changed Government guidance on affordable housing and provides additional guidance on certain matters to clarify the operation of our policies. In addition, the Council wishes to ensure that rented affordable is genuinely affordable for households in need of such housing.

- 1.8 The title of this document includes the word 'Interim', because the SPD will remain operational only until the Council adopts its new Local Plan. At that time the Council will also adopt an updated Affordable Housing SPD, to supplement the new Local Plan's affordable housing policies.

- 1.9 Appendix 1 gives the web links to documents referred to in this SPD, whilst technical terms used in the document are defined in Appendix 2 (Glossary).

- 1.10 This SPD has replaced the Council's previous supplementary guidance on affordable housing in the:

- Affordable Housing Supplementary Planning Document (September 2013)
- Affordable Housing SPD - Clarification Note (revised March 2022)

Structure of SPD

1.11 There are six parts to this SPD:

Part 1 (Introduction and policy context): apart from the introduction, Part 1 contains sections on the national planning policy context, the Dacorum planning policy context, other published Council documents and neighbourhood plans in Dacorum.

Part 2 (Affordable housing qualifying sites and overall affordable housing percentage): provides guidance on which developments should provide affordable housing and the overall percentage of housing that should be affordable.

Part 3 (Different affordable housing tenures): provides an overview of the different types of affordable housing and guidance on the percentage split between the different types. It then looks at the main types of affordable housing, such as social rent, affordable rent, First Homes and shared ownership. It also covers affordable housing on schemes for older people and exception sites.

Part 4 (Affordable housing mix, design and layout): matters addressed are housing size mix for affordable housing, design quality, distribution of affordable housing, accessible and adaptable housing, and sustainable homes.

Part 5 (Considering planning applications): deals with submitting a planning application, vacant building credit, viability, registered providers, off-site affordable housing provision or financial contribution, and Section 106 agreements.

Part 6 (Other considerations): covers funding, registered providers, community infrastructure levy relief, and monitoring and review.

Further information

1.12 Further information on affordable housing can be obtained from the relevant Council team, as indicated below, or by phoning the Council on 01442 228000:

Table 1.1: Further information on affordable housing

Team	Issues relating to	Email
Strategic Housing, Investment & Regeneration	Tenure mix and housing need information	housing.strategy&investment@dacorum.gov.uk
Housing Development	Delivery of affordable housing schemes	newhomes@dacorum.gov.uk
Development Management	Planning applications involving affordable housing	planning@dacorum.gov.uk
Strategic Planning	Planning policy on affordable housing	strategicplanning@dacorum.gov.uk
Infrastructure	Monitoring and implementation of approved S106 agreements involving affordable housing	S106@dacorum.gov.uk

2. NATIONAL PLANNING POLICY CONTEXT

Key guidance

The Council must take account of Government guidance on affordable housing and any future changes to it. The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. The NPPF's guidance on affordable housing includes the following:

- Affordable housing should be sought only on major housing developments (see section 6 below), except in designated rural areas such as Areas of Outstanding Natural Beauty.
- On major housing developments, at least 10% of homes should be available for affordable home ownership, subject to certain provisos and exemptions.

The Government's Planning Practice Guidance Notes (PPGs) provide additional, more detailed guidance to supplement the NPPF. Some PPGs contain guidance on affordable housing. For example, First Homes should account for at least 25% of all affordable housing units.

Government guidance also allows for exception sites, to meet local affordable housing need on sites where housing development is not normally permitted.

- 2.1 The Council must take account of Government guidance on affordable housing and any future changes to it. Web links to the documents referred to in this section are provided in Appendix 1.

National Planning Policy Framework

- 2.2 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. The NPPF was last revised in December 2023.

- 2.3 Paragraphs 60-66 in the NPPF provide the main guidance on meeting housing need, including affordable housing. Key points to note are that:

- The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies, including those who require affordable housing (paragraph 63).
- Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required (applying the definition in Annex 2 to the Framework) and expect it to be met on-site, subject to certain provisos (paragraph 64).
- Provision of affordable housing should not be sought for residential developments that are not major developments (see section 6 below), other than in designated rural areas where policies may set out a lower threshold of 5 units or fewer (paragraph 65).
- Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the

identified affordable housing needs of specific groups. Exemptions to this 10% requirement should also be made where the site or proposed development:

- a) provides solely for Build to Rent homes;
- b) provides specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for the elderly or students);
- c) is proposed to be developed by people who wish to build or commission their own homes; or
- d) is exclusively for affordable housing, a community-led development exception site or a rural exception site (paragraph 66).

2.4 Also relevant are paragraph 82 on rural exception sites that will provide affordable housing to meet identified local needs and paragraph 73 on community-led development. Exception sites are unallocated sites where housing development is not normally permitted.

2.5 The definition of 'affordable housing' in NPPF Annex 2 is set out in full in Appendix 2 to this SPD. Appendix 2 also includes the NPPF definition of the following terms:

- Build to rent
- Community-led development
- Rural exception sites

Planning Practice Guidance

2.6 The Government's Planning Practice Guidance Notes (PPGs) provide additional, more detailed guidance to supplement the NPPF. The following PPGs include guidance relating to the provision of affordable housing:

- Build to rent
- Community Infrastructure Levy
- First Homes
- Housing and Economic needs assessment
- Housing needs of different groups
- Housing for older and disabled people
- Planning obligations
- Viability

2.7 For example, the First Homes PPG states that First Homes should account for at least 25% of all affordable housing units delivered by developers through planning obligations. This PPG also gives guidance on First Homes exception sites. Appendix 2 includes definitions of 'First Homes' and 'First Homes exception site'.

Other relevant Government guidance

2.8 The Council will also take account of any other relevant Government guidance regarding planning for affordable housing, including:

- The 'New Model for Shared Ownership: technical consultation' (April 2021).
- The ministerial statement on First Homes (May 2021), which accompanied the First Homes PPG.

3. DACORUM PLANNING POLICY CONTEXT

Key guidance	
The Council's adopted planning policies on affordable housing are summarised below. This SPD supplements these policies:	
Policy	Key points
Core Strategy Policy CS18 (mix of housing)	<ul style="list-style-type: none"> • Provide a choice of homes, including affordable housing.
Core Strategy Policy CS19 (affordable housing)	<ul style="list-style-type: none"> • Requires 35% affordable housing. • At least 75% of affordable homes should be for rent. • 100% affordable housing on rural sites.
Core Strategy Policy CS20 (rural sites for affordable homes)	<ul style="list-style-type: none"> • Encourages small-scale schemes for local affordable homes at selected small villages.
Site Allocations Policies LA1-LA6 (one policy for each local allocation)	<ul style="list-style-type: none"> • 40% affordable housing required on six key sites called local allocations.
The Council is preparing a new Local Plan, but we are continuing to work to the adopted affordable housing policies when considering planning applications for housing development.	
Recent local evidence shows there is still a great need for affordable housing in Dacorum.	

Adopted policies on affordable housing

3.1 The Council's adopted planning policies on affordable housing are contained in the following documents which, together with the saved policies of the Dacorum Borough Local Plan 1991-2011 (adopted April 2004), make up the Dacorum Local Plan:

- Core Strategy (adopted September 2013)
- Site Allocations Development Plan Document (adopted July 2017)

3.2 Web links to these documents are provided in Appendix 1 and the full wording of the policies on affordable housing can be found in Appendix 3.

(i) Core Strategy policies

3.3 Two policies in the Core Strategy deal specifically with affordable housing:

- Policy CS19 (affordable housing)
- Policy CS20 (rural sites for affordable homes)

3.4 In addition, Policy CS18 (mix of housing) states that new housing development will provide a choice of homes, including affordable housing in accordance with Policy CS19.

3.5 Policy CS19 is the Council’s main policy on affordable housing. Key points to note are that this policy:

- Sets the site size thresholds for requiring affordable housing (note: we are not using these thresholds, as explained in section 6).
- Requires 35% of new homes on qualifying sites to be affordable homes. Higher levels may be sought on sites specified in a development plan document. On rural housing sites, all new homes will normally be affordable.
- Requires that at least 75% of the affordable homes are for rent.
- States that judgements about the level, mix and tenure of affordable homes will have regard to points (a)-(d) in the policy.

3.6 Policy CS20 states that small-scale schemes for local affordable homes will be promoted in and adjoining selected small villages in the countryside (see Policies CS6 and CS7), and exceptionally elsewhere with the support of the local parish council. The selected small villages are listed below and Figure 1 overleaf shows their location:

Policy CS6 (selected small villages in the Green Belt)	Chipperfield Flamstead Potten End Wigginton
Policy CS7 (rural area)	Aldbury Long Marston Wilstone

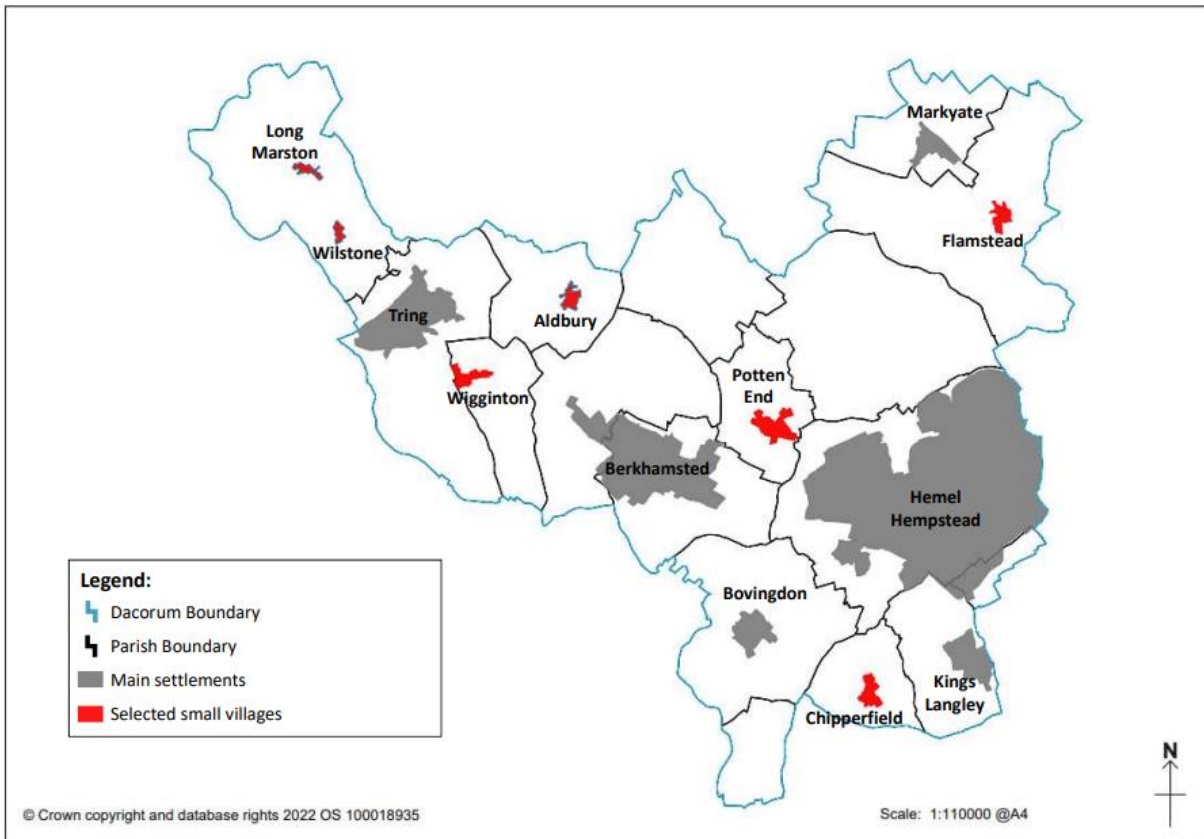
3.7 Core Strategy Policy CS6 states that certain types of development will be permitted in the selected small villages in the Green Belt, including affordable housing in accordance with Policy CS19. However, the Clarification Note explains that infilling schemes in the selected small villages are no longer limited to affordable housing. This is because Government guidance in the NPPF now classifies limited infilling in villages as appropriate development in the Green Belt (paragraph 154) and the site size thresholds for requiring affordable housing have changed (paragraph 65).

(ii) Site Allocations policies

3.8 Site Allocations Policies LA1-LA6 require 40% affordable housing on the following sites called local allocations:

- LA1: Marchmont Farm, Hemel Hempstead
- LA2: Old Town, Hemel Hempstead
- LA3: West Hemel Hempstead
- LA4: Hanburys, Shootersway, Berkhamsted
- LA5: Icknield Way, West of Tring
- LA6: Chesham Road and Molyneaux Avenue, Bovingdon

Figure 1: Selected villages with potential for rural sites for affordable homes



Which policies does this SPD supplement?

- 3.9 Given paragraphs 3.1-3.8 above, this SPD supplements the following adopted planning policies:
- Core Strategy Policy CS18 (mix of housing)
 - Core Strategy Policy CS19 (affordable housing)
 - Core Strategy Policy CS20 (rural sites for affordable homes)
 - Site Allocations Policies LA1-LA6, on the sites listed in paragraph 3.8
- 3.10 This SPD does not supplement the following policies for housing development, as these policies make no reference to affordable housing:
- Core Strategy Policy CS22 (new accommodation for Gypsies and Travellers)
 - Saved 2004 Local Plan Policy 84 (residential moorings)

New Local Plan

- 3.11 The Council is preparing a new single Local Plan for Dacorum. Once adopted, the new Plan will replace the existing documents referred to in paragraph 3.1.
- 3.12 In November 2020, the Council published the Local Plan Emerging Strategy for Growth (2020-2038) consultation document. It included proposed new policies on affordable housing. However, the new Local Plan is still at an early stage, so the Council is still working to the adopted affordable housing policies when considering planning applications for new housing.

3.13 A further consultation, on the Local Plan Revised Strategy for Growth (2024-2040), took place from October to December 2023. This consultation was only about proposed housing sites. It did not contain any draft planning policies.

3.14 The timetable for the new Local Plan is set out in the Local Development Scheme:

https://www.dacorum.gov.uk/docs/default-source/strategic-planning/local-development-schemea449724551156b7f9bc7ff00000246a4.pdf?sfvrsn=315c199e_2

Evidence base for planning policies on affordable housing

3.15 When the Core Strategy was prepared, evidence (in the South West Hertfordshire Strategic Housing Market Assessment 2010, the updated Housing Market Needs Assessment 2012 and earlier Council studies) showed a high affordable housing need in the Borough.

3.16 More recent evidence is provided by the South West Hertfordshire Local Housing Needs Assessment (September 2020). Chapter 5 in this document showed that there remains a very substantial need for affordable housing in Dacorum. The Local Housing Needs Assessment is currently being reviewed and its updated evidence and recommendations will inform the finalised version of this SPD. Other up-to-date evidence appears in some of the Council's own documents (see section 4).

3.17 The Council takes account of such evidence on the need for affordable housing. Justification for this approach comes from Policy CS19, which states that judgements about the level, mix and tenure of affordable homes will have regard to the Council's Housing Strategy, identified housing need and other relevant evidence.

4. OTHER RELEVANT COUNCIL DOCUMENTS

Key guidance

The Council has published some other documents relevant to affordable housing in Dacorum:

- Delivering for Dacorum: Corporate Plan 2020-2025
- Shaping the future of Dacorum: Our Growth and Infrastructure Strategy to 2050
- Homes for the Future: Housing Strategy 2019-2021 (new strategy due 2024)
- Housing Allocations Policy
- Tenancy Strategy

The Council is also preparing a 'Local Connection Policy for Other Affordable Housing'.

- 4.1 Apart from the planning policy documents referred to in section 3, the Council has published or is preparing some other corporate or housing documents relevant to affordable housing in Dacorum, as stated below. Web links to the published documents are given in Appendix 1.
- 4.2 **Delivering for Dacorum: Corporate Plan 2020-2025.** One of the Council's five key priorities is "Providing good quality affordable homes, in particular for those most in need". Proposed action on this priority includes:
- Building over 400 new Council homes and supporting Housing Associations where viable.
 - Supporting residents to access good quality and affordable homes in the private rented sector.
- 4.3 **Shaping the future of Dacorum – Our Growth and Infrastructure Strategy to 2050.** A key theme is "Building Dacorum's future with homes for everyone". The provision of good quality homes across the public and private sectors that meets the community's needs is supported. There is also a strong commitment to delivering affordable housing and new Council homes.
- 4.4 **Homes for the Future: Housing Strategy 2019-2021.** This strategy focuses on how the Council can influence the housing options for people across the Borough. It provides a positive, clear vision for ensuring quality, safe and affordable homes. The outcome based commitments include: "We work in partnership to meet the demand for quality, affordable housing in Dacorum".
- 4.5 A revised strategy (Housing Strategy 2024-2029) is expected to be approved in spring 2024. It has been informed by affordability modelling and the new Local Plan's evidence base, and is aligned with the Tenancy Strategy and other key documents.
- 4.6 **Housing Allocations Policy (September 2023).** This document sets out how the Council prioritises applications for social rented and affordable rented housing provided by the Council and housing associations, based on people's circumstances and level of housing need (see Appendix 5 for further information).
- 4.7 **Tenancy Strategy (May 2019).** This strategy outlines:
- Different types of tenancies and our approach to granting and reviewing them.

- The approach to social and affordable rents in Dacorum.
- Our approach to working with local housing associations to make sure that all the Borough's residents have access to affordable, safe housing.

4.8 A review of the Tenancy Strategy will commence shortly.

4.9 **Proposed Local Connection Policy for Other Affordable Housing.** The Council wishes to ensure that, where possible, affordable housing is prioritised for people with a local connection to the Borough. Therefore, we are preparing a 'Local Connection Policy for Other Affordable Housing'. The policy will apply to properties that are not allocated via the Housing Register. This includes affordable home ownership products such as First Homes and shared ownership, and rented tenures including affordable private rent (see Appendix 5).

4.10 The finalised version of this SPD will take account of the approved Local Connection Policy, if available in time.

5. NEIGHBOURHOOD PLANS IN DACORUM

Key guidance

In Dacorum, there are two 'made' (i.e. adopted) neighbourhood plans and three being prepared:

- **Grovehill, Hemel Hempstead.** The made Grovehill Future Neighbourhood Plan supports the provision of a mix of housing tenures and types.
- **Kings Langley.** The made neighbourhood plan contains guidance on meeting local housing needs.
- **Bovingdon.** The submitted neighbourhood plan includes an affordable housing policy.
- **Great Gaddesden and Berkhamsted.** Evidence gathering and engagement with the local communities to inform the neighbourhood plans has started.

Background information

- 5.1 Paragraph 20 in the National Planning Policy Framework states that strategic policies should make sufficient provision for housing development, including affordable housing. Paragraphs 28-30 indicate that neighbourhood plans can contain non-strategic policies, but should not undermine strategic policies. A footnote adds that "Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area."
- 5.2 More detailed guidance is provided by paragraphs 074-077 of the Planning Practice Guidance (PPG) on 'Neighbourhood planning'.
- 5.3 Paragraph 017 in the PPG on 'First Homes' states that neighbourhood plans can include policies on and identify sites for First Homes. Depending on the local plan's strategic policies, neighbourhood plans may be able to vary the types of affordable housing required, or allocate additional sites for affordable housing. Neighbourhood plans can also develop policies that use the flexibilities allowed by the PPG (section 13 below gives further guidance on First Homes).

Neighbourhood Plans in Dacorum

- 5.4 Dacorum has two 'made' (i.e. adopted) neighbourhood plans and three being prepared (see below). Web links to the published documents are included in Appendix 1. Further details on neighbourhood planning in the Borough can be found at:
- <http://www.dacorum.gov.uk/home/regeneration/neighbourhood-planning>
- 5.5 **Grovehill, Hemel Hempstead.** The Grovehill Future Neighbourhood Plan (2016-2031) was produced by 'Grovehill Future', which involved members of the local community, businesses and Ward Councillors. The Plan contains no policy references to affordable housing, although Policy 3 (housing) states that "Where new homes are provided, the provision of a mix of tenures and types will be supported."
- 5.6 **Kings Langley.** The neighbourhood plan, produced by Kings Langley Parish Council, was made in January 2023. The Plan area covers all of Kings Langley parish.

- 5.7 Policy KL2 (meeting local housing needs) mentions affordable housing. This policy states that, subject to certain provisos, housing development should provide a mix of housing sizes, types, tenures, and affordability that assists in meeting needs identified in the most recently available Kings Langley Local Housing Needs Assessment. Proposals which seek to deliver a higher proportion of one and two-bedroom homes (both open market and affordable) to that set out in the most recent Local Housing Needs Assessment for Dacorum will be particularly supported.
- 5.8 **Bovingdon.** A steering group of local residents reporting to Bovingdon Parish Council is preparing a neighbourhood plan covering the whole parish. The Submission Version of the Plan (July 2023) will be considered by an independent examiner. Policy BOV H1 (affordable housing) expresses a preference for schemes that provide genuinely affordable homes that meet the need for affordable housing in Bovingdon. First Homes will make up 25% of affordable homes, whilst the recommended mix for rented affordable homes is 60% social rent/40% affordable rent. Schemes should provide a mix of house sizes, including extra care schemes, that support housing need in Bovingdon.
- 5.9 **Great Gaddesden.** Great Gaddesden Parish Council formally submitted a Neighbourhood Area designation letter and map to the Borough Council in February 2023. The designation was confirmed in March 2023. The parish council has started gathering evidence and engaging with the local community to help guide the draft policies that will form the neighbourhood plan.
- 5.10 **Berkhamsted.** Berkhamsted Town Council formally submitted a Neighbourhood Area designation letter and map to the Council in August 2023. The designation was confirmed in November 2023. The town council has started gathering evidence and engaging with the local community to help guide the draft policies that will form the neighbourhood plan.

PART 2: QUALIFYING SITES AND OVERALL AFFORDABLE HOUSING PERCENTAGE



Social rented housing at Bingham Mews, Gaddesden Row

6. WHICH DEVELOPMENTS SHOULD PROVIDE AFFORDABLE HOUSING?

Key guidance

An element of affordable housing will be required on:

- Major developments throughout Dacorum (i.e. sites for 10 or more homes; or with a site area of 0.5 hectares or more).
- Sites for 6-9 homes in the Chilterns Area of Outstanding Natural Beauty.

The thresholds apply to the gross number of homes proposed, unless vacant building credit applies.

The affordable housing should be provided on-site, unless off-site provision or a financial contribution is justified in terms of section 26.

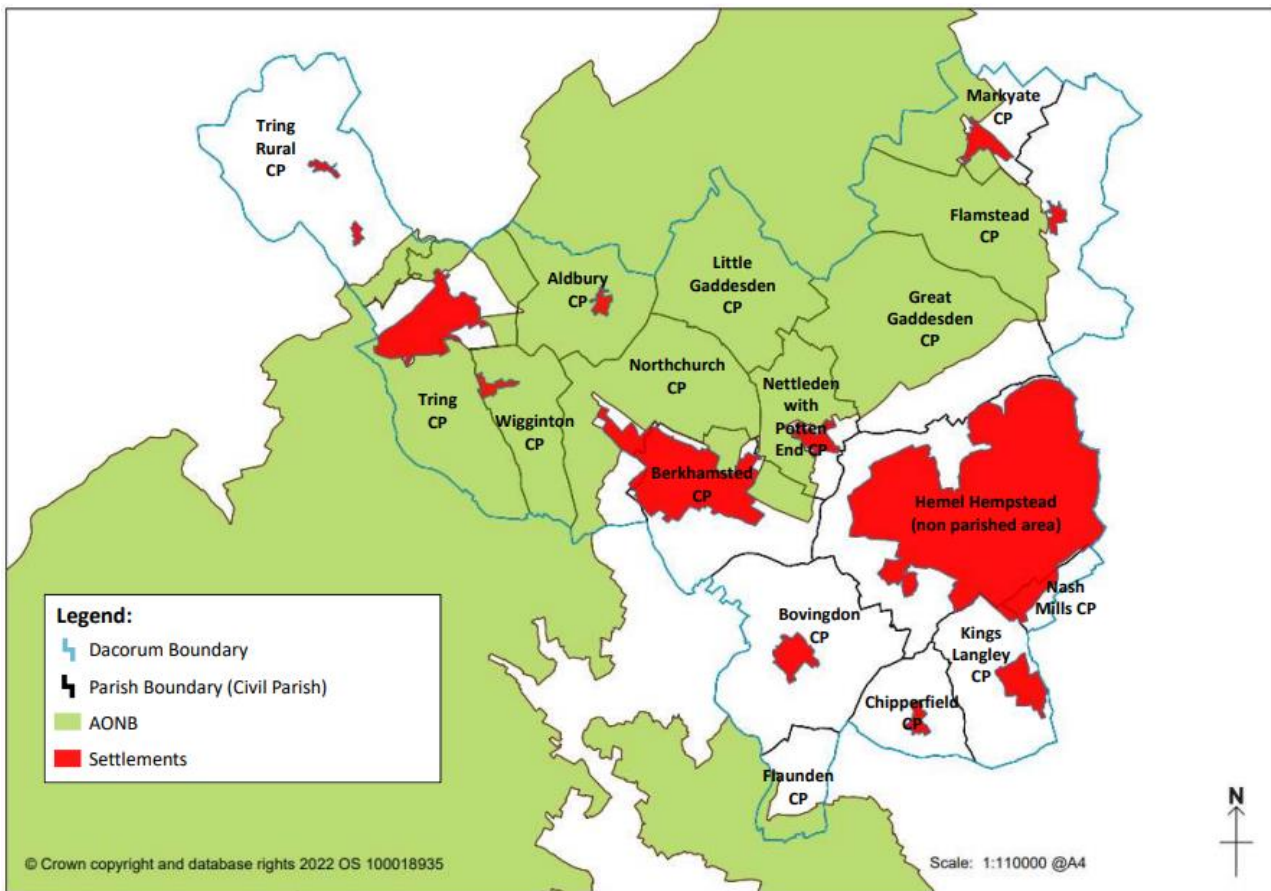
Background information

- 6.1 Dacorum Core Strategy Policy CS19 states that affordable homes will be provided:
- on sites of a minimum size 0.3ha or 10 dwellings (and larger) in Hemel Hempstead; and
 - elsewhere, on sites of a minimum size of 0.16ha or 5 dwellings (and larger).
- 6.2 However, the thresholds in Policy CS19 have been superseded by Government guidance in the National Planning Policy Framework (NPPF). Paragraph 65 in the NPPF states that:
- “Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer).”
- 6.3 The definitions of ‘major development’ in NPPF Annex 2 and the Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO) differ in certain respects (see Appendix 2 for the DMPO definition).
- 6.4 In NPPF paragraph 65, the term ‘designated rural areas’ includes Areas of Outstanding Natural Beauty (AONBs). Figure 2 below shows the extent of the Chilterns AONB in Dacorum, settlements within the AONB and parish council boundaries. The ‘rural area’ covers all the AONB in Dacorum, which includes all or part of the following parishes:

Aldbury	Great Gaddesden	Northchurch
Berkhamsted	Little Gaddesden	Tring
Flamstead	Markyate	Tring Rural
Flaunden	Nettleden with Potten End	Wigginton

- 6.5 The AONB is illustrated by the green shaded area in Figure 2.

Figure 2: Chilterns AONB in Dacorum



The Council's approach

- 6.6 The Council is using site size thresholds for requiring affordable housing based on the DMPO's definition of 'major development', rather than the NPPF definition or the thresholds in Core Strategy Policy CS19. This is because the DMPO is more recent than the Core Strategy and has greater legal status than the NPPF or Core Strategy. However, the NPPF provides the basis for our threshold in the AONB.
- 6.7 In view of the above, an element of affordable housing will be required on:
- Major developments throughout Dacorum (i.e. sites for 10 or more homes; or with a site area of 0.5 hectares or more and the number of homes is not known; or if the proposed floorspace is 1,000 sq. metres or more).
 - Sites for 6-9 homes in the Chilterns Area of Outstanding Natural Beauty.
- 6.8 The affordable housing should be provided on-site, unless off-site provision or a financial contribution is justified in terms of section 26.
- 6.9 It should also be noted that:
- The thresholds apply to the gross number of homes proposed, unless vacant building credit applies (see section 24).
 - The Council will resist any attempt to circumvent the site size thresholds for affordable housing, for example by phasing development, by sub-dividing a larger site, or by

proposing too few homes in terms of the guidance in section 11 of the NPPF on making effective use of land.

- An element of affordable housing will be required on housing developments in Use Class C3 (dwelling houses) and extra care housing schemes in Class C2 (residential institutions) – see section 16.
- No affordable housing is required on prior approval schemes for changes of use from Use Class E (commercial, business and service) to housing. However, prior approval schemes cannot be submitted in the areas listed below, because the Council has withdrawn permitted development rights by Article 4 directions. Major planning applications for housing in these areas should include affordable housing. However, Hemel Hempstead town centre is the only Article 4 area where housing is normally permitted.

Town centre	Hemel Hempstead (part)
General employment areas	Maylands Business Park (part), Hemel Hempstead
	Doolittle Meadows, Hemel Hempstead
	Park Lane, Hemel Hempstead
	Northbridge Road and River Park, Berkhamsted
	Icknield Way, Tring

7. OVERALL AFFORDABLE HOUSING PERCENTAGE

Key guidance

On sites where affordable housing is required, the proportion of affordable housing should be as shown below:

Type of site	Affordable Housing Percentage
1. All, except those covered by rows 2 and 3 below	35%
2. Local allocations	40%
3. Exception sites	100%, subject to section 17

Schemes proposing a higher percentage of affordable housing will be welcomed.

The amount of affordable housing will be reduced or waived, only where fully justified.

Background information

- 7.1 This section provides guidance on the overall percentage of affordable housing required on sites where affordable housing should be provided. Section 9 then deals with the percentage split between different types on affordable housing.
- 7.2 Government guidance does not set a national percentage requirement for affordable housing, except for exception sites where 100% affordable housing should normally be provided (see section 17). However, broad guidance on meeting housing needs, including affordable housing, can be found in the National Planning Policy Framework (paragraphs 60-66), the Planning Practice Guidance (PPG) on 'Housing and Economic Needs Assessment' (paragraphs 018-024) and the PPG on 'Viability (paragraph 001).
- 7.3 Exception sites can provide affordable housing outside settlement boundaries, as exceptions to normal planning policy. Section 17 provides further information and explains Government guidance on whether such schemes can contain an element of open market housing.
- 7.4 Policy CS19 (affordable housing) in the Dacorum Core Strategy states that:
- “35% of the new dwellings should be affordable homes. Higher levels may be sought on sites which are specified by the Council in a development plan document, provided development would be viable and need is evident. On rural housing sites 100% of all new homes will normally be affordable (Policy CS20).”
- 7.5 In the Dacorum Site Allocations Development Plan Document, Policies LA1-LA6 require 40% affordable housing on six key greenfield sites called local allocations. These are the only planned sites where the affordable housing percentage required is higher than 35% (due to the high viability associated with these greenfield sites).

The Council's approach

- 7.6 On sites where affordable housing is required, the proportion of affordable housing should be based on the Core Strategy and the Site Allocations document, as indicated in the table below:

Table 7.1: Affordable housing percentages

Type of site	Affordable housing percentage	Justification
1. All, except those covered by rows 2-4 below	35%	Core Strategy Policy CS19
2. Local allocations	40%	Core Strategy Policy CS19, Site Allocations Policies SA8 and LA1-LA6
3. Exception sites	100%, subject to section 17	Core Strategy Policy CS20

- 7.7 If applying the above percentages results in a requirement for a fraction of an affordable home, the requirement should be rounded to the nearest whole number. The affordable housing number should be rounded up if the calculation produces a requirement for half a home.
- 7.8 The need for affordable housing in Dacorum is very high, as shown by chapter 5 of the South West Hertfordshire Local Housing Needs Assessment. Indeed, the Council's current affordable housing percentages fall well short of meeting the full need for affordable housing in Dacorum. However, possible changes to the percentages are a matter for the new Local Plan, not this SPD.
- 7.9 The Council will welcome planning applications that propose a higher percentage of affordable housing than required in Table 7.1, including schemes from registered providers for 100% affordable housing. However, we acknowledge that viability and other factors may result in less affordable housing being provided on some sites than shown in Table 7.1.
- 7.10 Given the above, the Council would like to discuss the tenure mix and the overall affordable housing percentage with developers at an early stage in the development process, before a decision is made on whether a viability assessment is needed (see section 25).
- 7.11 In addition, the affordable housing requirement will be reduced or waived in the following circumstances:
- If vacant building credit applies (see section 24).
 - If the affordable housing requirement would make a development unviable. In such cases, the Council will apply the requirements flexibly, if fully justified to our satisfaction through a viability assessment (see section 25).
 - On prior approval schemes for change of use from offices to housing, where no affordable housing is required (see paragraph 6.10, bullet point 4 above).

PART 3: DIFFERENT AFFORDABLE HOUSING TENURES



Recently completed Council homes on Coniston Road, Kings Langley

8. DIFFERENT AFFORDABLE HOUSING TENURES - OVERVIEW

Key guidance

Government guidance splits affordable housing into:

- Affordable housing for rent
- Affordable home ownership

The guidance also distinguishes between different types of affordable housing for rent and different types of affordable home ownership.

The main types of affordable housing likely to be provided in Dacorum are as follows:

Affordable housing for rent	<ul style="list-style-type: none"> • Social rent • Affordable rent • Affordable private rent in build to rent schemes
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Affordable home ownership	<ul style="list-style-type: none"> • First Homes • Shared ownership • Rent to buy
Any proposals for other types of affordable home ownership will be treated on their merits.	

8.1 Government guidance (see section 2) splits affordable housing into:

- Affordable housing for rent
- Affordable home ownership

8.2 The guidance also distinguishes between different types of affordable housing for rent and different types of affordable home ownership.

8.3 Tables 8.1 and 8.2 show the main types of affordable housing that are likely to be provided in Dacorum. These tables also set out key points for each housing type, relating to Government guidance and the Council’s priorities:

Table 8.1: Different types of affordable housing for rent – key points

Type of housing	Key points
Affordable housing for rent - overall requirements	<ul style="list-style-type: none"> • Rents must accord with the Government’s policy for social rent or affordable rent, or be at least 20% below local market rents. • Landlords must be registered providers, unless the housing is part of a build to rent scheme. • The affordable housing must remain at an affordable price for future eligible households, or the subsidy must be recycled for alternative affordable housing provision.
Social rent	<ul style="list-style-type: none"> • The Council supports social rented housing, as it offers tenants a secure form of housing with lower rents than with affordable rented housing. • Rents vary depending on location and house type. Based on current evidence typical rents in Dacorum are equivalent to 39%-54% of lower quartile open market rents. • The Council has an active social rented new build programme and will encourage registered providers to build such housing, where possible.
Affordable rent	<ul style="list-style-type: none"> • Affordable rented housing is the main type of affordable housing for rent supplied by registered providers (mainly housing associations), apart from the Council. • The Council’s priority is that affordable rented housing is genuinely affordable, which requires rents at around 60% of median market values.

Type of housing	Key points
Affordable private rent in build to rent schemes	<ul style="list-style-type: none"> • The normal form of affordable housing in build to rent schemes is 'affordable private rent'. • Government guidance says 20% of homes on such schemes should generally be for affordable private rent, with rents at least 20% below local market rents. • As with other housing, the Council will require 35% affordable housing in build to rent schemes. • Affordable private rented homes should be genuinely affordable, so the approach for affordable rent (above) will also apply to affordable private rent.

Table 8.2: Different types of affordable home ownership – key points

Type of housing	Key points
Affordable home ownership – overall requirements	<ul style="list-style-type: none"> • The National Planning Policy Framework (NPPF) states that 10% of all homes should be for affordable home ownership, except with build to rent homes, specialist accommodation (such as for the elderly), self and custom build homes, and community-led development and rural exception sites.
First Homes	<ul style="list-style-type: none"> • The Planning Practice Guidance on First Homes states that: <ul style="list-style-type: none"> - First Homes are the Government's preferred discounted market tenure and should account for at least 25% of all affordable homes. - First Homes must be discounted by a minimum of 30% against the market value, with this discount (as a percentage of current market value) passed on at each subsequent title transfer. - After the discount has been applied, the first sale must be at a price no higher than £250,000 (outside London). - Purchasers of First Homes (including future sales) should comply with the national standard criteria, including that they are first time buyers and have a household income not exceeding £80,000 (outside London). • The £250,000 price cap means that most First Homes in Dacorum are likely to be flats.
Shared ownership	<ul style="list-style-type: none"> • Shared ownership housing enables households to purchase a share in a home with a mortgage, whilst paying rent on the rest. Purchasers can buy additional shares when they can afford to do so. • Total monthly costs (mortgage payments and rent) should be lower than renting or purchasing a similar home on the open market.

Type of housing	Key points
	<ul style="list-style-type: none"> Shared ownership will still be an important type of affordable home ownership in Dacorum (despite the introduction of First Homes), in order to secure an appropriate broad mix of types of homes for affordable home ownership. Most shared ownership homes should be houses.
Rent to buy	<ul style="list-style-type: none"> Rent to buy housing is available initially for affordable rent, but can later be converted to outright ownership or shared ownership. The Council will support proposals, if rent levels are genuinely affordable based on the maximum rent per month considered to be affordable in Dacorum. There must also be an agreed length of tenancy, followed by an option to buy or rent again over an agreed period.

8.4 Section 9 below provides guidance on the percentage split between different types on affordable housing. More detailed guidance on different types of affordable housing can be found in the following sections in this SPD:

Section	Subject
9	Percentage split between different types of affordable housing
10	Social rent
11	Affordable rent
12	Affordable private rent in build to rent schemes
13	First Homes
14	Shared ownership
15	Rent to buy
16	Affordable housing on schemes for older people
17	Exception sites

8.5 The definition of 'affordable housing' in the NPPF (see Appendix 2 to this SPD) also identifies some other types of affordable home ownership:

- **Starter homes** (now in effect superseded by First Homes).
- **Discounted market sales housing.** Sold at a discount of at least 20% below local market value. Eligibility is based on local incomes and house prices.
- **Other affordable routes to home ownership** (for those who cannot achieve home ownership through the market), including relevant equity loans and other low cost homes for sale (at least 20% below local market value).

8.6 The Council envisages that few schemes for such types of affordable home ownership will be submitted in Dacorum. However, the Council will treat any proposals that are forthcoming on their merits. With schemes for discounted market sales housing, much of the guidance in section 13 on First Homes is relevant. Such homes should have a price discount of at least 30% against market value, as with First Homes.

9. PERCENTAGE SPLIT BETWEEN DIFFERENT TYPES OF AFFORDABLE HOUSING

Key guidance

The Core Strategy states that a minimum of 75% of the affordable housing units provided should be for rent.

The Council must also take account of Government guidance introduced since the Core Strategy was adopted that:

- At least 10% of homes on sites where affordable housing is required should be available for affordable home ownership (subject to certain exemptions).
- At least 25% of the affordable homes should be First Homes. The remainder of the affordable housing tenures should reflect the proportions in the local plan policy.

This results in the following percentage split:

Affordable housing for rent	At least 56%
Affordable home ownership	No more than 44%

In order to secure an appropriate broad mix of types of homes for affordable home ownership, the Council favours the following percentage split between First Homes and other types of affordable home ownership, whilst recognising that it may not be possible to deliver shared ownership housing in flats:

Affordable home ownership (total)	No more than 44%
First Homes	25%
Other types of affordable home ownership, usually shared ownership and/or rent to buy	Up to 19%

Background information

9.1 Section 7 provides guidance on the overall percentage of affordable housing required on sites where affordable housing should be provided. Section 9 moves onto considering the percentage split between different types on affordable housing.

9.2 Dacorum Core Strategy Policy CS19 (affordable housing) states that:

“A minimum of 75% of the affordable housing units provided should be for rent.”

The policy adds that judgements about the level, mix and tenure of affordable homes will have regard to points (a)-(d) in the policy, which cover various matters including the Council’s Housing Strategy, identified housing need and the overall viability of the scheme.

9.3 The Council must also take account of Government guidance. In particular:

- National Planning Policy Framework (NPPF), paragraph 66: on sites where affordable housing is required, at least 10% of the total number of homes should be available for affordable home ownership (subject to certain exemptions – see paragraph 2.3 above).
- Planning Practice Guidance (PPG) on ‘First Homes’, paragraph 001: First Homes should account for at least 25% of all affordable housing units delivered by developers through planning obligations.

9.4 In addition, the ‘First Homes’ PPG states that:

- A policy compliant planning application should seek to capture the same amount of value as would be captured under the local authority’s up-to-date published policy (paragraph 014).
- Once a minimum of 25% of First Homes has been accounted for, social rent should be delivered in the same percentage as set out in the local plan. The remainder of the affordable housing tenures should be delivered in line with the proportions set out in the local plan policy (paragraph 015).

9.5 Policy CS19 does not mention social rent. It simply requires that at least 75% of the affordable housing should be for rent. This implies that the rest of the affordable housing should be for affordable home ownership.

The Council’s approach

9.6 Taking account of paragraphs 001 and 015 in the PPG and Policy CS19, this results in the following split between affordable housing for rent and affordable home ownership:

Affordable housing for rent	At least 56%
Affordable home ownership	No more than 44%

9.7 Table 9.1 shows how this split is calculated:

Table 9.1: Percentage split between affordable housing for rent and affordable home ownership

Type of affordable housing	% of total affordable housing
1. First Homes	25
2. Remainder of affordable housing	75
The other 75% of the affordable housing should reflect Policy CS19, which states that 75% of the affordable housing should be for rent.	
This gives the following split:	
Affordable housing for rent (75% of 75%)	56
Affordable home ownership (25% of 75%)	19
Total affordable home ownership (25% + 19%)	44

- 9.8 As stated in Table 8.2, the price cap of £250,000 for First Homes means that most First Homes in Dacorum will probably be flats. However, the South West Hertfordshire Local Housing Needs Assessment (LHNA) recommended a broad mix of house sizes for affordable home ownership, including 35% of homes having three or more bedrooms (see section 18).
- 9.9 Paragraph 14.11 states that shared ownership generally works best with 2 and 3-bedroom houses, but there can be difficulties in obtaining shared ownership housing in leasehold flats.
- 9.10 Therefore, in order to secure an appropriate broad mix of types of homes for affordable home ownership, 25% (but no more) of the affordable housing should be First Homes (unless the scheme is exempt from providing First Homes – see paragraphs 13.5 and 13.6). The rest of the affordable home ownership properties should be shared ownership housing and/or rent to buy, unless otherwise agreed with the Council. For example, we recognise that it may not be possible to deliver shared ownership housing in flats:

Table 9.2: Preferred percentage split between different types of affordable home ownership

Housing type	Proportion of affordable housing
Affordable home ownership (total)	No more than 44%
First Homes	25% (but no more)
Other types of affordable home ownership, usually shared ownership and/or rent to buy	Up to 19%

- 9.11 There may be instances where the Council would consider an alternative tenure split. Examples could include schemes proposing:
- **Few or no flats:** such schemes will probably deliver few, if any, First Homes due to the £250,000 price cap (see paragraphs 13.8 and 14.11). If so, the affordable housing tenure split will be as per Policy CS19, subject to the NPPF's requirement for 10% of the total homes to be available for affordable home ownership (see paragraphs 9.2 and 9.3 above).
 - **A higher than normal affordable housing percentage** (i.e. a higher percentage of affordable housing than required by the Council's adopted planning policies - see Table 7.1). These schemes and the tenure mix proposed will be considered on their merits.

10. SOCIAL RENTED HOUSING



Recently completed Council Homes at School End Crescent and Old School House, Hemel Hempstead

Key guidance

Social rented homes are generally owned by local authorities or registered providers. Rents are usually lower than for affordable rented homes.

The Core Strategy states that a minimum of 75% of the affordable housing should be for rent, but gives no guidance on the type of rented affordable housing to be provided.

The Council supports social rented housing, as can be seen by its own new build council house programme. We will encourage registered providers to build social rented housing where possible.

Background information

- 10.1 The definition of 'affordable housing for rent' in the National Planning Policy Framework (NPPF) requires social rented housing to meet certain conditions (see Appendix 2). The rent is set in accordance with the Government's rent policy for Social Rent and landlords must be registered providers. Also, the affordable housing must remain affordable for future eligible households, or the subsidy recycled for alternative affordable housing provision.
- 10.2 Social rented homes are generally owned by local authorities or registered providers of affordable housing. Not all providers have business models that include social rented housing.

- 10.3 Social rent is set in accordance with the Government's target rents guidelines through the national rent regime. Social rents are explained in Section 80 of the Housing and Regeneration Act (2008) and are usually lower than for affordable rented homes. New build social rented homes must be made available at formula rents. Rents can be 5% higher than formula rents for general needs housing and 10% higher for sheltered schemes.
- 10.4 Dacorum Core Strategy Policy CS19 (affordable housing) states that a minimum of 75% of the affordable housing should be for rent, but gives no guidance on what type of rented affordable housing should be provided (see paragraph 9.5).

The Council's approach

- 10.5 The Council supports social rented housing, as it offers tenants a secure form of housing with lower rents than with affordable rented housing. Although the rent will vary depending on location and house type, based on current evidence typical rents are equivalent to 39%-54% of lower quartile open market rents (see Figure 2 in Appendix 4). The rents are as low as 21% of market rents for some existing social rented properties in Dacorum.
- 10.6 Social rented housing is currently being built in the Borough by the Council, through its own new build housing programme.
- 10.7 The Council will encourage registered providers to build social rented housing where possible. This would normally require grant funding (see Appendix 5). It is uncertain how much, if any, social rented housing will be built by registered providers. Therefore, this SPD does not contain a proposed split between social rented housing and affordable rented housing.
- 10.8 Social rented housing will be allocated to people on the Council's Housing Register and will be based on our Housing Allocations Policy (see Appendix 5).

11. AFFORDABLE RENTED HOUSING



Affordable rented housing at Charter Court, Midland Road, Hemel Hempstead (Hightown Housing Association)

Key guidance

Government guidance requires affordable rented housing to be at least 20% cheaper than local market rates and for landlords to be registered providers. Rents can be considerably higher than for social rented housing.

The Core Strategy states that a minimum of 75% of the affordable housing should be for rent, but gives no guidance on what type of rented affordable housing should be provided.

The Council's priority is to ensure that affordable rented housing is genuinely affordable. Therefore, our starting point will be that rents for affordable rented housing should be 60% of median market values (including service charges), subject to viability. Such housing is called 'Dacorum Affordable Rent'.

Rents should remain at around 60% of median market rents during the lifetime of this SPD, unless convincing evidence is brought forward to justify higher rents.

Background information

- 11.1 The definition of 'affordable housing for rent' in the National Planning Policy Framework (NPPF) requires affordable rented housing to meet certain conditions (see Appendix 2). Rents must be at least 20% cheaper than local market rates and landlords must be registered providers. Also,

the affordable housing must remain affordable for future eligible households, or the subsidy recycled for alternative affordable housing provision. Rents can be considerably higher than for social rented housing.

- 11.2 Dacorum Core Strategy Policy CS19 (affordable housing) states that a minimum of 75% of the affordable housing should be for rent. However, the policy gives no guidance on what type of rented affordable housing should be provided (see paragraph 9.5 above), or on the cost of affordable housing.
- 11.3 Paragraphs 5.107-5.120 in the South West Hertfordshire Local Housing Needs Assessment (LHNA) show that rents for affordable rented homes at 80% of lower quartile open market values are affordable to only 13% of households in Dacorum who need such housing. However, many households on benefits can afford these rents, if the full rent is covered by Housing Benefit.
- 11.4 Paragraphs 5.166-5.179 in the LHNA provide advice on the cost of affordable housing to rent, excluding social rent which is set nationally. The LHNA states that the Local Housing Allowance limits for the six Broad Rental Market Areas covering South West Hertfordshire should be a key consideration when setting rent levels for affordable rented properties. However, the LHNA adds that this would potentially require low income working families to claim housing benefit to be able to afford their rent. The analysis also considers 'Living Rents', but such rents would affect the viability of affordable housing delivery. The LHNA concludes that local authorities should balance the quantum of affordable housing to be delivered and the rent levels to be charged.
- 11.5 Paragraphs 5.195-5.199 in the LHNA consider the cost of housing versus incomes, with local authority level analysis provided in Appendix B. A key point is that people on 35% of lower quartile wages in Dacorum can afford only 1-bedroom affordable rented housing (see Figure 27 in Appendix B). However, the Council does not regard this as generally appropriate in Dacorum as it would not deliver genuinely affordable housing. This is particularly so in the South West Herts Broad Rental Market Area (which covers most of the Borough), where the Local Housing Allowance is over 80% of open market value.
- 11.6 Justin Gardner Consulting produced a paper in May 2022 on 'Affordable rents in Dacorum' (see Appendix 4). It advises that providing affordable rents at 60% of market values (including service charges) would be a sensible start point for affordable rented housing, subject to the viability of delivering housing at these costs.

The Council's approach

- 11.7 The Council's priority is to ensure that affordable housing for rent is genuinely affordable to those in housing need, so we will follow the approach recommended in paragraph 11.6. Therefore, our starting point will be that rents for affordable rented housing should be 60% of market values (including service charges), subject to the viability of delivering housing at these costs. Such housing is called 'Dacorum Affordable Rent'.
- 11.8 The Council may develop a housing policy to explain our approach where full compliance with the Council's planning policies and this SPD, including providing Dacorum Affordable Rent housing, would make schemes unviable. If so, the key points will be included in the finalised version of the SPD.
- 11.9 Rents for Dacorum Affordable Rent homes should continue to be secured at around 60% of median market rents as recommended in paragraph 11.6 during the lifetime of this SPD, unless convincing evidence to the Council's satisfaction is brought forward to justify higher affordable rents. In such circumstances, affordable rents should be capped at no more than 80% of median market rents and be within Local Housing Allowance rates.

11.10 In operating this approach, we will take account of rental prices for the private rental market from the Valuation Office Agency and Office for National Statistics:

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/privaterentalmarketsummarystatisticsinengland>

11.11 Section 106 agreements attached to planning permissions for housing development should require rented affordable homes to remain at an affordable price for future eligible households, or indicate how the subsidy should be recycled for alternative affordable housing provision (see Table 27.1).

11.12 Affordable rented housing will be allocated to people on the Council's Housing Register and will be based on our Housing Allocations Policy (see Appendix 5).

12. AFFORDABLE PRIVATE RENT IN BUILD TO RENT SCHEMES

Key guidance

Build to rent housing is purpose built housing that is typically 100% rented out. The normal form of affordable housing in such schemes is 'affordable private rent'.

Government guidance states that on build to rent schemes, 20% of homes should generally be for affordable private rent. Also, rents on these homes should be at least 20% below local market rents.

As with other housing, the Council will expect the proportion of affordable homes in build to rent schemes to be 35% (40% on local allocations).

The approach in section 11 on Dacorum Affordable Rent can apply equally to affordable private rent.

When considering planning applications, we will bear in mind that Government guidance encourages flexibility.

Background information

12.1 The National Planning Policy Framework (NPPF) defines 'build to rent' as follows:

"Purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control."

12.2 The NPPF's definition of 'affordable housing for rent' (see Appendix 2) states that, for build to rent schemes, affordable housing for rent is expected to be the normal form of affordable housing provision (and is called 'affordable private rent'). The landlord need not be a registered provider. The NPPF definition also requires that affordable private rented housing must meet the following conditions:

- the rent is at least 20% below local market rents (including service charges where applicable); and
- it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision.

12.3 NPPF paragraph 66 states that affordable home ownership is not required in build to rent schemes.

12.4 Further guidance on affordable private rented homes is contained in the Planning Practice Guidance (PPG) on 'Build to rent'. In particular:

- 20% is generally a suitable level of affordable private rent homes to be provided (and maintained in perpetuity) in build to rent schemes. Local authorities can set a different

proportion, if justified by evidence in their local housing need assessment and included in a local plan policy (paragraph 002).

- Build to rent developers should assess the market rent using the definition of the International Valuations Standard Committee as adopted by the Royal Institute of Chartered Surveyors (paragraph 003).
- Developers will usually meet their affordable housing requirement by providing affordable private rent homes. However, a developer and a local authority can agree to meet this requirement by other routes, such as a commuted payment and/or other forms of affordable housing as defined in the NPPF (paragraph 004).
- Both the proportion of affordable private rent units, and discount offered on them can be varied across a development, over time. Similarly, it should be possible to explore a trade off between the proportion of discounted units and the discount(s) offered on them, with the proviso being that these should accord with the headline affordable housing contribution agreed through the planning permission (paragraph 005).
- Affordable private rent homes should be under common management control, along with the market rent build to rent homes. They should be distributed throughout the development and physically indistinguishable from the market rent homes in terms of quality and size. The section 106 agreement should set out the process for managing affordable private rent units and require an annual statement on these homes (paragraph 006).
- The section 106 agreement should include a mechanism to recoup ('clawback') the value of the affordable housing provision that is withdrawn if affordable private rent homes are converted to another tenure. The sale of homes from a build to rent development should not result in the loss of affordable housing without alternative provision being made (paragraphs 007 and 008).
- Eligibility for occupying affordable private rented homes should be agreed between the local authority and the scheme operator. The eligibility criteria for the affordable private rent homes should be set out in the section 106 agreement. In the absence of a local intermediate housing list, the criteria should reflect the authority's housing allocation policies and potential candidates from the Statutory Housing list. Ideally, peoples' local residence or employment connections should also be included (paragraph 009).

12.5 Paragraph 5.126 in the South West Hertfordshire Local Housing Needs Assessment advised that, given the scale of identified affordable housing need, the affordable housing contribution from build to rent schemes should be maximised to the level which viability permits.

The Council's approach

- 12.6 To date, just one build to rent scheme has been built in Dacorum (at Bryanston Court, in Hemel Hempstead town centre). It appears that such developments are usually on large, high density, urban sites.
- 12.7 The Council will judge any such proposals on their merits, taking account of the guidance in the PPG. In view of paragraph 004 in the PPG, we will be flexible over how the affordable housing requirement should be met on build to rent schemes.
- 12.8 Planning applications should be accompanied by a viability assessment (see section 25). Subject to the results of the assessment, the proportion of homes for affordable private rent

should normally be 35% (40% on local allocations – see paragraph 7.5). This approach is justified as the guidance on the affordable housing percentages in the Council’s adopted planning policies applies to all types of affordable housing (see section 7). However, we will be mindful of the flexibility in paragraph 005 of the PPG.

- 12.9 The Council wishes to ensure that affordable private rented homes are genuinely affordable, subject to paragraph 005 in the PPG. The approach outlined in paragraphs 11.7-11.9 on ‘Dacorum Affordable Rent’ can apply equally to affordable private rent.
- 12.10 The Council is preparing a housing policy document called ‘Local Connection Policy for Other Affordable Housing’ (see Appendix 5). Once this document is approved, eligibility for affordable private rented housing will be assessed against the criteria in the policy.
- 12.11 A bespoke Section 106 agreement will be needed for build to rent housing. The agreement should require the affordable private rented homes to remain at a genuinely affordable price for future eligible households, or indicate how the subsidy should be recycled for alternative affordable housing provision (see Table 27.1). It should also reflect the references to Section 106 agreements in the ‘Build to rent’ PPG, including the points made in paragraph 12.4.

13. FIRST HOMES

Key guidance

First Homes are discounted open market sale units, which will be the main type of affordable home ownership. Key requirements in Government guidance are that:

- First Homes must be discounted by a minimum of 30% against the market value.
- They are sold to first time buyers with a household income no more than £80,000.
- After the discount has been applied, the first sale price must not exceed £250,000.
- First Homes should account for at least 25% of affordable homes, except in certain circumstances.

These requirements mean that most First Homes in Dacorum are likely to be flats. Therefore, in order to secure a broad mix of house sizes for affordable home ownership, 25% (and no more) of the affordable homes should be First Homes (unless the scheme is exempt from providing First Homes).

Eligibility for First Homes will be assessed against the Council's Local Connection Policy, once it is approved.

Background information

- 13.1 In May 2021, the Government issued the Planning Practice Guidance (PPG) on First Homes. This was accompanied by a Written Ministerial Statement on First Homes, which was very similar to the PPG. In February 2024, a Local Authority Guidance Note on 'First Homes' was published by the Government to give more detailed guidance on First Homes. This guide is not a statement of national planning policy, but is designed to further support local authorities in interpreting and implementing the First Homes policy.
- 13.2 Paragraph 001 in the 'PPG explains what First Homes are (see Appendix 2). Key points are that First Homes are discounted market sale units which:
- a) must be discounted by a minimum of 30% against the market value;
 - b) are sold to a person or persons meeting the First Homes eligibility criteria (see below);
 - c) on their first sale, will have a restriction registered on the title to ensure this discount (as a percentage of current market value) and certain other restrictions are passed on at each subsequent title transfer; and
 - d) after the discount has been applied, the first sale must be at a price no higher than £250,000 (outside London).
- 13.3 Other important points to note from the First Homes PPG include that:
- First Homes are the government's preferred discounted market tenure and should account for at least 25% of all affordable housing units (paragraph 001) – but see paragraphs 13.5 and 13.6 below.
 - First Homes should be subject to a section 106 agreement restricting the use and sale of the property, and a legal restriction on the title of the property which applies the restrictions at each future sale (paragraph 002).

- Local authorities can require a higher minimum discount of either 40% or 50%, if they can demonstrate a need in their plan-making process (paragraph 004).
- Local authorities can require a lower price cap than £250,000, if they can demonstrate a need in their plan-making process (paragraph 005).
- Developers should obtain a valuation from a registered valuer acting in an independent capacity. When the home is resold in future, the seller should secure a valuation in the same way (paragraph 006).
- Purchasers of First Homes (including future sales) should comply with the national standard criteria, including that they are first time buyers and have a household income not exceeding £80,000 (outside London) (paragraph 007).
- Local authorities and neighbourhood planning groups can apply local eligibility criteria (paragraph 008).
- A policy compliant planning application including First Homes should seek to capture the same amount of value as under the local authority's up-to-date published policy (paragraph 014).
- Once a minimum of 25% of First Homes has been accounted for, social rent should be delivered in the same percentage as set out in the local plan. The remainder of the affordable housing tenures should be delivered in line with the proportions set out in the local plan policy (paragraph 015).
- If a planning application with 25% of the affordable homes as First Homes falls short of the NPPF's 10% affordable home ownership expectation, additional affordable home ownership homes may be provided to meet this expectation (paragraph 023).
- First Homes exception sites may come forward outside of local plan allocations and deliver primarily First Homes, but not in the Green Belt or Areas of Outstanding Natural Beauty (paragraphs 024-028).

13.4 In addition, the PPG contains more detailed advice on First Homes regarding planning applications and Section 106 agreements, as shown below (see section 27):

Subject	Paragraph in PPG
Legal mechanism to ensure the discount is passed to future purchasers	003
Establishing open market value	006
Mortgagee exclusion clause	010
Selling without the First Homes restrictions	011
Securing developer contributions for First Homes	012
Community Infrastructure Levy on First Homes development	016

13.5 Also relevant is the requirement in paragraph 66 of the National Planning Policy Framework (NPPF) that at least 10% of the total number of homes should be available for affordable home ownership, except in certain circumstances (see paragraph 2.3 above).

The Council's approach

13.6 The Council's approach towards First Homes is based on the national requirements in the NPPF and PPG and local circumstances, including the following:

- 25% (and no more) of the affordable homes should be First Homes (for the reasons stated in paragraph 13.8), subject to bullet point 2 below.
- Schemes that are exempt from the 10% affordable home ownership requirement in the NPPF (see paragraph 2.3 above) will also be exempt from the requirement in the First Homes PPG that at least 25% of the affordable housing units should be First Homes. This reflects the fact that First Homes are a type of affordable home ownership).
- First Homes must be discounted by a minimum of 30% against the market value in perpetuity.
- The first sale price must be no higher than £250,000 after applying the discount.

13.7 In the further work on the new Local Plan, the Council will consider whether a higher minimum discount and a lower price cap are justified.

13.8 Any property with an open market value of over around £357,000 will have to be discounted by more than 30% to reduce the price to the maximum for First Homes of £250,000. Discounts above 30% will have a greater impact on the viability of sites. This together with high local house prices, means that most First Homes in Dacorum will probably be one or two bedroom flats. Therefore, in order to secure a broad mix of house sizes for affordable home ownership, 25% (and no more) of the affordable homes should be First Homes (see paragraphs 9.7-9.10) (unless the scheme is exempt from providing First Homes).

13.9 The Council is preparing a housing policy document called 'Local Connection Policy for Other Affordable Housing' (see Appendix 5). Once this document is approved, eligibility for First Homes will be assessed against the local connection criteria in the policy.

13.10 In accordance with paragraph 008 in the 'First Homes' PPG, the local connection criteria will in relation to First Homes:

- Apply for only three months from when a home is first marketed. If a suitable buyer has not reserved a home by then, the eligibility criteria will revert to the national criteria (paragraph 007 in the PPG).
- Not apply to active members of the armed forces, divorced/separated spouses or civil partners of current members of the forces, spouses or civil partners of a deceased member of the forces (if their death was wholly or partly caused by their service) and veterans within five years of leaving the forces.

13.11 Outside the towns and large villages excluded from the Green Belt (see Core Strategy page 41), First Homes will not be permitted unless the proposal is for a First Homes exception site in Long Marston or Wilstone (see section 18).

13.12 Additional guidance on the Council's approach towards First Homes can be found elsewhere in this SPD:

Section	Subject
9	Percentage split between different types of affordable housing
17	Exception sites
23	Submitting a planning application
27	Section 106 agreements
28	Funding, registered providers and CIL relief

14. SHARED OWNERSHIP



Shared ownership housing at Chalklands, Zoffany Place, Hemel Hempstead (Hightown Housing Association)

Key guidance

Shared ownership housing enables households to purchase a share in a home with a mortgage, whilst paying rent on the rest. Purchasers can buy additional shares when they can afford to do so.

Shared ownership will still be an important type of affordable home ownership in Dacorum, despite the introduction of First Homes. It should form up to 19% of the affordable housing.

Most shared ownership homes should be houses with 2 or 3-bedrooms.

The total monthly costs (mortgage payments and rent) should be lower than renting or purchasing a similar home on the open market.

Applications to live in shared ownership housing will be assessed against the Council's Local Connection Policy, once it is approved.

Background information

- 14.1 The NPPF's definition of affordable housing (see Appendix 2) describes shared ownership housing as an affordable route to home ownership for those who could not achieve home ownership through the market. Such housing enables households to purchase a share in a home with a mortgage, whilst paying rent on the remaining unowned share. It is a common form of affordable home ownership, widely supported by the main mortgage lenders.

- 14.2 Shared ownership housing can be provided by registered providers (see paragraphs 28.5-28.9) or the Council. An initial share (usually between 25% and 75%) is bought and rent is paid to the provider on the remaining unowned share. Shared ownership homes are sold on the basis of a Homes England standard model lease. Purchasers can buy additional shares of equity in the property when they can afford to do so, up to 100% ownership. This is known as staircasing.
- 14.3 The following rural parishes in Dacorum are 'Designated Protected Areas' (see Figure 2 in section 6):

Table 14.1: Designated protected areas

Designated Protected Areas (parishes)		
Aldbury	Great Gaddesden	Nettleden with Potten End
Chipperfield	Little Gaddesden	Tring Rural
Flamstead	Markyate	

- 14.4 Within Designated Protected Areas, regulations ensure that rural affordable housing (specifically grant funded shared ownership properties) remains in the ownership of local people:

<https://www.gov.uk/government/publications/designated-protected-areas>

- 14.5 Where that applies, registered providers must offer grant-funded shared ownership properties with a lease that either:

- Restricts staircasing to 80%; or
- Where the leaseholder is permitted to acquire more than 80% (i.e. up to full ownership), obliges the landlord specified in the lease (or a designated alternative landlord) to repurchase the property when the leaseholder wishes to sell.

- 14.6 The Government's 'New Model for Shared Ownership: technical consultation' (April 2021), proposed changes to the standard model for shared ownership housing. The changes included reducing the minimum initial share from 25% to 10% and introducing a new gradual staircasing offer (1% per year). In May 2021, the ministerial statement on First Homes emphasised the Government's continuing support for shared ownership housing. It also confirmed that shared ownership homes delivered through Section 106 agreements should be based on the standard model in the technical consultation document (see section 27 for further guidance and Appendix 1 for web links to documents).

- 14.7 Chapter 1 in Homes England's Capital Funding Guide (CFG) contains the rules and procedures for all providers delivering shared ownership housing through grant funding from Homes England (see Appendix 1). Key points to note are that:

- The rent level is set by the provider. The annual rent at initial sale must be no more than 3% of the value of the home in the ownership of the provider (rents of no more than 2.75% on the unsold equity are encouraged).
- Providers must obtain valuations from a Royal Institution of Chartered Surveyors (RICS) qualified and registered valuer at the point of initial sale of a shared ownership home.
- Initial sales must be based on the full market value of the property.
- The price paid for further shares for all staircasing transaction other than the 1% per year option is also based on the full open market value of the property.

- Shared Ownership home applicants must have a gross household income of less than £80,000 and be otherwise unable to purchase a suitable property for their housing needs on the open market.
- Applicants must also meet the eligibility requirements of the provider of the shared ownership housing.

14.8 Paragraph 5.131 in the South West Hertfordshire Local Housing Needs Assessment (LHNA) found that the most appropriate affordable home ownership types in the area were shared ownership and discounted market sale, as they reach the widest and lowest-earning population base.

14.9 Paragraphs 5.192-5.194 in the LHNA consider the cost of shared ownership housing. Based on a number of assumptions, it is concluded that an equity share of not more than about 22% would potentially be affordable for most sizes of homes in Dacorum. This figure is based on an estimate of open market value (for the whole of Dacorum) and a set of assumptions. The LHNA advises that similar calculations would need to be carried out for any specific scheme to test affordability.

The Council's approach

14.10 In the past, shared ownership housing has been the main form of affordable home ownership in Dacorum. This will no longer be the case due to the introduction of First Homes, but shared ownership housing will still be important.

14.11 Shared ownership generally works best with 2 and 3-bedroom houses, in terms of affordability and demand. There may be more limited demand for shared ownership leasehold flats. Therefore, and to help secure an appropriate broad mix of housing (see section 18), the Council would like a substantial proportion of shared ownership properties to be 2 and 3-bedroom houses. This preference is reinforced by the expectation that few First Homes in Dacorum will be houses (see paragraph 13.8).

14.12 Given the above and also paragraphs 9.7-9.10, shared ownership housing should form up to 19% of the affordable housing.

14.13 To ensure affordability, the Council will 'sense check' the total monthly costs (mortgage payments and rent). These costs need to be lower than renting or purchasing a similar home on the open market, in order to meet the NPPF's definition of affordable housing. Registered providers will be required to demonstrate the affordability of their schemes. Our preference is that providers should follow Homes England's rules (see paragraph 14.7).

14.14 Additional guidance on the Council's approach towards shared ownership can be found in section 27 (Section 106 agreements).

14.15 The Council is preparing a housing policy document called 'Local Connection Policy for Other Affordable Housing' (see Appendix 5). Once this document is approved, people wishing to live in shared ownership housing will be assessed against the local connection criteria in the policy.

15. RENT TO BUY



Rent to buy housing at Two Waters Road, Hemel Hempstead

Key guidance

Rent to buy housing is available initially for affordable rent, but can later be converted to outright ownership or shared ownership. There must also be an agreed length of tenancy, followed by an option to buy or rent again over an agreed period.

Eligibility for rent to buy housing will be assessed against the Council's Local Connection Policy, once it is approved.

Background information

- 15.1 The National Planning Policy Framework's definition of affordable housing (see Appendix 2) describes rent to buy housing as an affordable route to home ownership for those who could not achieve home ownership through the market. Such housing includes a period of intermediate rent.
- 15.2 There are several types of rent to buy products. All effectively provide housing initially on an affordable rented basis, which may be converted to outright ownership or shared ownership over time.
- 15.3 Chapter 3 in Homes England's Capital Funding Guide (CFG) contains the rules and procedures for all providers delivering rent to buy housing through grant funding from Homes England:

- 15.4 The CFG states, amongst other things, that:
- Organisations must be registered providers with the Regulator of Social Housing and/or manage rent to buy homes.
 - The homes will be let at an intermediate rent for a minimum of five years.
 - Intermediate rents must not exceed 80% of market rents (inclusive of service charges).
 - The homes are not subject to local authority nominations, although landlords may choose to work with the local authority to identify potential tenants.
 - The homes will be sold at market value.
- 15.5 The South West Hertfordshire Local Housing Needs Assessment (LHNA) states in paragraph 5.162 that initial rents for rent to buy housing should be set at an “affordable” level, which includes repair and maintenance responsibilities. There should also be an agreed length of the tenancy, before an option to buy or continue to rent again over an agreed period.

The Council’s approach

- 15.6 Only one rent to buy scheme has been built in Dacorum, at Two Waters Road, Hemel Hempstead. The Council will support further proposals if they reflect Government guidance and the advice in the LHNA.
- 15.7 Rent to buy homes should usually be provided through an approved registered provider. Our preference is that providers should follow Homes England’s rules (see paragraph 14.7). The Council is aware that there are other rent to buy models that are not governed by Homes England’s rules.
- 15.8 Rent to buy homes will be secured by a planning obligation, to ensure they constitute affordable housing and provide nomination and sales rights to the Council (see section 27, particularly Table 27.2).
- 15.9 The Council is preparing a housing policy document called ‘Local Connection Policy for Other Affordable Housing’ (see Appendix 5). Once this document is approved, eligibility for rent to buy housing will be assessed against the criteria in the policy.

16. AFFORDABLE HOUSING ON SCHEMES FOR OLDER PEOPLE

Key guidance

Government guidance states that local authorities should plan to meet the full range of housing needs for older people.

Local evidence shows a substantial need for additional affordable extra care housing and care home bedspaces. There is a surplus of affordable retirement housing, but no vacancy problem in many of the Council's sheltered housing schemes.

The Council's approach towards affordable housing on different types of housing for older people is summarised below:

Type of housing	Affordable housing requirements on open market developments
Age-restricted general market housing	On-site provision of affordable housing, as per Core Strategy Policy CS19.
Retirement living or sheltered housing	Affordable housing required through on-site provision, off-site provision or financial contribution.
Extra care housing or housing-with-care	Affordable housing required through on-site provision, off-site provision or financial contribution.
Residential care homes and nursing homes	Affordable bedspaces not required.

Affordable housing for older people will be allocated on the basis of the Council's Housing Allocations Policy (rented homes) and the Local Connection Policy, once approved (homes for sale)..

Background information

- 16.1 Dacorum's Core Strategy Policy CS19 (affordable housing) sets out the Council's overall requirements for affordable housing. The policy refers to 'dwellings', so applies to all housing schemes for older people except care homes.
- 16.2 Annex 2 in the National Planning Policy Framework (NPPF) defines 'older people' as follows:
- "People over or approaching retirement age, including the active, newly-retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs."
- 16.3 NPPF paragraph 63 highlights the need to assess and plan for the housing needs of different groups in the community, including those who require affordable housing and older people.

16.4 More detailed guidance is provided in the Planning Practice Guidance (PPG) on 'Housing for older and disabled people'. In particular:

- Paragraph 010 states that the different types of specialist housing designed to meet the diverse needs of older people can include:
 - Age-restricted general market housing
 - Retirement living or sheltered housing
 - Extra care housing or housing-with-care
 - Residential care homes and nursing homes
- When determining whether a housing development for older people falls within Use Class C2 or C3, the level of care and scale of communal facilities provided should be considered (paragraph 014).
- The only mention of affordable housing is about viability (paragraph 015).

16.5 A number of reports confirm the high and growing need for housing for older people. For example, 'Housing for Older People' (House of Commons Communities and Local Government Committee, February 2018):

<https://publications.parliament.uk/pa/cm201719/cmselect/cmcomloc/370/370.pdf>

16.6 The South West Hertfordshire Local Housing Needs Assessment (LHNA) advises (paragraphs 7.24-7.32) that:

- Providing affordable housing on schemes for older people, particularly extra care, is less viable than in general housing. This is because fit-out is more expensive and there are ongoing costs. As a result, affordable housing contributions are likely to be lower than from general housing.
- Some developers resist affordable housing in their schemes, so an alternative approach is to seek off-site financial contributions.

16.7 Tables 90 and 96 in the LHNA show the assessed need for additional housing for older people in Dacorum:

Table 16.1: Older persons' dwelling and care bed requirements 2020-2036

Type of housing	Tenure	Homes required 2020-2036	Bedspaces required 2020-2036
Retirement housing	Affordable (rented)	-149	n/a
	Open market (leasehold)	726	n/a
Extra care housing	Affordable (rented)	366	n/a
	Open market (leasehold)	248	n/a
Care and nursing homes	All	n/a	1,019

16.8 With affordable retirement housing, the LHNA indicates a demand for an additional 526 homes 2020-2036, but this is insufficient to eliminate the surplus of 675 homes that existed in 2020. For care homes and nursing homes, the LHNA does not give separate figures for affordable and open market bedspaces.

16.9 The LHNA is currently being reviewed and its updated evidence and recommendations on housing for older people will inform the finalised version of this SPD.

16.10 Paragraphs 16.11-16.28 provide further background information and explain the Council's approach towards affordable housing on different types of housing for older people, taking account of Government guidance and local evidence on housing need.

(i) AGE-RESTRICTED GENERAL MARKET HOUSING

Background information

16.11 The PPG on 'Housing for older and disabled people' states (paragraph 010) that:

"This type of housing is generally for people aged 55 and over and the active elderly. It may include some shared amenities such as communal gardens, but does not include support or care services."

The Council's approach

16.12 Core Strategy Policy CS19 applies to such housing, so the Council will expect proposals to provide affordable housing on-site.

(ii) RETIREMENT LIVING OR SHELTERED HOUSING (ALSO CALLED SUPPORTED HOUSING)

Background information

16.13 The PPG (paragraph 010) states that:

"This usually consists of purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. It does not generally provide care services, but provides some support to enable residents to live independently. This can include 24 hour on-site assistance (alarm) and a warden or house manager."

16.14 The LHNA shows a surplus of affordable retirement housing in Dacorum (see Table 16.1 above), However, whilst vacancies in the Council's sheltered housing stock are fairly high, they are concentrated mainly in a few schemes which do not meet current or future needs. The Council is currently carrying out a Supported Housing Review, as part of a wider strategic assets review.

The Council's approach

16.15 Core Strategy Policy CS19 applies to retirement housing. The Council will decide in the final version of this SPD whether to seek any affordable housing in open market retirement housing developments. The decision will reflect the findings of the Council's Supported Housing Review and the LHNA Review.

16.16 Our provisional view is that seeking affordable housing on such developments is justified, because:

- Many of the Council's sheltered housing schemes do not have a vacancy problem - this should be given considerable weight, as it shows the actual position rather than the results of the LHNA's theoretical model.
- The Supported Housing Review is expected to lead to a substantial capital programme to refurbish or redevelop some sites for continued sheltered housing use. Financial contributions from private sector retirement schemes could help to fund this programme.

16.17 If the provisional decision to seek affordable housing is confirmed, the final SPD will indicate that:

- Viability assessments should be submitted if applicants consider that the Council's requirements for affordable housing would make their proposals unviable (see section 25).

- Off-site provision or a financial contribution in lieu of the on-site provision of affordable housing may be acceptable (see paragraph 26.6).

16.18 Affordable retirement housing for older people will be allocated on the basis of the Council's Housing Allocations Policy (rented homes) and the Local Connection Policy once approved (homes for sale) – see Appendix 5.

(iii) EXTRA CARE HOUSING (ALSO CALLED HOUSING WITH CARE OR FLEXICARE)

Background information

16.19 The PPG (paragraph 010) states that:

“This usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24 hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses.”

The Council's approach

16.20 The Council will regard extra care housing schemes as falling within Use Class C2 (residential institutions), if the level of care and scale of communal facilities justifies this in terms of paragraph 014 in the PPG. We will also take account of the High Court judgment on extra care housing in Rectory Homes v South Oxfordshire District Council:

<https://www.judiciary.uk/wp-content/uploads/2020/07/Rectory-Homes-v-SSHCLG-final-judgment-31-07-2020.pdf>

16.21 This judgment found that:

- The use of the word “dwelling” in South Oxfordshire's policy was not restricted to C3 uses.
- There is no reason why a Class C2 development may not provide residential accommodation in the form of dwellings.

16.22 Local evidence of need, together with the Rectory Homes v South Oxfordshire judgment, provides a clear justification for applying Policy CS19 to extra care schemes, whether they fall within Class C2 or C3.

16.23 The Council recognises that viability issues may mean that less affordable housing than normal (or none at all) can be provided on some extra care schemes. If applicants consider this to be the case, they should submit a viability assessment alongside their proposals (see section 25). Also, the Council is willing to accept on-site provision of affordable housing, off-site provision, or a financial contribution in lieu of on-site provision (section 26).

16.24 There may be scope to use land owned by Hertfordshire County Council and/or Dacorum Borough Council for off-site provision of affordable extra care housing, or to put financial contributions towards such housing. This depends partly on the outcome of the Borough Council's Supported Housing Review (see paragraph 16.15).

16.25 Affordable extra care housing for older people will be allocated on the basis of the Council's Housing Allocations Policy (rented homes) and the Local Connection Policy once approved (homes for sale) – see Appendix 5.

(iv) RESIDENTIAL CARE HOMES AND NURSING HOMES

Background information

16.26 The PPG (paragraph 010) states that:

“These have individual rooms within a residential building and provide a high level of care meeting all activities of daily living. They do not usually include support services for independent living. This type of housing can also include dementia care homes.

The Council’s approach

- 16.27 Care homes are C2 uses. The LHNA shows a high need for additional care home bedspaces in Dacorum, but does not provide a split between affordable and open market bedspaces (see paragraphs 16.7 and 16.8). There are no proposals for new public sector care homes, although Hertfordshire County Council funding is increasing (see paragraph 16.9).
- 16.28 The Council concludes that it would not be appropriate to seek any affordable bedspaces in open market care home developments, despite the evidence of need in the LHNA. This is because Core Strategy Policy CS19 refers to “dwellings” and “housing units”. Therefore, it does not apply to bedspaces in care homes. The matter will considered further in the new Local Plan.

17. EXCEPTION SITES

Key guidance

Government guidance identifies three types of exception sites, which can be permitted outside settlement boundaries as exceptions to normal planning policy (on land not allocated for housing).

Our approach towards the three types of exception sites is summarised below. Also, with rural exception sites and First Homes exceptions sites, a need for affordable housing must be established and the housing restricted to people with a strong local connection.

(i) Rural exception sites

The Council supports appropriate affordable housing proposals in Aldbury, Chipperfield, Flamstead, Long Marston, Potten End, Wigginton and Wilstone.

A small element of open market housing will be permitted only if necessary to make a scheme viable.

(ii) First Homes exception sites

These sites deliver primarily First Homes, but can include a small proportion of open market housing if necessary to ensure viability, or other types of affordable housing if justified by evidence. Long Marston and Wilstone are the only acceptable places for such housing.

The normal requirements for First Homes apply (see section 13).

(iii) Community-led developments

These developments are instigated and taken forward by a not-for-profit organisation set up and run primarily for the purpose of meeting the housing needs of its members and the wider local community.

The Council will support proposals in Long Marston and Wilstone which comply with Government guidance.

Background information

- 17.1 The National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG) on 'First Homes' encourage the following types of affordable housing schemes, which can be permitted outside settlement boundaries as exceptions to normal planning policy (on land not allocated for housing):
- Rural exception sites
 - First Homes exception sites
 - Community-led development
- 17.2 Paragraphs 17.3-17.10 deal with rural and First Homes exception sites. Community-led development is then considered in paragraphs 17.11-17.17.

(i) RURAL AND FIRST HOMES EXCEPTION SITES

Background information

- 17.3 The Government definitions of rural and First Homes exception sites are set out in Appendix 2.
- 17.4 On rural exception sites, NPPF paragraph 82 states that:
- “Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this.”
- 17.5 There is no need for 10% of the homes on rural exception sites to be for affordable home ownership (NPPF paragraph 66).
- 17.6 Government guidance on First Homes exception sites is set out in paragraphs 024-028 of the PPG on ‘First Homes’. In particular:
- A First Homes exception site delivers primarily First Homes.
 - Such sites cannot come forward in the Green Belt or AONBs, where rural exception sites are the sole permissible type of exception site.
 - First Homes exception sites can deliver a small proportion of market housing, if necessary to ensure viability.
 - Small quantities of other forms of affordable housing can be included, where justified by evidence in a local housing needs assessment, local authority housing register, or other sufficiently rigorous local evidence.
- 17.7 Dacorum Core Strategy Policy CS20 (rural sites for affordable homes) supports rural exception sites in appropriate locations (see Appendix 3). It states that small-scale schemes for local affordable homes will be promoted in and adjoining selected small villages, and exceptionally elsewhere. Development will be permitted only if it meets an identified local need for affordable housing, is for people with a strong local connection and the scale and design are acceptable.
- 17.8 The selected small villages are listed in Policies CS6 and CS7, and Figure 1 (in section 3) shows their location:

Policy CS6 (selected small villages in the Green Belt)	Chipperfield Flamstead Potten End Wigginton
Policy CS7 (rural area)	Aldbury Long Marston Wilstone

- 17.9 The Core Strategy contains no reference to First Homes exception sites, as such housing had not been introduced at the time.

The Council’s approach

- 17.10 Our approach towards rural and First Homes exception sites is set out in Table 17.1. It takes account of Government guidance and the Dacorum Core Strategy.

Table 17.1: The Council’s approach towards exception sites

(i) Points which apply to rural and First Homes exception sites							
1. A need for affordable housing must be established through a local housing needs survey							
<p>Housing need must be identified in a local housing needs survey undertaken by the Rural Housing Enabler (RHE) for Dacorum. In Hertfordshire, the RHE is employed and managed by CDA Herts (cdaherts.org.uk) and acts as an independent advisor, who can offer impartial assistance. Approaches from private developers should be made directly to Dacorum Borough Council.</p> <p>CDA Herts assesses housing need by working with the local community and parish councils through housing needs surveys. It also works with landowners, planning authorities, housing associations and developers to facilitate the provision of affordable housing in rural Hertfordshire.</p> <p>Contact details for CDA Herts are shown below:</p> <table border="1" data-bbox="185 752 928 860"> <tr> <td>Address</td> <td>The Castle, Hertford, SG14 1HR</td> </tr> <tr> <td>Phone</td> <td>01992 289060</td> </tr> <tr> <td>Email</td> <td>Office@cdaherts.org.uk</td> </tr> </table> <p>The geographical extent of the housing needs survey should be agreed with the Council. It may be appropriate to include adjoining parishes. The survey should be no more than three years old when a planning application for a rural exception site is submitted.</p> <p>The survey will be used not only to justify the development of a site, but also to ensure that the size and type of housing proposed meets the identified need and that this need cannot be met on a site that would otherwise accord with policy.</p>		Address	The Castle, Hertford, SG14 1HR	Phone	01992 289060	Email	Office@cdaherts.org.uk
Address	The Castle, Hertford, SG14 1HR						
Phone	01992 289060						
Email	Office@cdaherts.org.uk						
2. The housing must be restricted to people with strong local connections							
<p>Occupation will be restricted to people who have a strong local connection with the village or parish through work, residence or family.</p> <p>The Council’s Choice Based Lettings service, Moving with Dacorum, will be used to allocate rented properties to households with a local connection to the relevant village or parish.</p> <p>The restriction of the housing to people with a strong local connection must remain in perpetuity. This will be stated in a Section 106 agreement (see Table 27.2). The Section 106 agreement will include a cascade of secondary parishes, if there are insufficient people coming forward from the main parish. The assessment of eligibility will be based on the Local Connection Policy once approved (see Appendix 5), but applied at a more local level.</p> <p>If there are still vacant properties after the above process has been followed, the Council will use its Housing Allocations Policy to find occupants for homes for rent.</p>							
3. Scale and design of schemes							
<p>The scale and design of schemes should respect the character, setting and form of the village and surrounding countryside. A site on the edge of a village must represent a logical extension to it.</p> <p>Sites should normally contain between 5 and 15 homes.</p> <p>Proposals should generally be for houses, rather than flats. Bungalows may be permitted, where compatible with the local character.</p>							

Sites should be well related to the existing village and close to amenities and facilities such as shops, a primary school, a village hall and bus stops.

The design and layout of schemes should take account of sections 18-22. It should be noted that:

- Aldbury and Wigginton are in the Chilterns Area of Outstanding Natural Beauty, so Core Strategy Policy CS24 applies.
- All the selected small villages except Wigginton have conservation areas - see Policy CS27 (quality of historic environment). Conservation area character appraisals have been published for Aldbury and Chipperfield.

(ii) Points where the approach varies between different types of exception sites

Rural exception sites

First Homes exception sites

4. Acceptable locations for exception sites

In and adjoining selected small villages (Aldbury, Chipperfield, Flamstead, Long Marston, Potten End, Wigginton, Wilstone) and exceptionally elsewhere.

Only in or adjoining Long Marston and Wilstone (as Government guidance does not allow such schemes in the Green Belt or Chilterns AONB).

5. Affordable housing tenures and scope to include open market housing

Normally 100% affordable housing.

No need for 10% of the homes to be for affordable home ownership.

A small proportion of open market housing may be allowed where a viability assessment (see section 25) demonstrates that a cross subsidy is necessary to make a scheme viable. In these circumstances, the open market housing will be expected to meet identified local needs.

Normally 100% First Homes for sale.

Schemes can include:

- A small proportion of open market housing, if necessary to ensure viability (see column 1).
- Small quantities of other forms of affordable housing can be included, where justified by evidence.

6. Cost of affordable housing

Rents should be genuinely affordable, based on the guidance in section 11.

The sale price must be discounted by 30% against the market value.

The homes must be sold to first time buyers with a household income no more than £80,000.

After the discount has been applied, the first sale price must not exceed £250,000.

(ii) COMMUNITY-LED DEVELOPMENTS

Background information

17.11 NPPF Annex 2 defines community-led development as follows:

“A development instigated and taken forward by a not-for-profit organisation set up and run primarily for the purpose of meeting the housing needs of its members and the wider local community, rather than being a primarily commercial enterprise. The organisation is created, managed and democratically controlled by its members. It may take any one of various legal forms including a community land trust, housing co-operative and community benefit society. Membership of the organisation is open to all beneficiaries and prospective beneficiaries of that organisation. The organisation should own, manage or steward the homes in a manner consistent with its purpose, for example through a mutually supported arrangement with a Registered Provider of Social Housing. The benefits of the development to the specified community should be clearly defined and consideration given to how these benefits can be protected over time, including in the event of the organisation being wound up.”

17.12 The main Government guidance on community-led development can be found in NPPF paragraph 73:

“Local planning authorities should support the development of exception sites for community-led development (as defined in Annex 2) on sites that would not otherwise be suitable as rural exception sites. These sites should be on land which is not already allocated for housing and should:

a) comprise community-led development that includes one or more types of affordable housing as defined in Annex 2 of this Framework. A proportion of market homes may be allowed on the site at the local planning authority’s discretion, for example where essential to enable the delivery of affordable units without grant funding; and

b) be adjacent to existing settlements, proportionate in size to them, not compromise the protection given to areas or assets of particular importance in this Framework, and comply with any local design policies and standards.”

17.13 Footnote 37 in the NPPF adds that:

“Community-led development exception sites should not be larger than one hectare in size or exceed 5% of the size of the existing settlement.”

17.14 NPPF footnotes 7 and 38 indicate that community-led developments cannot come forward in protected areas including the Green Belt or AONBs, where rural exception sites are the sole permissible type of exception site.

17.15 There is no need for 10% of the homes on community-led developments to be for affordable home ownership (NPPF paragraph 66).

17.16 Dacorum’s Core Strategy does not include any mention of community-led development.

The Council’s approach

17.17 In view of paragraph 17.14, community-led developments are acceptable in principle in Dacorum only at Long Marston and Wilstone. We will support community-led developments in these villages if they comply with the Government guidance referred to above.

PART 4: AFFORDABLE HOUSING MIX, DESIGN AND LAYOUT



Affordable rented housing at Maylands Plaza, Maylands Avenue, Hemel Hempstead (Hightown Housing Association)

18. HOUSING SIZE MIX FOR AFFORDABLE HOUSING

Key guidance

Based on local evidence, the Council is seeking an overall housing size mix broadly as shown below, but will amend the split if justified by more up-to-date information:

Bedrooms	Social/affordable rented housing	Affordable home ownership	Open market housing
	%	%	%
1	30	25	5
2	35	40	20
3	25	25	45
4+	10	10	30

The housing size mix will be negotiated by the Council on a site by site basis and will vary accordingly.

The Council will request that new homes, including the affordable housing element, are built to the nationally described space standards.

Affordable housing should usually be designed to accommodate two adults in one bedroom and two children in each further bedroom.

Background information

18.1 The National Planning Policy Framework (paragraph 63) states that the size of housing needed for different groups in the community should be assessed and reflected in planning policies including, but not limited to, those who require affordable housing.

18.2 The Government's 'Technical housing standards – nationally described space standard' includes standards on the minimum gross internal floor areas and storage (Table 1):

<https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard/technical-housing-standards-nationally-described-space-standard>

18.3 However, the Planning Practice Guidance on 'Housing: optional technical standards' states in paragraphs 018 and 020 that local planning authorities should not require these standards, unless the need for them has been justified through the plan-making process.

18.4 Dacorum Core Strategy Policy CS18 (housing mix) states that:

“New housing development will provide a choice of homes. This will comprise:

- (a) a range of housing types, sizes and tenure;
- (b) housing for those with special needs; and
- (c) affordable housing in accordance with Policy CS19.

Decisions on the appropriate type of mix of homes within development proposals will be guided by strategic housing market assessments and housing needs surveys, and informed by other housing market intelligence and site-specific considerations.”

18.5 Policy CS19 (affordable housing) states that judgements about the level, mix and tenure of affordable homes will have regard to various factors, including the Council's Housing Strategy, identified housing need and other relevant evidence.

18.6 The South West Hertfordshire Local Housing Needs Assessment (LHNA) sets out recommendations on the strategic mix of dwelling sizes for different types of housing. The following mix is suggested in Dacorum for the 2020-2036 period:

Table 18.1: Mix of dwelling sizes by tenure

Bedrooms	Social/affordable rented housing	Affordable home ownership	Open market housing
	%	%	%
1	30	25	5
2	35	40	20
3	25	25	45
4+	10	10	30

- 18.7 The recommended mix took account of the following points:
- Smaller properties (i.e. 1- bedroom homes) offer limited flexibility in accommodating the changing needs of households.
 - Larger family homes can help reduce waiting times for families who may be a higher priority and can result in the release of smaller properties for other households. The stock of 4-bedroom affordable homes is very limited and tends to have a low turnover.
- 18.8 The LHNA also advises that other evidence should be considered, including the Housing Register, although this should be monitored.
- 18.9 As a result of the Council’s revised Housing Allocations policy (May 2022) the proportion of households on Dacorum’s Housing Register looking for 1-bedroom homes is now lower than shown in the LHNA (Table 66). Whilst the number of applicants for 1-bedroom homes is still high, the need for larger properties is often accompanied by a greater degree of need.

The Council’s approach

- 18.10 Given the above, the Council is seeking an overall housing size mix broadly in line with the LHNA’s recommendations. The LHNA is currently being reviewed and its updated evidence and recommendations on the housing size mix for affordable housing will inform the finalised version of this SPD.
- 18.11 We will aim to avoid the over-provision of any one type of affordable housing and under-provision of others across the Borough. The evidence will be kept under review and the Council will amend the broad size mix, if justified by more up-to-date information.
- 18.12 The housing size mix will be negotiated by the Council on a site by site basis and will vary accordingly. The type and size of affordable homes sought will reflect the nature and location of the site and the type and size of open market housing proposed.
- 18.13 A general guide to the mix of affordable housing that the Council will seek on different types of sites is given below. Any proposals to depart from these guidelines should be discussed with the Council’s Strategic Housing team at an early stage in the development process.

Table 18.2: Affordable housing mix generally appropriate by type of site

Type of site	Affordable housing mix generally appropriate
100% Flats	1 and 2-bedroom flats.
100% houses	Usually houses (2, 3 and 4-bedrooms).
Mix of flats and houses	Mix of flats and houses, particularly on sites for 50+ homes.
Urban sites (medium or high density)	Usually flats. Townhouses may also be acceptable.
Suburban, village and greenfield sites	Usually houses. Flats may be acceptable, especially in or close to village and local centres.

- 18.14 The Council will also have regard to site specific guidance on housing mix in the Site Allocations Development Plan Document, development briefs and design codes.
- 18.15 The following points made earlier in this SPD should also be noted:
- First Homes: are likely to be mainly 1 and 2-bedrom flats (see paragraph 13.8).

- Shared ownership: a substantial proportion of 3-bedroom houses is preferred (see paragraph 14,11).

18.16 The Council cannot insist that the internal space standards referred to in paragraphs 18.2 and 18.3 are adhered to, because the need for them in Dacorum has not been justified through the plan-making process. However, we consider that there is a strong case to apply these standards in Dacorum. Therefore, the Council is proposing to include a policy to this effect in the new Local Plan. Meanwhile, the Council will request that new housing, including the affordable housing element, is built to these standards. Indeed, this is already happening with the Council's own housing developments.

18.17 The Council consider it good housing management practice to provide affordable housing that will accommodate the growing needs of households over a period of time, thus allowing them to stay in the family home longer. As such, the provision of homes which are designed to accommodate two adults in one bedroom and two children in each further bedroom is preferred. This is particularly so in the rented sector. 3 bed 5 person houses are acceptable in homes for affordable home ownership, as this makes them more affordable to first time buyers.

19. DESIGN AND LAYOUT OF AFFORDABLE HOUSING

Key guidance

Housing developments including affordable housing should comply with guidance from the Government and Homes England, the Council's planning policies and other relevant Council documents, including the Strategic Design Guide SPD.

As with all forms of housing, affordable housing should be built to a high standard of design and amenity. In particular, the Council will expect a tenure-neutral design approach so that it is not possible to distinguish between the affordable and open market housing.

Background information

- 19.1 Section 12 in the National Planning Policy Framework (NPPF) provides guidance on achieving well-designed places, but there is no specific mention of affordable housing.
- 19.2 The National Design Guide (see Appendix 1 for web link) provides more detailed advice. Paragraph 116 states that where different housing tenures are provided, they should be well-integrated and designed to the same high quality to create tenure neutral homes and spaces, where no tenure is disadvantaged. Paragraph 119 highlights ways in which good design can promote social inclusion.
- 19.3 Until October 2019, affordable housing schemes receiving grant funding had to comply with the 'Housing Design Quality Standards' document produced by the Homes and Communities Agency (now Homes England). This document has been withdrawn, but in June 2021 Homes England brought in the Building Research Establishment and the Design Council to help draw up new environmental and design standards for developments that it funds or procures.
- 19.4 The Council's main planning policies on design quality are the following Core Strategy policies:
- CS10 (quality of settlement design)
 - CS11 (quality of neighbourhood design)
 - CS12 (quality of site design)
 - CS13 (quality of the public realm)
- 19.5 Also, a number of policies relate at least partly to design and layout issues. The Core Strategy policies listed below are particularly relevant:
- CS6 (selected small villages in the Green Belt)
 - CS7 (rural area)
 - CS24 (the Chilterns Area of Outstanding Natural Beauty)
 - CS25 (landscape character)
 - CS26 (green infrastructure)
 - CS27 (quality of the historic environment)
 - CS28 (carbon emission reductions)
 - CS29 (sustainable design and construction)
- 19.6 The saved policies in the Environment section of the 2004 Local Plan are also relevant, including:

- Policy 99 (preservation of trees, hedgerows and woodlands)
- Policy 102 (sites of importance to nature conservation)
- Policy 111 (height of buildings)

19.7 In addition, the Council has produced a range of additional Planning Guidance and Advice Notes, some of which deal with design and layout matters:

[http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/supplementary-planning-documents-\(spds\)](http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/supplementary-planning-documents-(spds))

The most relevant documents are the:

- Strategic Design Guide Supplementary Planning Document (SPD) (February 2021)
- Parking Standards SPD (November 2020)

19.8 The Strategic Design Guide SPD aims to improve the quality of the design of new homes, estates and employment-use buildings in the Borough. The guide sets out a design process and principles for developers to follow when preparing their plans for new development. The approach aims to create distinctive, attractive and successful places to live and work that are adaptable for the future.

19.9 The Council has produced conservation area character appraisals for the following conservation areas (see Appendix 1 for web links):

Aldbury	Frithsden	Nettleden
Berkhamsted	Great Gaddesden	Tring
Bovingdon	Hemel Hempstead	
Chipperfield	Little Gaddesden	

The Council's approach

19.10 The Council will require proposed housing developments including affordable housing to comply with the NPPF, the National Design Guide and any future guidance from Homes England (for grant funded schemes). Relevant policies in the Core Strategy and the 2004 Local Plan should also be followed, as should the guidance in other documents produced by the Council, including the Strategic Design Guide SPD and conservation area character appraisals. Regard should also be had to any further relevant design guidance and design codes published by the Council.

19.11 On sites allocated for development in the Site Allocations Development Plan Document, the Council will require proposals to take into account the relevant planning requirements and any development brief or master plan.

19.12 As with all housing, affordable homes should be built to a high standard of design and amenity. In particular, the Council will expect a tenure-neutral design approach so that it is not possible to distinguish between the affordable and open market housing. Affordable housing should be built using the same materials, form and quality of design to ensure that it makes a positive contribution to local character and distinctiveness. This also applies to provision of parking which should be no different to that of market homes.

19.13 The design and layout of affordable housing should also take account of the guidance in the following sections:

Section 20: distribution of affordable homes

Section 21: accessible and adaptable homes

Section 22: sustainable homes

20. DISTRIBUTION AND PHASING OF AFFORDABLE HOUSING

Key guidance

The Council will consider the distribution of social rented, affordable rented and shared ownership housing on a site by site basis. In particular:

- The affordable housing should be fully integrated into the overall scheme layout, with clusters proportionate to the size of each site or phase. Clusters should not usually exceed 20 dwellings.
- The affordable housing should be indistinguishable from the open market housing.
- There should be an appropriate degree of separation between nearby affordable housing clusters.

On larger sites which will be developed in phases, there should be between 25% and 50% affordable housing in each phase.

Background information

- 20.1 This section is concerned with the distribution of affordable housing across sites that are also providing open market housing. There is no Government guidance on the subject or any reference to it in the Dacorum Core Strategy.

The Council's approach

(a) Distribution

- 20.2 The distribution of affordable housing within a new development can affect the social sustainability of a community and residents' quality of life. Care should be taken to avoid placing any particular type of tenure in less desirable parts of the site, such as to disadvantage one group over another.
- 20.3 The Council will consider the distribution of social rented, affordable rented and shared ownership housing (but not First Homes or discounted market sales housing) on a site by site basis. We will apply the following general principles:
- The affordable housing should be fully integrated into the overall scheme layout, with clusters proportionate to the size of each site or phase. Clusters should not usually exceed 20 dwellings.
 - The affordable housing should be indistinguishable from the open market housing, be 'tenure blind' and use the same building materials and have the same form and external appearance as the market housing.
 - There should be an appropriate degree of separation between nearby affordable housing clusters. Separation should be provided by open market housing, open space or landscape features and the grouping of affordable housing in nearby existing schemes

(as appropriate). A road or garden boundary is not usually considered adequate to separate clusters.

- This principle applies to each phase of sites that are being developed in phases.

20.4 The location of the affordable housing will also have implications for the future management and maintenance by the registered providers. Private sector developers are advised to consult with registered providers at the pre-application stage regarding the location of the affordable homes. The aim is to avoid any unintended negative consequences for the future management and maintenance of the new homes. For instance, a block of all one bedroom flats or mixed tenure could pose management issues and may not be approved.

(b) Phasing

20.5 On larger sites which will be developed in phases, the Council's requirement for 35% affordable housing (40% on the local allocations) should be achieved across the whole site on a cumulative basis.

20.6 The percentage of affordable housing in each phase will be dependent on the dwelling types, layout and numbers proposed. There should be a minimum of 25% and maximum of 50% affordable housing delivered in each phase. The Council will monitor actual numbers delivered in each phase to ensure that the overall affordable housing requirement is achieved.

21. ACCESSIBLE AND ADAPTABLE HOMES

Key guidance

In the light of the Building Regulations, Government guidance and local evidence, the Council's approach towards adaptable and accessible homes is as shown below:

Social rented and affordable housing, where the Council is responsible for Allocating or nominating a person to live in the housing	Require (unless not possible for viability or other reasons): <ul style="list-style-type: none"> • 100% of homes to M4(2) accessible and adaptable standards. • 10% to M4(3)(2)(b) wheelchair accessible standard. • Ground floor flats should have level access to a wetroom, with a shower instead of a bath.
Other housing schemes	Encourage: <ul style="list-style-type: none"> • 100% of homes to M4(2) standards; and • 5% of market homes to M4(3)(2)(a) wheelchair adaptable standards.

Background information

- 21.1 The Dacorum Core Strategy provides no guidance on accessible and adaptable homes. However, saved Policy 18 (the size of new dwellings) in the Dacorum Borough Local Plan 1991-2011 requires at least 10% of all dwellings on sites for 25 or more homes to be 'lifetime homes'. Such homes are readily accessible and usable by a disabled or elderly person, or are capable of adaptation for such use at minimal cost.
- 21.2 Lifetime homes standards have now been superseded by the following standards in Part M of the Building Regulations (access to and use of buildings):
- M4(1) Category 1: Visitable dwellings (the minimum standard that applies where no planning condition is given unless a plan sets a higher minimum requirement)
- M4(2) Category 2: Accessible and adaptable dwellings
- M4(3) Category 3: Wheelchair user dwellings
- 21.3 There are two separate standards under Category 3:
- M4(3)(2)(a): wheelchair adaptable – potential to be easily adapted for wheelchair user.
 - M4(3)(2)(b): wheelchair accessible – suitable for immediate occupation by wheelchair user.
- 21.4 The National Planning Policy Framework (NPPF) states in paragraph 63 that planning policies should take account of the housing needed by people with disabilities. Annex 2 (Glossary) defines 'people with disabilities' as follows:

“People have a disability if they have a physical or mental impairment, and that impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. These persons include, but are not limited to, people with ambulatory difficulties, blindness, learning difficulties, autism and mental health needs.”

21.5 The Planning Policy Guidance Note (PPG) on ‘Housing for older and disabled people’ provides guidance on accessible and adaptable housing (paragraphs 008 and 009). The guidance states that planning policies can set out the proportion of new housing that will be delivered to the M4 standards in the Building Regulations.

21.6 Paragraphs 005-012 in the PPG on ‘Housing: optional technical standards’ deal with accessibility and wheelchair housing standards. On M4(3) housing, paragraph 009 states that:

“...Local Plan 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.”

21.7 Following the ‘Raising accessibility standards for new homes’ consultation paper, the Government announced in July 2022 its intention to amend the Building Regulations to make M4(2) the minimum standard for all new homes. M4(3) will continue as now where there is a local planning policy in place in which a need has been identified and evidenced. Local authorities will need to continue to tailor the supply of wheelchair user dwellings to local demand.

21.8 Based on the evidence of need, the South West Hertfordshire Local Housing Needs Assessment (paragraphs 7.64-7.90) suggested the level of provision shown in the table below. However, the LHNA emphasised that such provision may not be possible on some sites, for viability or reasons such as built form, topography and flooding. The different standards for M4(3)(2)(a) and M4(3)(2)(b) housing recognised the higher proportion of wheelchair users in affordable housing.

Table 21.1: Accessible and adaptable dwellings (LHNA recommendations)

Building Regulations standards	LHNA recommendations
M4(2) accessible and adaptable dwellings	All new homes should be compliant
M4(3)(2)(a) wheelchair adaptable dwellings	Up to 5% of market properties
M4(3)(2)(b) wheelchair accessible dwellings	Up to 10% of affordable homes

21.9 The LHNA is currently being reviewed and its updated evidence and recommendations on accessible and adaptable dwellings will inform the finalised version of this SPD.

The Council’s approach

21.10 The Council will consider what policy on accessible and adaptable homes should be included in the new Dacorum Local Plan. In the interim period, the Council’s approach is as shown in Table 21.2:

Table 21.2: Accessible and adaptable homes (the Council's approach)

Type of housing	The Council's approach
Social rented and affordable rented housing, where the Council is responsible for allocating or nominating a person to live in the housing	<p>Require 100% of homes to M4(2) standard and 10% to M4(3)(2)(b) standard, unless this is not possible for viability or other reasons (e.g. we may not require lifts in low rise maisonettes or small blocks of flats).</p> <p>Ground floor flats should have level access to a wetroom, with a shower instead of a bath.</p>
Other housing schemes	Encourage proposals to include 100% of homes to M4(2) standards and 5% of market homes to M4(3)(2)(a) standards.

22. SUSTAINABLE HOMES

Key guidance

Core Strategy policy states that new development will comply with the highest standards of sustainable design and construction possible.

Government guidance requires new development to be planned for in a way that reduces greenhouse gas emissions and minimises energy consumption.

New development in Dacorum should comply with the above. The Council will encourage higher levels of energy efficiency and sustainable design and construction than required by the Government.

Background information

- 22.1 Dacorum Core Strategy Policy CS29 (sustainable design and construction) states that new development will comply with the highest standards of sustainable design and construction possible. The policy sets out several principles that should normally be satisfied, including the need to plan to minimise carbon dioxide emissions and maximise the energy efficiency performance of the building fabric. Buildings will be designed to have a long life and adaptable internal layout. For example, their design should be 'future proofed', to enable retrofitting to meet tighter energy efficiency standards and connection to decentralised community heating systems.
- 22.2 Section 14 in the National Planning Policy Framework (NPPF) includes guidance on planning for climate change. In particular, paragraph 159 states that new development should be planned for in a way that reduces greenhouse gas emissions.
- 22.3 The Planning Policy Guidance Note (PPG) on 'Climate change' is concerned mainly with plan-making, but there is some guidance on considering planning applications, particularly paragraphs 004 and 005.
- 22.4 The Future Homes and Buildings Standard is a set of standards that will complement Parts F and L of the Building Regulations to ensure new homes built from 2025 will produce 75-80% less carbon emissions than homes delivered under current regulations. As an interim measure, the Government introduced major Building Regulations changes from June 2022, one of which is that new homes in England will have to produce around 30% less carbon emissions.

The Council's approach

- 22.5 New development in Dacorum should comply with Policy CS29 and the Government guidance. In all new homes, the Council will encourage developers to achieve higher levels of energy efficiency and sustainable design and construction than required by the Government. This is an approach already followed by the Council in its own housing developments.

PART 5: CONSIDERING PLANNING APPLICATIONS



New Council homes at Corn Hill Court, High Street, Berkhamsted

23. SUBMITTING A PLANNING APPLICATION

Key guidance

The Council encourages the submission of a wide range of information on affordable housing at the pre-application stage. This should include a draft schedule of accommodation, covering matters such as the number of affordable homes and the tenures and housing size mix of the affordable housing.

Any information on affordable housing not provided at the pre-application stage should be included in the outline or full planning application.

An 'Affordable Housing Plan' should be submitted with outline and full planning applications, to help the Council assess the proposals against our affordable housing policies and this SPD.

Background information

23.1 Section 4 in the National Planning Policy Framework contains high level guidance on decision-taking. Key points in paragraphs 39-46 on pre-application engagement and front-loading are that:

- Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties.

- Local planning authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage.
- The more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits.
- Applicants and local planning authorities should consider the potential for voluntary planning performance agreements, particularly for large or complex proposals.

23.2 Further guidance is provided by the Planning Practice Guidance notes on 'Before submitting an application' and 'Making an application'. The former includes guidance on planning performance agreements and the latter explains the two main types of planning applications:

- Outline applications, which deal with the general principles of development on a site. Outline planning permission is granted subject to conditions requiring the subsequent approval of 'reserved matters'.
- Full applications, which put forward detailed proposals for the development of a site.

The Council's approach

23.3 Applicants are advised to seek pre-application planning advice to discuss all aspects of the planning proposal, including the affordable housing requirement. The Council's pre-application advice service offers advice from a qualified planning officer and a written report, before a planning application is submitted. Further information is available via the following link:

<https://www.dacorum.gov.uk/home/planning-development/planning-applications/pre-application-advice>

23.4 Informal discussions with the Council's Strategic Housing Team regarding affordable housing proposals are also encouraged at an early stage in the planning process.

23.5 Applicants are advised to submit as much information as possible at the pre-application stage, especially with major developments. The Council encourages the use of planning performance agreements for large and/or complex applications. Such agreements should cover the pre-application and application stages, but may also extend to the post-application stage.

23.6 A draft schedule of accommodation should be submitted at the pre-application stage. This should contain the following information:

- The number of affordable homes and the percentage of affordable housing to be provided (see section 7).
- Tenures of the affordable housing, such as affordable rent, First Homes and shared ownership (sections 9-15).
- The housing size mix of the affordable housing (section 18) and the floorspace, room size and the number of persons per each type of unit.
- A site plan, showing the distribution of affordable housing across the site (section 20).
- The proportion of the affordable homes to be built to standards for accessible and adaptable homes (section 21) and the location of these homes.

23.7 The following matters should also be addressed at the pre-application stage:

- The justification for any suggestion that vacant building credit should reduce the amount of affordable housing required (section 24).

- A viability assessment, if the applicant considers that the Council's affordable housing requirements would make a development unviable (section 25).
- The justification for any proposal to provide the affordable housing off-site or via a financial contribution in lieu of on-site provision (section 26).
- The heads of terms of the Section 106 Agreement that will be required to ensure delivery of the affordable housing (section 27). The agreement must be completed before planning permission is issued.
- The proposed or potential registered provider(s), who should be involved in the pre-application discussions (section 28).

23.8 Community engagement should be carried out by the developer at the pre-application stage, if necessary to comply with the Council's Statement of Community Involvement:

<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/statement-of-community-involvement>

23.9 Any necessary information on affordable housing not provided at the pre-application stage should be included in the outline or full planning application. Reserved matters applications should confirm the affordable housing mix and their location. The mix should broadly reflect that proposed in the outline application, unless the reserved matters application proposes a significant change to overall dwelling types and sizes.

23.10 Upon submission of a qualifying planning application, the Council will expect to be provided with an 'Affordable Housing Plan', showing:

- The location of affordable homes.
- The tenure of affordable homes.
- The location and tenure for accessible and adaptable homes (section 21). This would normally be illustrated on a layout plan at a scale of 1:1250.

23.11 For outline or major developments, the Council may also request a phasing plan showing how development is likely to be implemented and the timetable for the delivery of affordable homes within the scheme.

23.12 The affordable housing plan should be updated during the course of the planning application to reflect any changes in the number, location or tenure of affordable homes. The affordable housing plan is unlikely to be subject to a planning condition, but will inform the content of any associated Section 106 Agreement (see Table 27.1) and may form a Schedule thereto.

23.13 Planning permissions including affordable housing will be subject to a planning obligation requiring developers to tell the Council when affordable homes are completed and transferred to registered providers, together with details such as:

- Address
- Unique property reference number (UPRN)
- Affordable housing tenure
- Number of bedrooms
- Floorspace
- The price paid by the registered provider

23.14 This information will be required either when a development is completed, or in stages as set out in the Section 106 agreement.

23.15 Such information is also vital to help the Council monitor the overall supply of affordable homes in the Borough (see section 29).

24. VACANT BUILDING CREDIT

Key guidance

Government guidance states that where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount, subject to certain provisos.

The Council's methodology to calculate vacant building credit is based on this guidance.

Background information

24.1 Paragraph 65 in the National Planning Policy Framework (NPPF) states that:

“...To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount³⁰.

³⁰ Equivalent to the existing gross floorspace of the existing buildings. This does not apply to vacant buildings which have been abandoned.”

24.2 The following more detailed explanation of ‘vacant building credit’ is provided by paragraph 026 in the Planning Practice Guidance note (PPG) on ‘Planning Obligations’:

“National policy provides an incentive for brownfield development on sites containing vacant buildings. Where a vacant building is brought back into any lawful use, or is demolished to be replaced by a new building, the developer should be offered a financial credit equivalent to the existing gross floorspace of relevant vacant buildings when the local planning authority calculates any affordable housing contribution which will be sought. Affordable housing contributions may be required for any increase in floorspace.”

24.3 Paragraphs 027 and 028 in the PPG provide further relevant guidance. For example, in deciding whether a use has been abandoned, it may be appropriate to consider:

- whether the building has been made vacant for the sole purposes of re-development
- whether the building is covered by an extant or recently expired planning permission for the same or substantially the same development

The Council's approach

24.4 The application of vacant building credit in Dacorum will be guided by the NPPF and PPG. In dealing with planning applications, we will reach a decision on whether vacant building credit can be claimed before considering viability issues relating to the provision of affordable housing (see section 25).

24.5 To demonstrate that a building has not been made vacant for the sole purpose of redevelopment, an applicant must show that the buildings they are claiming the credit for have been vacant for at least three years before the submission of the application. Evidence will also be needed to prove that the site has been actively marketed for at least one of those years at a realistic price.

24.6 Based on the guidance in paragraph 027 of the PPG, the Council will use the following methodology to calculate vacant building credit:

Step 1 - Calculate the number of affordable homes required (35% of total homes proposed on most sites).

Step 2 - Calculate, as a proportion, the extent of existing floorspace to be demolished or reused against the proposed floorspace. The calculation should be based on the gross internal area as set out in the CIL Regulations 2021. Gross internal floorspace should be calculated in accordance with the RICS Code of Measuring Practice. Such information will normally be reflected in the CIL Additional Information form.

Step 3 – Reduce the number of affordable homes to be provided, based on the proportion identified at step 2. This will be calculated as per the worked example below:

Table 24.1: Calculating vacant building credit

Total gross homes proposed	50
Normal affordable housing requirement	18 homes (i.e. 35% of 50)
Existing floorspace to be demolished	1,000 sq. metres
Proposed floorspace to be created	5,000 sq. metres
Revised affordable housing requirement after applying vacant building credit	$18 - ((18 \times 1,000) \div 5,000) = 18 - 4 = 14$ homes

24.7 It should be noted that:

- If the total floorspace of existing buildings to be demolished or reused is equal to or exceeds the total floorspace created, then no affordable housing is required.
- If affordable housing provision is in the form of a commuted sum, the revised affordable homes figure will be translated into a financial contribution (see section 26)

25. VIABILITY

Key guidance

Government guidance states that the role for viability assessment is primarily at the plan making stage. It is up to the applicant to demonstrate that a viability assessment is needed at the application stage.

Any concerns an applicant has about viability should be discussed with the Council as early as possible in the development process. Should an agreement not be reached, a viability assessment will be required.

Viability assessments should accord with Government guidance and reflect best practice guidance.

The Council will seek review mechanisms where it would not be viable to comply with our affordable housing policies when planning permission is granted, but where it may become so during the course of the development.

Background information

- 25.1 Dacorum Core Strategy Policy CS19 (affordable housing) states that judgements about the level, mix and tenure of affordable homes will have regard to various factors, including the overall viability of the scheme and any abnormal costs.
- 25.2 Paragraph 58 in the National Planning Policy Framework gives overall guidance on viability. It is up to the applicant to demonstrate that a viability assessment is needed at the application stage. The purpose of a viability assessment is show whether the level, mix and tenure of affordable housing needed to comply with Policy CS19 and this SPD would make a development unviable. All viability assessments should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available.
- 25.3 The Planning Policy Guidance (PPG) on 'Viability' sets out key principles in understanding viability in plan making and decision taking. The following points are particularly relevant to decision taking:
- It is up to the applicant to demonstrate that a viability assessment is needed at the application stage. For example, with non-standard types of development for sale, such as build to rent or housing for older people (paragraph 007).
 - Viability assessments should be based on the viability assessment that informed the plan. The applicant should provide evidence of what has changed since then (paragraph 008).
 - Where contributions are reduced below policy requirements to provide flexibility in the early stages of a development, review mechanisms may be used by local authorities to seek compliance with policies over the project's lifetime (paragraph 009).
 - Viability assessments should follow the Government's recommended approach to assessing viability as set out in the PPG (paragraphs 010-019). With viability assessments to inform decision making, the price paid for land is no justification for failing to accord with the plan's policies.

The Council's approach

- 25.4 As stated in the PPG, it is up to the applicant to demonstrate that a viability assessment is needed at the application stage. Land values are high in Dacorum and we would anticipate that there will be only limited circumstances where viability testing at the planning application stage is necessary.
- 25.5 Nevertheless, the Council recognises that there will be occasions where the affordable housing requirements may have to be reduced or waived in order to make a development viable. Indeed, this SPD draws attention to types of development where viability may be an issue:
- Following the introduction of First Homes and given the Council's wish to ensure that affordable rented housing is genuinely affordable (see paragraphs 7.9 and 7.10).
 - With extra care housing schemes (see paragraph 16.23).
 - With rural exception and First Homes exception sites, if a small element of market housing is necessary to make a scheme viable (see point 5 in Table 17.1).
- 25.6 If an applicant considers that viability is an issue, they must demonstrate why a site should not include affordable housing provision in line with the Council's targets. Our Strategic Housing officers are happy to meet applicants early in the development process, to discuss 'valid' viability concerns and potentially negotiate and review the affordable housing percentage and tenure mix. Should an agreement not be reached, a viability assessment will be required.
- 25.7 The assessment should be outsourced to an independent third party at the developer's cost. It should be submitted as soon as possible during the Council's consideration of a planning application. This will enable us to assess at the earliest opportunity, the optimum affordable housing mix which is economically viable on the site. However, the assessment may have to be revised later in the process, when the application is close to being determined.
- 25.8 Viability assessments in support of planning applications should accord with paragraphs 010-019 in the PPG on 'Viability'. Assessments must be 'open book' financial appraisals of development. They should also reflect best practice guidance, such as the RICS guidance note on 'Assessing viability in planning under the National Planning Policy Framework 2019 for England' (March 2021), or any updates to it:
- https://www.rics.org/globalassets/rics-website/media/upholding-professional-standards/sector-standards/land/assessing-financial-viability_final.pdf
- 25.9 Assessments should consider different options which might improve economic viability. For example, different mixes of tenure, unit type and size, and phasing.
- 25.10 The PPG on 'Viability' states that the Community Infrastructure Levy (CIL) charge should be taken into account in viability assessments. Information on CIL charges in Dacorum can be found at:
- [http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/developer-contributions/community-infrastructure-levy-\(cil\)](http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/developer-contributions/community-infrastructure-levy-(cil))
- 25.11 In line with the NPPF and paragraph 021 in the 'Viability' PPG, any viability assessment should be prepared on the basis that it will be made publicly available other than in exceptional circumstances.

- 25.12 All schemes are expected to maximise the delivery of genuinely affordable housing and make the most efficient use of available resources to achieve this objective. Where grant or other public subsidy is available, and would with the co-operation of a registered provider increase the proportion of affordable housing, this should be utilised. The higher proportion of affordable housing should be set out in the Section 106 agreement as being subject to grant availability, alongside the proportion viable without grant. This would be pursuant to any further delivery achievable following viability review.
- 25.13 Paragraph 009 in the PPG on 'Viability' allows for review mechanisms in certain circumstances (see paragraph 25.3 above). Dacorum's planning policies do not refer to review mechanisms. However, in allowing an appeal decision in Hove (appeal ref: APP/Q1445/W/20/3265732), the Inspector included a review mechanism even though Hove's Policy CP20 makes no express provision for such an approach. Therefore, Dacorum will seek review mechanisms where it would not be viable to comply with the Council's affordable housing policies when planning permission is granted, but where it may become so during the course of the development.
- 25.14 The Council has reviewed best practice on review mechanisms and will follow the approach set out in The London Plan (Policy H5: Threshold approaches to applications). In instances where meeting affordable housing requirements has been demonstrated as unviable, the Council will normally require a viability review mechanism to be inserted into the Section 106 Agreement (see section 27).
- 25.15 Review mechanisms consider the impact of time and the changing financial/development environment upon the viability of policy compliant affordable housing provision. The following triggers may be imposed upon the permission:
- If significant progress has not been made on site two years after full permission has been granted.
 - On all phased schemes prior to 75% occupation of any new phase and/or building.
 - Upon completion of all works.
 - Upon or prior to 75% occupation of the development/phase.
- 25.16 Significant progress is defined as completed all ground works, foundations and slab base of the development/phase. This is not fixed, and dependent on the scale of development and the scheme's deviation from policy, may be subject to negotiation should site specific circumstances require.
- 25.17 The review will consider the previous assumptions made within the viability assessment at planning application stage, under the new financial/development environment at the time of the review. The aim will be to increase affordable housing provision and potentially meet the affordable housing policy requirements and deliver maximum community benefit on-site, making the application more acceptable in planning terms. Alternatively, if not possible on site, a financial contribution made to the Council in lieu of on-site provision may be acceptable if robustly justified (see section 26).
- 25.18 Where appropriate, post-delivery review mechanisms will be favoured as this provides the Council with actual as opposed to estimated costs, which should help realise greater affordable housing contributions. A post-delivery review may be triggered upon completion of all works, or upon 75% occupation of a development/ phase. This is most likely to be required where permissions have, for viability reasons, failed to deliver satisfactory levels of affordable housing.
- 25.19 The developer will fund the costs of independent viability review at the stage of the planning application and review mechanism.

26. OFF-SITE AFFORDABLE HOUSING PROVISION OR FINANCIAL CONTRIBUTION

Key guidance

Affordable housing should be provided on-site unless off-site provision or an appropriate financial contribution in lieu can be robustly justified.

Off-site provision or a financial contribution may be acceptable in certain other circumstances at the Council's discretion.

Off-site provision will be accepted only if developers are able to deliver the affordable housing on a suitable site elsewhere.

The financial contribution should be at least broadly equivalent to the cost of re-providing the land for affordable housing on another site.

Background information

- 26.1 Dacorum Core Strategy Policy CS19 (affordable housing) states that affordable housing will be sought on sites above the site size thresholds specified. It adds that a financial contribution will be sought in lieu of affordable housing on sites which fall below these thresholds.
- 26.2 The National Planning Policy Framework (NPPF) states in paragraph 64 that:
- “Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site unless:
- a) off-site provision or an appropriate financial contribution in lieu can be robustly justified; and
 - b) the agreed approach contributes to the objective of creating mixed and balanced communities.”

The Council's approach

- 26.3 Points (i)-(iv) below outline the Council's approach towards proposals for off-site provision of affordable housing or a financial contribution in lieu of on-site provision.
- 26.4 The Council will normally expect affordable housing to be provided on site, in accordance with Government guidance and Core Strategy Policy CS19. However, we recognise that in certain circumstances it will be appropriate for the Council to accept off-site provision, or if this is not achievable a financial contribution in lieu of on-site provision. Financial contributions will be used by the Council to provide suitable affordable housing elsewhere in the Borough.
- 26.5 Our overall approach will reflect the recent guidance in the NPPF, rather than Core Strategy Policy CS19. As stated in paragraph 23.7, the justification for any proposal to provide the affordable housing via off-site provision or a financial contribution should preferably be submitted at the pre-application stage and revisited at the planning application stage and again when the application is close to being determined.

(ii) Circumstances in which off-site provision or a financial contribution may be accepted

- 26.6 The Council may accept off-site provision of affordable housing or a financial contribution on retirement and extra care housing schemes (see paragraphs 16.17 and 16.23).
- 26.7 Other circumstances where the Council, at its discretion, may be willing to accept off-site provision or a financial contribution for at least part of the affordable housing include where:
- The Council is satisfied that providing affordable housing on-site would not be viable.
 - On-site provision would result in a small number of affordable homes and it is clear that it would not be practical or viable for transfer to a registered provider.
 - There is a demonstrable lack of interest from registered providers to purchase the affordable homes.
 - The site is not in a sustainable location, particularly in relation to access to key facilities, such as schools, shops, medical facilities, job opportunities and public transport.
 - Housing need could be better met in an alternative location, for example if flats are proposed where there is a need for family housing.
 - The Council considers that an off-site contribution could enable the delivery of a better affordable housing solution, for example by funding the regeneration of existing affordable housing stock.
- 26.8 The marketability of the private housing is not regarded by the Council as a factor that would justify off-site provision of affordable housing or a financial contribution.

(iii) Off-site provision

- 26.9 Off-site provision of affordable housing will be accepted only if developers can show that they are in a position to deliver the affordable housing on a suitable site elsewhere. The development of the two sites will be linked through a Section 106 agreement to ensure that the affordable housing is actually delivered in a timely manner.
- 26.10 The Council's normal affordable housing requirements must be met across the two sites. For example, if a total of 200 homes are proposed and 35% affordable housing is required, it means that 70 affordable homes should be provided on one of the sites.

(iv) Calculating financial contributions

- 26.11 The sum required for a financial contribution is based on the principle that replacing on-site affordable housing provision with a payment in lieu should be financially neutral for the developer. The financial contribution should be at least broadly equivalent to the cost of re-providing the land for affordable housing on another local site. In other words, the contribution should be no less than the level of developer subsidy that would have been necessary to meet the affordable housing policy requirements on-site.
- 26.12 Therefore, the Council's method used to calculate a financial contribution does not look to the residual value of a development, but to the land value and the number of homes proposed. The land value should be appraised by an independent Royal Institute of Chartered Surveyors (RICS) qualified surveyor, on the basis that the site is serviceable and there is no affordable housing contribution to be made or financial contribution payable.
- 26.13 Our method is illustrated below, using a worked example:

Table 26.1: Calculating financial contributions (worked example)

Total number of homes proposed	20
Affordable housing percentage	35%
Number of affordable homes required	7 (i.e. 35% of 20)
Total land value	£4,000,000
Land value per unit	£200,000 (i.e. £4,000,000 ÷ 20)
Financial contribution required	£1,400,000 (i.e. £200,000 x 7)

- 26.14 If the financial contribution cannot be agreed, the fall-back position for the developer is to submit a full open-book viability assessment (see section 25), which may result in a higher or lower affordable housing contribution.
- 26.15 The Council intends to review its method of calculating financial contributions. This may lead to a revised method being included in the finalised version of this SPD.

(v) Management of fund by the Council

- 26.16 Financial contributions received from developers will be pooled in a specific affordable housing fund, to support the Housing Capital Programme for the provision of new affordable homes anywhere within Dacorum. The Council envisages that the financial contributions will be spent on building affordable homes on Council owned land, or via the purchase of land on the open market. Alternatively, the Council may use some of the money collected to give grants to registered providers to build new affordable homes in the Borough.
- 26.17 The Council's Strategic Housing Team will administer the fund and identify development opportunities and appropriate schemes in accordance with the Council's procedures on capital projects. The accounting for the funding will be undertaken by the Section 106 planning monitoring officer.

(vi) Indexation of the fund

- 26.18 Financial contributions will be subject to indexation, using Building Cost Information Service (BCIS) mean averages for Hertfordshire or such other indexation that may be agreed between the Council and the applicant. Indexation will commence from the date that planning permission is granted following completion of a Section 106 agreement.
- 26.19 The applicant should notify the Council's Section 106 planning monitoring officer when the development commences or the trigger for payment/delivery has been reached. This is the most cost effective method for developers as late notification to us will incur penalties. On receipt of the notification, the Council will issue an invoice for the amount payable including any indexation.
- 26.20 The Council will monitor building control and other sources and will issue an invoice if the applicant fails to advise the Council that the payment has been triggered. Indexation applies until the date of the invoice, so in these circumstances the amount may be higher than if the applicant had advised the Council when the payment was triggered. Penalty interest is payable on unpaid contributions and accrues from the date payment is triggered to the date of actual payment.

27. SECTION 106 AGREEMENTS

Key guidance

The Council will secure affordable housing requirements through a Section 106 agreement or unilateral undertaking.

The heads of terms of the Section 106 agreement should be considered at the pre-application stage and the agreement must be completed before planning permission is issued.

The Council has produced a draft S106 model agreement, which includes standard clauses to secure the provision of affordable housing. However, each agreement will be drawn up on a case by case basis.

With some types of affordable housing, a bespoke S106 agreement based on the model agreement will be needed.

Background information

- 27.1 Dacorum Core Strategy Policy CS35 (infrastructure and developer contributions) gives general guidance on planning obligations, but does not mention affordable housing.
- 27.2 Planning obligations are legal obligations entered into to mitigate the impacts of a development proposal. This can be via a planning agreement entered into under Section 106 of the Town and Country Planning Act 1990 by a person with an interest in the land and the local planning authority; or via a unilateral undertaking entered into by the landowner without the local planning authority. Paragraphs 55 and 57 in the National Planning Policy Framework provide high level guidance on planning obligations.
- 27.3 The Planning Practice Guidance (PPG) on 'Planning obligations' provides more detailed guidance. However, the references to affordable housing relate to matters such as the site size thresholds for seeking affordable housing and vacant building credit, which are considered elsewhere in this SPD.
- 27.4 The PPG on 'First Homes' covers a number of matters that should be taken into account in S106 agreements on developments that include First Homes. In particular:
- The landowner should enter into a S106 agreement to secure the delivery of the First Homes. The S106 agreement should also ensure that the 30% price discount and certain other legal restrictions are applied to the property at each future sale. The Government has published template planning obligations for this purpose (paragraphs 001-003).
 - When a First Home is resold, the seller should secure a valuation from a registered valuer acting in an independent capacity (paragraph 006).
 - The national eligibility criteria for First Homes should apply to future sales of a First Home (paragraph 007).
 - Any local eligibility criteria applied by the local authority should be included in the S106 agreement. If a suitable buyer has not reserved a home after three months, the eligibility criteria will revert to the national criteria (paragraph 008).

- A Mortgagee Exclusion Clause should be present in planning obligations securing First Homes, to protect lenders and encourage competitive lending rates (paragraph 010).
- Agreements should not prevent First Homes from being sold for a long period if a suitable buyer cannot be found, even following removal of local restrictions. Therefore, the agreement may allow a First Home to be sold on the open market and the removal of the title restriction, if certain conditions are met (paragraph 011).
- The requirement for at least 25% of the affordable homes should be secured through the S106 agreement. An agreement is also required where cash contributions for affordable housing are secured instead of on-site units (paragraph 012).
- First Homes are eligible for mandatory social housing relief from the Community Infrastructure Levy (see section 23), if a planning obligation is entered into to ensure that the first and subsequent sales of the dwelling are for no more than 70% of market value (paragraph 016).

27.5 The Government has confirmed that shared ownership homes delivered through Section 106 agreements should be based on the standard model in the 'New Model for Shared Ownership: technical consultation' (see paragraph 14.6).

27.6 In December 2021, the Government published 'First Homes – Section 106 Provisions', the template planning obligations for First Homes:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1043248/First_Home_model_s106_for_delivery_through_planning_system.pdf

27.7 The model clauses in the template are for use by local authorities and home builders in preparing S106 agreements that deliver First Homes through developer contributions, including First Homes exception sites.

The Council's approach

27.8 The Council will secure affordable housing requirements through a S106 agreement or unilateral undertaking (only with a financial contribution in lieu of on-site provision). The agreement is made by deed between the landowner(s), the developer (if different), Dacorum Borough Council and Hertfordshire County Council (only if there are specific obligations to them e.g. education, highways). Where affordable housing is being secured by S106, the Council's Solicitor will produce the first draft and the applicant will be required to pay the Council's legal and administrative costs incurred in negotiating and completing the deed.

27.9 As stated in paragraph 23.7, the heads of terms of the Section 106 agreement should be considered at the pre-application stage. The agreement must be completed before planning permission is issued.

27.10 The Council has produced a draft S106 model agreement, which includes standard clauses to secure the provision of affordable housing. However, each agreement will be drawn up on a case by case basis. The draft model agreement takes account of the Government's template planning obligations for First Homes (see paragraph 27.6) and section 13 in this SPD.

27.11 The draft model agreement applies to the main types of affordable housing (social rent, affordable rent, First Homes and shared ownership). Bespoke agreements will be required for other types of affordable housing (see paragraph 27.15).

27.12 Paragraph 5.1 in the draft model agreement requires all financial contributions payable to the Council to be index linked. Schedule 2 relates to affordable housing and the key points are summarised below:

Table 27.1: Summary of Schedule 2 (affordable housing) in the Council's draft S106 model agreement

Paragraph	Summary of key points
Part 1	
1 and 5	The affordable housing units must be used only for affordable housing.
2	<p>The development shall not start until the Council has approved a scheme ("the Scheme") for the provision and long term management of the affordable housing.</p> <p>The Scheme shall cover the requirements in the Schedule and the matters in paragraph 2, including:</p> <ul style="list-style-type: none"> • The phasing for the construction and transfer of the affordable housing to a registered provider, including a plan ("the Affordable Housing Phasing Plan"). • The price (unless previously agreed) for granting a lease or freehold transfer of the affordable housing to a registered provider. • The size (number of bedrooms) and tenure of the affordable homes.
4	<p>(a) and (b) Restrictions will be placed on the proportion of open market units that can be occupied in any phase until at least the stated percentage of:</p> <ul style="list-style-type: none"> • Affordable housing units have been completed and transferred to a registered provider; and • First Homes have been completed and marketed. <p>(c) A nominations agreement must be completed, securing nomination rights to the Council for the affordable homes for rent.</p>
6	This paragraph deals with the sale of affordable housing units if there is a default on the mortgage or a charge.
Part 2	First Homes
7	Quantum of First Homes: x homes shall be provided and retained in perpetuity as First Homes, subject to Part 2 of the schedule.
8	Clustering: clusters of affordable houses and flats should not exceed the limits stated in the agreement.

Paragraph	Summary of key points
9	Type and distribution: the mix of First Homes shall accord with the Affordable Housing mix and the distribution in the Affordable Housing Plan (see paragraph 23.10).
10	Development standard: First Homes shall be constructed to the Development Standard (as defined on pages 4 and 5 of the draft model agreement) and no less than the standard for the market housing.
11	Delivery mechanism: this clause deals with various matters, including: <ul style="list-style-type: none"> • The national and local eligibility criteria for First Homes. • The marketing of First Homes. • The disposal of First Homes if no suitable purchasers can be found.
12	Each First Home shall be used only as the main residence of the First Homes owner, subject to certain provisos.

27.13 Developers should provide the Council with a schedule, providing information (see paragraph 23.13 of how each obligation set out in the S106 agreement has been met. The Council can then assess whether we agree and that it can be marked off as fulfilled. This information will be required either when a development is completed, or in stages as set out in the Section 106 agreement.

27.14 With some types of affordable housing, a bespoke S106 agreement based on the model agreement will be needed, as shown below:

Table 27.2: Types of housing requiring a bespoke S106 agreement

Type of housing	Key requirements in S106 agreement	Guidance elsewhere in SPD
Affordable private rent in build to rent schemes	<ul style="list-style-type: none"> • Rents to remain at least 20% below market rents for future eligible households, or the subsidy recycled for alternative affordable housing provision. • The process for managing affordable private rent units and requirement for an annual statement on these homes. • A mechanism to recoup ('clawback') the value of the affordable housing provision that is withdrawn if affordable private rent homes are converted to another tenure. • Eligibility criteria for the affordable private rent homes. <p>Note: see the PPG on 'Build to rent' for further guidance on S106 agreements in relation to affordable private rent homes.</p>	Paragraph 12.4

Type of housing	Key requirements in S106 agreement	Guidance elsewhere in SPD
Rent to buy	<ul style="list-style-type: none"> • Ensure such housing constitutes affordable housing. • Provide nomination and sales rights to the Council. 	Paragraph 15.7
Rural exceptions sites and First Homes exception sites	<ul style="list-style-type: none"> • Restrict the housing in perpetuity to people with a strong local connection. • Include a cascade of secondary parishes, if there are insufficient people coming forward from the main parish. 	Point 2 in Table 17.1
Financial contribution in lieu of on-site affordable housing provision	<ul style="list-style-type: none"> • Secure the financial contribution. • Accounting for the pooled affordable housing fund. 	Paragraphs 26.4 and 26.17
Off-site provision of affordable housing	<ul style="list-style-type: none"> • Ensure delivery of the affordable housing in a timely manner. 	Paragraph 26.9

PART 6: OTHER CONSIDERATIONS



Affordable rented housing at Wood Lane, Paradise, Hemel Hempstead (Hightown Housing Association)

28. FUNDING, REGISTERED PROVIDERS AND COMMUNITY INFRASTRUCTURE LEVY RELIEF

Key guidance

Funding

Homes England provides grant funding to support the capital costs of developing affordable housing for rent or sale in certain circumstances.

Registered providers and partnership working

The Council works with registered providers and the private sector to maximise affordable housing development in Dacorum. Registered providers are best placed to manage most affordable housing developments.

Developers should have a registered provider on board early in the development process.

Community Infrastructure Levy relief

Community Infrastructure Levy (CIL) liability may be reduced for developments containing social rented housing that meets the criteria in the CIL regulations.

Funding of affordable housing

28.1 Homes England's Affordable Homes Programme provides grant funding to support the capital costs of developing affordable housing for rent or sale. Grants from Homes England will not generally be available for affordable housing required via Section 106 agreements. However, grant funding may be available if a registered provider proposes a higher percentage of affordable housing than required by the Council in Core Strategy Policy CS19.

28.2 Homes England's Capital Funding Guide (CFG) contains the rules and procedures for all providers delivering affordable housing through one of the affordable homes programmes:

<https://www.gov.uk/guidance/capital-funding-guide>

28.3 The following chapters in the CFG are particularly relevant:

- Chapter 1: Shared ownership
- Chapter 2: Rent to buy
- Chapter 3: Specialist housing (including housing for older people)
- Chapter 4: Homes for rent (including affordable rent and social rent)

28.4 Further information on Homes England grant funding for shared ownership and buy to rent housing is provided in paragraphs 14.7, 15.3 and 15.4.

Registered providers and partnership working

28.5 Registered providers are local authorities or bodies such as housing associations which are entered on the Regulator of Social Housing's Register (see definition in Appendix 2). The Council puts significant resources into delivering affordable housing and is committed to working with registered providers and the private sector to maximise the development of affordable homes in Dacorum.

28.6 Registered providers are best placed to manage most affordable housing developments. The only exceptions are the Council's own housing schemes and build to rent schemes, which will typically be professionally managed stock in single ownership and management control (see 'build to rent' definition in Appendix 2). Private developers are, therefore, encouraged to work closely with registered providers to deliver affordable housing and ensure the new homes are managed effectively. As stated in paragraph 10.7, the Council may encourage registered providers to build social rented housing on some developments in the future.

28.7 The Council is not prescribing which registered providers should deliver affordable housing in Dacorum, although housing associations are likely to be involved in most developments. Only organisations that are registered with the Regulator of Social Housing, including 'for profit' organisations, are accepted as being registered providers. The Council will actively work in partnership with a range of registered providers, who can demonstrate high quality management services and housing delivery. We are keen to work with providers who are aligned with our policy on affordability (see section 11) and meet the needs of our residents.

28.8 Developers are strongly encouraged to have a registered provider on board early in the development process. At the very least applicants should be engaging with a provider before starting pre-application discussions with the Council. The developer should secure a

commitment from the registered provider for the affordable housing provision at an agreed purchase price. This enables the registered provider to input into the design and development of the scheme and ensures timely delivery of the affordable housing. Any concerns should be resolved by practical design and appropriate and reasonable lettings arrangements.

- 28.9 Registered providers that wish to develop in Dacorum should have a management service within a reasonable distance of the Borough. This will ensure that repairs and maintenance can be carried out effectively. Providers should levy fair and affordable service charges on affordable housing. These should not affect the affordability of the property to households on the waiting lists.

Community Infrastructure Levy relief

- 28.10 The Community Infrastructure (CIL) liability may be reduced for developments where social housing is present and meets the criteria stated in Regulation 49 of the Community Infrastructure Levy Regulations 2010 (as amended). Further information on social housing relief can be found in paragraphs 065-075 of the Planning Practice Guidance (PPG) on the Community Infrastructure Levy.
- 28.11 Social housing relief is a mandatory discount that can be applied to most affordable housing provided by a local authority or registered provider and shared ownership dwellings. This includes social rented, affordable rented and rent to buy housing. Subject to meeting specific conditions, it can also apply to discounted rental properties provided by other bodies.
- 28.12 Mandatory social housing relief can also apply to First Homes. A planning obligation must be entered into to ensure the first and subsequent sales of the dwelling are for no more than 70% of market value. Similar guidance is set out in paragraph 016 of the PPG on 'First Homes'.

29. MONITORING AND REVIEW

Key guidance

The Council will monitor and keep under review this Affordable Housing SPD to ensure the delivery of affordable homes.

Information on the delivery of affordable housing is reported annually in the Authority Monitoring Report.

If necessary this SPD will be updated, but it will be replaced by a new SPD when the Council adopts the new Local Plan.

- 29.1 The Council will monitor and keep under review this Affordable Housing SPD to ensure the delivery of affordable homes. The number of affordable homes will be reported annually in the Authority Monitoring Report (AMR), prepared by the Strategic Planning team. This document is made publicly available on the Council's website.
- 29.2 The AMR 2019/20 contains information on affordable housing completions, in paragraphs 7.8-7.10, Appendix 5 and the AMR Technical Appendix (Tables 7.8 and 7.9). Information is provided on completions of affordable homes since 2006, including completions of different types of affordable housing such as social rented, affordable rented and shared ownership housing:
- <http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/monitoring-reports-and-land-position-statements>
- 29.3 In the future, the Council intends to provide more information on affordable housing in the AMR. For example, the aim is to add information on the housing size mix (number of bedrooms) in affordable housing and data on commitments for new affordable housing (i.e. sites with planning permission or under construction) as well as completions.
- 29.4 The Council is also working on arrangements across its Planning, Infrastructure and Housing teams to improve the tracking of progress on affordable housing developments, from the planning application stage through to the occupation of completed homes. This will include information on the matters stated in paragraph 23.13 and draw on the Infrastructure team's monitoring of S106 agreements involving affordable housing (see paragraph 27.15). Furthermore, the Council is seeking to co-ordinate and improve its monitoring processes.
- 29.5 This SPD will be kept under review and where necessary updated, for example, to reflect changes to Government guidance and evidence on housing need and the housing market in Dacorum. As stated in paragraph 1.8, this SPD will be replaced by a new SPD when the Council adopts the new Local Plan.

APPENDIX 1: WEB LINKS TO DOCUMENTS

National planning policy context

(i) National Planning Policy Framework (December 2023)

https://assets.publishing.service.gov.uk/media/65829e99fc07f3000d8d4529/NPPF_December_2023.pdf

(ii) Planning Practice Guidance:

<https://www.gov.uk/government/collections/planning-practice-guidance>

The following Planning Practice Guidance notes are referred to in this document:

- Build to Rent (September 2018)
- Community Infrastructure Levy (January 2023)
- First Homes (December 2021)
- Housing and Economic Needs Assessment (December 2020)
- Housing Needs of Different Groups (May 2021)
- Housing for older and disabled people (June 2019)
- Neighbourhood planning (September 2020)
- Planning Obligations (September 2019)
- Viability (September 2019)

(iii) Other documents

Ministerial Statement on First Homes (May 2021)

<https://questions-statements.parliament.uk/written-statements/detail/2021-05-24/hlws48>

First Homes – Section 106 Provisions (December 2021) i.e. the Government’s template planning obligations

<https://www.gov.uk/government/publications/first-homes-model-section-106-agreement-for-developer-contributions>

Local Authority Guidance Note on First Homes (February 2024)

<https://www.gov.uk/government/publications/first-homes-stakeholder-guidance-documents/local-authority-guidance-notes>

National Design Guide (January 2021)

<https://www.gov.uk/government/publications/national-design-guide>

New Model for Shared Ownership: technical consultation (April 2021)

[New model for Shared Ownership: technical consultation - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/new-model-for-shared-ownership-technical-consultation)

Raising accessibility standards for new homes: a consultation paper (September 2020)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/930274/200813_con_doc_-_final__1_.pdf

Homes England: Capital Funding Guide (November 2023)

<https://www.gov.uk/guidance/capital-funding-guide>

Dacorum planning policy context

(i) Existing adopted plans and other relevant documents

Core Strategy (September 2013)

http://www.dacorum.gov.uk/docs/default-source/strategic-planning/adopted-core-strategy-2013.pdf?sfvrsn=80753a9e_2

Site Allocations Development Plan Document (July 2017)

http://www.dacorum.gov.uk/docs/default-source/strategic-planning/dacorum-site-allocations-statement-june-2017.pdf?sfvrsn=d63a3c9e_10

Affordable Housing Supplementary Planning Document (September 2013)

http://www.dacorum.gov.uk/docs/default-source/planning-development/affordable-housing-spd-2013-nbsp-.pdf?sfvrsn=5b39f89f_0

Affordable Housing SPD - Clarification Note (revised March 2022)

<affordable-housing-spd-clarification-note-update-march-2022.pdf> (dacorum.gov.uk)

Authority Monitoring Report 2019/20

<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/monitoring-reports-and-land-position-statements>

Statement of Community Involvement (September 2019)

<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/statement-of-community-involvement>

(ii) Emerging new Local Plan consultation documents

Local Plan Emerging Strategy for Growth consultation document (November 2020) – link to all policies referred to in this paper:

https://www.dacorum.gov.uk/docs/default-source/strategic-planning/part-1---local-plan-emerging-strategy-for-growth-2020-2038---pages-1-to-187.pdf?sfvrsn=93bf0c9e_10

Local Plan Revised Strategy for Growth (2024-2040) consultation:

[https://www.dacorum.gov.uk/docs/default-source/strategic-planning/dacorum-local-plan-\(2024-2040\)-revised-strategy-for-growth-print-version2153724551156b7f9bc7ff00000246a4.pdf?sfvrsn=b546199e_2](https://www.dacorum.gov.uk/docs/default-source/strategic-planning/dacorum-local-plan-(2024-2040)-revised-strategy-for-growth-print-version2153724551156b7f9bc7ff00000246a4.pdf?sfvrsn=b546199e_2)

(iii) Emerging new Local Plan evidence base

Local Plan Emerging Strategy for Growth: Housing Topic Paper (November 2020)

<https://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/new-single-local-plan/technical-work-for-the-early-partial-review>

Local Plan Emerging Strategy for Growth: Site Assessment Study – Viability (an appendix to the study) (December 2019)

https://www.dacorum.gov.uk/docs/default-source/strategic-planning/dbc-site-assessment-study---volume-4.pdf?sfvrsn=d3b80c9e_4

South West Hertfordshire Local Housing Needs Assessment (September 2020)

https://www.dacorum.gov.uk/docs/default-source/strategic-planning/south-west-herts-local-housing-needs-assessment-final-report---september-2020.pdf?sfvrsn=ecd00c9e_4

Other relevant Council documents

Additional planning guidance and advice notes:

[http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/supplementary-planning-documents-\(spds\)](http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/supplementary-planning-documents-(spds))

Authority Monitoring Report

<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/monitoring-reports-and-land-position-statements>

Conservation area appraisals

<https://www.dacorum.gov.uk/home/planning-development/planning-cons-design/conservation-areas>

Delivering for Dacorum Corporate Plan 2020-2025

https://www.dacorum.gov.uk/docs/default-source/council-democracy/corporate-plan-2020-2025.pdf?sfvrsn=ba6f089e_8

Shaping the future of Dacorum – Our Growth and Infrastructure Strategy to 2050

<http://www.dacorum.gov.uk/docs/default-source/strategic-planning/dacorum-growth-and-infratstructure-strategy-to-2050.pdf>

‘Homes for the Future’ Housing Strategy 2019-2021

<http://www.dacorum.gov.uk/home/housing/services-we-offer/strategies-and-policies#f8b46b45-5115-6b7f-9bc7-ff00000246a4>

Housing Allocations Policy (last reviewed November 2017, adopted April 2018, updated February 2021)

https://www.dacorum.gov.uk/docs/default-source/housing/housing-allocations-policy.pdf?sfvrsn=8dcd0a9e_30

Tenancy Strategy (May 2019)

<https://democracy.dacorum.gov.uk/documents/s20523/Housing-04-09-19-Housing%20Strategy-Appendix%203%20-%20Tenancy%20Strategy.pdf>

Neighbourhood plans in Dacorum

Bovingdon Neighbourhood Plan, Submission Version (July 2023)

https://www.dacorum.gov.uk/docs/default-source/strategic-planning/bovingdon-neighbourhood-plan-consultation/bnp-submission-reg-15-document-optimised.pdf?sfvrsn=5f0b199e_2

Grovehill Future Neighbourhood Plan (2016-2031)

http://www.dacorum.gov.uk/docs/default-source/strategic-planning/grovehill-future-neighbourhood-plan---referendum-version.pdf?sfvrsn=44840b9e_4

Kings Langley Neighbourhood Plan (January 2023)

<https://klnp.co.uk/wp/wp-content/uploads/2022/10/Kings-Langley-Neighbourhood-Plan-Referendum-September-2022.pdf>

APPENDIX 2: GLOSSARY

Abbreviations used in this appendix:

NPPF: National Planning Policy Framework

PPG: Planning Practice Guidance

Accessible and adaptable homes (standards in Part M of the Building Regulations (access to and use of buildings):

M4(1) Category 1: Visitable dwellings (the minimum standard that applies where no planning condition is given unless a plan sets a higher minimum requirement)

M4(2) Category 2: Accessible and adaptable dwellings

M4(3) Category 3: Wheelchair user dwellings

Affordable housing (definition in NPPF Annex 2): housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

a) Affordable housing for rent: meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).

b) Starter homes: is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.

c) Discounted market sales housing: is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.

d) Other affordable routes to home ownership: is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.

Affordable Housing Plan: This will provide details on the phasing for the construction and transfer of the affordable housing to a registered provider, including a plan showing the location of the affordable homes. It is a requirement of the Council's Section 106 model agreement.

Affordable private rent: See point a) (affordable housing for rent) in the NPPF's definition of 'Affordable housing' above.

The NPPF indicates that for Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).

Affordable private rented housing must meet the following conditions: (a) the rent is at least 20% below local market rents (including service charges where applicable); (b) the landlord need not be a registered provider; and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision.

Further guidance is provided in the Build to Rent PPG, paragraphs 002 and 003.

Affordable rent: See point a) (affordable housing for rent) in the NPPF's definition of 'Affordable housing' above.

The NPPF states that affordable rented housing must meet the following conditions: (a) the rent is set in accordance with the Government's rent policy for Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider; and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision.

Age-restricted general market housing (definition in PPG on Housing for older and disabled people, paragraph 010): This type of housing is generally for people aged 55 and over and the active elderly. It may include some shared amenities such as communal gardens, but does not include support or care services.

Build to Rent (definition in NPPF Annex 2): Purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control.

Community Infrastructure Levy (CIL) (definition in PPG on Community Infrastructure Levy, paragraph 001): The Community Infrastructure Levy (the 'levy') is a charge which can be levied by local authorities on new development in their area. It is an important tool for local authorities to use to help them deliver the infrastructure needed to support development in their area.

Most new development which creates net additional floor space of 100 square metres or more, or creates a new dwelling, is potentially liable for the levy.

Community-led developments (definition in NPPF Annex 2): A development instigated and taken forward by a not-for-profit organisation set up and run primarily for the purpose of meeting the housing needs of its members and the wider local community, rather than being a primarily commercial enterprise. The organisation is created, managed and democratically controlled by its members. It may take any one of various legal forms including a community land trust, housing co-operative and community benefit society. Membership of the organisation is open to all beneficiaries and prospective beneficiaries of that organisation. The organisation should own, manage or steward the homes in a manner consistent with its purpose, for example through a mutually supported arrangement with a Registered Provider of Social Housing. The benefits of the development to the specified community should be clearly defined and consideration given to how these benefits can be protected over time, including in the event of the organisation being wound up.

Custom-build housing: see definition of self-build and custom-build housing below.

Extra care housing (definition in PPG on Housing for older and disabled people, paragraph 010): This usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission

(CQC). Residents are able to live independently with 24 hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses.

First Homes (definition in PPG on First Homes, paragraph 001: First Homes are a specific kind of discounted market sale housing and should be considered to meet the definition of 'affordable housing' for planning purposes. Specifically, First Homes are discounted market sale units which:

a) must be discounted by a minimum of 30% against the market value;

b) are sold to a person or persons meeting the First Homes eligibility criteria (see below);

c) on their first sale, will have a restriction registered on the title at HM Land Registry to ensure this discount (as a percentage of current market value) and certain other restrictions are passed on at each subsequent title transfer; and,

d) after the discount has been applied, the first sale must be at a price no higher than £250,000 (or £420,000 in Greater London).

First Homes are the government's preferred discounted market tenure and should account for at least 25% of all affordable housing units delivered by developers through planning obligations.

First Homes exception site (definition in PPG on First Homes, paragraph 024): A First Homes exception site is an exception site (that is, a housing development that comes forward outside of local or neighbourhood plan allocations to deliver affordable housing) that delivers primarily First Homes as set out in the First Homes Written Ministerial Statement.

Homes England: The non-departmental Government body that provides funding and enabling expertise in the delivery of regeneration and new affordable homes and performs a regulatory function in respect of registered providers. It replaced the Homes and Communities Agency.

Local housing needs survey: In order to demonstrate a need for rural exception sites and First Homes exception sites, a local housing needs survey must be undertaken by the Rural Housing Enabler (RHE) for Dacorum (see point 1 in Table 18.1 of this SPD for further information).

Local plan (definition in NPPF Annex 2): A plan for the future development of a local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. A local plan can consist of either strategic or non-strategic policies, or a combination of the two.

Major development*::

Major development' means development involving any one or more of the following—

(a) the winning and working of minerals or the use of land for mineral-working deposits;

(b) waste development;

(c) the provision of dwellinghouses where —

(i) the number of dwellinghouses to be provided is 10 or more; or

(ii) the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i);

(d) the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or

(e) development carried out on a site having an area of 1 hectare or more.

* Definition in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

National Planning Policy Framework (NPPF): The NPPF was first published in March 2012 and has since been revised, most recently on 19 December 2023. It sets out the government's planning policies for England and how these are expected to be applied. It also provides a framework within which locally-prepared plans for housing and other development can be produced.

Nomination rights: The grant of rights to the council to nominate households to occupy accommodation provided by the registered provider. These rights are formalised in the form of a nomination agreement.

Older people (definition in NPPF Annex 2): People over or approaching retirement age, including the active, newly retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs.

People with disabilities (definition in NPPF Annex 2): People have a disability if they have a physical or mental impairment, and that impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. These persons include, but are not limited to, people with ambulatory difficulties, blindness, learning difficulties, autism and mental health needs.

Planning obligation (definition in NPPF Annex 2): A legal agreement entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.

Planning Practice Guidance (PPG): The Government's Planning Practice Guidance notes provide additional, more detailed guidance to supplement the NPPF. The PPGs provide an extensive online resource of detailed policy guidance on various topics, which is produced by the Department for Levelling Up, Housing and Communities.

Registered Provider: A local authority entered on the Regulator of Social Housing's Register pursuant to section 114 of the Housing and Regeneration Act 2008, or a body such as a housing association entered on the Register as a non-profit organisation or a profit-making organisation (as such terms are defined in section 115 of the Housing and Regeneration Act 2008).

The Regulator of Social Housing is a non-departmental public body that regulates private registered providers of social housing to promote a viable, efficient and well-governed social housing sector able to deliver homes that meet a range of needs.

Re-lets: Local authority or registered provider rented properties which become vacant due to the departure of a previous tenant, therefore enabling their re-letting to another tenant or applicant from the Council's Housing Register.

Rent to buy: this affordable housing product is included in the NPPF's definition of affordable housing (see above) under 'other affordable routes to home ownership'. The definition describes rent to buy housing as an affordable route to home ownership for those who could not achieve home ownership through the market. Such housing includes a period of intermediate rent.

Rural exception sites (definition in NPPF Annex 2): Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. A proportion of market homes may be allowed on the site at the local planning authority's discretion, for example where essential to enable the delivery of affordable units without grant funding.

Shared ownership: See point d) (other routes to home ownership) in the NPPF's definition of 'Affordable housing' above.

Social rent: See point a) (affordable housing for rent) in the NPPF's definition of 'Affordable housing' above. See also paragraph 10.3 in this SPD.

The NPPF states that social rented housing must meet the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider; and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision.

Supplementary planning documents (definition in NPPF Annex 2): Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.

APPENDIX 3: DACORUM'S AFFORDABLE HOUSING POLICIES

Core Strategy (September 2013)

POLICY CS18: Mix of Housing

New housing development will provide a choice of homes. This will comprise:

- (a) a range of housing types, sizes and tenure;
- (b) housing for those with special needs; and
- (c) affordable housing in accordance with Policy CS19.

Decisions on the appropriate type of mix of homes within development proposals will be guided by strategic housing market assessments and housing needs surveys, and informed by other housing market intelligence and site-specific considerations.

POLICY CS19: Affordable Housing

Affordable homes will be provided:

- on sites of a minimum size 0.3ha or 10 dwellings (and larger) in Hemel Hempstead; and
- elsewhere, on sites of a minimum size of 0.16ha or 5 dwellings (and larger).

A financial contribution will be sought in lieu of affordable housing on sites which fall below these thresholds.

35% of the new dwellings should be affordable homes. Higher levels may be sought on sites which are specified by the Council in a development plan document, provided development would be viable and need is evident. On rural housing sites 100% of all new homes will normally be affordable (Policy CS20).

A minimum of 75% of the affordable housing units provided should be for rent.

Judgements about the level, mix and tenure of affordable homes will have regard to:

- (a) the Council's Housing Strategy, identified housing need and other relevant evidence (see Policy CS18);
- (b) the potential to enlarge the site;
- (c) the overall viability of the scheme and any abnormal costs; and
- (d) arrangements to ensure that the benefit of all affordable housing units passes from the initial occupiers of the property to successive occupiers

Further, detailed guidance is provided in the Affordable Housing Supplementary Planning Document.

POLICY CS20: Rural Sites for Affordable Homes

Small-scale schemes for local affordable homes will be promoted in and adjoining selected small villages in the countryside (see Policies CS6 and CS7), and exceptionally elsewhere with the support of the local Parish Council.

Development will only be permitted if:

- (a) it meets an identified local need for affordable housing;
- (b) the housing is for people who have a strong local connection with the village or parish through work, residence or family; and
- (c) the scheme is of a scale and design that respects the character, setting and form of the village and surrounding countryside.

Any site on the edge of a village must represent a logical extension to it.

Site Allocations Development Plan Document (July 2017)

Policy LA1: Marchmont Farm, Hemel Hempstead

Policy LA2: Old Town, Hemel Hempstead

Policy LA3: West Hemel Hempstead

Policy LA4: Hanburys, Shootersway, Berkhamsted

Policy LA5: Icknield Way, West of Tring

Policy LA6: Chesham Road and Molyneaux Avenue, Bovingdon

The introductory text at the start of Policies LA1- LA6 includes the following:

“The key development principles for the site are set out below. Further detail is in a site master plan.”

Under ‘Key Development Principles’, Policies LA1-LA6 commence by stating that:

“The following principles have been used to guide the site master plan and will be used assess the subsequent planning application:

- Deliver a mix of two storey housing including 40% affordable homes.”

APPENDIX 4: AFFORDABLE RENTS IN DACORUM

This paper was produced by Justin Gardener Consulting in May 2022.

Introduction

1. This note sets out suggestions about the cost of affordable rented housing to make it affordable in a local context for Dacorum. This builds on analysis in the South West Hertfordshire Local Housing Needs Assessment (LHNA) (September 2020) which suggested in Table 41 that only 13% of households unable to afford market housing would be able to afford an affordable rent (without the need to claim Housing Benefit/Universal Credit with a housing entitlement). This finding was based on an assumption that an affordable rent would be priced at 80% of lower quartile market rents.
2. It is recognised that affordable rented housing could be provided with a range of discounts from the open market rent. One potential issue with the analysis is that it is quite difficult to know exactly what rent level a particular discount would equate to. This is because the market value of a property (of a similar size) could vary significantly depending on factors such as location and built-form. There is also the issue that a newly-built rental home could attract a premium when compared with an equivalent existing home in the market. Therefore, whilst pricing is investigated below, figures should be treated as indicative.

Current rent levels

3. The table below shows current rent levels in the Borough for a range of products along with relevant local housing allowance (LHA) rates. Dacorum falls into three different Broad Rental Market Areas (BRMAs) for the purposes of LHA, with the South West Herts area covering much of the Borough (parts are also in the Aylesbury and Chilterns BRMAs).
4. Data about average social and affordable rents has been taken from the Regulator of Social Housing (RSH) and this is compared with lower quartile and median market rents (from ONS data). This analysis shows that social rents are lower than affordable rents; the analysis also shows that affordable rents are less than both lower quartile and median market rents.
5. When looking at the LHA limits, the analysis shows figures close to or above lower quartile rents, but typically lower than median rents. This does potentially mean that households seeking accommodation in some (more expensive) locations may struggle in some cases to secure sufficient benefits to cover their rent.

Figure 1: Comparison of rent levels for different products – Dacorum (2020-21)

	Social rent	Affordable rent (AR)	Lower quartile (LQ) market rent	Median market rent	LHA (South West Herts) – Sept 2021
1-bedroom	£432	£628	£800	£850	£798
2-bedrooms	£506	£769	£975	£1,100	£997
3-bedrooms	£563	£963	£1,260	£1,350	£1,296
4-bedrooms	£603	£1,118	£1,550	£1,875	£1,695

Source: RSH, ONS and VOA

6. To some extent it is easier to consider the data above in terms of the percentage one housing cost is of another and this is shown in the table below. Discussion focusses on 2-

bedroom homes (this is the main stock size held by Affordable Housing Providers, 40% of social rented housing and 53% of affordable rents). This shows that social rents are significantly cheaper than market rents (and indeed affordable rents) but that affordable rents (as currently charged) represent 79% of a current lower quartile rent (70% if comparing with a median rent).

Figure 2: Difference between rent levels for different products – Dacorum

	Social rent as % of affordable rent	Social rent as % of LQ market rent	Social rent as % of median market rent	Affordable rent as % of LQ market rent	Affordable rent as % of median market rent	LQ market rent as % of median market rent
1-bedroom	69%	54%	51%	79%	74%	94%
2-bedrooms	66%	52%	46%	79%	70%	89%
3-bedrooms	58%	45%	42%	76%	71%	93%
4-bedrooms	54%	39%	32%	72%	60%	83%

Source: RSH, ONS and VOA

Affordability of Current Social/Affordable Rents

7. An analysis has been undertaken to compare the income distribution of households with the cost of different products – initially based on actual affordable and social rents as published by the Regulator of Social Housing. For comparative purposes a lower quartile market rent is used to determine the group of households who cannot afford a market rent and would therefore benefit from a subsidised rent.
8. For the affordability test, a standardised average rent for each product has been used (figures standardised on the basis of estimated need for social/affordable rented housing shown in paragraph 6.74 of the LHNA). The table below suggests that around 18% of households who cannot afford to rent privately could afford an affordable rent, with a further 31% being able to afford a social rent (but not an affordable one). A total of 51% of households would need some degree of benefit support to be able to afford their housing (regardless of the tenure).
9. The figure of 18% being able to afford affordable rents is higher than suggested in the LHNA and this situation largely arises due to analysis in this note being based on actual affordable rents which are typically less than 80% of a lower quartile market rent. The standardising of rents for each product will also have some impact on the analysis. Regardless, it is clear when based on income alone that only a small proportion of households unable to afford market rents would be able to afford an affordable rent at current costs without the need to claim benefits (or where it would be assumed they are spending too high a proportion of their income on housing costs). Clearly reducing the cost of affordable rents would bring more households into the able to afford (without benefit) category.

Figure 3: Estimated need for affordable rented housing (% of households able to afford)

	Dacorum
Afford affordable rent	18%
Afford social rent	31%
Need benefit support	51%
All unable to afford market	100%

Source: Affordability analysis

Affordable Rents at 60%, 70% and 80% of the Market

10. The analysis below seeks to investigate to potential impact of providing affordable rents at a 20%, 30% and 40% discount from market rents (i.e. rents at 60%, 70% and 80%). Two analyses are provided, one where the discount is applied to lower quartile rents and a second linked to the median rent. In reality, it is possible that the open market rents (prior to any discount) could be even higher than the median values, if they have a premium due to being a newbuild product. The table below shows the rent levels that would apply if using these levels of discount from the lower quartile and median values.

Figure 4: Estimated Monthly Rental Costs at Different Levels of Discount

	Discount from lower quartile market			Discount from median market		
	20% (80% of market)	30% (70% of market)	40% (60% of market)	20% (80% of market)	30% (70% of market)	40% (60% of market)
1-bedroom	£640	£560	£480	£680	£595	£510
2-bedrooms	£780	£683	£585	£880	£770	£660
3-bedrooms	£1,008	£882	£756	£1,080	£945	£810
4-bedrooms	£1,240	£1,085	£930	£1,500	£1,313	£1,125

Source: Derived from ONS data

11. These figures have been modelled in the same way as for existing rent levels to look at the proportion of households able to afford different rent levels. In all cases the social rent is as previously set out and so it is only the first two categories in the table below that vary. The outputs based on existing rents have also been included for reference. The analysis suggests when looking at a 20% discount from median rents that very few additional households (additional to those able to afford the market) are now able to afford housing (just 8%) although higher discounts do see a greater proportion of households being able to afford an affordable rent.

Figure 5: Estimated Monthly Rental Costs at Different Levels of Discount

	Based on existing rents	Discount from lower quartile market			Discount from median market		
		20% (80% of market)	30% (70% of market)	40% (60% of market)	20% (80% of market)	30% (70% of market)	40% (60% of market)
Afford affordable rent	18%	15%	24%	34%	8%	17%	27%
Afford social rent	31%	33%	24%	14%	40%	31%	21%
Need benefit support	51%	51%	51%	51%	51%	51%	51%
All unable to afford market	100%	100%	100%	100%	100%	100%	100%

Source: Affordability Analysis

Consideration of the Evidence

12. On the basis of this analysis, taking account of the likelihood that the open market rent is at or above the median, and that concerns have been expressed about affordability tests used by Affordable Housing Providers, it can be concluded that the Council would be reasonable to seek a higher level of discount than 20% from the market. **It is considered that providing lower Affordable Rents or (at 60% of market values, including service charges) would be a sensible start point, subject to the viability of delivering housing at these costs.**
13. There will be a series of other considerations both at a strategic level and for specific schemes. For example, there may be funding streams that are only available for a particular

type of housing, and this may exist independently to any local assessment of need. Additionally, there will be the consideration of the balance between the cost of housing and the amount that can be viably provided. For example, it is likely that affordable rented housing is more viable, and therefore a greater number of units could be provided. Finally, in considering a split between social and affordable rented housing it needs to be considered that having different tenures on the same site (at least at initial occupation) may be difficult – e.g. if tenants are paying a different rent for essentially the same size/type of property and services.

14. On this basis, it is not recommended that the Council has a rigid policy for the split between social and affordable rented housing, although the analysis is clear that both tenures of homes are likely to be required in all areas.

Suggested rent levels (at 60% of median market)

15. The analysis above is interesting and suggests that current affordable rents are only affordable to a fraction of households unable to afford the market and therefore lowering rent levels would make them more affordable. As noted, the Council should investigate affordable rents at 60% of the market (subject to viability) and the table below shows what these rent levels would be on the basis of the analysis above.

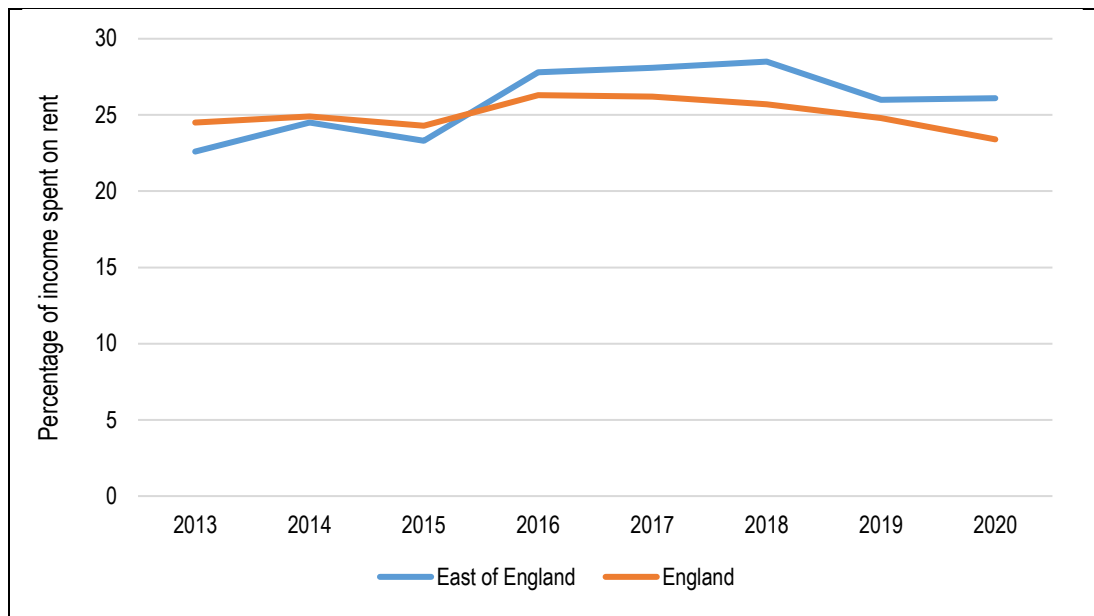
Figure 6: Suggested Affordable Rent Levels (per month) – based on 60% of median market rents – Dacorum

	Social rent	Lower quartile (LQ) market rent	Suggested affordable rent (AR)
1-bedroom	£432	£800	£510
2-bedrooms	£506	£975	£660
3-bedrooms	£563	£1,260	£810
4-bedrooms	£603	£1,550	£1,125

Source: Based on RSH and ONS

16. The analysis above is based on data at a point in time (largely relating to 2021). It is possible that the percentages calculated and therefore the conclusions drawn could change over time, for example if market rents were to increase faster than social rents then the discount from the market might need to increase to keep rents affordable. Likewise, if private rents were to increase at a different rate to local incomes then the proportions able to afford would change, which in turn could lead to a different conclusion about how much discount is required to be affordable.
17. Overall, however, it is considered that incomes and rents are likely to increase at a similar rate over time and so the conclusions above will remain valid for at least 3-5 years. The figure below shows estimated change to the private rental affordability ratio in England and the East of England for the 2013-20 period. This is a dataset published by ONS and the period used it the full period studied. The ratio shown is comparing monthly rents with estimated monthly incomes.
18. The analysis shows for the East of England an increase in this ratio from 2015 to 2016 but that since then the ratio has declined. For England, a more modest increase was shown for 2015-16 and subsequently a greater decline. Overall, for the period studied there does not appear to be any notable trend with the ratio between private sector rents and incomes remaining at broadly the same level.

Figure 7: Percent of income spent of privately renting – East of England and England (2013-20)



Source: ONS Private Rental Affordability data

APPENDIX 5: LOCAL CONNECTION CRITERIA FOR AFFORDABLE HOUSING

Background information

1. The Council is committed to ensuring that affordable housing is occupied by local people who have a housing need that cannot be satisfied by the open market alone. Our approach towards eligibility to occupy affordable housing varies between:
 - Social and affordable rented housing: allocated via the Council's Housing Register; and
 - Other affordable housing: not allocated via the Housing Register
2. A nominations agreement must be completed, securing nomination rights to the affordable homes for the Council. The agreement must be completed prior to occupation of any affordable housing for rent, securing 100% of the initial lets and 75% of subsequent lets. The agreement should be included in the Section 106 agreement when planning permission is granted for a development providing affordable housing (see section 27).

(i) Social and affordable rented housing (allocated via the Housing Register)

3. The Council's 'Housing Allocations Policy' sets out how we prioritise applications for social and affordable rented housing, based on people's circumstances and level of housing need (see paragraph 4.6).
4. Section 2.2 in the Housing Allocations Policy requires most applicants to meet at least one of the following local connection criteria:
 - A ten-year residency within the Borough at some point in their lifetime;
 - Family connection where an immediate family member (parents, children, siblings) who are over the age of 18 and are resident within the Borough for ten years consecutively, immediately preceding the date of application and are still resident at point of allocation;
 - Currently in permanent employment within the Borough boundary, consisting of 16 hours a week or more, and which has been continuous for the last 24 months. Applicants who are home working must provide evidence that their main workplace is in Dacorum. The employment must be based on actual place of work and not where the head/ regional office is sited.
5. A number of exceptions to the requirement to meet the local connection criteria are identified in section 2.2 in the Housing Allocations Policy, including applicants for sheltered housing.
6. Section 5.2 sets out some additional local connection criteria, which apply in the following villages: Aldbury, Bovingdon, Chipperfield, Flaunden, Flamsted, Great Gaddesden, Gaddesden Row, Kings Langley, Little Gaddesden, Long Marston, Markyate, Northchurch, Potten End, Wilstone and Wigginton.

(ii) Other Affordable Housing (not allocated via the Housing Register)

7. The Council is preparing a housing policy document called 'Local Connection Policy for Other Affordable Housing' (see Appendix 5). Once this document is approved, people wishing to live in

affordable private rented housing will be assessed against the criteria in the policy. We will take account of the approved Local Connection Policy in the finalised version of this SPD.

8. The Local Connection Policy will apply to properties that are not required to be allocated via the Housing Register. These properties will be called 'Other Affordable Housing'. This includes the following types of affordable housing:
 - First Homes
 - Shared ownership
 - Discounted market sales housing
 - Rent to buy
 - Affordable private rent
9. Some households are excluded from the Housing Register (for example, because they exceed the savings and income thresholds or the stricter local connection criteria), but are eligible for Other Affordable Housing.
10. It is envisaged that applicants for Other Affordable Housing will need to provide evidence that they comply with the Local Connection Policy in terms of at least one of the following:
 - Current residency
 - Employment
 - Key worker criteria (a definition of 'key workers' will be provided)
 - Family connection
 - Special circumstances such as caring responsibilities
11. Other points to note are that:
 - People who do not meet the above points, but have exceptional circumstances, will be considered on a case by case basis.
 - In the villages named in paragraph 6 above, priority is likely to be given to applicants with a local connection to that village.
 - Some military personnel, members of the British Armed Forces and, in some instances, their divorced/separated or bereaved spouse or civil partner, will not require a local connection. However, for First Homes, the approach will be as stated in paragraph 13.9.

Dacorum BC Community Impact Assessment (CIA) Template

Policy / service / decision

Dacorum Draft Interim Affordable Housing SPD

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

Supplementary guidance on Dacorum's planning policies for affordable housing is currently set out in the following documents:

- Affordable Housing Supplementary Planning Document (September 2013)
- Affordable Housing SPD - Clarification Note (revised March 2022)

There is a need to replace these documents by a new Supplementary Planning Document (SPD), for the following main reasons:

1. The Council wishes to ensure that rented affordable housing is genuinely affordable for households in need of such housing.
2. To take account of changed Government guidance on affordable housing, including the introduction of First Homes.
3. To provide updated and expanded guidance on how our planning policies for affordable housing should be applied.

The Council will use the updated SPD when deciding planning applications for housing development.

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 CIA has been prepared following an iterative process. This involved identifying the likely impacts arising from the draft Interim Affordable Housing SPD and then considering these impacts as positive, negative or neutral in light of the thrust of the relevant guidance. This was set against known facts, information and evidence gathered including through early engagement with a range of stakeholders and which relates specifically to the protected characteristics listed in the Equality Act 2010.

Recommendations on ways by which the negative impacts could be removed or mitigated and the positive impacts strengthened were then sought. The draft Interim Affordable Housing SPD contents are then reconsidered and re-examined again in the same iterative process until they emerge with no known negative impacts and became more acceptable.

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.*

The Council has engaged with a wide range of stakeholders, predominantly on an internal basis. Give the specific nature of the SPD in serving those most in need of affordable housing, the focus of consultation to date has been with the following:

- Strategic Housing Investment and Regeneration;
- Housing Needs team;
- Supported Housing;
- Legal;
- Development Management;
- Infrastructure Planning; and
- Senior Leadership Team

Public consultation on the draft Interim Affordable Housing SPD will allow the Council the opportunity to consult with a much wider range of stakeholders, including those who represent protected and vulnerable groups both within the Borough and beyond.

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	<p>The Interim Affordable Housing SPD includes guidance on such schemes for older people, reflecting evidence that there is a substantial need for additional affordable extra care housing and care home bedspaces.</p> <p>It also includes guidance on how the Council will apply the introduction of First Homes. Although not age specific, it is likely to benefit younger adults who would otherwise not be able to purchase a home in the borough.</p>	□	□	☒
Disability (physical, intellectual, mental) <i>Refer to CIA Guidance Notes and Mental Illness & Learning Disability Guide</i>	<p>The draft Interim Affordable Housing SPD includes guidance on the proportion of new affordable housings that are required to meet accessible and adaptable standards.</p> <p>It also requests that all new homes are built to the Nationally Described Space Standards, which will reduce the potential for</p>	□	□	☒

	cramped conditions that can have a negative impact on human health, both mentally and physically.			
Gender reassignment	The interim Affordable Housing SPD is neutral with regards to gender-reassignment or other gender identity.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Race and ethnicity	The Interim Affordable Housing SPD is neutral with regards to race and ethnicity. The delivery of housing for specific groups such as gypsies, travellers and travelling showpeople are dealt with through other policies in the adopted Core Strategy.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Religion or belief	The Interim Affordable Housing SPD is neutral with regards to religion or belief.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sex	The Interim Affordable Housing SPD is neutral with regards to sex.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sexual orientation	The Interim Affordable Housing SPD is neutral with regards to sexual orientation.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<p>Not protected characteristics but consider other factors, e.g. carers, care leavers, veterans, homeless, low income, loneliness, rurality etc.</p>	<p>The Interim Affordable Housing SPD includes guidance to support a number of non-protected characteristics including:</p> <ul style="list-style-type: none"> • the delivery of housing (both to rent or to purchase) for those on lower incomes and those that are homeless; • the delivery of housing for those with a local connection to the area; and • the delivery of rural exception sites to meet those in more remote locations in the borough. 	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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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.

<p>Action taken/to be taken <i>(copy & paste the negative impact / outcome then detail action)</i></p>	<p>Date</p>	<p>Person responsible</p>	<p>Action complete</p>
<p>n/a</p>	<p>Select date</p>		<p style="text-align: center;"><input type="checkbox"/></p>

If negative impacts / outcomes remain, please provide an explanation below.

n/a

Completed by (all involved in CIA)	Ronan Leydon, Strategic Planning Manager
Date	26/02/2024
Signed off by <i>(AD from different Directorate if being presented to CMT / Cabinet)</i>	David Barrett, Assistant Director, Strategic Housing & Delivery
Date	26/02/2024
Entered onto CIA database - date	
To be reviewed by (officer name)	Ronan Leydon, Strategic Planning Manager
Review date	Following public consultation, the CIA will be reviewed in light of comments received and updated alongside the SPD being finalised and if appropriate recommended for adoption.

**SPAEC OSC
Work Programme 2024/2025**

Meeting Date	Report Deadline	Items	Contact Details	Background information
June 2024	June 2024	Action Points (from previous meeting)		
		Q1 Quarterly Budget Monitoring Report	Clare Dempsey – Financial Planning & Analysis Team Leader Clare.dempsey@dacorum.gov.uk	
		Q1 Neighbourhood Services Performance Report	Stefania Horne – Strategic Director – Neighbourhood Services Stefania.horne@dacorum.gov.uk	
		Q1 Planning, Development and Regeneration Quarterly reports	Sara Whelan – Assistant Director Strategic Planning and Regeneration Sara.Whelan@dacorum.gov.uk	
July 2024	July 2024	Action Points (from previous meeting)		

Sept 2024	Aug 2024	Action Points (from previous meeting)		
		Q2 Quarterly Budget Monitoring Report	Clare Dempsey – Financial Planning & Analysis Team Leader Clare.dempsey@dacorum.gov.uk	
		Q2 Neighbourhood Services Performance Report	Stefania Horne – Strategic Director – Neighbourhood Services Stefania.horne@dacorum.gov.uk	
		Q2 Planning, Development and Regeneration Quarterly reports	Sara Whelan – Assistant Director Strategic Planning and Regeneration Sara.Whelan@dacorum.gov.uk	
Oct 24	Oct 24	Action Points (from previous meeting)		
Nov 24	Nov 24	Action Points (from previous meeting)		

		Action Points (from previous meeting)		
Dec 2024	Nov 2024	Action Points (from previous meeting)		
		Joint Budget <i>Ideally no further items to be added</i>		
Jan 2025	Jan 2025			
		Action Points (from previous meeting)		

Feb 2025	Jan 2025	Action Points (from previous meeting)		
		Joint Budget <i>Ideally no further items to be added</i>		
March 2025	Feb 2025	Action Points (from previous meeting)		
		Q3 Quarterly Budget Monitoring Report	Clare Dempsey – Financial Planning & Analysis Team Leader Clare.dempsey@dacorum.gov.uk	
		Q3 Neighbourhood Services Performance Report	Stefania Horne – Strategic Director – Neighbourhood Services Stefania.horne@dacorum.gov.uk	
		Q3 Planning, Development and Regeneration Quarterly reports	Sara Whelan – Assistant Director Strategic Planning and Regeneration Sara.Whelan@dacorum.gov.uk	
TO BE DATED		CIL Review	Sara Whelan – Assistant Director Strategic Planning and Regeneration Sara.Whelan@dacorum.gov.uk	
		Local Cycling & Walking	Sara Whelan – Assistant Director Strategic Planning	

	Infrastructure Plan	and Regeneration Sara.Whelan@dacorum.gov.uk	
	E-Bikes	Sara Whelan – Assistant Director Strategic Planning and Regeneration Sara.Whelan@dacorum.gov.uk	

Items to be planned in by chair

Luton Airport

Economic Development Update

Place Strategies (Hemel, Berko, Tring)

Maylands Master Plan

Visit to Cupid Green and CCTV

Hemel Garden Communities

Air Quality

Water – Sewage

Rural Plan

Visit Fly Tip – In small groups

Climate Change

Verge Hardening

Buses

Natural England – National Trust