



Issues and Options Consultation Local Plan to 2036

November 2017

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Foreword

This consultation is the first step in creating a new Local Plan for Dacorum. The Plan, which looks ahead to 2036, will be a key document in shaping the future of our Borough and will affect us all. We are therefore keen to encourage as many people as possible to get involved.

You may be wondering why we are preparing a new Plan when we've only recently prepared our Core Strategy and Site Allocations documents, which look to 2031.

These documents have put us in a strong position. They have helped, and will continue to help, steer new building to the places we've planned it and to stop inappropriate development. However, the Planning Inspector who examined our Core Strategy required us to sign up to an 'early review' of key parts of our plan, relating to the level of new homes we would provide and how we consider the future role of the Green Belt.

As these issues have knock-on effects for all other parts of the strategy, we have decided to prepare a whole new Local Plan, to ensure we remain in control of what happens where in our Borough.

We are committed to getting this new Local Plan in place as quickly as possible, whilst at the same time allowing sufficient time for evidence to be updated and for appropriate stages of consultation and engagement.

The Council will continue to plan positively for regeneration and growth and in doing so some difficult decisions will need to be made. Given the limited amount of available land in the Borough and significant environmental constraints it will be vital that the right balance is struck between new development and protecting the character of our towns, villages and countryside which we value so greatly.

It is an important time to get involved and tell us what you think. Using evidence, we have identified what we believe to be the key social, environmental and economic issues and opportunities facing the Borough and have highlighted these in this document. Whilst we set out how and why the Council feels it should try to meet local needs for homes and jobs in full, we have yet to make a final decision on these matters and would like to know your views.

Please respond to this consultation – and encourage others to do so too – your responses will all be considered and will help us to develop our new Local Plan.



Graham Sutton
Planning & Regeneration Portfolio Holder

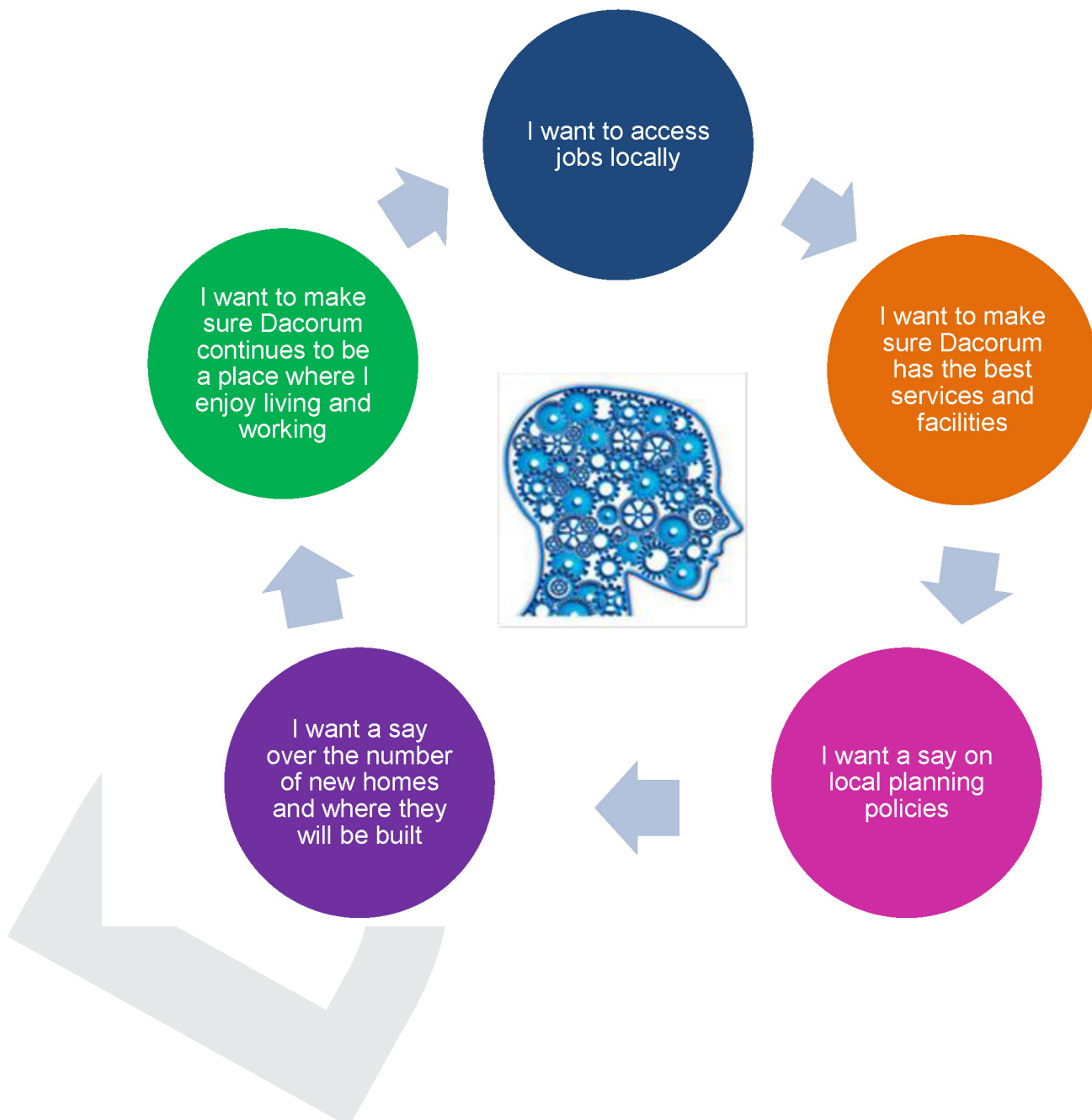
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The opportunity of Growth

The challenge

- 1.0.1** This is the first stage of consultation on the new Local Plan which will provide a planning strategy for Dacorum up to 2036. It is important that local communities, interested people and groups get involved and have their say to help shape the future of Dacorum. This document sets out the planning issues that face the area over the next 20 years and broad options for how they could be addressed.
- 1.0.2** As this document will explain, Dacorum is facing a huge increase in demand for new homes – at a level not seen since Hemel Hempstead New Town was created in the 1950s. But with this challenge comes opportunities. Opportunities to think creatively about how best to meet the needs of residents – both current and future, how we can attract new business and investment to the area, how we can ensure delivery of the necessary infrastructure and how we can best protect our important historic environment, landscapes and habitats. This Issues and Options consultation is therefore not about whether Dacorum should grow or not. Growth of some scale will happen and must be planned for. Rather it is about how this growth is directed and managed, and how we harness the benefits of change.

Why should I get involved?



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How do I comment?

- 2.0.1** This document has been prepared for consultation purposes and is available for public comment until 23:59 hours on 13 December 2017.
- 2.0.2** ***You do not have to answer all of the questions raised. We would welcome your comments on issues that are of particular importance to you.***
- 2.0.3** Where possible, comments should be submitted on-line using our specially designed web page listed below. Further background information is available at: www.dacorum.gov.uk/newlocalplan .
- 2.0.4** A separate questionnaire is also available. Comments can be passed to us:
- On-line at** <http://consult.dacorum.gov.uk>
- By email** Strategic.Planning@dacorum.gov.uk
- By post** Strategic Planning and Regeneration
R
Dacorum Borough Council
The Forum
Hemel Hempstead
Hertfordshire
HP1 1DN
- 2.0.5** A sustainability appraisal working note has been prepared on this document by our specialist consultants TRL. This report appraises the environmental, social and economic implications of the issues raised and options put forward. Your comments on the sustainability appraisal working note are welcomed and can be sent by email or post (see above) or by answering question 1. A separate sustainability appraisal working note has also been carried out for all of the sites within the draft Schedule of Site Appraisals that accompanies this consultation.
- 2.0.6** Copies of the Issues and Options Paper, the draft Schedule of Site Appraisals and the sustainability appraisal working notes are available on our website www.dacorum.gov.uk/planningpolicy at Dacorum Council offices and in local libraries.
- 2.0.7** There will also be opportunities to meet with planning staff face-to-face at public drop-in exhibitions. These will be held during the consultation period. Please visit our website for details on times and locations.
- 2.0.8** If you have any questions regarding this document, please contact a member of the Strategic Planning team on 01442 228660, or via the above email address.

If you are promoting a site for development and did not submit it as part of previous 'Calls for Sites' process please follow the instructions at:

www.dacorum.gov.uk/callforsites

- 2.0.9** ***Please note:*** All comments received will be published on our consultation portal in accordance with the Data Protection Act. They will be used to help inform preparation of the draft Plan (known as the Pre-Submission or Publication Plan), which you will have a further opportunity to comment on in 2018 and 2019.

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Background

3.1 What does this document cover?

- 3.1.1** The main focus of this document is to explore the growth needs in Dacorum and how far these needs should be met. This includes setting out the principles we propose to use when choosing broad locations for new development. The detail of the actual development sites and planning policies will evolve as the new Local Plan progresses.
- 3.1.2** The document is divided into three main sections:
- A vision for the new Local Plan;
 - Issues facing Dacorum when planning for growth; and
 - How this future growth could be accommodated.

3.2 What is a Local Plan?

- 3.2.1** The new Local Plan will address the needs and opportunities for future development growth in our area, as well as protecting those of existing communities. These needs include new housing and employment opportunities, alongside community facilities and supporting infrastructure. In addition, it will safeguard our environment and ensure new development is well designed and adapts to climate change. The new Local Plan will also provide the policies to guide decisions on future planning applications.
- 3.2.2** The new Local Plan will cover the whole of Dacorum’s area and will run until 2036.

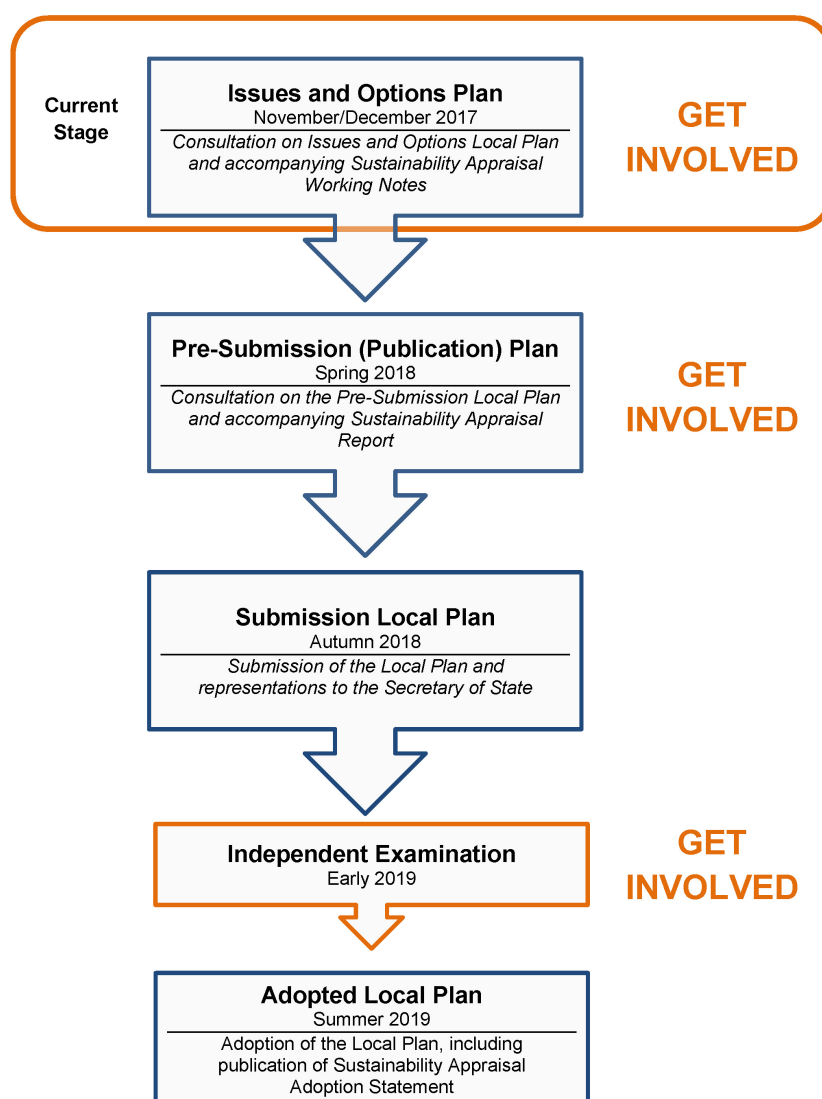
3.3 Why is a new Local Plan needed?

- 3.3.1** All Councils are required to produce a Local Plan and keep it up to date. Dacorum’s current Local Plan isn’t currently a single document, but is made up of the following:
- Core Strategy Development Plan Document (DPD) (adopted September 2013);
 - Site Allocations Development Plan Document (DPD) (adopted July 2017); and
 - ‘Saved’ parts of the Dacorum Borough Local Plan 1991-2011 (adopted May 2004).
- 3.3.2** This is supported by other supplementary guidance.
This is supported by other supplementary guidance.
- 3.3.3** Whilst much of the content of these documents remains valid and can be carried forward into the new single Local Plan with minimal change, other areas require more comprehensive review. This includes those areas highlighted in the Core Strategy as requiring early review. These are:
- Housing need,
 - The role and function of the area’s Green Belt; and
 - The role that effective co-operation with other Councils could have in helping meet Dacorum’s housing needs.
- 3.3.4** Without an up-to-date Local Plan, we would have very limited influence over the location of new development and the provision of infrastructure. Sites could be promoted for development in locations that the Council and its communities want to protect. Not having a Local Plan would create uncertainty and make it harder to secure appropriate sites for new infrastructure such as schools and health facilities.
- 3.3.5** Having no further growth in Dacorum is not an option. The Government continues to stress the need for housing growth in all areas and has stated that if Councils do not deliver this by way of a Local Plan, then the Government could impose growth in that area. The new Local Plan is therefore the opportunity for local communities to plan for how Dacorum should grow and improve.

3.4 What are the key stages in preparing the new Local Plan?

3.4.1 The timetable for preparing the new Local Plan with details on key stages of public consultation is summarised below. Further information about the timetable is contained within our Local Development Scheme. Further information about how we will carry out these consultations is set out in our Statement of Community Involvement. Both are available online at www.dacorum.gov.uk/planningpolicy.

Key Stages in preparing the Local Plan



3.5 How will we assess the likely impacts of the Plan?

- 3.5.1** To help inform this consultation, we have also published an Issues and Options Sustainability Appraisal (SA) working note. This has been undertaken by Consultants TRL on behalf of the Council and incorporates the requirements of the European Directive on Strategic Environmental Assessment (SEA) as well as considering the issues of equality and diversity.
- 3.5.2** The SA assesses this consultation document against a range of social, environmental and economic indicators and helps to identify all the likely significant effects. It then advises on ways in which any adverse effects could be avoided, reduced or mitigated and how any positive effects could be maximised. This helps us to ensure that the emerging policies, plans and allocations in the new Local Plan will promote sustainable development.

The components of sustainable development



- 3.5.3** There is also a requirement to undertake a Habitats Regulations Assessment (HRA) which will accompany the next stage of consultation on the new Local Plan. This will assess whether the new Local Plan could cause damage to European habitat sites. For Dacorum this is the Chilterns Beechwoods Special Area of Conservation (SAC) at Ashridge and Tring Park. The HRA advises on how any such damage could be avoided or if any impacts are too great.
- 3.5.4** The Council will take into account the findings of the SA and HRA processes when preparing the new Local Plan, alongside other considerations of national policy and guidance, our evidence base and formal consultation responses.

Question 1

Do you agree with the conclusions reached in the Sustainability Appraisal working notes that accompanies this Issues and Options document?



Yes / No

If No, please explain why and what you think needs to be amended.

3.6 How will we engage with other Councils and partners?

- 3.6.1** Dacorum Borough Council is committed to co-operation with other Councils and key organisations on planning issues that cross the Council’s boundary. This is to make sure that strategic issues such as providing land for new homes, jobs and infrastructure are properly co-ordinated. We have already had discussions with a number of key partners including other local planning authorities, Hertfordshire County Council and Highways England. We have undertaken an initial Duty to Co-operate scoping consultation on potential cross-boundary matters. The results of these discussions have fed into this consultation document and further joint working will continue.
- 3.6.2** In addition, the Council needs to have regard to other authorities' plans. This includes neighbouring authorities' Local Plans, Hertfordshire County Council's Minerals and Waste Plans, and strategies of any other relevant bodies.
- 3.6.3** The Government's recent consultation document 'Planning for the right homes in the right places' (September 2017) makes it clear that co-operation between neighbouring authorities will need to be further formalised through written 'Statements of Common Ground.'

Question 2

Have we reflected all cross boundary issues, or issues of particular importance to you or your organisation?



Yes / No

If no, please explain what we have missed and how they should be addressed in the plan.

3.7 Other Plans and Strategies

- 3.7.1** The challenge of planning for the future of Dacorum cannot be tackled by the Local Plan alone. They are already being addressed in varying degrees by a range of other strategies and policies at national, county and local levels. It is therefore important that our new Local Plan complements and reinforces these.
- 3.7.2** The Government requires Local Plans to be positively prepared, justified, effective and consistent with national planning policies and guidance.
- 3.7.3** The National Planning Policy Framework (NPPF) provides the main context for local plans. It also provides guidance for decision-making in the absence of relevant local planning policies. The NPPF is due to be updated and reissued in Spring 2018. The Government asks Councils to be positive and proactive, and support development which encourages economic growth and the creation of sustainable communities. The content of the NPPF is due to be revised shortly, to reflect changes suggested within the 2017 Housing White Paper ('Fixing the Broken Housing Market'). We have also taken into account the content of the Government consultation on 'Planning for the right homes in the right places' (September 2017).
- 3.7.4** Further details regarding how Government wishes Councils to address issues within their Local Plans is set out in Planning Practice Guidance (PPG). This is a web-based document that is updated on a regular basis. The Government also publishes additional topic-based guidance as appropriate such as that relating to Caravans and Houseboats (Draft, March 2016) and Planning Policy for Travellers (March 2015).

Local Plans should avoid repeating policies that are already covered by national policy and guidance and not duplicate matters covered by other legislation.

- 3.7.5** There are also a wide range of documents prepared on a county or local level which we need to take into account. These include:
- Perfectly Placed for Business (Hertfordshire Local Enterprise Partnership);
 - Hertfordshire Local Transport Plan;
 - South West Hertfordshire Growth and Transport Plan (emerging); and
 - Hertfordshire Biodiversity Action Plan.

3.8 Evidence Base

- 3.8.1** As well as working with partners and stakeholders, the Council has already started collecting and producing the evidence that will inform the content of the Local Plan. This work is referred to as the Evidence Base and includes studies on particular topics like the need for new homes, shops and jobs. It will be expanded as the new Local Plan progresses, but at this stage has helped us to identify key issues, challenges and options within this document. Details of the relevant evidence are given at the end of each section. All documents supporting this Local Plan are available to view on our website via www.dacorum.gov.uk/planningpolicy.

Question 3

Have we taken account of all relevant studies and reports as part of our Issues and Options work?

Yes / No

If no, please explain what the gaps in our evidence are and how they should be addressed.



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A vision for the new Local plan

4.1 Does the current vision need updating?

- 4.1.1** Local Plans are expected to set out a clear vision for the local area. This vision is the means to measure the success of the overall strategy and the more detailed strategic priorities that have been identified.
- 4.1.2** A vision was drawn up for the Core Strategy, which covered the period to 2031. This vision reflected feedback from public consultation at the time the Core Strategy was drawn up and much of its content remains relevant today. However, some updating is required to ensure it appropriately reflects increasing pressures for growth; refers more explicitly to addressing infrastructure needs; and updates references to the regeneration of Hemel Hempstead town centre. There may be other changes that you also feel should be made. The suggested revised vision is shown below. This may require further refinement depending on the growth Option chosen (see section 10 'How this future growth could be accommodated').

DACORUM 2036: A VISION

How things could be with our new Local Plan in place

Dacorum is recognised as a happy, healthy, prosperous and safe place in which to live, work and enjoy.

The natural beauty of the Chiltern Hills and the varied character of the countryside is admired and cherished. The countryside is actively managed and supports a healthy local economy and diversity of wildlife. Water quality in the rivers is good and towns and villages have sufficient water supply. Local housing needs have been met, with the impact on the countryside minimised through making effective use of previously developed land in the towns and villages.

The growth and regeneration of Hemel Hempstead continues, with further improvements to the town centre, the Apsley and Two Waters area and Maylands Business Park. The town is fulfilling its potential as a sub-regional business centre, with the Enterprise Zone supporting the green technology sector.

The market towns of Berkhamsted and Tring and the large villages provide the necessary services for their communities and surroundings.

The economy is buoyant and all parts of the borough have local employment opportunities, which are both varied and accessible.

Communities are inclusive and healthy. Minority groups are an accepted part of culture and diversity. New homes are affordable and cater for the needs of the population. Open space, facilities and services are accessible. New schools have opened and access to the Watford Health Campus is improved. Public transport is more widely used and provision for pedestrians and cyclists has improved.

Differences in the character of each place are recognised and valued. Developments reflect local character through their design, and sustainable methods of construction are the norm. Special features, such as the Grand Union Canal, remain an active part of the heritage of the borough. The wider historic environment is valued and protected.

Question 4

Do you agree with the suggested vision for the Borough?

Yes / No

If no, please explain what changes you would like to see and why.



- 4.1.3** In our current Core Strategy document, the Borough vision is complemented by a set of local visions set out in the individual Place Strategies for each town, large village and the wider countryside. These local visions express specific local objectives and set out what these places will be like in the future. These strategies will be rolled forward into our new Plan and updated as required.

Question 5

Does our current Core Strategy reflect the specific local aspirations and/or qualities that you feel should continue to be reflected in the visions for Hemel Hempstead, Berkhamsted, Tring, Markyate, Kings Langley, Bovington, or the wider countryside?



Yes / No

If no, please explain what changes you would like to see and why.

4.2 What are the Plan's overarching objectives?

- 4.2.1** This vision for the plan needs to be underpinned by a series of objectives that will guide the direction of the detailed policies within it.
- 4.2.2** Discussions with other Councils in south west Hertfordshire and beyond have indicated that the following issues need to be addressed on a cross-boundary basis:
- Transport
 - Education provision
 - Provision of new homes
 - Provision of new jobs
 - Approach to the Green Belt
 - Approach to the countryside and environmental protection
 - Provision of health facilities
 - Water – both drinking and waste
- 4.2.3** These issues are reflected in the objectives set out in the current Core Strategy, which, subject to some minor amendments are considered to remain valid for the new Local Plan. The suggested objectives are set out below. There may be some further amendments you feel should be made.

Sustainable Development

- To promote healthy and sustainable communities and a high quality of life.
- To mitigate and adapt to the impacts of climate change.
- To promote social inclusion and cohesiveness, embrace diversity and reduce inequalities.
- To enable convenient access between jobs, homes and facilities, minimise the impact of traffic and reduce the overall need to travel.
- To promote the towns of Hemel Hempstead, Berkhamsted and Tring as the focus for homes, jobs and strategic services.
- To conserve and enhance the function and character of the villages and countryside.
- To ensure the effective use of existing land and previously developed sites.
- To create safe and attractive environments through high quality design.

Strengthening Economic Prosperity

- To promote a vibrant and prosperous economy.
- to strengthen confidence in Hemel Hempstead's role as a thriving sub-regional business centre and shopping hub.
- to develop Maylands Gateway as a hub for Envirotech business.
- to maintain commercial enterprise and employment opportunities in the market towns and large villages.
- to support rural enterprise.

Homes and Community Facilities

- To provide a mix of new homes to meet the needs of the local population.
- To provide for a full range of social, leisure and community facilities and services.

Looking After the Environment

- To protect and enhance Dacorum's distinctive landscape character, open spaces, biological and geological diversity and historic environment.
- To promote the use of renewable resources, reduce carbon emissions, protect natural resources and reduce waste.
- To protect people and property from flooding.
- To minimise the effects of pollution on people and the environment.

Infrastructure and Delivery

- To ensure that all development contributes appropriately to local and strategic infrastructure requirements.
- To co-ordinate the delivery of new infrastructure with development.

Question 6

Do you agree with the suggested objectives for the new Local Plan?

Yes / No

If no, please explain the changes you would like to see and why.

**4.3 What policies will the Plan include?**

4.3.1 The Government requires local Councils to include policies in their plans that cover the following topics (where appropriate to the area):

- The homes and jobs needed in the area;
- The provision of retail, leisure and other commercial development;
- The provision of infrastructure, telecommunications, waste management, water supply, waste water, flood risk and coastal change management, and the provision of minerals and energy (including heat);

- The provision of health, security, community and cultural infrastructure and other local facilities; and
 - Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.
- 4.3.2** Within Dacorum, responsibility for minerals and waste planning lies with Hertfordshire County Council who prepare separate Minerals and Waste Local Plans.
- 4.3.3** It is proposed that the new Dacorum Local Plan follows the same broad structure as the Council's current Core Strategy. It will however need to incorporate and update many of the more detailed policies relating to the control of development from the previous Dacorum Borough Local Plan (2004) that are still being used. A suggested policy list is set out in Section 12.1 'Appendix a) Draft list of policies for Local Plan'.

Question 7

Do you agree with the proposed policy coverage of the new Local Plan?



Yes / No

If no, please set out what issues, topics or policies you think need to be included.

4.4 Issues facing Dacorum when planning for growth

- 4.4.1** The role of the new Local Plan is to identify the best possible locations for future development and set out how important assets will be protected. Development locations should minimise impacts upon environment, make best use of existing infrastructure where possible, or identify locations capable of being served by new infrastructure and services. This represents sustainable development, for the benefit of existing and future communities. Local Plans are critical in ensuring the proper planning of an area and to create a co-ordinated approach to providing new homes, jobs and supporting infrastructure whilst protecting the interests of existing communities.
- 4.4.2** The following sections (5-9) set out the main issues which face Dacorum when planning for the growth needed to 2036 on a topic by topic basis. Each topic is introduced by a series of facts which provide some relevant context. These sections are:
- Our towns, villages and countryside
 - Homes
 - Our economy
 - Our environment
 - Infrastructure
- 4.4.3** Conclusions from each section are drawn together in a series of potential 'Growth Options' (see section 10 'How this future growth could be accommodated').
- 4.4.4** After each issue we ask for feedback on whether you support the approach we propose to follow in the new Local Plan. This provides the opportunity to put forward any alternative approach(es) that you feel we should consider, and to explain why. There is also the opportunity at the end of section 10 (10 'How this future growth could be accommodated') to comment on the sites contained within the draft Schedule of Site Appraisals.



Our towns, villages and countryside



In 2016 Dacorum was home to about **153,000** people



There are **four** mainline stations

85% 

of the borough is rural with 60% of this designated as Green Belt



64,000

estimated households (2016)



The Borough covers **210km²**



There is good access to the **M1** and **M25**



During 2015-2016, **86%** of houses were completed on previously developed land

16  percent

of the households do not own a car, whilst 10% have three or more cars

The average distance commuted to work increased from 14km to

16km 
between 2001 and 2011



Hemel Hempstead New Town was designated in **1947**

Introduction

5.0.1 Our Core Strategy is currently the document which sets out the overarching approach towards development within Dacorum. It establishes the roles of our towns, villages and countryside, sets out broadly where new development will be focussed and how it will be accessed, promotes high quality design and helps promote sustainable development.

5.1 Issue 1 – How should we distribute new development?

5.1.1 Our current approach in the Core Strategy distributes development in line with what is called a 'settlement hierarchy.' This relates the size of settlements to levels of local services, facilities and infrastructure they contain. It chiefly focuses new development on the main towns, with lower levels of development directed towards the three larger villages. The smaller villages also play a role in meeting development needs, but in a much more limited way.

5.1.2 This approach targets new housing and other development to the larger settlements (particularly Hemel Hempstead) in order to:

- make the most efficient use of land and local service provision;
- minimise impacts on the Green Belt;
- reduce the need to travel to access jobs and services;
- protect the appearance and distinctiveness of the area; and
- safeguard the countryside and attractive landscapes from development.

5.1.3 The new Local Plan provides an opportunity for us to look again at this development strategy and check that it remains fit for purpose.

Our proposed approach

5.1.4 Our draft Settlement Hierarchy Study, which looks at the role and function of each of our towns and villages, concludes that our existing approach to the distribution of development correctly reflects the different characteristics of each place. It does not recommend any significant changes to the role of any individual towns or villages within the hierarchy, but emphasises the importance of continuing investment in and regeneration of Hemel Hempstead. The study also recognises that future growth will need to be supported by infrastructure improvements.

5.1.5 Further consideration is given as to how we distribute new development when we discuss future growth options (see section 10 'How this future growth could be accommodated').

Question 8

Do you agree with the proposed broad approach to distributing new development?

Yes / No

If no, please explain what alternative approach or changes to our proposed approach you would like and why. Where possible, support your answer with reference to any evidence.



5.2 Issue 2 – What is the role and function of the Green Belt?

5.2.1 Almost 85% of our Borough is rural. 60% of this area, and just over half of the Borough is designated as Green Belt. A key purpose of Green Belt is to keep a sense of openness between built up areas (in this case around London), together with other factors such as protecting the countryside from development and supporting urban regeneration. Green Belt also provides opportunities for people to access the countryside, to grow food and support nature conservation.

- 5.2.2** Government policy states that most types of development should not be allowed in the Green Belt. At the same time, it is clear that this does not rule out all development in the Green Belt. The Government also says we must plan for enough sustainable development to meet our future needs. This means that in an area like Dacorum we have to try to balance these two conflicting requirements. We can amend Green Belt boundaries, but in order to do this we need to show that there are ‘exceptional circumstances’. A review can only be done as part of the Local Plan process. Any changes to the Green Belt boundary should take a long term view, so that we don’t need to look at them each time we update our Plan.
- 5.2.3** We commissioned a Green Belt Review (Stage 1, November 2013) which considers all the Green Belt in Dacorum. This is supported by a further Green Belt Review and Landscape Appraisal (Stage 2, January 2016) which considers the Green Belt adjoining our main settlements. The studies break the Green Belt into parcels and assess these against nationally set criteria. The Stage 2 study also considers the wider issue of landscape setting.
- 5.2.4** The studies conclude that most of our Green Belt meets the Government’s criteria for designation. There are however a few areas which don’t meet all of the criteria and so could have their Green Belt designation removed. This could allow planned development to then take place.
- 5.2.5** These conclusions will help us consider whether we should earmark some Green Belt land for new housing or other uses, and if so, how much and where. This final decision will depend on the Growth Option we choose and if exceptional circumstances exist.
- 5.2.6** However, whether or not particular areas of land meet Government criteria for Green Belt designation is not the only consideration for growth locations. We also need to consider how sustainable these areas would be if they were developed. For example, how could they be accessed, could they provide the necessary infrastructure needed to support the development and how would they affect the character of the town or village?
- 5.2.7** In the Housing White Paper the Government suggests a checklist of things that we need to consider before making any changes to our Green Belt boundaries. These include:
- making best use of brownfield sites and supporting their regeneration;
 - making best use of land which is currently underused, including land owned by the public sector;
 - maximising the density at which new development is built; and
 - exploring whether any other Councils can help meet some of our local needs.
- 5.2.8** The new Local Plan will need to consider all of these matters before coming to a final decision about the level and location of growth. See section 10 ‘How this future growth could be accommodated’ for further information on these growth options.

Major Developed Sites

- 5.2.9** We currently allocate a number of large and well-established developments in the Green Belt as ‘Major Developed Sites.’ These help to meet local education, housing and employment needs, for example Abbot’s Hill School, Berkhamsted Castle Village and Bovington Prison. The boundaries for these sites are set out in the Plan and whilst there are still restrictions regarding the amount of new development that can happen in these locations, it is a little more flexible than the policies that apply to areas in the wider Green Belt. We propose to continue this approach in the new Local Plan, but would welcome your views on any additional sites that should be considered for this designation.

Defined village boundaries

- 5.2.10** Decisions made by Government Planning Inspectors at recent planning appeals have clarified that the village boundaries that we show on the Policies Map (that accompanies our 2004 Local Plan) provide a ‘starting point’ for debate and cannot be applied as a definitive boundary when determining planning applications. However, showing such boundaries can help control the extent of infill development in villages and limit the effects of sprawl. Whether this approach of using village boundaries is continued or not, and whether any further small villages should have boundaries identified, will be considered as part of the Plan review and we would welcome your views.

Detailed Policies

- 5.2.11** As well as setting out our overall approach to the Green Belt, the new Local Plan also needs to include more detailed policies which control what people can do to existing buildings and land within the Green Belt. An example would be a policy that sets limits on how far you can extend existing homes. Our new Local Plan should also provide locally appropriate definitions for terms used in national Green Belt policy, to ensure we apply our policies in a consistent and fair way. These include terms such as ‘disproportionate,’ ‘materially larger,’ ‘limited infilling’ and ‘major development.’

Question 9

Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?



Yes / No

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

5.3 Issue 3 – What is the role and function of the wider Rural Area?

- 5.3.1** The ‘Rural Area’ is the name that we give to the countryside that isn’t designated as Green Belt. It largely covers the area around Wilstone / Long Marston, and that north of Berkhamsted and Hemel Hempstead. Much of this land falls within the Chiltern Area of Outstanding Natural Beauty and is poorly located in terms of access to key services and facilities.
- 5.3.2** In the past, we have treated the Rural Area in a similar way to the Green Belt and the Settlement Hierarchy Study suggests that restrictions on development in the countryside – whether Green Belt or Rural Area - should continue to be applied consistently. We therefore propose to assess sites in the Rural Area in broadly the same way as those in the Green Belt and take forward the same broad policy approach as in our current plans.

Question 10

Do you agree with the proposed approach to the Rural Area summarised above?



Yes / No

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

5.4 Issue 4 - How will we select development sites?

- 5.4.1** Whilst the Settlement Hierarchy will help inform the overall distribution of growth in the area, our new Local Plan also needs to identify (allocate) sites that fulfil these growth needs and explain how these have been selected. This involves consideration of a range of factors.

Size of sites

- 5.4.2** It would be impractical and almost impossible to try to identify all future development sites in the Local Plan, particularly when these sites will be very small in size. In terms of housing, we suggest that we continue our current approach of only including sites with a capacity of 10+ units and/or a minimum of 0.3 ha in area as specific allocations within the Plan. This doesn't mean that smaller sites cannot come forward for development. They just wouldn't be shown on the Policies Map and so wouldn't have a specific set of requirements set out for them (within a development schedule in the Plan).
- 5.4.3** Generally, we should plan for a variety of sites over the plan period. This will encourage a spread of opportunities, provide greater flexibility over the timing of sites, ensure a steady release of land, and will promote opportunities for a range of developers. However, very large scale development (e.g. sites of over about 3,000 homes, or large business parks) will put substantial pressure on local infrastructure. They may also take considerable time to get started and so only deliver homes or jobs at the end of the plan period (i.e. around 2036). As a result, we don't suggest that such schemes are fully allocated now, but there may be opportunity to reserve or 'safeguard' all or part of such land for use after 2036.
- 5.4.4** Where safeguarded land lies between a town or village and the Green Belt beyond, it is treated in the same way as Green Belt except that its protection is not necessarily guaranteed beyond the end of the plan period (in our case, beyond 2036). Planning permission for development on safeguarded land can only be given following a future Local Plan review.

Type of Sites

- 5.4.5** In addition to not identifying all sizes of sites, we also feel that it isn't always appropriate to allocate every type of site that is available. For example, we usually choose to exclude sites if they are already at an advanced stage in the planning application process, as they are likely to be completed before the Plan comes into force. However, these sites still contribute to overall homes and jobs targets set in the Plan and we monitor site completions on an annual basis to identify these.
- 5.4.6** When sites are put forward for consideration, we must consider whether they are (a) available, (b) suitable, and (c) achievable. If a site does not meet these requirements, then we cannot allocate it in the Plan.
- 5.4.7** Government also requires us to prove that the new Local Plan is deliverable. The sites that are eventually allocated for development must be able to come forward in a timely and co-ordinated way and by 2036. The timing of sites will be subject to a number of factors, including scale, the need for site preparation, marketing, and the timing of key pieces of infrastructure.
- 5.4.8** As the new Local Plan progresses, we will refine potential site allocations through the sustainability appraisal process and further assessments of their deliverability and viability.

Brownfield Sites

- 5.4.9** The Government encourages the use of brownfield sites, which are sites that have been previously developed. As part of our current Local Plan, a large number of these brownfield sites have, or are being, developed, with 84% of new homes since 2006 having been built on brownfield sites. However, more recently this level has dropped, as the availability of brownfield sites has reduced.
- 5.4.10** Our priority will be to maximise the use of brownfield sites. Government expects us to demonstrate that we have fully explored such sites before Green Belt sites are considered. We maintain a Brownfield Register of housing sites and this will help ensure we maximise the number of new homes from brownfield sites. The development of brownfield land is a common starting point for all our potential growth options (see section 10 'How this future growth could be accommodated').

- 5.4.11** The continued renewal of Hemel Hempstead new town, through the redevelopment of brownfield sites, will be a crucial part of the new Local Plan. In particular, there is considered to be scope to accommodate around 1,130 new homes as part of regeneration of the Two Waters and Apsley area of Hemel Hempstead. This regeneration is being taken forward through a masterplan, which has been separately consulted upon.
- 5.4.12** However, even if we encourage higher densities / taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or densities to fully meet our future growth needs.



Apsley Lock, an example of a former brownfield site

Greenfield Sites

- 5.4.13** Greenfield sites are undeveloped sites in both the urban areas and in the countryside. As brownfield sites are a finite resource, it is likely that we will need to rely more on greenfield opportunities in the future. Such sites can offer greater opportunity for large-scale developments or uses that would be difficult to accommodate in the urban areas.
- 5.4.14** Whilst it is important to keep areas of open space within our towns and villages (see section 9 'Infrastructure'), there may be some greenfield sites that could be developed. However, many greenfield sites are covered by other planning designations – such as the Green Belt, or landscape and environmental designations, such as the Chilterns Area of Outstanding Natural Beauty (AONB) and Wildlife Sites. These constraints will all be very important factors in assessing where new development should be located.
- 5.4.15** As mentioned above, it may not always be possible to deliver very large greenfield developments within the timescale the new Local Plan covers, but we can consider “safeguarding” these sites for development beyond the plan period.
- 5.4.16** Whilst this Issues and Options document does not make final decisions about which sites will be chosen for future development, we have begun this assessment process. The assessment for sites that could accommodate 50+ new homes is contained in the draft ‘Schedule of Site Appraisals’ (October 2017), with smaller sites considered through the Strategic Land Availability Assessment (SHLAA) process (see section 6 'Homes' for more information). This information will be refined as work on the new Local Plan progresses.

If there are any brownfield or greenfield sites that you feel have development potential, please complete the ‘Call for Sites’ form on www.dacorum.gov.uk/callforsites and submit this information to the Council alongside your consultation response. Suggestions for new brownfield sites will also be considered for inclusion on our Brownfield Register.

Question 11

Do you agree with the proposed approach to selecting sites?

Yes / No

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

5.5 Issue 5 - How will people get around?

5.5.1 Government policy requires plans to direct future growth to ‘sustainable locations’ which enable maximum use to be made of public transport, cycling and walking. Choosing sites that make the most of these existing and potential modes of transport can help reduce greenhouse gas emissions, improve air quality, lower levels of congestion, reduce the need for major new transport infrastructure, promote more sustainable patterns of development and encourage healthier lifestyles.

5.5.2 We consider that the key transport issues within Dacorum are as follows:

- Poor east-west public transport links;
- Capacity of strategic and local road network;
- Capacity of Euston to Glasgow (West Coast main line) railway;
- The poor quality of some of our railway stations;
- The ongoing reduction in local bus services and increasing fares;
- Balancing the needs of car and other road users (i.e. pedestrians and cyclists);
- Ensuring appropriate levels of parking are provided with new development; and
- Impact of expansion of Luton airport (particularly for those areas under the flightpaths).

Transport Plans

5.5.3 Hertfordshire County Council (HCC) is the local highway authority and is therefore responsible for the majority of transport policies and schemes in the area. Only the really major routes, such as the M25 and M1, are managed more centrally, by Highways England.

5.5.4 HCC prepare the overarching transport strategy for the county – known as the Local Transport Plan (LTP). This LTP is currently under review and the new document is expected to place much greater emphasis upon improving walking and cycling routes, better public transport between towns and encouraging shared transport schemes (such as lift-share and car clubs), than in the past.

5.5.5 HCC has also prepared town level plans – called Urban Transport Plans (UTPs). There are currently UTPs in place for Hemel Hempstead and a joint document covering Northchurch, Berkhamsted and Tring. HCC intend to replace these UTPs with new Growth and Transport Plans (GTPs) which focus on transport corridors and growth areas and cover the period up to 2031. The South West Hertfordshire GTP is currently in draft form and covers parts of Dacorum, Three Rivers, Watford, St Albans and Hertsmere areas.

Transport Modelling

5.5.6 Although not an exact science, transport modelling provides us with a greater understanding of the current and future transport challenges in the area. HCC use the ‘Paramics’ Model (for Hemel Hempstead) and the ‘COMET’ Model (for the whole of Hertfordshire). This shows that traffic levels and issues in the area vary significantly between peak times and other times of the day.

- 5.5.7** Modelling undertaken for the Core Strategy and Site Allocations DPD indicate that the additional traffic generated through new development can be accommodated on the road networks (subject to some improvements to key roads and junctions).
- 5.5.8** The need for further new or improved transport infrastructure to support the additional growth that our new Local Plan will include will become clearer once the preferred locations for growth have been finalised. We have asked for a run of the COMET model to be carried out to provide an initial assessment of the impact of the middle growth scenario (Option 2C section 10 'How this future growth could be accommodated'). The results of this model run will help us understand the likely infrastructure improvements needed (see section 9 'Infrastructure')

Parking

- 5.5.9** We are currently reviewing our parking standards. This review covers parking levels for certain uses and also looks at whether these levels should vary based on how close different areas are to key services and facilities. This review will inform new parking guidance, which we will consult on separately.
- 5.5.10** In addition to this work, the County Council are also updating their guidance on the layout and design of parking areas.

Question 12

Do you think that we have covered the key issues relating to roads, transport and accessibility that should be addressed in the new Local Plan?

Yes / No

If no, please explain what changes you would like to see and why. Where possible, support your answer with reference to any evidence.

5.6 Issue 6 - How can we maximise the quality of new development?

- 5.6.1** Our aim is to achieve high quality design in all schemes. The Plan will provide policies and guidance to support well designed developments when applications are submitted.
- 5.6.2** Government guidance emphasises the importance of good design and the role it plays in good planning and making places better for people. It says that we should refuse planning permission for poorly designed development that doesn't improve the character and quality of an area and how it functions.
- 5.6.3** Our current approach acknowledges that design encompasses far more than just the architecture of a building, or how things look. The principles of good design apply at all scales from considering what is in-keeping with the character of a town or village, right through to the choice of materials for individual schemes. They also include issues relating to overall layout, access and considerations of safety and security.
- 5.6.4** We suggest that this approach continues to be guided by the following:
- Urban Design Assessment (2010 and 2011);
 - Existing guidance on Residential Character Areas;
 - Local Village Design Statements, such as that prepared by Chipperfield Parish Council;
 - Neighbourhood Plans, such as that prepared by Grovehill Futures;
 - Chilterns AONB Management Plan, Building Design Guide and supplementary Technical Notes;
 - Conservation Area Appraisals;

- Good Practice from the Building Futures partnership which promotes sustainable places and good design:
<https://www.hertfordshire.gov.uk/microsites/building-futures/building-futures.aspx>; and
- The principles of ‘Secured by Design’.

5.6.5 In response to recent pressures for both higher densities and building heights, we are also preparing guidance on tall and taller buildings. This will look at where there is scope to go upwards in terms of building heights, and equally where this wouldn’t be appropriate, and how such buildings should be designed.

5.6.6 We will also continue to include design principles as part of master plans or concept frameworks for key development sites within the new Local Plan.

Question 13

Do you agree with the proposed approach to ensuring good quality design within Dacorum?



Yes / No

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

5.7 Issue 7 – What other policies are required to help us control and guide new development?

5.7.1 What we refer to as ‘development management’ policies are important because they help provide more detailed guidance about what the Council will and won’t support in terms of new development.

5.7.2 These policies include those on design which are currently in our Core Strategy document, but also a range of other policies which are still being used from our 2004 Local Plan.

5.7.3 In some instances we intend to retain, merge or delete policies from these previous plans. Supplementary guidance and site master plans will support the approach where necessary. Section 12.1 ‘Appendix a) Draft list of policies for Local Plan’ sets out an initial list of policies we suggest should be included in the new Local Plan.

Question 14

Do you agree with the list of suggested policies for the new Local Plan, set out in Appendix a)?



Yes / No

If no, please explain what we have missed and why it should be included.

Evidence

- National Planning Policy Framework (March 2012)
- Core Strategy (adopted September 2013)
- Dacorum Settlement Hierarchy study (Draft) (October 2017)
- 2015/16 Authority Monitoring Report
- Employment Land Position Statement (1st April 2016)
- Residential Land Position Statement (1st April 2016)
- Draft Two Waters Master Plan Guidance (June 2017)
- Hertfordshire Local Transport Plan 2011-2031
- Hertfordshire County Council Rail Strategy (2011)
- Hertfordshire County Council Growth and Transport Plan – South West Hertfordshire (Draft 2017)
- Hertfordshire County Council Bus Strategy (2011)
- Hemel Hempstead Urban Transport Plan (2009)
- Tring, Northchurch and Berkhamsted Urban Transport Plan (2013)
- COMET model results
- Maylands Growth Corridor and M1 junction 8 improvements (Emerging results)
- Hertfordshire Transport Vision 2050, HCC, October 2016
- Policy Advice Note version 1 (July 2017)
- Urban Design Assessments (2010) and Update Paper (2011);
- Area Based Policies - Residential Character Areas for Hemel Hempstead, Berkhamsted and Tring
- Chipperfield Village Design Statement
- Grovehill Futures Neighbourhood Plan
- Chilterns AONB Management Plan 2014-2019, Building Design Guide and supplementary Technical Notes
- Conservation Area Appraisals for Aldbury, Berkhamsted, Bovingdon, Chipperfield, Frithsden, Great Gaddesden, Hemel Hempstead Old Town and Nettleden
- Building Futures partnership:
<https://www.hertfordshire.gov.uk/microsites/building-futures/building-futures.aspx>
- Green Belt Review purposes assessment: Stage 1 (November 2013)
- Stage 2 Green Belt Review and Landscape Appraisal (January 2016 (Published December 2016))
- Schedule of Site Appraisals (October 2017)



DRAFT



Homes



In 2016 you would need **eleven times** the average pensions wage to afford an average priced house

Over **4,000**  homes have been built since 2006 (i.e. an average of 404 homes per year)



32% of pensioners in the area live alone

In the last 10 years,

1,130 

new affordable homes have been built. Of which most were rented accommodation

The council manages over **10,000** houses (October 2015) 



Since **2006**

nearly two thirds of all homes built were flats



six%

of households are considered to be overcrowded (i.e. have 1 room too few)

36 

existing traveller pitches, with a further 12 pitches in the pipeline



Since **2006** over half of new housing was either 1 or 2 bedroom properties

There are **5,609** households on the Council's waiting list for Council housing



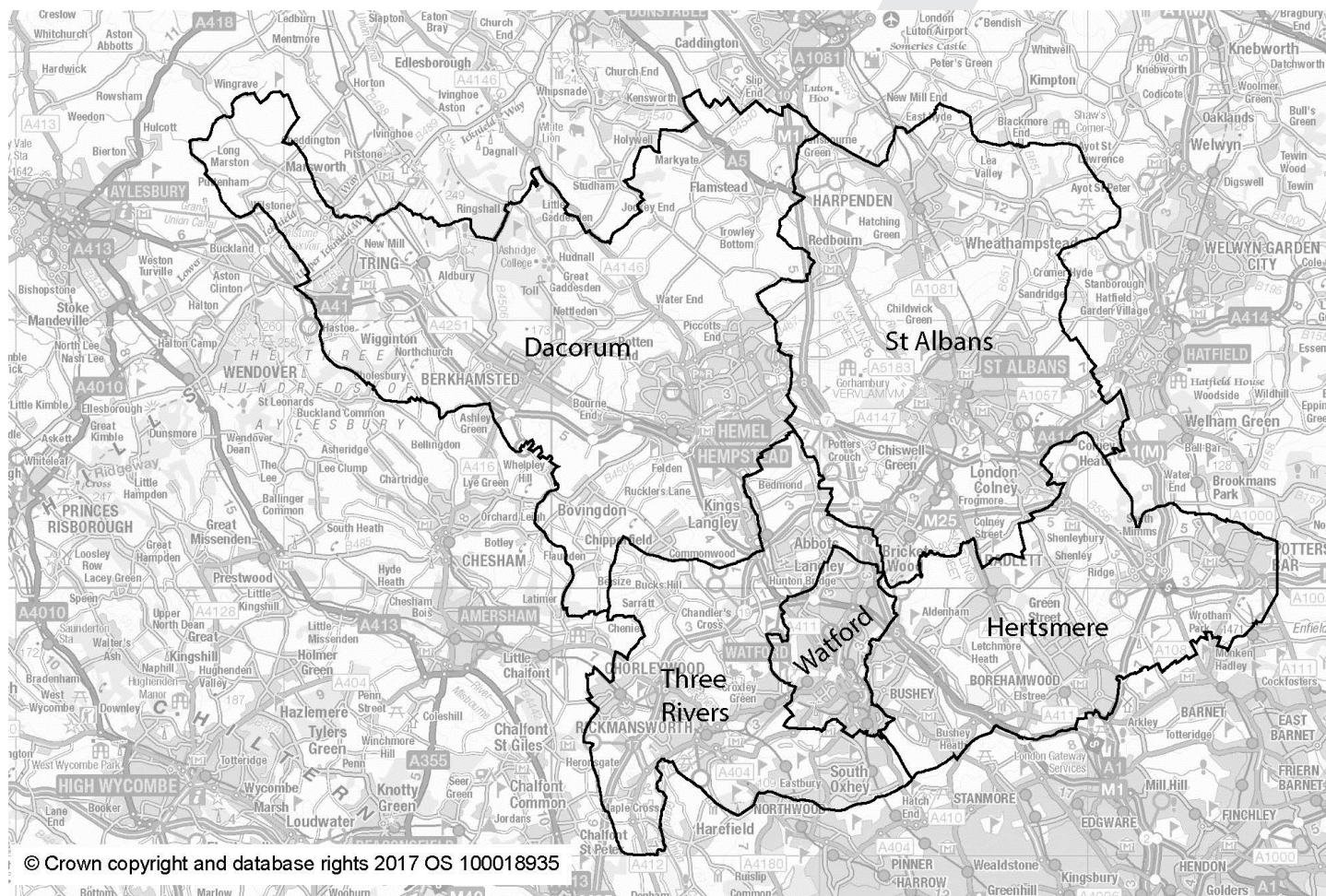
6.1 Issue 8 – How many new homes need to be provided by 2036?

- 6.1.1** The Government is seeking to significantly increase new house building, to meet growing housing needs. The recent Housing White Paper contained a number of measures aimed at spurring on Councils and developers to plan for and build more homes more quickly. This is a key challenge for our new Local Plan.
- 6.1.2** We must plan to meet the full need for both market and affordable housing in our area, as long as this is consistent with other Government planning policies. This is a quantitative assessment of the number of new homes that are needed in the area over the plan period.
- 6.1.3** Our Strategic Housing Market Assessment (SHMA) sets out what our local housing market area is and identifies the mix and tenure of housing we need to plan for. It also provides a local assessment of what our housing need is. The Government is currently consulting on a different way of calculating local housing need, which we also need to take into account.

The Housing Market Area

- 6.1.4** The Government requires us to assess the need for new homes in our 'Housing Market Area' (HMA). These are areas that share similar characteristics in terms of migration and commuting patterns, and house prices.
- 6.1.5** In 2016, the South West Hertfordshire SHMA defined a South West Hertfordshire Housing Market Area (see map below). This covers the Dacorum, Hertsmere, St Albans, Three Rivers and Watford Council areas.
- 6.1.6** At the time of writing this document, St Albans Council doesn't agree that it should be included within this Housing Market Area, mainly because of house price differences. However, our consultants who produced the SHMA tell us that there are very strong grounds for continuing to include St Albans because of its strong links to the rest of the area.
- 6.1.7** South West Hertfordshire's local housing market is influenced by close connections to London. Other more localised links include Tring with Aylesbury Vale, Markyate with Central Bedfordshire and Luton, and Bovingdon with Chiltern.
- 6.1.8** The Government's consultation document 'Planning for the right homes in the right places', published in September 2017, also stresses the importance of these Housing Market Areas as a logical area for discussing other key planning issues, such as the provision of new infrastructure.

The South West Hertfordshire Housing Market Area



Question 15

Do you agree with the definition of the Housing Market Area, as shown in the South West Hertfordshire Strategic Housing Market Assessment?



Yes / No

If no, please explain what changes you would like to see and why. Where possible, support your answer with reference to any evidence.

Calculating Local Housing Need

- 6.1.9 Household projections produced by the Government are the starting point for assessing the total need for new homes in our area. Current guidance also says we must also consider whether the housing need figure should be increased to support job growth, help deliver affordable housing, or take account of 'market signals'.
- 6.1.10 Using just the household projections (with a 2012 base date), our SHMA calculated a need for 728 additional homes a year to be provided in Dacorum. The SHMA then used information from one of our employment studies to consider whether economic growth was likely to further increase the need for new homes. It concluded that there was no need to increase the housing figure to support expected job growth.

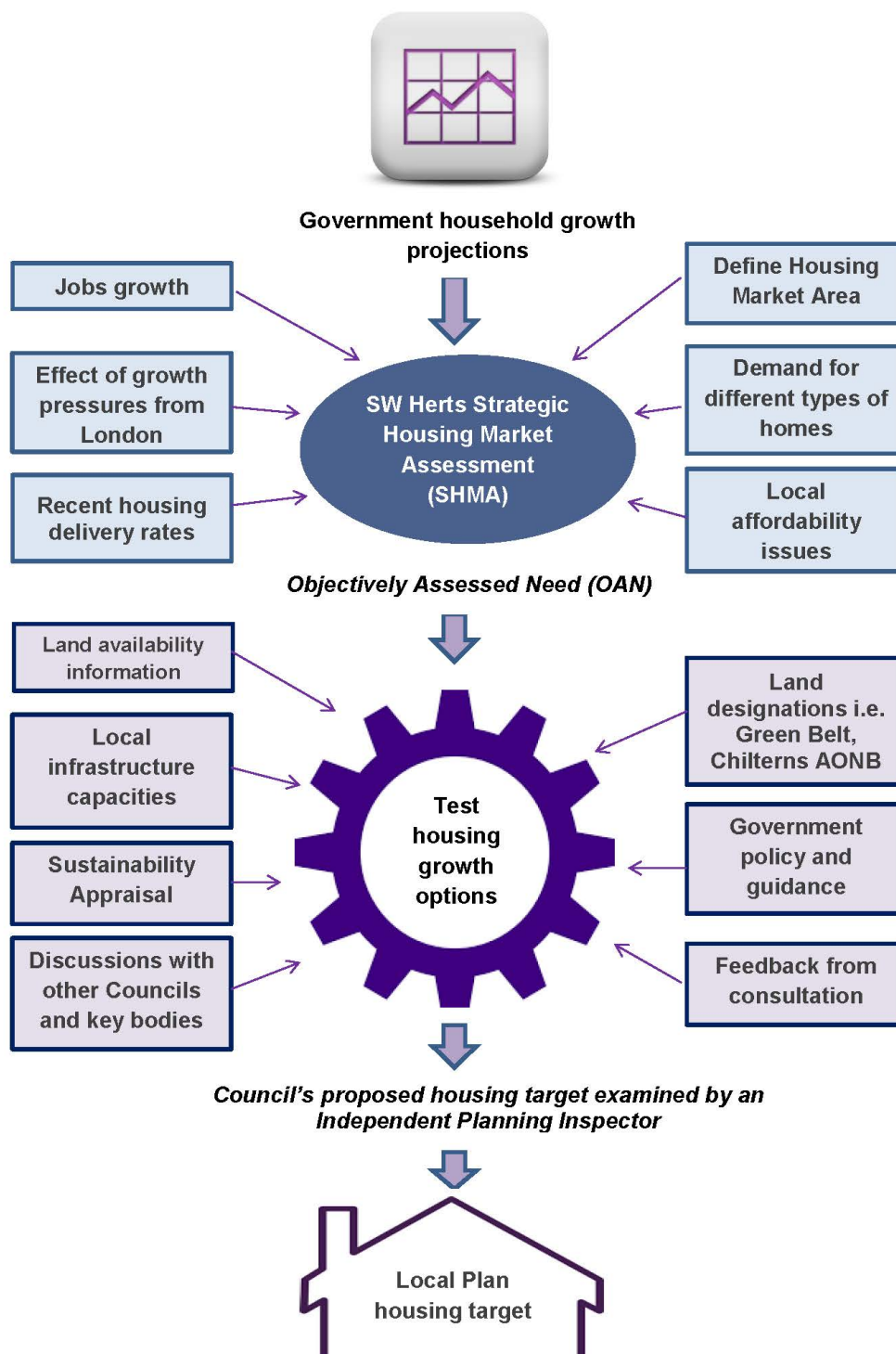
- 6.1.11** The next factor the SHMA considered was whether the total need for new homes should be increased to reflect other ‘market signals.’ These may include land prices, house prices, rent levels, affordability, historic rates of development and overcrowding. Taking account of these ‘market signals’, the SHMA concluded that an additional 28 homes a year will be needed in Dacorum.
- 6.1.12** Drawing all of the strands of evidence together results in our local assessment indicating a total need for 756 homes a year in Dacorum and 3,151 new homes a year in South West Hertfordshire between 2013 and 2036. This is detailed in the table below

Conclusions from the SHMA

	New homes needed each year 2013-2036	Total homes 2013-2036
Dacorum	756	17,388
Hertsmere	599	13,777
St Albans	705	16,215
Three Rivers	514	11,822
Watford	577	13,271
South West Hertfordshire Total	3,151	72,473

- 6.1.13** The flow diagram below shows how the conclusions of the SHMA about local housing need currently influence the Council's final decision on what housing target to set in the Local Plan. Please see the SHMA document itself if you would like further explanation of how these conclusions were reached (listed at the end of this section).

The current process of setting a housing target (note this would change as a result of the Government's current proposals for assessing housing need)



6.1.14 In September 2017 the Government published a consultation document, 'Planning for the right homes in the right places', which suggests a new standard approach to calculating housing need. This aims to reduce the differences in the approaches taken by SHMAs across the country

and tries to make the process faster, less technical and more transparent. The consultation document is accompanied by an indicative assessment of housing need for each local authority based on the Government's proposed formula. The Government's approach to housing need differs according to whether an authority has an up to date Local Plan (i.e. one that is less than 5 years old) or not. Because we have a Core Strategy that is currently less than 5 years old, our draft figure is 602 homes a year. This is based on a 40% increase on our current housing target of 430 homes a year. If the proposed formula for authorities with older plans is used, this figure rises to around 1,000-1,100 homes a year. The consultation indicates that this higher figure would need to be used once our plan gets more than 5 years old i.e. from September 2018 onwards.

- 6.1.15** We have some concerns about how robust and realistic the Government's proposed formula is and will be raising these concerns in our response to the consultation document. The Government's final approach is due to be set out in a revised version of the National Planning Policy Framework (NPPF), expected in Spring 2018.
- 6.1.16** Whatever figure is finally agreed as being the best approximation of our local housing need, it will represent a substantial increase over the current housing target and historic rates of building in the area.
- 6.1.17** In addition to trying to meet our own housing need, we may also be asked to help meet unmet housing needs from other nearby areas, including London. To-date the only request has come from Welwyn Hatfield Council, which falls outside of our Housing Market Area.

Question 16

Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?



- a) The Government's draft figure of 602 homes a year**
- b) The figure of 756 homes a year**
- c) The figure of 1,000 to 1,100 homes a year from the Government's draft standard formula**
- d) Another figure (please specify).**
- If no, please explain your answer with reference to any evidence.**

6.2 Issue 9 – What land is available for the new homes needed?

- 6.2.1** Whilst the SHMA provides us with our starting point for considering the number of new homes we need to plan for, we also need to understand what land might be available to meet these needs. This is of course on top of any extra land we might need for employment and other important uses.
- 6.2.2** We have a good understanding of our current housing supply in terms of information on the number of homes already built, the levels of planning permissions, progress on existing planned housing sites, and other potential housing sites.
- 6.2.3** In 2014 and 2015 we asked developers and landowners to let us have details of sites that they felt were suitable for a range of developments, including housing, through a “call for sites” exercise. Information on additional sites is still coming forward. The majority of land promoted through this process was large sites in the Green Belt.

- 6.2.4** Information on available sites is also drawn from our Strategic Housing Land Availability Assessment (SHLAA). This study concluded that at 1st April 2015 there was capacity for just over 14,500 homes in the Borough. However, the bulk of these are on sites where housing is not acceptable in terms of the Council's existing planning policies, being on greenfield sites on the edge of our towns and villages, or in the wider countryside. We are also drawing up a 'Brownfield Register.' This work will help us further improve our knowledge of the supply of brownfield land that is suitable for housing.
- 6.2.5** 'Windfall' sites can further add to our housing supply. These are sites that are not specifically allocated for housing in the Local Plan, but come forward for development on a more ad-hoc basis. However, by their very nature they are difficult to predict and Government rules prevent us from relying too heavily upon them as a source of supply. Our current Core Strategy only assumed a modest windfall assumption for smaller sites of around 50 homes each year. Recently, the Government has relaxed planning control on certain types of development (for example, allowing the conversion of office buildings to housing) in order to both speed up and boost housing supply, and in particular for brownfield sites. If continued, this trend could further increase the windfall figure. For our new Local Plan we will check our windfall figure and also consider whether we should make any assumption for larger windfall sites.
- 6.2.6** Reducing the number of vacant properties is also an important part of our overall approach. However, there will always be some vacancies in any healthy housing market. We will keep these to a minimum within the housing stock we own and manage. In July 2017, there were only 30 vacant Council properties across the whole area.
- 6.2.7** In order to boost future housing supply and support the regeneration of Hemel Hempstead, we have undertaken several area and site-specific studies. These include the Two Waters masterplan, which concludes there is potential for around 1,130 additional homes in this area of Hemel Hempstead, largely through the conversion of underused employment land and increasing building heights and densities.
- 6.2.8** Taking all of the above sources of information into account, we estimate that there is the capacity to provide around 10,940 homes from existing and planned sites that are consistent with existing planning policies:

Location	Assumed housing capacity (2013-36)*
Hemel Hempstead	8,900
Berkhamsted	600
Tring	500
Bovingdon	90
Kings Langley	50
Markyate	200
Small villages and the countryside (combined)	600
TOTAL	10,940

* Some of this capacity has already been built out over the 2013-16 period (1,257 homes).

- 6.2.9** Whilst this figure of 10,940 will be kept under review, it is not expected to change dramatically. What this means is that if we are to try to meet local housing needs in full (or aim for a figure above this), then we will have to make up the difference through greenfield land, from Green Belt sites around the edge of our towns and villages.

What about the Gorhambury land at East Hemel Hempstead?



Land to the east of Hemel Hempstead forms part of the wider Gorhambury Estate owned by The Crown Estates. Whilst the land immediately borders Hemel Hempstead, it lies within St Albans District. Part of this land was allocated in the St Albans' draft Strategic Local Plan (SLP) as a growth location referred to as 'East Hemel Hempstead' (see map above). It was previously earmarked to provide about 2,500 new homes and 55ha of new employment land. There may be pressure for this number of homes to increase as St Albans progress work on their new Local Plan.

We have previously objected to the fact that that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and jobs targets, and none towards Dacorum's. The St Albans Local Plan is now being re-appraised and a new version will be prepared.

Whilst St Albans has now indicated that some of the jobs at East Hemel Hempstead could count towards Dacorum's jobs target (see section 7 'Our Economy'), the housing issue remains unresolved. Discussions with St Albans Council on this and other cross-boundary planning matters will continue as both our new Local Plans are progressed.

This is an important issue as the final decision will obviously affect how much land we will need to allocate for housing in our own area.

6.3 Issue 10 – What types of homes do we need to plan for?

- 6.3.1** Government policy requires us to identify the types and sizes of homes likely to be needed in the future, including homes for groups with specific housing needs. Whilst the new Government document 'Planning for the right homes in the right places' looks at the issue of overall housing need, it doesn't provide any guidance about how we look at this issue of mix. This issue is however picked up by the South West Hertfordshire SHMA.

Housing size and type

- 6.3.2** Our SHMA estimates that the following mix of new house sizes is needed over the 2013-2036 period across South West Hertfordshire to meet the areas needs:

	1 bedroom	2 bedrooms	3 bedrooms	4+ bedrooms
Open market homes	5-10%	25-30%	40-45%	20-25%
Affordable homes	30-35%	30-35%	25-30%	5-10%
All homes	15%	30%	40%	15%

- 6.3.3** Based on this advice we will need to decide on what housing mix to require through our new Local Plan and also take into account detailed local evidence, such as information gained from managing our existing affordable housing stock.
- 6.3.4** In considering the housing mix on individual development sites, the SHMA advises that we need to take into account the nature of the site and character of the area, evidence of need and the existing mix and turnover of properties in the locality.
- 6.3.5** The SHMA indicated that the size of homes will also vary depending on their tenure. It suggests that we plan for mainly larger sized open market homes and smaller sized affordable homes. Our past experience suggests that larger greenfield sites are more likely to provide opportunities for family sized homes than brownfield sites in our towns and villages. These brownfield sites tend to be more suitable for smaller houses and flats.



A development of affordable homes on Maylands Avenue

Affordable Housing Need and Mix

- 6.3.6** As explained above, Government guidance requires us to look at whether we should increase our housing need figure to take account of what they call ‘market signals.’ We know that house prices are very high in the area and our SHMA showed that affordability pressures in South West Hertfordshire were above the national average.
- 6.3.7** Affordable homes generally fall into two different categories. Intermediate housing covers a range of different schemes, including Help-to-Buy and low cost homes for sale. The other type of provision covers social housing or ‘affordable rent.’
- 6.3.8** The report suggested that an appropriate mix of new affordable homes in South West Hertfordshire as a whole would be 20% intermediate housing and 80% social or affordable rented homes. However, they advised due to the high number of social rented homes we already have in Dacorum, that we could increase the intermediate housing proportion up to 30% in this area.

Our proposed approach

- 6.3.9** The Local Plan will need to establish a target for affordable homes. This will need to take account of development viability as well as the evidence showing the level of need.
- 6.3.10** Whilst the SHMA indicates the overall scale of affordable housing need in the area, it doesn’t recommend setting a specific percentage of new homes we should require to be affordable. In the current housing market, continuing to require 35% of all new homes to be affordable, subject to viability considerations, on sites of 11 or more dwellings is considered reasonable, with a general emphasis on properties for rent. Increasing the overall supply of new housing will therefore help boost the supply of affordable homes. We could consider requiring a higher

percentage level. However, this is unlikely to be a realistic option for all sites, bearing in mind the need to balance affordable housing contributions with other developer contributions and still ensuring sites remain viable to develop in financial terms.

- 6.3.11** We consider that our current approach to ask for higher levels of affordable housing on any future large greenfield housing sites should continue i.e. asking for 40% rather than the standard 35% provision. Although this will need to be confirmed through further viability testing work.
- 6.3.12** We believe that there also remains a role, albeit small, for housing schemes on rural sites that deliver a very high proportion (ideally 100%) of affordable homes. House prices in villages remain especially high and the supply of affordable homes here is generally more restricted. Such homes can help support the vitality of villages and allow people who are in housing need to stay living locally.
- 6.3.13** The provision of affordable homes will however be complicated by changes beyond our control. Changes to national policy have reduced the type of sites we can ask for affordable housing on, making it harder to ask for contributions from sites of ten homes or less. We could seek to challenge this requirement by trying to set a lower threshold, but consider this would be hard to do and limited additional numbers of new affordable units would provide. The broadening of the Government's definition of 'affordable' to include types of homes previously excluded, together with the continued rise in house prices locally, will also affect how many affordable homes we can realistically deliver.
- 6.3.14** The Council has an active 'New Build Programme', where we use our own land, or buy other land on which to build new affordable homes. This programme is expected to continue and will be an important additional source of local affordable homes.

Question 17

Do you agree with the proposed approach to affordable housing?

Yes / No

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.



Travellers and other temporary accommodation

- 6.3.15** We recognise that new traveller sites raise particular concerns with the settled community. However, national policy and guidance advises that we must plan for new traveller pitches alongside more traditional "bricks and mortar" housing. If we do not effectively plan for the needs of travelling communities we will see an increase in illegal sites in the area, which are harder to control.
- 6.3.16** At present there are two existing sites accommodating 36 pitches in the Borough. The largest site at Three Cherry Trees Lane in Hemel Hempstead has 30 pitches, whilst the smaller site at Cheddington Lane, Long Marston has 6 pitches. Both are managed by Hertfordshire County Council. A pitch provides space for one household.
- 6.3.17** We undertook an assessment of future pitch needs in January 2013 and as a result have made provision in the Site Allocations DPD for two additional sites (on land at Marchmont Farm and West Hemel Hempstead), which will provide a further 12 pitches.
- 6.3.18** Together with Watford Borough Council, we have commissioned consultants to update our existing Traveller Needs Assessment to take account of recent changes to Government policy. These changes include altering the definition of what types of families can be considered to be 'Gypsies and Travellers' for planning purposes.

- 6.3.19** If this new assessment recommends that further new pitches need to be provided, then we will need to decide where this provision should be. The extension of existing sites in Hemel Hempstead and Long Marston is not practical. Previously, we have sought to provide new sites as part of major new housing developments, bearing in mind the practical difficulties of securing standalone sites, and we suggest that this general approach is carried forward into the new Local Plan. As there is currently a high concentration of pitches around Hemel Hempstead we will need to consider whether any future new sites should be located elsewhere in the Borough.
- 6.3.20** If the updated needs assessment advises that there are a number of families who do not meet the new definition, we still have a legal obligation under housing legislation to provide them with what is referred to as 'culturally appropriate accommodation.'
- 6.3.21** We also need to ensure that our new policies allow us to make decisions on speculative applications for traveller sites. The best way of dealing with this is through a set of policy criteria that looks at the need for, and suitability of, such sites.
- 6.3.22** The County Council's traveller liaison team will continue to guide us in our decisions on this and other related matters.
- 6.3.23** Our new needs assessment will also update current advice on the need for sites for travelling showpeople and also those of other forms of non-permanent accommodation e.g. those living on canal houseboats and in park homes.

Specialist Accommodation for Older Persons

- 6.3.24** In 2013 16% of South West Hertfordshire's population was aged over 65. By 2036 this figure is expected to grow by 65%, for the 75-84 group by 60% and those aged over 85 by 137%. As a result, the SHMA estimates that we need to make provision for an average of 72 homes per year for specialist accommodation for older people, as part of our overall housing need. This could be in the form of sheltered accommodation or "Extra Care" provision (also referred to as "Flexi-Care").
- 6.3.25** Local knowledge of demand and the availability of suitable housing stock will help inform decisions on the appropriate mix of specialist housing in development schemes.
- 6.3.26** Residential and nursing care provision was analysed separately to general housing need within the SHMA. It concluded that Dacorum has an overall need for 688 additional residential and nursing care bed spaces between 2013 and 2036, which equates to 30 new bed spaces each year. Our new Local Plan will need to set out how these needs will be met.
- 6.3.27** Schemes for specialist housing and accommodation for older persons are already coming forward as the market responds to increasing local demand. The new Local Plan will need to ensure that this trend continues, by requiring suitable provision as part of larger housing allocations or on specific sites. Some forms of specialist housing can also be secured through the adaptation of existing homes.

Other types of accommodation

- 6.3.28** Houses in Multiple Occupation (HMOs) help provide for lower cost accommodation in the area. Where schemes come forward, it is important that local amenities are protected, that they provide adequate facilities for their residents, and that the character of residential areas is protected. Our current planning policies do not cover HMOs, but we intend to amend our existing policy on flat conversions to cover this.
- 6.3.29** We also keep a register of individuals and community groups who are interested in acquiring 'serviced land' for self-build and custom-build housing projects. So far demand in this area is low, with fewer than 50 names on the register. There may however be opportunities for some (self build home) plots to be set aside on public land (including land owned by the Council) and on larger housing developments. The new Local Plan provides an opportunity to make such provision.

Question 18

Do you agree with the proposed approach to planning for specific types of housing?



Yes / No

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence

6.4 Issue 11 – How should the delivery of housing sites be managed?

- 6.4.1** We need to ensure a steady release of housing land over the plan period to meet the housing target we set, encourage the development of brownfield sites and to ensure we continue to have a supply of housing land towards the end of the plan period, when the number of brownfield sites may drop off.
- 6.4.2** The timing of major infrastructure to support growth will be a key factor to take into account when considering the timing of sites coming forward. We consider that sites within our towns and villages should be able to come forward at any time (i.e. they should be un-phased). Most small to medium urban sites can be developed without placing significant pressure on local infrastructure. Larger urban sites will naturally be subject to some form of phasing in terms of physical delivery, infrastructure needs and marketing, and these will be delivered over a number of years.
- 6.4.3** Historically, we have sought greater control on the release of any Green Belt sites that are allocated for development as our wish was to give priority to brownfield sites. In the Core Strategy, the Council took the following into account when determining the release of a series of Green Belt sites (the “local allocations”):
- a. The availability of infrastructure in the settlement;
 - b. The relative need for the development at that settlement; and
 - c. The benefits it would bring to that settlement.

Our proposed approach

- 6.4.4** We believe that there may be good reasons to continue the approach of staggering the release of any large Green Belt sites required. Considerations include the general availability of urban sites in the short to medium term, the need to maintain a steady supply of new homes over the whole plan period and future pressures on local infrastructure that may take some time to address. However, our evidence is telling us that housing need is likely to substantially increase. In addition, initial work on the Schedule of Site Appraisals indicates that many of the Green Belt sites can be delivered early and the larger ones have the ability to secure necessary key infrastructure. This will need to be tested carefully when we assess the suitability of these sites as the plan is prepared.
- 6.4.5** We must ensure that a 5 year land supply is available at all times. As mentioned in section 5 'Our towns, villages and countryside', we can also 'safeguard' land that we know will be needed for development after the end of the current plan period i.e. after 2036. This approach would allow for sites to be appropriately masterplanned and for infrastructure improvements to be made in a timely manner.

Question 19

Do you agree with the proposed approach to the timing of site delivery?



Yes / No

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.


Evidence

- National Planning Policy Framework (May 2012)
- South West Hertfordshire Strategic Housing Market Assessment (SHMA) (2016)
- South West Hertfordshire Economic Study (February 2016)
- Dacorum Core Strategy (adopted September 2013)
- Dacorum Site Allocations Development Plan Document (adopted July 2017)
- Housing White Paper: Fixing Our Broken Housing Market (February 2017)
- Dacorum Strategic Housing Land Availability Assessment (April 2016) (SHLAA)
- Dacorum 2015/16 Authority Monitoring Report (AMR)
- Dacorum Residential Land Position Statement (April 2016)
- Two Waters Master Plan Guidance (Draft) (July 2017)
- Dacorum Borough Council Gypsy Traveller Needs Assessment (January 2013)
- Planning Policy for Traveller Sites (August 2015) (PPTS)
- Planning for the right homes in the right places : consultation proposals, Department for Communities and Local Government (September 2017)






Our economy

Average income is 
£30,000
compared to £30,800 in
Hertfordshire as a whole

60% 
of residents travel
to work by car




The area has a working age
population of **83,600**


83.4%
of working age residents
are economically active.
(June 2016)

64,500 
jobs in Dacorum – including many in
retail, professional and education sectors (2015)


13.1%
of under 16s live in
poverty (2014)


7,600
enterprises in 2016


78% residents educated
to GCSE/NVQ Level 2 (2016)
– compared to 72% East of
England and 74% in Great Britain


Our tourism
industry
is worth
£256m
per year.

7.1 Issue 12 - How should our local economic area be defined?

- 7.1.1** The Government requires us to assess the future quantity of land or floorspace required for offices, industry and warehousing for our Local Plans. This must be done on the geography of what they call 'Functional Economic Market Areas' (FEMAs). These areas are defined largely by analysing data on travel to work and migration. Connections with London are also important, as many residents commute to the capital.
- 7.1.2** In 2016, the South West Hertfordshire Economic Study defined a South West Hertfordshire FEMA. This covers the following Council areas:
- Dacorum
 - Hertsmere
 - St Albans
 - Three Rivers
 - Watford
- 7.1.3** This FEMA covers the same area as our Housing Market Area (HMA) (see map in section - 6 'Homes').
- 7.1.4** St Albans Council currently considers its area should be excluded from this FEMA. However, the consultants who produced the Economic Study found that St Albans has clear links with Dacorum, Hertsmere, Three Rivers and Watford and that this justifies their inclusion.

Question 20

Do you agree with the definition of the Functional Economic Market Area in the South West Hertfordshire Economic Study?



Yes / No

If no, please explain what changes you would like to see and why. Where possible, support your answer with reference to any evidence.

7.2 Issue 13 – How many new jobs are needed in Dacorum by 2036?

- 7.2.1** South West Hertfordshire is economically strong, given its location close to London in the most economically dynamic area of the country. The local workforce has above average skills and qualifications compared to the UK as a whole.
- 7.2.2** The South West Hertfordshire Economic Study (2016) estimated that jobs (measured as full time equivalent roles) in the area will increase by 60,700 between 2013 and 2036. For Dacorum during the same period, the forecast increase is 10,900 jobs.
- 7.2.3** Around 48% of the additional jobs needed in South West Hertfordshire over this 23 year period are predicted to be in the office, industrial and warehousing roles. The Dacorum figure for these roles is 58%, which amounts to 5,400 full time equivalent jobs. The overall jobs growth forecast each year to South West Hertfordshire is 0.8% a year. This is above the national average, but considered to be a realistic prediction for a prosperous area such as this.
- 7.2.4** The job growth forecasts in the Economic Study have been translated into the following forecasts for office, industrial and warehousing jobs and floorspace growth (2013-2036):

	Jobs growth (full time equivalent)		Floorspace growth (sq. metres)	
	SW Herts	Dacorum	SW Herts	Dacorum
Offices *	26,500	5,600	461,000	103,000
Industrial	-2,600	-700	-122,000	-42,000
Warehousing	1,400	500	134,000	44,000
Total	25,300	5,400	473,000	105,000

* Including research and development

7.2.5 The Economic Study also estimated the amount of additional land required for these uses over this 23 year period as follows:

	Offices (hectares)	Industrial (hectares)	Warehousing (hectares)	Total
Dacorum	13	-10	10	13
SW Herts	52	-31	30	51

7.2.6 The floorspace implications for different types of employment uses are important to consider, as the land required to provide one job in the industrial / warehousing sector is significantly greater than the land required to provide one office based job. For example, office sites on average provide around eight times as many jobs as warehousing sites.

7.2.7 A more detailed look at Dacorum's future employment land needs is provided by the Dacorum Employment Land Availability Assessment (ELAA) (October 2017). This study considers the amount, type and geographical spread of land required for offices, industry and warehousing uses. It took account of the South West Hertfordshire Economic Study's forecasts, but also considered whether the Council should plan for more or less development. The land availability study's main conclusions are set out below:

DEMAND FOR OFFICE USES

- Watford and St Albans are the main office centres in South West Hertfordshire, but scope for further major office building is limited, except near Watford Junction station.
- Dacorum is not a commercially attractive location for new office development and almost no new offices have been built recently. Office floorspace has been reducing and there is vacant office space. Several buildings have been converted to housing and this is continuing through the Government's 'prior approval' process.
- Hemel Hempstead, Berkhamsted and Tring town centres are not commercially attractive locations for new offices.
- The Maylands Gateway area, next to Junction 8 of the M1 in Hemel Hempstead, is the only site in our area where major office building is proposed. 23 hectares of land remains undeveloped here, but warehousing has recently been allowed on part of the site. Maylands Gateway has good road access, but is poorly served by public transport, partly due to its distance from a train station. This and other factors are likely to continue to limit office development there, at least in the short term.
- Next to Maylands Gateway is the Green Lane site in St Albans District. A large (55 hectare) employment development has been proposed by St Albans District Council in their Strategic Local Plan. Up to around 8,000 office, industrial and warehousing jobs were envisaged. However, their approach to their draft Strategic Local Plan is being re-appraised at the current time. It is understood that the site is likely to carry forward into the new Local Plan they intend to produce. St Albans Council has still to confirm formally if any of these jobs can count towards Dacorum's needs.

- Maylands Gateway and the Green Lane site are within the Hertfordshire Enviro-Tech Enterprise Zone. This improves the prospects for employment development on these sites.

DEMAND FOR INDUSTRIAL AND WAREHOUSE USES

- Market demand for industrial and warehousing development in our area is likely to be higher than assumed in the initial South West Hertfordshire Economic Study. There is a significant demand for large new warehouses and also demand for smaller scale industrial and warehousing development.
- Maylands Gateway is a very attractive location for industrial and warehousing development, including large warehouses. Elsewhere in Dacorum, there is almost no land currently available for industrial or warehousing development.
- The proposed 55 hectare employment development at Green Lane in St Albans District may help to meet some of Dacorum's future needs (see Demand for Office Uses above).
- Some industrial sites have been lost to other uses, mainly housing.

Our proposed approach

- 7.2.8** In the light of these conclusions, the study recommends that we should plan for office job growth as proposed in the South West Hertfordshire Economic Study, but provide opportunities for a higher level of industrial and warehousing jobs. We consider it is sensible to accept these recommendations. We also need to reflect the emphasis on 'enviro-tech' businesses in the newly designated Enterprise Zone, part of which is within the Maylands Business Park.
- 7.2.9** However, these conclusions will be kept under review, as they may change depending on what housing target is finally established for the area (see section 6 - 6 'Homes'). This is because issues of new homes and jobs needs are closely linked.
- 7.2.10** It will also be important to ensure that we work with partners, such as The Hemel Hempstead Ambassadors, and further education providers, such as West Herts College, to ensure the workforce continues to have the right skills to meet the needs of local employers. The continuing demand for units at the Maylands Business Centre, which provides accommodation and support for small local businesses and business start-ups, suggests that there is scope for the new Local Plan to encourage further provision of this type of business accommodation. Whilst the facility in Maylands is Council-run, there are examples elsewhere in the country of similar privately managed facilities.

Question 21



Do you agree with the proposed approach to meeting future jobs growth?

Yes / No

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

7.3 Issue 14 – What additional sites should we set aside for office, industrial and warehousing development?

Land requirements

- 7.3.1** The Dacorum Employment Land Availability Assessment (ELAA) advised us that most existing sites used for offices, industry and warehousing uses in our area are well-used and should be retained.
- 7.3.2** In relation to new offices, the ELAA reached the following conclusions:

LAND FOR OFFICE USES

- Around 18 hectares of new office development are required to achieve the proposed level of office job growth, based on revised calculations.
- The only option for significant new office development in Dacorum is located south west of Kings Langley (west of Watford Road). This site appears attractive for offices, because of its proximity to Kings Langley station, bus routes and M25 Junction 20.
- The Council could allocate about 18 hectares on the Kings Langley site to meet Dacorum's own needs, or possibly a larger area to meet wider South West Hertfordshire needs.
- The site in St Albans District at Green Lane, Hemel Hempstead next to M1 Junction 8 also has potential to meet wider South West Hertfordshire needs. Green Lane is likely to be brought forward for development in the near future. Consequently, the Kings Langley site should be held in reserve and brought forward if Green Lane fails to attract significant office development.

- 7.3.3** Turning to industrial and warehousing sites, our Land Availability Assessment concluded the following:

LAND FOR INDUSTRIAL AND WAREHOUSING USES

- The Council should allocate a portfolio of local quality sites in excess of current allocations. There are potential sites near the A41, but these locations are not attractive for large warehouses.
- Suitable sites are east of the A41 at Two Waters, Hemel Hempstead (5.6 hectares) and Dunsley Farm, Tring (up to 5 hectares). Both sites have good access to the A41 and could accommodate small and medium sized industrial and warehouse units.

- At Maylands Gateway, industrial and warehousing development (including large warehouses) should be acceptable as well as offices.

Our proposed approach

- 7.3.4** The Council considers that it is sensible to accept the recommendations of the land availability assessment study on office, industrial and warehousing sites. This would mean removing land from the Green Belt at south west Kings Langley, east of the A41 at Two Waters, and Dunsley Farm in Tring. We consider that the need for additional employment land justifies such changes to the Green Belt in these areas.
- 7.3.5** As with Section 7.2 7.2 'Issue 13 – How many new jobs are needed in Dacorum by 2036?', this conclusion is provisional and may change to reflect the forthcoming updates to our housing and employment needs figures, that may require us to look again at the balance between new space for homes and jobs.
- 7.3.6** A key issue that still needs further consideration is the scale and timing of any employment development on the Kings Langley site. Our initial view is that about 18 hectares of land should be designated as 'safeguarded land' for possible long-term office development. This means that offices will not be permitted unless a clear need is demonstrated in the future following a Local Plan review. The land would continue to be farmed in the meantime. One of the reasons for this approach is that we don't want to jeopardise the success of the Enterprise Zone at Maylands by having another large new employment site under construction at Kings Langley at the same time. We will need to consider whether the new Local Plan should include specific policies relating to this Enterprise Zone.

Question 22

Do you agree with the proposed approach to choosing sites to accommodate future jobs growth?



Yes / No

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

7.4 Issue 15 – What additional retail development is required and where should this be?

Retail needs

- 7.4.1** Government policy says that our Local Plans should be positive, promote town centre environments and set out policies for the management and growth of centres. They should also allocate sites for the scale and type of retail development and other town centre uses required. A 'sequential approach' should be applied, which means that preference is given to town centre sites, followed by edge of centre sites and then out of centre sites. Out of centre sites should be proposed only if suitable town centre sites are not available, or cannot be made to work in financial terms.
- 7.4.2** Our Core Strategy defines a retail hierarchy for the area. This sets out the role of different town, village and local centres in terms of the amount and range of retail units.

Type of centre	Location
Principal town centre	Hemel Hempstead (including Hemel Hempstead Old Town)
Secondary town centre	Berkhamsted and Tring
Local centre – with a district shopping function	Woodhall Farm, Hemel Hempstead
Local centre – with a neighbourhood shopping function	Adeyfield, Apsley, Bennetts End (Bennettsgate), Boxmoor (St. John's Road), Chaulden, Gadebridge (Rossgate), Grovehill, Heart of Maylands, Highfield (Bellgate), Highfield (The Heights), Leverstock Green, Nash Mills (The Denes) and Warners End (Stoneycroft) in Hemel Hempstead Bovingdon, Kings Langley, Markyate, Miswell Lane (and Western Road) in Tring and Northchurch

- 7.4.3** Our Site Allocations document also shows the existing out of centre retail locations. These include the retail parks at Apsley and Jarman Park in Hemel Hempstead and the new M&S food store in Berkhamsted.
- 7.4.4** Our current policy approach refers to the retail hierarchy and indicates that most retail development will be directed to the town and local centres. The policy also states how much new retail floorspace will be permitted if there is demand. This states new retail development will be allowed outside these areas only if it is assessed to be acceptable in terms of the sequential approach (referred to above) and the impact on existing shopping areas would be limited.
- 7.4.5** Neither the Hemel Hempstead Town Centre Masterplan nor the Site Allocations document contain any site-specific proposals for major new retail development in our town centres. Some potential exists for new shopping at Market Square and the Civic Centre site in Hemel Hempstead town centre, but not on a large scale.
- 7.4.6** Our current policy approach also distinguishes between what are called the 'primary' and 'secondary' frontages in the town centres. The policy encourages shops, restaurants, cafes and some leisure uses in primary frontages, whilst a wider range of uses are allowed in secondary frontages.
- 7.4.7** In practice, most retail development in Dacorum in recent years has been in out of centre locations, including two Aldi foodstores. The town centres, particularly Hemel Hempstead, have experienced a reduction in retail floorspace, mainly caused by changes of use, including to cafes. The three largest retail schemes given planning permission in recent years have all been in out of centre locations as shown below:

Location	Development permitted
Maylands Avenue, Hemel Hempstead	Retail park (12,500 sq. metres)
Jarman Park, Hemel Hempstead	Retail park (10,300 sq. metres)
Gossoms End, Berkhamsted	Lidl food store (1,200 sq. metres)

- 7.4.8** A major refurbishment of the Marlowes Centre and along the Marlowes in Hemel Hempstead town centre is however planned by the landowners. This refurbishment will introduce more leisure and restaurant uses, but may not result in any increase in the overall amount of retail floorspace.

Our proposed approach

- 7.4.9** No conclusions have yet been reached on whether any new proposals for retail development should be included in the new Local Plan. A South West Hertfordshire Retail and Leisure Study is underway and is due to be completed early next year. The recommendations of this study will help shape our final decisions.

- 7.4.10** The Retail and Leisure Study will cover the Dacorum, Hertsmere, Three Rivers and Watford areas. It will advise on the need for and potential location of new retail development in the period up to 2036. Other related uses such as cafes, restaurants, indoor leisure uses and arts and cultural facilities will also be looked at.
- 7.4.11** We are aware that the increasing use of internet shopping is reducing the need for new retail development in Dacorum. Nevertheless, population and income growth will probably justify some additional shopping provision. For example, new local centres will be required if the new Local Plan proposes any major housing developments (see section 10 'How this future growth could be accommodated').

Question 23

Do you agree with the proposed approach to meeting future retail needs?



Yes / No

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

7.5 Issue 16 – What approach should the new Local Plan take to tourism?

- 7.5.1** Although Dacorum is not seen as a major tourist destination, the Borough's visitor economy was worth £256 million in 2015 and supports almost 4,000 jobs. Local tourist attractions include Tring Natural History Museum, Frogmore Paper Mill, the Snow Centre, XC (Extreme Centre), Ashridge Estate (National Trust), Tring Reservoirs and the Grand Union Canal. Others visit to enjoy the plentiful walks and rides in the Chilterns Area of Outstanding Natural Beauty. There are several hotels in Dacorum, providing a wide range of accommodation. Dacorum is also close to important tourist attractions, such as Hatfield House, St Albans Cathedral, ZSL Whipsnade Zoo and the Warner Brothers Studio Tour (Harry Potter) in Leavesden.



The Ashridge Estate, an important local visitor attraction

- 7.5.2** The current Local Plan has an overarching policy that supports tourism and there are also specific policies covering the provision of restaurants, overnight accommodation and pubs.
- 7.5.3** Over the last five years, the Council has been more actively promoting tourism in the area. A Tourism Officer was appointed, a Tourism Strategy drawn up and a Tourism Partnership established. This partnership has brought together representatives from hotels, attractions, pubs and restaurants in the local area and has been assisting the Council in delivering the Tourism Strategy.

Our proposed approach

- 7.5.4** Tourism service delivery for Dacorum has recently been outsourced to a specialist organisation called 'Visit Herts'. The Tourism Partnership is working with Visit Herts to draft a new strategy and action plan to cover 2017-2020.
- 7.5.5** The current Tourism Strategy sets out the vision, objectives and targets for the period to 2017. The vision in the Tourism Strategy states that:

“By 2017 Dacorum will be known as a distinct place and understood for its breadth of assets and depth of offer. It will inspire new and repeat business as a compelling destination of choice for both day and increasingly weekend visits, a convenient base for business and a fantastic resource for those proud to call it home. The destination will be positioned to grow its core markets and take effective steps forward, safe in the knowledge it operates from strong foundations.”

- 7.5.6** The strategy aims to increase visitor numbers, visitor spending and overnight stays by 3% a year.
- 7.5.7** It is suggested that the new Local Plan contains a revised tourism policy, reflecting the increased importance the Council now gives to tourism.

Question 24

Do you agree the proposed approach to encouraging tourism?

Yes / No

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.



Evidence

- Economic Development Strategy for Hertfordshire 2009-2021
- South West Hertfordshire Economy Study (2016)
- Perfectly Placed for Business (Hertfordshire Local Enterprise Partnership) (2014)
- Employment Land Position Statement (April 2016)
- Employment Land Availability Assessment (October 2017)
- Dacorum Tourism Strategy 2015-17 (April 2015)
- Retail Study Update (2009)
- Enterprise and Investment Report 2015/16
- Enterprise and Investment Action Plan 2017-2020
- Hemel Hempstead Town Centre Masterplan (January 2013)





Our environment

Over **230** Wildlife Sites

 **50%**
of household waste is recycled or composted in Hertfordshire

 The Council manages **sixteen** allotment sites

23 
Conservation Areas

Almost **40%** of carbon  emissions are generated by transport

Household water use is **161 litres** 
per head each day, compared to a national average of **150** 

 Over **thirty**
Scheduled Monuments

3 Air Quality Management Areas 

2,000 
plus listed buildings

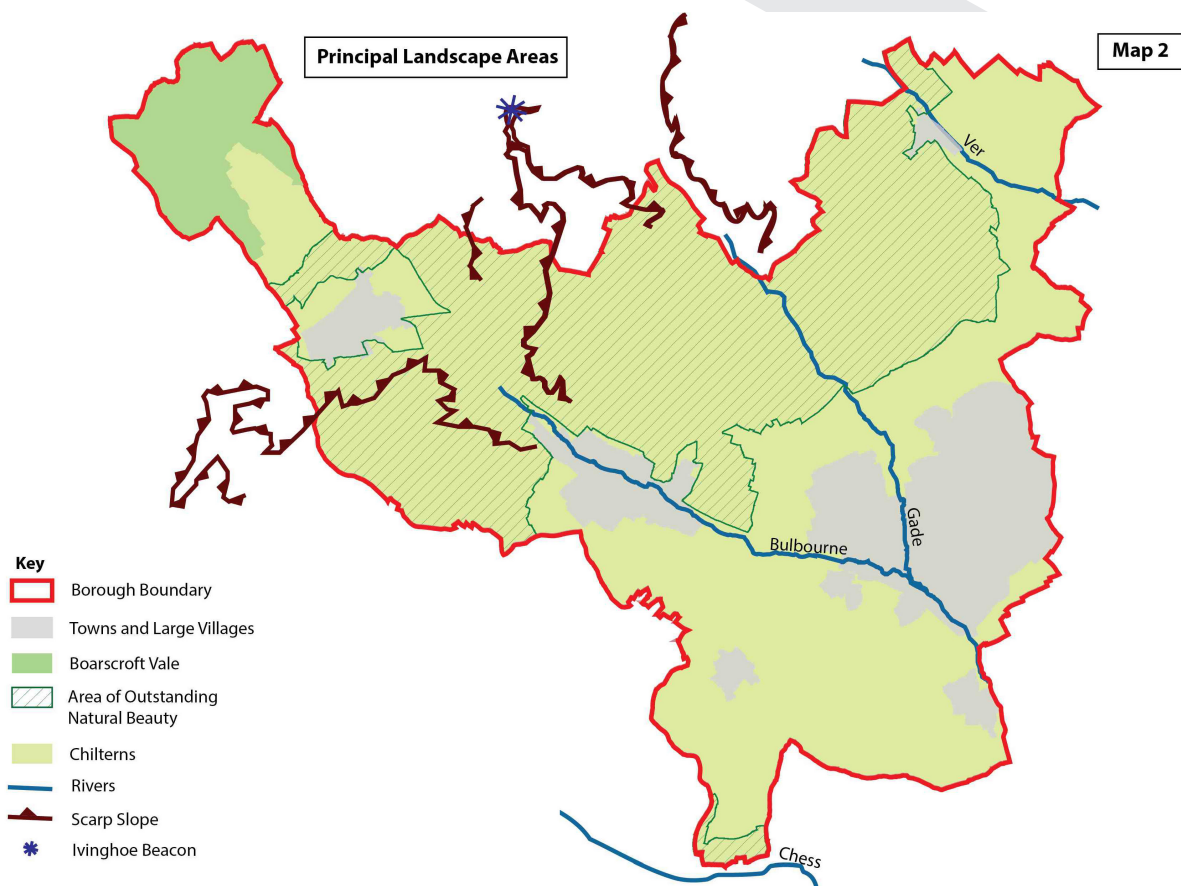
8.1 Issue 17 - How can we protect the natural environment?

8.1.1 As part of preparing the new Local Plan a range of issues relating to the natural environment must need to be considered and will inform the way the Plan is shaped. All are considered in more depth within the Sustainability Appraisal Scoping Report (March 2017) and the Sustainability Appraisal working notes (October 2017) that accompany this Issues & Options document were prepared by our independent sustainability consultants TRL.

Landscape Character

8.1.2 The Landscape Character Assessment describes the main types of landscapes across Dacorum and gives advice about the management and planning of these. The majority of Dacorum falls within the 'Chilterns' national character area. A large section of this is protected as part of the Chilterns Area of Outstanding Natural Beauty (AONB). Its special qualities, which we are required to help conserve and enhance, include the steep chalk escarpment with areas of flower rich chalk downland, beech woodland, commons, tranquil valleys, chalk streams and villages with their distinctive brick and flint houses.

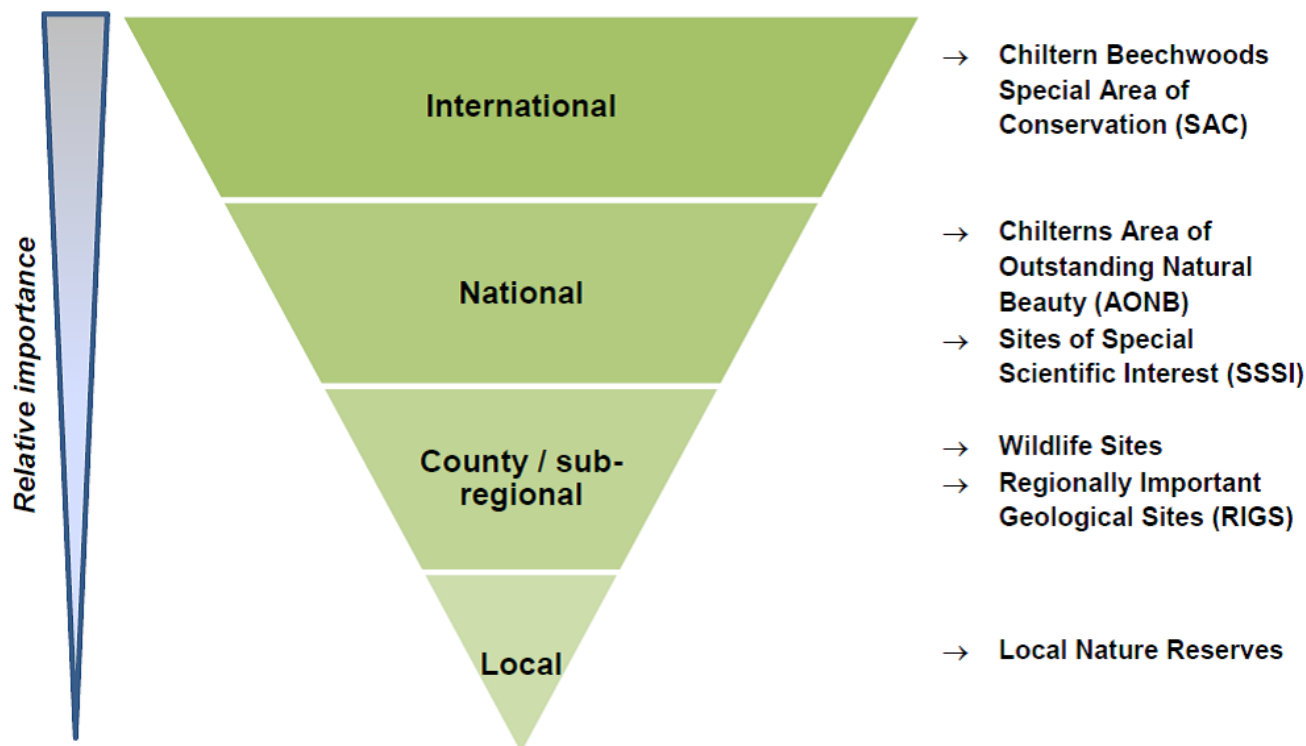
8.1.3 The north western tip of Dacorum is outside of the Chilterns area and instead forms part of the Bedfordshire and Cambridgeshire Claylands – an area also known as the Boarscroft Vale. This area is rare in Dacorum as it is a high quality deserted medieval landscape.



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Environmental Designations

8.1.4 Within the wider landscape, Dacorum contains a variety of different environmental designations. These comprise a mixture of Local, National and European designations, as illustrated below:



8.1.5 Special Areas of Conservation are designated under European Habitats Directive, and are areas of especially high wildlife and habitat value. The designation within Dacorum covers two areas of Chiltern Beechwoods – the largest covering the Ashridge Estate and a smaller area at Tring Park. Growth within Dacorum could increase the number of people using these areas for recreation, the the new Local Plan will need to try to reduce the negative impacts this could have on the woodlands.

8.1.6 Sites of Special Scientific Interest (SSSIs) comprise land which is nationally important in terms of its flora, fauna or geology. The SSSI designation sometimes applies to sites which are also subject to local designations, such as Wildlife Sites, Regionally Important Geological Sites (RIGS), or Local Nature Reserves. There are 8 such sites in our area.

8.1.7 There are over 230 Wildlife Sites within the Dacorum, covering meadows, ponds, woodland, urban green space and geological sites. Important geological features are also designated as RIGS.

8.1.8 Local Nature Reserves (LNRs), of which Dacorum has 6, have wildlife or geological features that are of special interest locally. They often overlap with other designations, such as SSSIs, Wildlife Sites and RIGS. LNRs are places for both people and wildlife. To qualify for LNR status, a site must be of importance for wildlife, geology, education or public enjoyment.

Our proposed approach

8.1.9 The Core Strategy sets a framework to consider proposals which affect the natural environment and to protect and enhance what Government calls ‘valued landscapes.’ It is our intention to take forward these existing policies, expanding them where necessary to pick up more detailed issues currently covered by policies in the 2004 Local Plan. The policy covering the AONB will need to be reviewed to ensure it reflects the content of the latest AONB Management Plan prepared by the Chilterns Conservation Board. This Management Plan identifies a number of

pressures on this important landscape due to increased visitor numbers, the impact of development in areas surrounding the Chilterns, increased water extraction, the erosion of traditional farming practices such as grazing, and the influence of climate change.

- 8.1.10** We will also review the current policy relating to ‘Sustainability Offsetting’, where development provides off-site rather than on-site compensation for loss of biodiversity or increased carbon emissions. This is to see if it needs to be changed in the light of emerging good practice and advice from our ecological advisers at the County Council.
- 8.1.11** The Herts and Middlesex Wildlife Trust have carried out work to identify ecological corridors and how they can be protected. We will consider how we can incorporate this work in the new Local Plan and through any master plans prepared for key development sites.
- 8.1.12** Not all designations relating to the natural environment are made by us through Local Plans. Some are controlled through separate legislation. However, in order to give a complete picture of potential development constraints, it is good practice to include these designations on the Policies Map. This provides an overview of all designations affecting land within Dacorum.
- 8.1.13** Please see section - 9 'Infrastructure' for further consideration of provision and enhancement of ‘Green Infrastructure’ within Dacorum.

Question 25

Do you support the proposed approach to the natural environment?

Yes / No

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.



8.2 Issue 18 - How can we protect the historic environment?

- 8.2.1** National guidance requires Local Plans to set out a positive strategy for conservation and enjoyment of the historic environment. These heritage assets should be recognised as irreplaceable resources which need to be conserved in a manner appropriate to their significance. Dacorum has a range of historic assets which positively contribute to the environment. These include:
- Listed Buildings;
 - Registered Parks and Gardens – both those on the national list and those on our local list;
 - Scheduled Monuments;
 - Conservation Areas; and
 - Areas of archaeological interest.

Our proposed approach

- 8.2.2** Existing policies that protect and enhance these heritage assets are generally working well, and our intention is to carry these forward into the new Local Plan, updating them as required to ensure they comply with the latest guidance from Government and Historic England and to reflect good practice.
- 8.2.3** Policies within the new Local Plan will be supported by up-to-date Conservation Area Appraisals (CAAs) for each of our 23 Conservation Areas. The implementation is encouraged through our Conservation Strategy and more localised Heritage Improvement Strategies, such as the one prepared alongside the Hemel Hempstead Town Centre Masterplan.

- 8.2.4** As is the case for natural environment designations, not all designations relating to the historic environment are made by us through our Local Plan. Some are controlled through separate legislation. However, it is our intention to show as many of these designations as we can on the Policies Map, to provide a clear picture of the restrictions affecting particular areas.

Question 26

Do you support the proposed approach to the historic environment?



Yes / No

If no, please explain what alternative approach to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

8.3 Issue 19 - How can we ensure natural resources are used efficiently and pollution and flood risk minimised?

- 8.3.1** National guidance requires us to adopt proactive strategies to reduce and adapt to climate change, taking full account of flood risk, water supply and demand considerations. Development in vulnerable areas needs to be given careful consideration to ensure that risks are managed and minimised.

Flood risk

- 8.3.2** National guidance states that development in areas at risk of flooding should be avoided, which can be ensured by directing development to lower risk areas. Dacorum has two main Rivers – the Bulbourne and the Gade – plus a small stretch of the River Ver in the Markyate area. There are also other areas at risk of flooding, such as around Tring reservoirs, which all need to be taken into consideration.

- 8.3.3** The purpose of a Strategic Flood Risk Assessment (SFRA) study is to assess and map all forms of flood risk from groundwater, surface water, sewer and river sources and to also take into account future climate change predictions. The current SFRA Stage 1 report (completed August 2007) covers four councils (Dacorum, St Albans, Three Rivers and Watford). As a result of recommendations in the Stage 1 Report, a Stage 2 study (June 2008) was carried out to look at the River Gade at Hemel Hempstead and modelling of the Grand Union Canal at Berkhamsted. The Stage 2 study concluded that there were only three areas at risk of flooding:

- Hemel Hempstead Town Centre,
- Moor End Road, Hemel Hempstead; and
- Two Waters Road (south of the roundabout), Hemel Hempstead.

The study also suggested that land between the Grand Union Canal and the River Bulbourne in Berkhamsted would be severely inundated with water if a breach of the canal occurred.

- 8.3.4** Our SFRA will be updated later this year to reflect revised flood zone mapping provided by the Environment Agency. The conclusions of this new study will be an important factor in deciding where to locate new development - and which areas should be avoided.

- 8.3.5** For further discussion of issues relating to water infrastructure, please refer to section - 9 'Infrastructure'.

Pollution and waste management

- 8.3.6** Together with other rules and regulations, the planning system has a key role to play in seeking to limit impacts of pollution in all its forms – whether from noise, light, fumes, chemicals, other hazardous substances or waste in general.
- 8.3.7** Whilst air quality in Dacorum is generally good, the main source of pollution comes from traffic emissions. In 2012 three areas were designated in Dacorum as Air Quality Management Areas (AQMAs) as a result of nitrogen dioxide exceeding accepted national standards. These AQMAs cover parts of Lawn Lane and London Road in the Apsley area of Hemel Hempstead, and the High Street in Northchurch. We need to take care when choosing where to locate growth, to ensure existing air quality issues are not worsened or new problems created and that sensitive development such as schools and care homes are not located in areas of existing poor air quality.
- 8.3.8** Special consideration needs to be given to noise and light pollution, with tranquillity and dark skies especially important characteristics to preserve in the Chilterns AONB.
- 8.3.9** The Bulbourne and Gade are Chalk Streams that are recognised as being of national importance and so are very vulnerable to the effects of pollution, climate change and over-abstraction.
- 8.3.10** Our soil is the foundation of the environment, landscape, wildlife and food production and must be protected from erosion and contamination. High quality agricultural land is a particularly important resource, supporting local food production and supports the continuation of a strong rural economy. In some instances, new development can actually help improve the quality of contaminated land.

Our proposed approach

- 8.3.11** Policies that seek to ensure all new development limit their impacts on natural resources and minimises all forms of pollution will be carried forward into the new Local Plan. Development will be avoided in areas at greatest risk from flooding.

Question 27

Do you support the proposed approach to protecting natural resources, preventing pollution and controlling flood risk?



Yes / No

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

8.4 Issue 20 – How can we help reduce the impacts of climate change?

- 8.4.1** Local Plans can help us reduce greenhouse gas emissions and encourage us to change our behaviours through:
- Planning for new development (in the most accessible locations and through the materials or appliances chosen); and
 - Actively supporting energy efficiency improvements to existing buildings.
- 8.4.2** Sustainable building design and construction is an essential response to the challenges of climate change, natural resource depletion and environmental habitat loss. The ways buildings are designed, constructed, operated and decommissioned can have significant impacts on the

built and natural environment, for example some may consume major resource (energy, water and materials) inputs. Minimising construction waste from decommissioned buildings can not only reduce Dacorum's carbon footprint, but also can reduce costs for developers and occupiers.

8.4.3 In March 2015, Government withdrew all national sustainable design and construction standards (BREEAM and the Code for Sustainable Homes) that applied to all new residential development. Since this time, Building Regulations assess whether residential development demonstrate appropriate design and construction standards. In light of this change, we will cease to set such requirements for residential development as this would duplicate the Building Regulations process and Government no longer allows us to set tighter standards through the Local Plan process.

8.4.4 Besides reducing greenhouse gas emissions to mitigate climate change, it is also important to ensure we adapt to likely impacts. The future climate in Hertfordshire is predicted to become warmer, with drier summers and wetter winters. Such changes have particular implications for agriculture, biodiversity, building design and the water environment.

8.4.5 However, we will encourage and guide developments to the most accessible locations in Dacorum (see section - 5 'Our towns, villages and countryside') and support the use of site waste management plans.

8.4.6 Further design features can be incorporated into new developments, such as District Heating. District heating is a system for distributing heat generated in a centralised location and can meet either residential or commercial heating requirements. Heat can be generated from burning fossil fuels, but can often use renewable energy sources such as biomass, heat pumps or solar heating. A system could heat a block of flats or, at a much larger scale, many buildings. This removes the requirement for individual boilers and a gas supply in each home.

8.4.7 The benefits of communal heating can be:

- Reduce greenhouse gas emissions;
- Cheaper costs to the consumer;
- Bulk purchasing gas can reduce cost per unit price;
- Consumer is protected against big price increases; and
- More efficient use of natural resources.

8.4.8 Our Plans currently highlight areas where there could be opportunities to include district heating schemes with further advice to be provided through future supplementary guidance.

Our proposed approach

8.4.9 As a result of Government changes, we intend to cease referring to some standards relating sustainable design and construction that were within the Code for Sustainable Homes and instead use the replacement requirements within the updated Building Regulations. However, we will continue to encourage and guide applicants concerning these matters through policies in our new Local Plan.

8.4.10 We will also continue to apply the principle of the energy hierarchy which advocates firstly minimising energy use, then supplying energy efficiently and finally promoting the use of renewable energy sources.

Question 28

Do you think we have addressed the key issues relating to how we can help reduce the impacts of climate change through our planning policies?



Yes / No

If no, please explain what other options we should consider and where possible, support your answer with reference to any evidence.

Evidence

- Landscape Character Assessment *****
- Ecological Networks *****
- AECOM work re district heating *****
- Hertfordshire Local Nature Partnership (LNP) Strategic Plan 2013-2016
- Hertfordshire Biodiversity Action Plan 2006
- Hertfordshire & Middlesex Wildlife Trust How to build a Living Landscape
- Dacorum Borough Council Green Space Strategy 2011
- Chilterns AONB Management Plan 2014-2019
- Urban Nature Conservation Study (March 2006)
- Dacorum Green Infrastructure Plan (March 2011)
- The Building Regulations (2010) as amended
- Dacorum Borough Air Quality Action Plan 2015-2018
- Water Cycle Study 2010
- Strategic Flood Risk Assessment Level 1 (2007) and Level 2 (2008)
- Dacorum's Conservation Strategy 2014-2019 (November 2015)
- Heritage Improvement Strategy for Hemel Hempstead (November 2012)



DRAFT



Infrastructure

Twenty GP practices



91% of all journeys taken on foot are under 1 mile in length



12 community centres in Dacorum



55 Council owned play areas and adventure playgrounds



Life expectancy is 80 years for men and 84 years for women



£4,435.521.38 received in developer contributions towards infrastructure since May 2013



7 libraries in Dacorum



Only 4% of residents consider their health to be poor or very poor (2011)



sixtyfour schools



four Council managed cemeteries



Introduction

- 9.0.1** The Council works closely with a wide range of infrastructure providers to ensure that necessary infrastructure is provided alongside new development and that the information we have on the types of infrastructure needed to support development is up-to-date. This includes working with those organisations responsible for roads, public transport, education, health, water supply, sewerage and power.
- 9.0.2** The new Local Plan must ensure the delivery of infrastructure in a timely and phased manner. This will enable new residents' access to the right services and facilities and reduce more negative effects on existing communities.
- 9.0.3** The term infrastructure covers a wide range of services and facilities (provided both by public and private agencies). It includes:
1. **Physical Infrastructure – roads, public transport, pedestrian and cycle routes/paths, electricity, gas, provision of clean water, sewerage and waste collection/disposal;**
 2. **Social Infrastructure – schools, nurseries, further education, healthcare, emergency services, and social and community buildings. Social infrastructure covers a range of services and facilities that can be provided by either the public or private sector; and**
 3. **Green Infrastructure – the network of green space which connects towns, villages and the wider countryside. It can include green corridors, formal and informal open green spaces, sports and recreation facilities and waterways.**
- 9.0.4** The provision of large-scale infrastructure will require co-operation with the County Council and neighbouring Councils, as well as service providers. Such infrastructure provision has been identified as a key element of the 'duty to co-operate' with which Government requires us to comply (see section 3 - 3.6 'How will we engage with other Councils and partners?' for more information). These discussions will also be informed by each Council's Infrastructure Delivery Plan (InDP).
- 9.0.5** Dacorum's InDP identifies our social, physical and green infrastructure requirements to meet the growth levels set in our current Plan – the Core Strategy. The InDP sets out what, where and when it is needed and provides both estimated costs and suggestions for funding. A number of other documents listed at the end of this section identify existing infrastructure deficits. The InDP is reviewed regularly to ensure the information it contains remains up-to-date.
- 9.0.6** Work is underway on updating the 2016 version of the InDP (in partnership with key providers) to reflect potential growth levels in our new Local Plan. This will identify essential infrastructure to support the level and distribution of growth chosen (see section 10 for the growth options - 10 'How this future growth could be accommodated').

Growth options

- 9.0.7** The extent of the necessary infrastructure works will depend on the type and scale of growth pursued. Precise requirements will also depend on the scale, timing and location of growth. An indication of the type and nature of provision for varying scales of development is provided in the table at the end of this section - 'Infrastructure needs for different scales of development'. Where this table contains greyed sections, financial contributions may still be required towards new infrastructure items. We have developed our understanding of the infrastructure necessary to support different scales and types of development through our Settlement Hierarchy Study (July 2017) and InDP. Both documents will be updated when the final growth option has been confirmed.
- 9.0.8** Delivering infrastructure for scattered or small-scale growth can be very challenging, as it requires piecemeal upgrades to existing facilities, which may not always have the space or ability to expand. Larger-scale growth can make infrastructure delivery easier as new facilities and services can be directly provided on these new sites, or through more sizeable financial contributions.

9.1 Issue 21 – What are the area’s physical infrastructure needs?

Transport Infrastructure

- 9.1.1** An overview of the issues relating to transport connectivity, policies, the way we travel and transport modelling are given in section 5 - 5 'Our towns, villages and countryside'. Both this Council and the County Council’s aim is that people should be able to access homes, jobs and recreational facilities not only by using private cars, but also through the increased use of the train, bus and footpath/cycleway networks. A number of improvements will be necessary to the transport network to ensure that it remains fit for purpose.
- 9.1.2** The need for new or improved transport infrastructure will become clearer once preferred growth locations have been confirmed. We will assess the impact of growth and the need for transport improvements through transport modelling. This work will often extend beyond our immediate boundary, as we must take account of the impact our growth will have on the wider road and rail networks. This is an issue where the importance of cross boundary working has been identified. Key cross-boundary transport schemes include the A414 corridor project, which extends from our area all the way eastwards to Essex, and the Maylands Growth Corridor project, which will deliver road improvements at east Hemel Hempstead and involves land within both Dacorum and St Albans Council areas.



The Maylands link bus; a service provided by Arriva but subsidised by Hertfordshire County Council

Water and Sewerage

- 9.1.3** The quantity and quality of water supply and the disposal of waste water are important factors in planning for growth in Dacorum. The Council has worked with neighbouring authorities and infrastructure providers on the Hertfordshire Water Study 2017 and will continue to do so as our Local Plan moves forward. The Water Study provides evidence on the capacity of water infrastructure across Hertfordshire to aid decisions for growth over the next 35 years. It identifies the challenges in water supply and the need for improvements to Waste Water Treatment Works and associated infrastructure from 2021. However, specific pinch points and improvements will vary depending on the scale and location of growth. The Council, water companies and developers will work together to ensure that investments are made in water and sewerage infrastructure and that essential new infrastructure is delivered.

Telecommunications

- 9.1.4** Broadband Delivery UK (BDUK) is committed to improving broadband and mobile infrastructure across the country through a number of national schemes. We want homes and businesses to have good telecommunication connections. The best coverage and connection speed are demanded by users. We know there are issues in some rural areas and will work with providers to try to resolve these.

Power

- 9.1.5** We will work with gas and electric suppliers to ensure that their networks have sufficient capacity to accommodate future growth, with expansion or reinforcement, as necessary. In certain circumstances, developers would be required to cover all or part of the cost of these upgrade

works. We will continue to engage with power providers as work on the Local Plan moves forward. This will ensure we identify the electricity and gas infrastructure requirements in particular areas or for specific sites.

Question 29

Do you agree that we have covered all relevant issues relating to physical infrastructure?



Yes / No

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

9.2 Issue 22 – What are the area's social infrastructure needs?

Education

- 9.2.1** We recognise the importance of providing good quality, life-long education for our residents. This includes the provision of childcare, pre-school education, schools and further education. We have regular discussions with Hertfordshire County Council who are responsible for education planning in the area and will be advised by them on the education needs arising from future growth. They have already advised us that very limited capacity exists in primary and secondary schools in Dacorum and that additional development to the period 2036 will require further new provision (either through new schools, or expanding existing schools) in addition to the three education zones identified in our current planning documents.
- 9.2.2** The growth option chosen will dictate how much education provision is needed and where. The table at the end of this section sets out the education needs usually generated by different scales of development and is informed by the County Council education forecasts and modelling - 'Infrastructure needs for different scales of development'. Secondary schools will have varying capacity needs as they serve a larger area (potentially crossing Council and County boundaries). For larger sites, new education provision will need to be appropriately phased and master planned.
- 9.2.3** Further information on growth options and their broad schooling requirements is set out in section 10 - 10 'How this future growth could be accommodated'.

Healthcare

- 9.2.4** We acknowledge that growth will place additional demands on those responsible for the delivery of a range of health facilities including primary care (e.g. GP), secondary care (e.g. hospital care), mental healthcare and community healthcare services. We have been liaising with Herts Valleys Clinical Commissioning Group (HVCCG) which is responsible for GPs, as well as the West Herts Hospital Trust which is now responsible for hospitals and community services. This is to ensure that appropriate health infrastructure is provided alongside new development and that this is appropriate to the scale of growth we plan for.
- 9.2.5** The West Herts Hospital Trust and HVCCG are currently considering how to meet local demands at Hemel Hempstead, Watford General and St Albans hospitals. We expect local facilities to be retained in Hemel Hempstead and the new Local Plan will ensure sufficient land is available to accommodate these needs.

Community Facilities

- 9.2.6** The main town of Hemel Hempstead developed around a concept of neighbourhoods, each with a range of community facilities located within a local centre. This approach is reflected in local centres within other towns and villages, together with our three larger town centres. A wide range of community buildings are provided within these areas to support those living and working within the area. They may also serve to meet the needs of early years and youth. They include

community centres, libraries, sports facilities, places of worship, pubs and shops. Other community facilities that provide meeting space and cultural activities (arts and entertainment, museum and a range of services provided by the voluntary sector) are also important to the well-being of residents in Dacorum. Some facilities may ‘share’ their facilities outside of work hours through private hire arrangements. Community facilities can help to promote an evening economy. Existing facilities found in each of our towns and large villages are identified in the Settlement Hierarchy Study.

- 9.2.7** This study also highlights the need for new or improved community facilities, although details of future needs will be clearer once specific development locations have been chosen. A new town centre cinema is proposed within the Marlowes Shopping Centre in Hemel Hempstead and improvements made to access and facilities at the Old Town Hall.
- 9.2.8** The Core Strategy has already identified a need for large community centres/halls, space for local faith groups, as well as cultural centres. The new Local Plan will have an important role to play in ensuring that such community facilities are planned and provided.

Question 30

Do you think that we have covered all relevant issues relating to social infrastructure?



Yes / No

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

9.3 Issue 23 – What are the area’s green infrastructure needs?

- 9.3.1** The term ‘Green Infrastructure’ (GI) refers to the network of protected sites, nature reserves, green and blue spaces (lakes, rivers and other waterways), leisure and recreational spaces (including sports centres) and open space links within both towns and countryside. It can sit within both the urban and rural landscape. GI plays an important social, economic and environmental role and is essential for our quality of life. The quality of green spaces in Dacorum attracts people and families to live, work and play here. In some locations the natural environment is subject to statutory protection. However, it is important to recognise that the natural and historic environment may need further protection and enhancement through the Local Plan process because of its importance to the character and appearance of a location, its ecological qualities or for the role it plays in providing open, leisure or recreational space.
- 9.3.2** Our Core Strategy seeks to protect and manage 94 key areas of open space (greater than 1 hectare) as designated open space. This provides a structured approach to planning for green spaces which are not covered by other designations, such as Green Belt, Tree Preservation Orders, Listed Buildings or Conservation Areas.
- 9.3.3** We recognise the importance of providing a range of open space areas alongside future growth which benefits its residents and will seek to achieve broad standards of open space provision (as set out in the table below). We will also seek to address where possible the deficiencies in open space provision identified in previous technical studies.
- 9.3.4** We are updating our evidence base to understand the types of open space we need to protect and whether we need to apply new provision standards. Our general approach will be to meet national standards but we will also consider if any local variation is appropriate. We will also need to ensure that opportunities to improve existing green infrastructure, and to provide new green infrastructure as part of new development, are maximised.

Question 31

Do you think that we have covered all issues relating to green infrastructure?



Yes / No

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Infrastructure needs for different scales of development

	Scale of development					
	25 Dwellings	50 Dwellings	100 dwellings	500 dwellings	1000 dwellings	2000+ dwellings
Primary Education			0.2 form entry (expansion of school premises)	1 form entry (expansion or new build)	1 x 2 form entry (new primary school)	4 forms of entry+ (new primary school(s) and /or expansions)
Secondary⁽¹⁾ Education				1 form entry (school expansion)	2 forms of entry (school expansion)	4 forms of entry+ (consideration to new secondary school)
GP Provision				0.5 x GP (expanded practices)	1 x GP (single practice)	GP Premises
Allotment Provision				0.2ha	0.4ha	0.6ha+
Play Provision (NEAP, LEAP or LAP)	0.06 ha (LEAP)	0.1 ha (NEAP)	0.2 ha (Mixed play areas)	0.8 ha (Mixed play areas)		
Playing Fields or Additional Open Space				1.6 ha		
Community Building				61 m ² (extension to existing premise)	172 m ² (new building) ⁽²⁾	

1 The County Council normally seeks to provide a minimum of 6 forms of entry in new schools.

2 There may be a preference for shared facilities where no end user for the community space has been identified.

9.4 Issue 24 – How will new infrastructure be funded?

- 9.4.1** Because development creates additional demands on infrastructure, it is logical that developers contribute towards improvements to, or the provision of, new infrastructure.
- 9.4.2** There are a number of mechanisms we use to secure these contributions, including planning conditions, legal obligations and a Community Infrastructure Levy (CIL) charge. CIL will be used to address the cumulative effects of growth and will be calculated on a case-by-case basis using the adopted charge rates for different types of development. However, contributions from other types of legal agreements will continue to be used for some specific pieces of infrastructure. They will be particularly important where the timing of infrastructure delivery is critical, and the need is very site-specific.
- 9.4.3** We recognise that the level of developer contributions needs to fairly reflect the scale of growth proposed and must be set at a level which development in the area can afford to pay. Supporting infrastructure will need to be funded not only from developer contributions but also through investment in new facilities by infrastructure providers, including the County Council and by ourselves. We will seek to maximise the use of external funding to deliver infrastructure improvements and are open to innovative methods of securing funds (for example Crowd funding). Where possible, the Council will work together with neighbouring Councils, the County Council and providers to improve the chances of securing such external funding.
- 9.4.4** A site's ability to support new infrastructure will be an important consideration when deciding on the size and location of growth in the new Local Plan (see section 9 - 9 'Infrastructure'). As a general rule, it is easier to secure the timely delivery of new infrastructure on a limited number of large sites, than on lots of smaller sites.

Question 32

Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?

Yes / No

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.



Evidence

- Infrastructure Delivery Plan (InDP) update (2016)
- Dacorum Borough Council Strategic Infrastructure Study (2011)
- Hertfordshire Infrastructure Investment Strategy (HIIS) Update (2013)
- Community Infrastructure Levy and Regulation 123 List
- West Hertfordshire Hospital's NHS Trust Five Year Plan 2014-2019
- Dacorum Open Space Study (2017)
- Playing Pitch Strategy and Action Plan (2015)
- Dacorum's Outdoor Leisure Facilities Study (2014)
- Sports Facilities Audit 2011 (2012)
- Hertfordshire Water Study – Stage 1 (2017)
- Meeting the Demand for School Places (Summer 16/17)
- COMET model outputs
- Hertfordshire Local Transport Plan (LTP3)
- Tring, Northchurch and Berkhamsted Urban Transport Plan (September 2013)
- Hemel Hempstead Urban Transport Plan (2009)
- Dacorum Cycling Strategy (2009)
- Landscape Character Assessment for Dacorum (2004)
- Dacorum Green Infrastructure Plan (2011)
- Green Space Strategy 2011-2016
- Ecological Networks document *****
- Hertfordshire Biodiversity Action Plan (BAP) *****
- Green Arc Strategic Green Infrastructure Plan (with Hertfordshire) (2011)
- The Urban Nature Conservation Study (2006)
- Strategic Flood Risk Assessment (2007 and 2008)
- Settlement Hierarchy Study (Draft) (August 2017)



How this future growth could be
accommodated

Introduction

10.0.1 The Government requires our Local Plan to contain “*the most appropriate strategy when considered against reasonable alternatives, based on proportionate evidence.*” These alternatives can relate to both the amount of development planned for (the growth levels), and how this growth is spread across the area (the distributional options). Both are considered in turn below.

10.1 Issue 25 - What levels of housing growth should we consider?

The context

- 10.1.1** As explained in section 6 - 6 'Homes' we know that our own technical work assesses the local need for housing in our area to 2036 to be about 756 homes each year (or 17,388 homes) and that the Government expects us to use housing need as the starting point when setting our Local Plan housing target. However, as explained in section 6 'Homes', since our housing needs study (SHMA) was prepared, the Government has published a draft consultation document called 'Planning for the right homes in the right places' (14 September 2017) which provides an alternative figure of 602 homes/year based on a 40% increase on our current Core Strategy housing target, and a higher "uncapped" figure of about 1,100 homes/year if we apply the new standard formula they propose for calculating need.
- 10.1.2** We know that planning for new homes can give rise to significant local concerns. However, if we don't plan for enough new homes, then we could be forced into accepting sites in unplanned locations through developers winning planning appeals. We want to avoid this position. When looking at growth, we will also have to balance other linked factors, such as providing jobs alongside the new homes, minimising the impact on the Green Belt and wider countryside, protecting the environment and ensuring that there is supporting infrastructure in place
- 10.1.3** As section 6 - 6 'Homes' sets out, we estimate that there are suitable sites available in the Borough to deliver about 10,940 new homes up to 2036. This is known as our 'housing capacity' and involves the use of brownfield sites, together with some greenfield sites that have already been earmarked for development. Not all of these homes will be on new sites. Due to the period the Plan will cover, some have already been built, whilst others are already allocated for development in the current Site Allocations document e.g. the Local Allocations at West Hemel Hempstead and at Icknield Way in Tring.
- 10.1.4** We have tried to maximise this housing capacity figure by:
1. Allowing housing on land no longer needed for employment uses;
 2. Encouraging higher densities and taller buildings on sites where this won't be damaging to the area's character i.e. Hemel Hempstead Town Centre and parts of the Two Waters and Apsley area; and
 3. Making a modest allowance for small 'windfalls,' which are hard to predict in advance (see section 6 - 6 'Homes').
- 10.1.5** Any growth above this 10,940 figure will require the use of greenfield sites outside of the existing boundaries of our towns and large villages. These will currently either be designated as Green Belt or Rural Area.
- 10.1.6** The housing capacity figure for the Borough will be kept under review and updated as necessary. This could result in the figure either going up or down as the Local Plan is taken forward.
- 10.1.7** The amount of land that would be required in addition to the area's existing housing capacity will depend upon whether we decide to set a target that meets our own assessment of local needs, or whether we choose a level above or below this.

Growth levels

10.1.8 Feedback is sought on the following three levels of future growth:

Option 1: Draft Government figure

Amount:

This would equate to 602 homes a year or 13,846 over the 2013-36 plan-period.

Reason:

This is above the current target set out in the Core Strategy (430 homes/year), but is considered to be a reasonable target based on local evidence – particularly from the SHLAA and Green Belt studies. The level broadly matches the number of homes that could be built on land within existing town and village boundaries, or that is already allocated or expected to come forward, plus some limited Green Belt land. The amount of Green Belt land needed in this option broadly equals the amount of land the Green Belt study identified as not fully meeting the requirements for continued Green Belt designation. It also equates to the draft figure contained in the Government consultation on 'Planning for the right homes in the right places' (September 2017). However, a plan based on this level of housing growth would not meet full locally assessed need, as set out in our SHMA, and would be considerably below the figure arising from the Government's new standard formula which is proposed to be used in areas where the current Local Plan or Core Strategy is more than 5 years old (see below).

Option 2: Locally assessed need

Amount:

This would currently equate to about 756 homes a year or 17,388 over the 2013-36 plan-period.

Reason:

This is significantly above the current target set out in the Core Strategy (430 homes/year), but reflects the conclusion the South West Hertfordshire Strategic Housing Market Assessment (SHMA) came to about the real level of local housing need.

Option 3: Upper Government figure

Amount:

This would equate to about 1,100 homes a year or 25,300 over the 2013-36 plan-period.

Reason:

This is very significantly above the current target set out in the Core Strategy (430 homes/year) and the locally assessed housing need figure (Option 2). However, it is important to include a growth option higher than our current locally assessed need level, as this need figure may increase as the plan progresses. A figure of this level would however be extremely hard to achieve as it would require the use of almost all sites submitted to the Council for consideration - irrespective of whether we assess them to be suitable for housing or not. Further housing sites may however be put forward through the 'call for sites' process. Growth at this level also raises questions of deliverability - both in terms of the homes themselves and the scale of new infrastructure that would be needed to support these new homes. The option has however been put forward as an alternative for consultation purposes as the figure of around 1,100 homes/year figure broadly equates to the level of need that would be generated were the Government's new draft standard formula for assessing housing need to be applied to Dacorum.

Question 33

Do you agree that the three growth levels proposed are the most reasonable to consider?



Yes / No

If no, please explain your reasons, with reference to evidence where available

Rejected Growth options

- 10.1.9** We could of course consider planning for both higher and lower housing growth levels, such as:
- Continuing the current housing target (430 homes / year);
 - 'Urban Capacity' option - no new greenfield sites apart from existing proposals (476 homes year); and
 - Significantly above the upper Government figure (1,100+ homes / year).
- 10.1.10** However, these are not considered to be reasonable alternatives for the reasons set out in 12.2 'Appendix b) Reasons for rejecting alternative growth levels' and so we propose to reject them from further consideration.

Question 34

Do you agree with the rejection of the following growth levels:



1. *Continuing the current housing target (430 homes / year);*
2. *'Urban Capacity' option (476 homes / year); and*
3. *Significantly above the upper Government figure (1,100+ homes / year).*

Yes / No

If no, please explain your reasons, with reference to evidence where available

Question 35

Has the Council considered all reasonable alternative levels of growth?



Yes / No

If no, please explain your reasons, with reference to evidence where available

10.2 Issue 26 – What principles should be used when choosing growth locations?

- 10.2.1** Following consideration of the key issues our area faces in the future (as highlighted in sections 5 to 9), and the levels of growth the Plan needs to consider (above), we then need to look at *where* future growth could be located.
- 10.2.2** In order to help inform these decisions we have drawn up a number of locational principles. These cover the need to make the best use of brownfield land to maximise opportunities for urban regeneration. National planning policy is also clear that Green Belt boundaries should only be changed in exceptional circumstances. The protection of the Green Belt from inappropriate development is an important national and local principle. Current evidence suggests that the Green Belt within Dacorum is largely fulfilling the role for which it was designated, however there are some areas that have been identified as not fully meeting all the Government's criteria for designation.
- 10.2.3** Another important principle is to ensure that our urban areas do not sprawl into other existing settlements undermining their distinct and separate identities. Likewise, isolated development which has poor connections with local services and facilities should be discouraged. Protecting the character of our town and villages, and that of important landscapes and countryside will also be important considerations, as will using development to help fund and deliver essential new infrastructure.
- 10.2.4** These suggested locational principles are shown below:

Locational Principles

- Maximise the use of brownfield land for development.
- Maximise the density of development, whilst ensuring it reflects local character.
- Support urban regeneration – particularly of Hemel Hempstead new town.
- Locate development at well-connected sustainable locations.
- Avoid areas at high risk of flooding.
- Respect the character of the existing settlement pattern and restrict urban sprawl.
- Protect the character and value of important landscapes, heritage and biodiversity.
- Ensure that new development can be served by necessary infrastructure.
- Locate development to help support delivery of a 5 year housing land supply, as required by Government.

Question 36

Do you support the proposed locational principles?

Yes / No

If no, please explain your reasons, with reference to evidence where available



10.3 Issue 27 - How should future growth be distributed?

10.3.1 When the locational principles above are combined with the settlement hierarchy (see section 5 - 5 'Our towns, villages and countryside') which directs new development to the most sustainable locations, three main distributions for growth emerge:

1. Focus on three towns
2. Greater focus at Hemel Hempstead
3. More evenly spread across the Borough

10.3.2 A summary of each distribution is provided below:

A – Focus on three towns

This distribution seeks to concentrate new development at Hemel Hempstead, Berkhamsted and Tring. As the largest town in the Borough, Hemel Hempstead is considered to have the potential to accommodate new growth, provided this reflects and respects the neighbourhood structure of the original new town. There would be lower levels of growth at Berkhamsted and Tring, although both would need to accommodate new development to reflect their role as secondary towns. Growth at the large villages and elsewhere in the Borough would be restricted through the continued application of Green Belt and Rural Area policies.

Implications:

Focussing growth at all three towns would provide an opportunity to better meet local housing need where it is generated. It would also provide opportunities to improve local infrastructure provision at more locations, through the careful use of financial contributions from development, together with on-site provision of facilities.

The impact on the Green Belt would be dispersed to several locations, which has both positive and negative points. The impact of growth on any one town, (and its infrastructure), would be less than under a more concentrated approach to development.

B – Greater focus at Hemel Hempstead

This distribution would reflect the broad historic pattern of development since Hemel Hempstead New Town was planned in the 1950s. It would direct future growth to the principal town in the Borough, which has the greatest range of jobs, services and facilities.

Implications:

Focussing growth at Hemel Hempstead would help preserve the historic character of the two market towns. However, it would place significant pressure on the main town and potentially require a large amount of new development to occur in quite a small area. This would be in addition to the growth already expected to happen to the east of the town, on what is known as the Gorhambury land in St Albans City and District. It is unclear whether the market would choose to deliver such high levels of housing in one place – or if they might decide to 'land bank' sites to ensure prices don't fall as a result of over-supply. This would have implications for the Council to meet its annual target and demonstrate the required 5 year land supply.

Benefits may include the ability to pool financial contributions from new development, so that they enable major changes to New Town infrastructure, which is in need of improvement and renewal. Major changes would however be required to the town's road network, which transport modelling indicates is already almost at capacity.

Whilst several large sites have been put forward for consideration by the Council, it may be difficult to deliver full housing need levels or above at Hemel Hempstead alone.

Whilst some development would also need to be accommodated at other settlements, it is unlikely that this would be of a scale to allow them to meet local needs. A concentration of growth at Hemel Hempstead would also mean that there are fewer opportunities for improvements to local services and facilities in other locations.

C – Spread more evenly across the Borough

A – Focus on three towns

This distribution involves all three towns, together with the three large villages sharing responsibility for accommodating future growth. There may also be the opportunity for some more limited development at the small villages to help them retain their vitality and viability.

Implications:

Like (A) above, but to a greater degree, this approach would disperse the impact on the Green Belt across the settlements. The impact of growth on any one settlement (and its infrastructure) would also be less than under a more concentrated approach to development.

A more dispersed approach to growth would provide a better opportunity to meet local housing need where it is generated. It would also provide opportunities to improve local infrastructure provision at more locations – through the careful use of financial contributions from development, together with on-site provision of facilities.

This approach does however have the potential to impact on the character of the villages, and it could be challenging for some of the smaller settlements to sufficiently expand key facilities, such as primary schools, to accommodate growth.

Rejected Distributions

10.3.3 As for the overall level of growth, there are a number of ways to distribute growth that have been considered by the Council but rejected. These include the following:

- New settlement (town or village);
- Rural growth;
- Export growth to another Council, area;
- Use greenfield land before brownfield land; and
- Significant expansion of a large village(s)

10.3.4 12.3 'Appendix c) Reasons for rejecting alternative growth distributions' sets out why these are not currently considered to be reasonable alternative distributions for the new Local Plan to take forward.

Question 37

Do you agree with the rejection of the following growth distributions:



1. *New settlement (town or village);*
2. *Rural growth;*
3. *Export growth to another Council, area;*
4. *Use greenfield land before brownfield land; and*
5. *Significant expansion of a large village(s)*

Yes / No

If no, please explain your reasons, with reference to evidence where available

Question 38

Has the Council considered all reasonable alternatives for distributing growth?



Yes / No

If no, please explain your reasons, and set out what other alternatives we should consider, with reference to evidence where available

10.4 Issue 28 - What are the growth options?

10.4.1 For the reasons set out above, seven Growth Options are put forward for consideration. 10.5 'Option 1' ('Draft Government figure') and 10.6 'Option 2' ('locally assessed need') can both be delivered via the three suggested locational distributions. Due to the larger number of sites required for 10.7 'Option 3' (Upper Government figure), there is only one possible locational distribution, as it would require sites across the whole Borough.

10.4.2 For each alternative, a map indicates in a blue circle the amount of development that would be needed (if any) within the Green Belt. This is on top of the existing housing capacity we have assumed for each place. This existing capacity figure is shown in a yellow circle and summarised below.

Summary of housing numbers in each Growth Option:

	Hemel Hempstead	Berkhamsted	Tring	Bovingdon	Kings Langley	Markyate	Rest of Borough	Total
Urban Capacity*	8,900	600	500	90	50	200	600	10,940
Growth options – Green Belt housing numbers								
Option 1 – Draft Government figure								
1A	1,750	900	300	-	-	-	-	2,950
1B	2,980	-	-	-	-	-	-	2,980
1C	-	1,075	1,000	410	280	160	-	2,925
Option 2 – Locally assessed need								
2A	3,675	1,175	1,600	130	-	-	-	6,580
2B	4,150	1,075	1,350	-	-	-	-	6,575
2C	3,450	1,075	1,000	360	380	160	155	6,580
Option 3 - Upper Government figure								
3	6,850	2,250	2,667	435	950	600	608	14,360

* This figure is the same for each Growth Option and needs to be added to the Green Belt housing numbers to give the total growth for each place.

10.4.3 The need for new land to meet future jobs needs is harder to be specific about at this stage. However, for each option we indicate if land should be allocated now, or set aside ('safeguarded') for longer term needs. A summary of infrastructure implications is also provided – in terms of schools, roads and waste water. Further work is needed to assess full infrastructure implications and responses received to the consultation will help us with this.

When considering all of the options please remember that:

- The circles on the Options maps show the amount of growth, not the location.
- No decisions have yet been taken regarding sites that would make up each growth option. This will be considered once views from this consultation have been heard and further discussions with landowners and infrastructure providers have taken place.
- As explained in section 6 'Homes', none of the options assume any of the housing from the East Hemel Hempstead (Gorhambury) development in St Albans District will count towards our own target. This broad area is shaded brown on the maps that follow. This situation will be kept under review and discussions on these cross-boundary matters continue with St Albans Council.
- All numbers and assumptions are based on information available at the current time. It will be kept under review and updated when new data is published, or further information comes to light.

10.5 Option 1

Draft Government figure

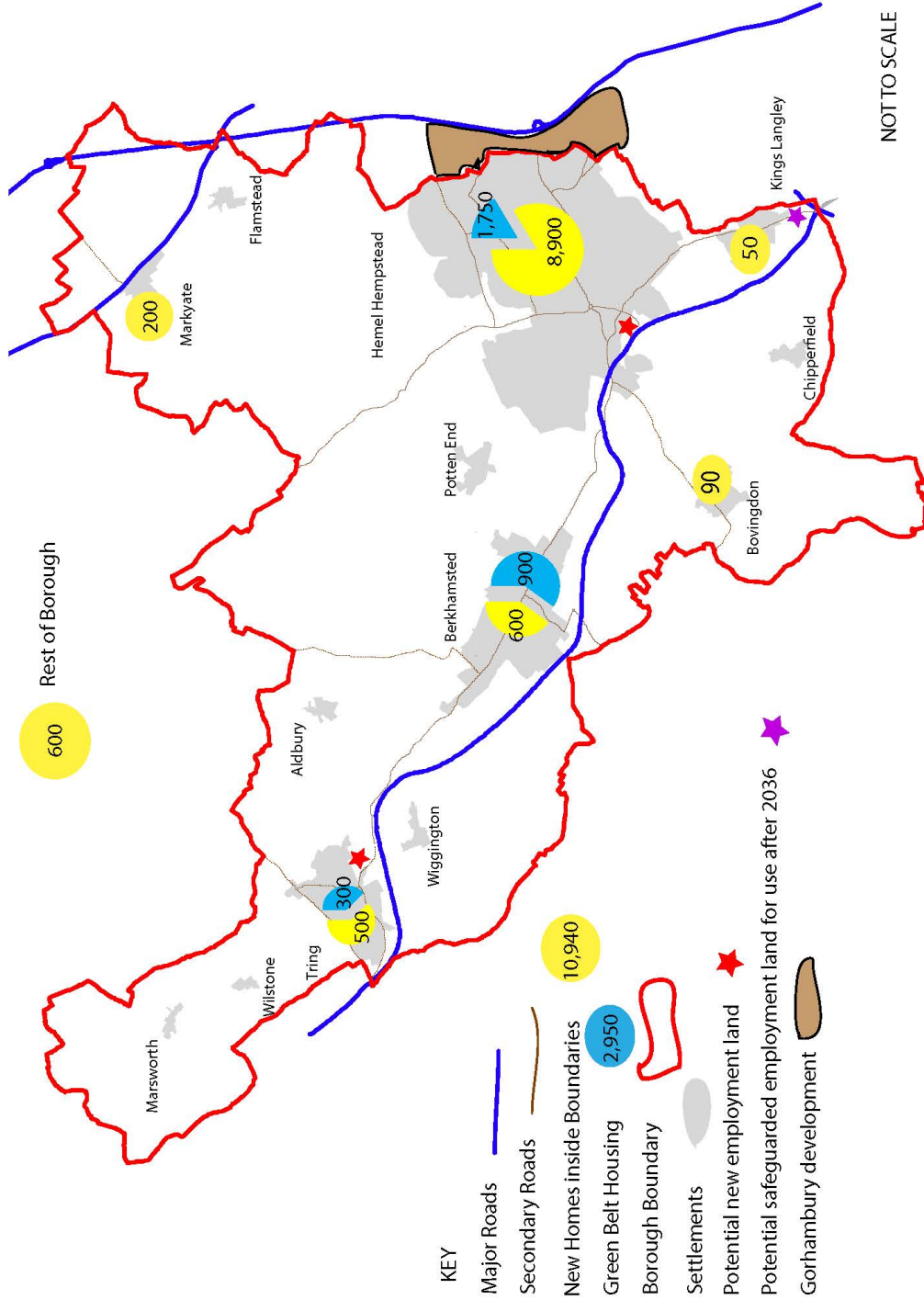
10.5.1 This Option requires a total of just over 13,800 new homes, with just under 3,000 of these needing to be provided in the Green Belt, on top of the existing housing capacity. This level of homes could be delivered through a number of different combinations of Green Belt sites. The draft Schedule of Site Appraisals gives our initial assessment of key sites that have been put forward by developers for consideration on the edge of our towns and villages and could accommodate 50+ homes. We would like your feedback on these sites (see 'Key site options' section below).

10.5.2 A summary of the implications for housing, jobs and infrastructure for each of the three ways this growth level could be distributed are set out in the table below. Maps for each sub-option then follow:

	Option 1A	Option 1B	Option 1C
HOMES	This Option requires a total of just over 13,800 new homes		
Towns	This Option would require the outward expansion of the three towns.	This Option would require the outward expansion of Hemel Hempstead only. There would be no need to expand the two market towns.	This Option would require the outward expansion of the two market towns. Hemel Hempstead would also grow, but through the use of existing and new sites within its current boundary.
Large Villages	There would be no need to expand Bovingdon, Kings Langley or Markyate outwards, with local needs being supported by existing and new sites within the village boundaries.	As for Option 1A.	This Option would require some outward expansion of the three large villages of Bovingdon, Kings Langley and Markyate.
Smaller villages and countryside	Any housing sites in the small villages and countryside would be small scale and only meet very local needs.	As for Option 1A.	As for Option 1A.
JOBS	There is not any urgent need for new employment allocations alongside the proposed level of housing growth, given new space already in the pipeline at Maylands Gateway (off Breakspear Way in Hemel Hempstead), and a potential contribution from St Albans from the 55ha of employment land that forms part of the Gorhambury development at East Hemel Hempstead. Together these sites should be sufficient to meet future employment needs. However, in order to ensure a prosperous economy going forward it would be sensible to consider providing some further employment land east of A41 at Two Waters, Hemel Hempstead and Dunsley Farm, Tring. It would also be prudent to consider setting aside some land for employment uses on land to the south of Kings Langley (known as 'safeguarded land'). Safeguarded land is land that would be set aside for use after the end of the current plan period i.e. post 2036. This land could potentially help meet any jobs growth that can't be met by other Councils in South West Hertfordshire.		
INFRASTRUCTURE			

	Option 1A	Option 1B	Option 1C
Roads	Existing highway 'hotspots' would be exacerbated, and the new development would need to support moves towards increased cycling, walking and use of public transport, as well as contribute towards local road improvements.		
Schools <i>(based on advice from Hertfordshire County Council)</i>	<p><u>Secondary:</u> There would be the need for some limited expansion of existing secondary schools to serve Hemel Hempstead, together with at least one new secondary school. This would be in addition to the new school already planned as part of the East Hemel Hempstead (Gorhambury) development. Ashlyns School in Berkhamsted and Tring School would need expansion, although capacity is limited.</p> <p><u>Primary:</u> Hemel Hempstead, Berkhamsted and Tring would need to provide new primary school(s), while there would potentially be the need for expansion of schools within some villages.</p>	<p><u>Secondary:</u> As for Option 1A with regard to secondary schools in Hemel Hempstead. Ashlyns School in Berkhamsted and Tring School may need expansion.</p> <p><u>Primary:</u> As for Option 1A, except no new primary schools would be needed in Berkhamsted.</p>	<p><u>Secondary:</u> As for Option 1A with regard to secondary schools in Hemel Hempstead. The secondary schools in Berkhamsted and Tring would also need to expand. However, expansion capacity is limited and it may not be sufficient to accommodate the level of pupil generation.</p> <p><u>Primary:</u> As for Option 1A although there may be the potential to consider the relocation of some primary schools within the large villages, if sufficient expansion cannot be accommodated within existing</p>
Sewage Treatment	There may need to be improvements to local waste water treatments plants after 2031.		
Other Infrastructure Issues	All development would need to support wider infrastructure provision or upgrades, either through on-site provision or financial contributions.		

10.5.1 Option 1A - Focus on three towns



Question 39

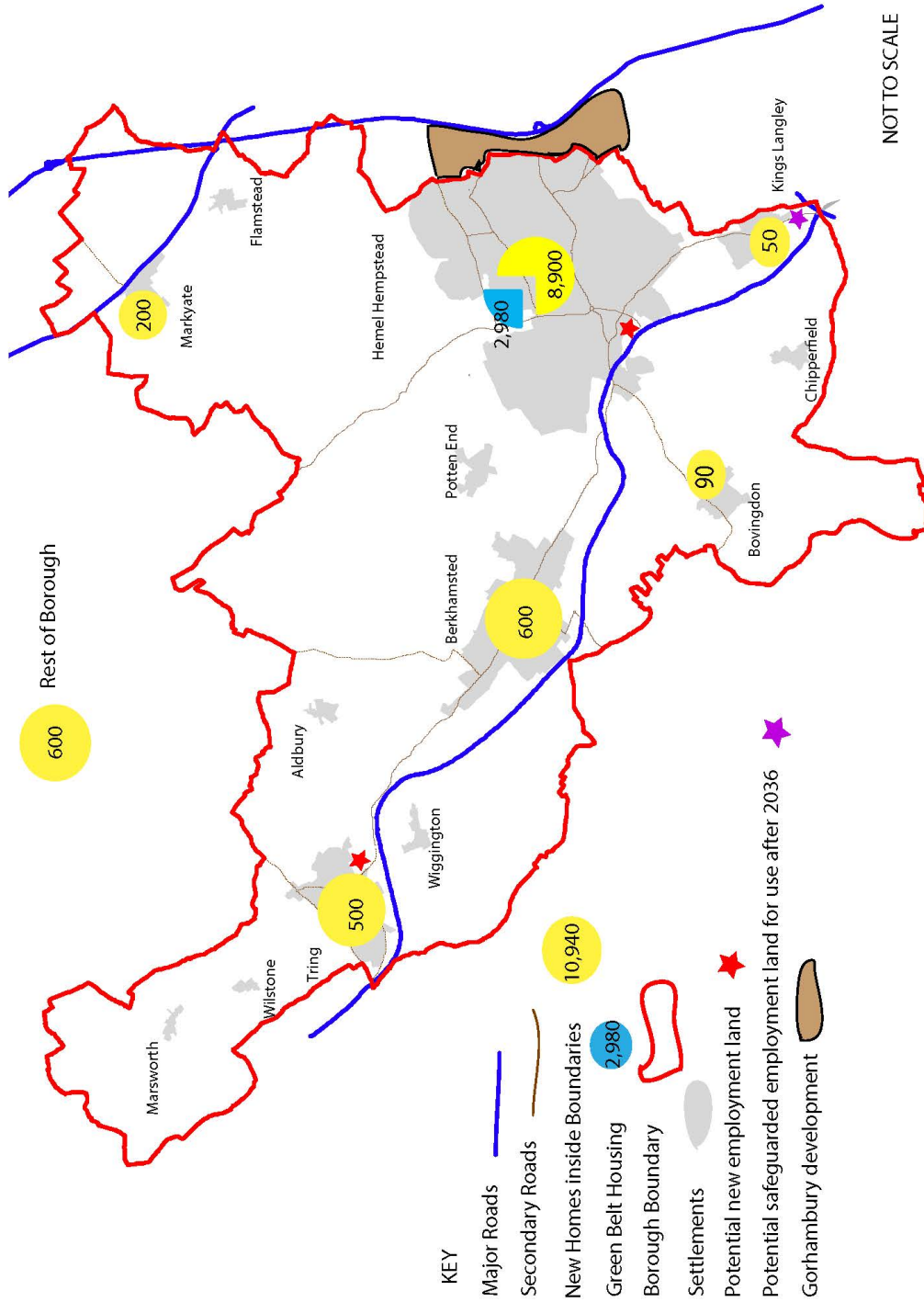
Is Option 1A your preferred option for delivering the growth needs of the Borough?

Yes / No

If no, please explain your reasons with reference to evidence where available



10.5.2 Option 1B - Greater focus at Hemel Hempstead



Question 40

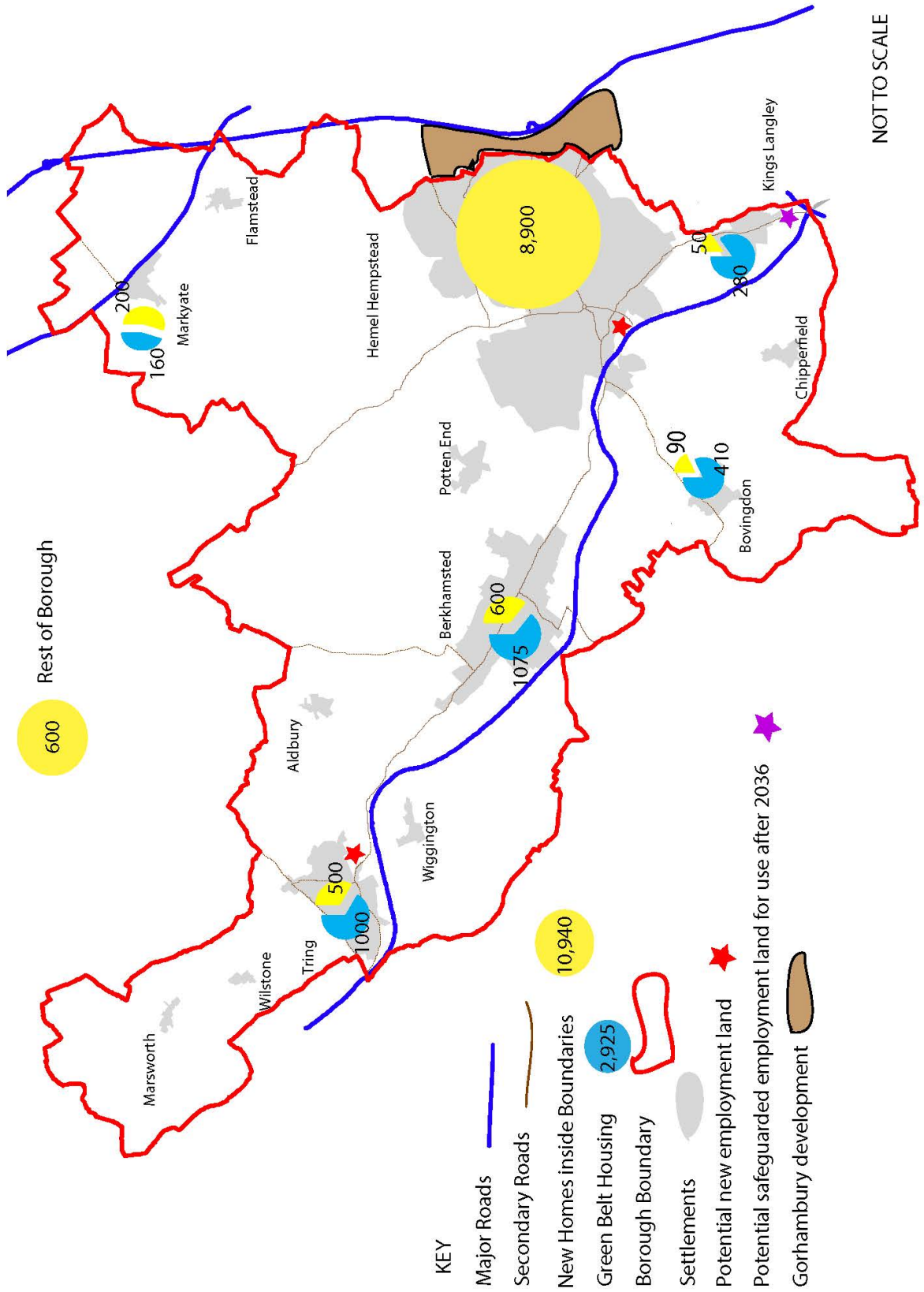
Is Option 1B your preferred option for delivering the growth needs of the Borough?

Yes / No

If no, please explain your reasons, with reference to evidence where available.



10.5.3 Option 1C - Spread more evenly across Borough



Question 41

Is Option 1C your preferred option for delivering the growth needs of the Borough?

Yes / No

If no, please explain your reasons, with reference to evidence where available.



10.6 Option 2

Locally assessed need

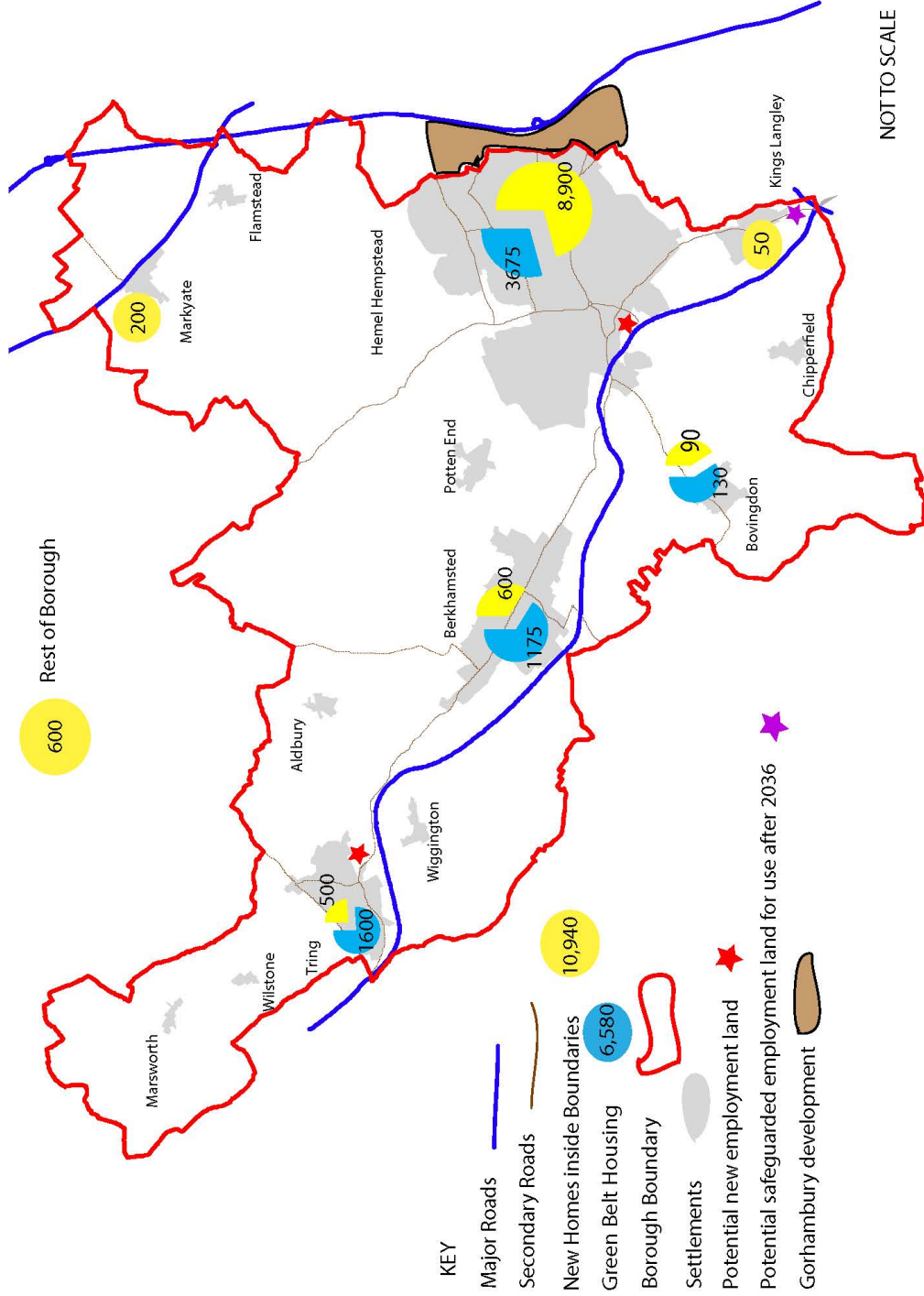
10.6.1 This Option requires a total of about 17,400 new homes, with just under 6,500 of these to be provided in the Green Belt, on top of the existing housing capacity. This level of homes could be delivered through a number of different combinations of Green Belt sites. See draft Schedule of Site Appraisal for our initial assessment of key sites that have been put forward by developers for consideration on the edge of our towns and villages and could accommodate 50+ homes. We would like your feedback on these sites (see 'Key site options' section below).

10.6.2 A summary of the implications for housing, jobs and infrastructure for each of the three ways this growth level could be distributed are set out in the table below. Maps for each sub-option then follow:

	Option 2A	Option 2B	Option 2C
HOMES	This Option requires a total of about 17,400 new homes.		
Towns	This Option would require a more significant outward expansion of the three towns than Option 1A	This Option would require a significant outward expansion of the three towns. Expansion at Hemel Hempstead would be larger than with Option 2A, while expansion at Berkhamsted and Tring would be somewhat smaller in scale.	This Option would require a significant outward expansion of the three towns. However, expansion would be smaller in scale than with Option 2A, particularly at Tring.
Large villages	This Option would require a small extension to Bovingdon. There would be no need to expand Kings Langley or Markyate outwards, with local needs being supported by existing and new sites within the village boundaries.	As for Option 2A, except there would be no need to expand Bovingdon beyond its current boundaries.	This option would require expansion at Bovingdon, Kings Langley and Markyate. The expansion at Bovingdon would be larger than with Option 2A.
Smaller villages and the countryside	Any housing sites in the small villages and countryside would be small scale and only meet very local needs.	As for Option 2A.	As for Option 2A.
JOBS	There would be some need for new employment provision alongside the proposed level of housing growth, but this can be met through sites already in the pipeline at Maylands Gateway (off Breakspear Way in Hemel Hempstead), together with a potential contribution from St Albans from the 55ha of employment land that forms part of the East Hemel Hempstead (Gorhambury) development. In order to meet local needs and ensure a prosperous economy going forward it would be also be prudent to allocate some further employment land east of A41 at Two Waters, Hemel Hempstead and Dunsley Farm, Tring. Consideration should also be given to setting aside some land for employment uses on land to the south of Kings Langley (known as 'safeguarded land'). Safeguarded land is land that would be set aside for use after the end of the current plan period i.e. post 2036. This land could potentially help meet any jobs growth that can't be met by other Councils in South West Hertfordshire		

Option 2A	Option 2B	Option 2C
Infrastructure - Infrastructure needs would be greater than for growth Option 2, but their precise scale and nature will depend upon which specific development sites are chosen.		
Roads	Existing highway 'hotspots' would be exacerbated, particularly in the three towns. New development would need to support moves towards increased cycling, walking and use of public transport, as well as contribute towards local road improvements. These road and junction improvements would be more numerous and significant in scale than under Option 1.	
Schools (Based on advice from Hertfordshire County Council)	<p><u>Secondary:</u> There would be the need for some limited expansion of existing secondary schools to serve Hemel Hempstead together with at least one new secondary school. This would be in addition to the new school planned as part of the East Hemel Hempstead (Gorhambury) development. The secondary schools in Berkhamsted and Tring would also need to expand. However, expansion capacity is limited and may not be sufficient to accommodate the level of pupil generation.</p> <p><u>Primary:</u> Hemel Hempstead, Berkhamsted and Tring would need to provide new primary school(s), while there would potentially be the need for expansion of some schools within the villages.</p>	<p><u>Secondary:</u> As for Option 2A.</p> <p><u>Primary:</u> As for Option 2A, although there may be the potential to consider the relocation of some primary schools within the large villages, if sufficient expansion cannot be accommodated within existing sites.</p>
Sewage treatment	There would need to be improvements to local waste water treatment plants after 2031.	
Other infrastructure issues	All development would need to support wider infrastructure provision or upgrades, either through on-site provision or financial contributions.	

10.6.1 Option 2A - Focus on three towns



Question 42

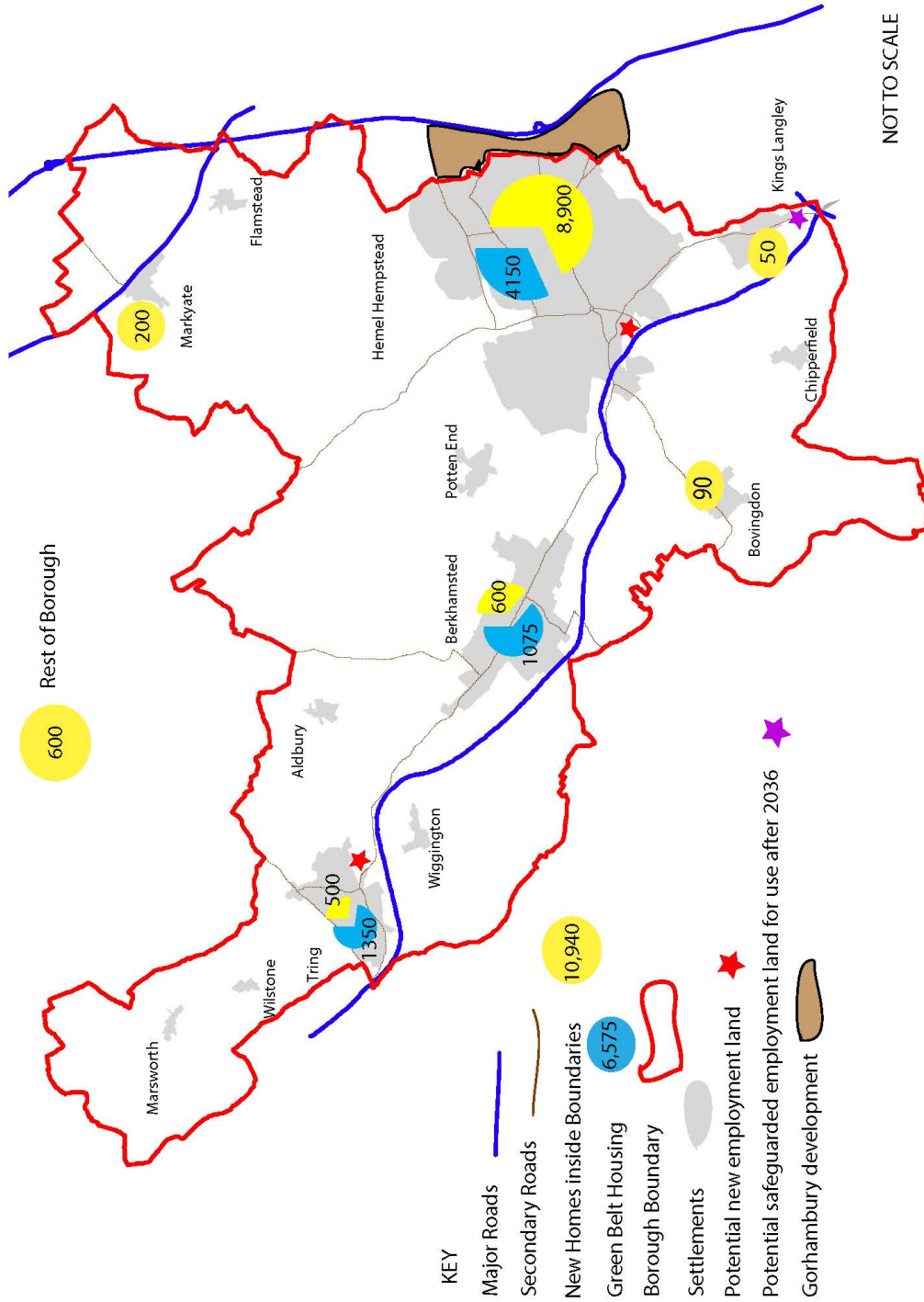
Is Option 2A your preferred option for delivering the growth needs of the Borough?

Yes / No

If no, please explain your reasons, with reference to evidence where available.



10.6.2 Option 2B - Greater focus at Hemel Hempstead



Question 43

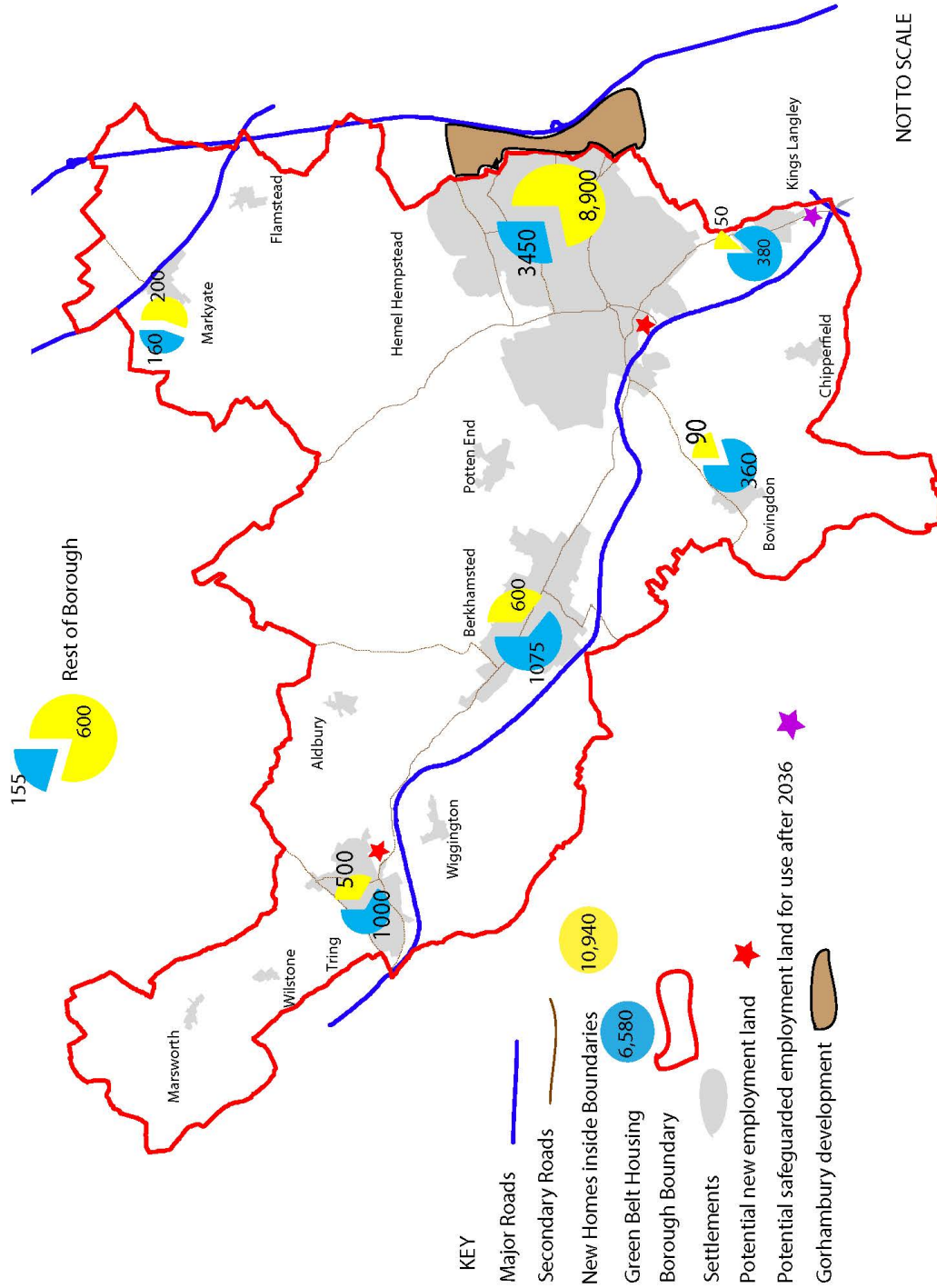
Is Option 2B your preferred option for delivering the growth needs of the Borough?

Yes / No

If no, please explain your reasons, with reference to evidence where available.



10.6.3 Option 2C - Spread more evenly across the Borough



NOT TO SCALE

Question 44

Is Option 2C your preferred option for delivering the growth needs of the Borough?



Yes / No

If no, please explain your reasons, with reference to evidence where available.

10.7 Option 3

10.7.1 Option 3 - Upper Government Figure

Upper Government figure

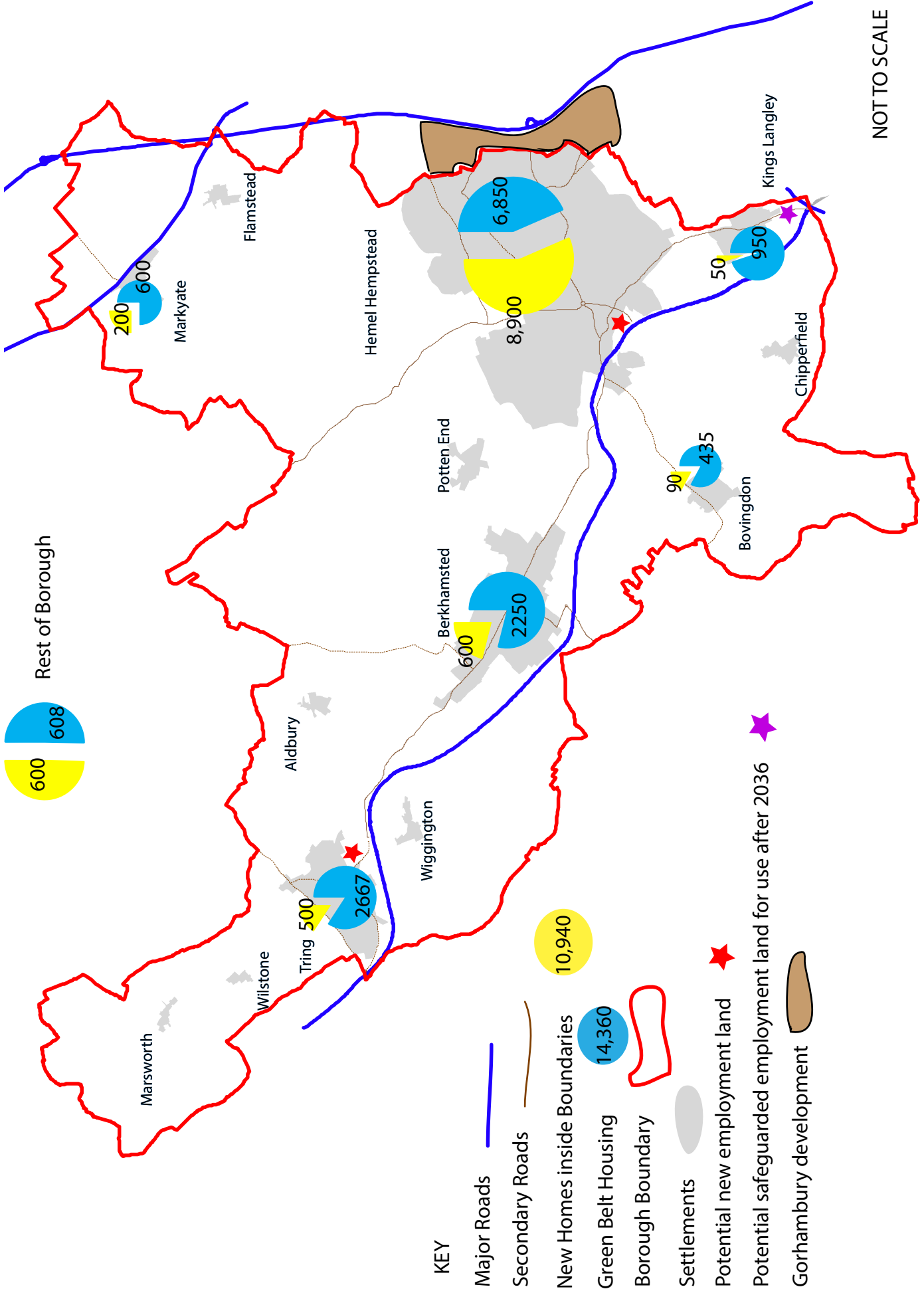
10.7.1.1 This Option requires a total of 25,300 new homes, with 14,360 of these to be provided in the Green Belt, on top of the existing housing capacity. This level of homes would require the all Green Belt sites that are being promoted for development within the Borough. This includes some sites that are within the Chilterns Area of Outstanding Natural Beauty (AONB), or affected by other constraints that would need to be overcome. It may also require some further sites which may come to light through the 'call for sites' that is running alongside this consultation, and/or for known sites to be built at a higher density than we have currently assumed. This option therefore does not have any separate locational distributions i.e. Options A, B and C. The draft Schedule of Site Appraisals provides our initial assessment of those sites that have been put forward by developers for consideration on the edge of our town and villages and could accommodate 50+ homes. We would like your feedback on these sites (see 'Key site options' section below).

10.7.1.2 Option 3 - Summary of Key implications

Option 3	
HOMES	This Option requires a total of 25,300 new homes.
<i>Towns</i>	This Option would require a more significant outward expansion of the three towns than any of the other suggested growth options.
<i>Large Villages</i>	This Option would require a much more significant outward expansion of Kings Langley and Markyate than with any of the other suggested growth options. Expansion at Bovingdon would be marginally higher than it would under Option 1C.
<i>Smaller villages and the countryside</i>	There would be the need for some new housing sites in the small villages and countryside.
JOBS	There would be a need for new employment provision alongside the proposed level of housing growth. This could be met in part through sites already in the pipeline at Maylands Gateway (off Breakspear Way in Hemel Hempstead), together with a potential contribution from St Albans from the 55ha of employment land that forms part of the Gorhambury development at East Hemel Hempstead. In order to meet local needs and ensure a prosperous economy going forward some further employment land should be allocated east of A41 at Two Waters, Hemel Hempstead and Dunsley Farm, Tring. Consideration could also be given to setting aside some land for employment uses on land to the south of Kings Langley (known as 'safeguarded land'). Safeguarded land is land that would be set aside for use after the end of the new plan period i.e. post 2036. This land could potentially help meet any jobs growth that can't be met by other Councils in South West Hertfordshire.
INFRASTRUCTURE	Infrastructure needs would be greater than for Option 2, and would be by far the most challenging to provide, due to the overall scale of growth across the area.
<i>Roads</i>	Existing highway 'hotspots' would be significantly exacerbated across the area. New development would need to support moves towards increased cycling, walking and use of public transport, as well as contribute towards local road improvements. These road and junction improvements would be more numerous and more significant in scale than under Option 2. More significant road and transport interventions would also be required to support growth at this level.
<i>Schools</i>	<p><u>Secondary:</u></p> <p>There would be the need for some expansion of existing secondary schools to serve Hemel Hempstead, together with at least one new secondary school to serve the town. This provision is in addition to the new school planned as part of the East Hemel Hempstead (Gorhambury) development. The existing secondary schools in Berkhamsted and Tring may not be able to expand sufficiently to accommodate future demand, so a new secondary school to serve both towns is likely to be required. No site has been identified for this, and there are few realistic options, as sites that may have been suitable are likely to be needed to deliver the required amount of housing growth.</p> <p><u>Primary:</u></p> <p>Hemel Hempstead, Berkhamsted and Tring would need to provide new primary school(s), while there would potentially be the need for relocation and/or expansion of some primary schools within the villages.</p>

Option 3	
Sewage treatment	There would need to be improvements to local waste water treatment plants after 2031.
Other infrastructure issues	All development would need to support wider infrastructure provision or upgrades, either through on-site provision or financial contributions. The scale of these requires improvements and upgrades would be significant.





NOT TO SCALE

Question 45

Is Option 3 your preferred option for delivering the growth needs of the Borough?

Yes / No

If please explain your reasons, with reference to evidence where available.

10.8 Key site options

- 10.8.1** As part of work on considering Options for the level of new growth the area should provide for in the next 20+ years, we have carried out an initial assessment of key sites that have been passed to us for consideration by developers (see 5.4 'Issue 4 - How will we select development sites?' in section 5). This assessment is set out in the draft 'Schedule of Site Appraisals (2017)' that is published alongside this consultation. This is our initial assessment of sites which are currently in the Green Belt or Rural Area, but have been put forward by developers and landowners for either housing and/or employment use. The current version of this Schedule only includes sites which are actively being promoted that immediately adjoin the towns and villages and have the potential to provide 50+ homes. These sites are listed in the table below and their broad location shown on the map that follows.
- 10.8.2** As the Local Plan moves forward, this Schedule will be updated to include all sites put forward for consideration. This will include any new sites put forward through the 2017 'Call for Sites' process that is currently underway (see 2 'How do I comment?' for further information).
- 10.8.3** All of the sites within the draft Schedule of Site Appraisals are assessed against a number of social, environmental and economic indicators in a *Sustainability Appraisal (SA) Working Note which accompanies this consultation document* [xxxxxINSERT WEB LINKxxxxx](#).

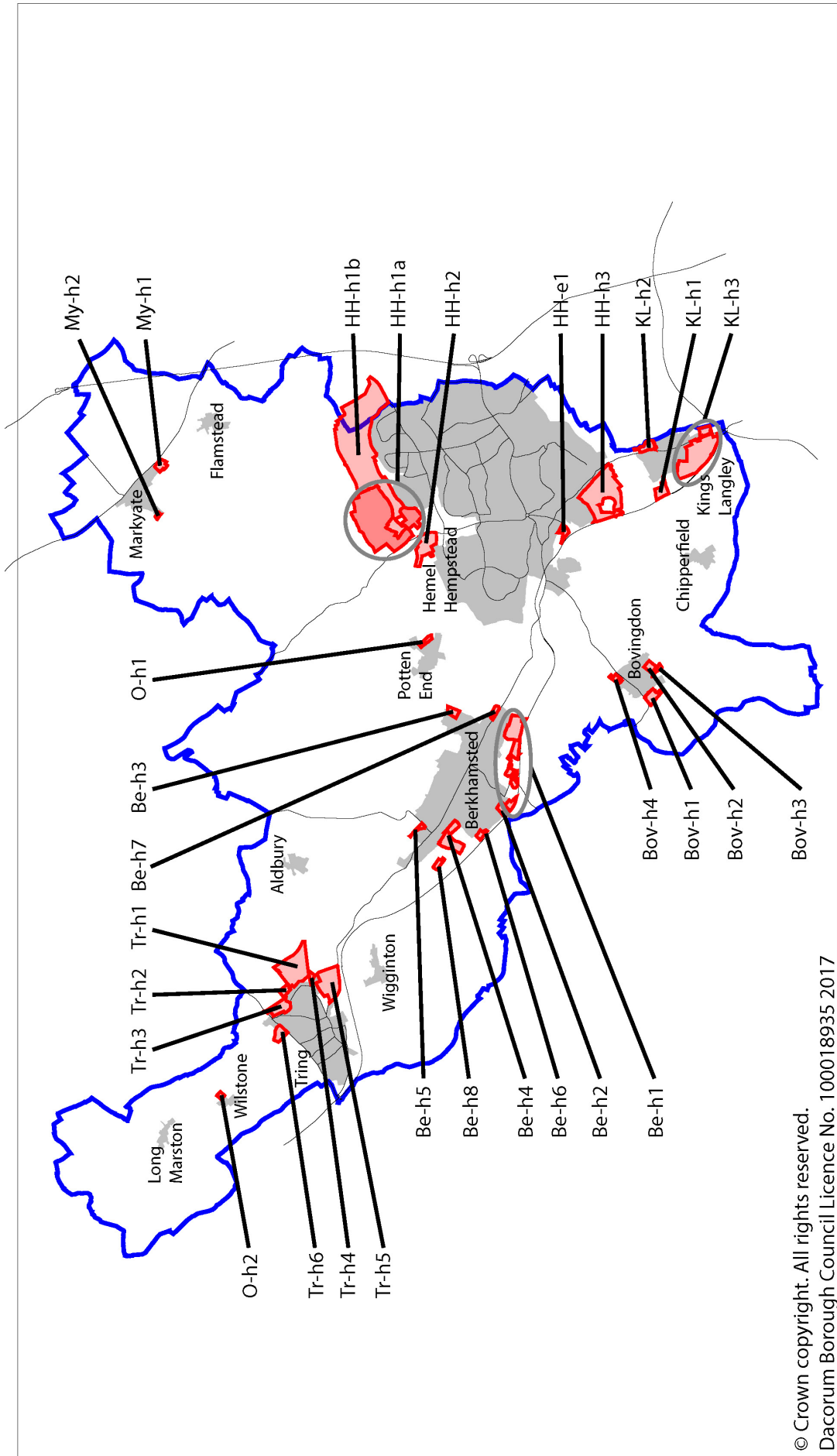
If there are any brownfield or greenfield sites that you feel have development potential, please see the 'Call for Sites' form on www.dacorum.gov.uk/callforsites and submit this information to the Council alongside your consultation response. Suggestions for new brownfield sites will also be considered for inclusion on our Brownfield Register.

List of key sites assessed in the draft Schedule of Site Appraisals document

HEMEL HEMPSTEAD	
HH-h1a	North Hemel Hempstead (Phase 1)
HH-h1b	North Hemel Hempstead (Phases 1 and 2)
HH-h2	North of Gadebridge (Land at Piccotts End)
HH-h3	Land at Shendish, London Road
HH-e1	Land East of A41 at Felden
BERKHAMSTED	
Be-h1	Land south of Berkhamsted
Be-h2	Haslam Fields, Shootersway

Be-h3	Land at Ivy House Lane
Be-h4	Land between Durrants Lane / Bell Lane / Darr's Lane (two sites)
Be-h5	Land at Lockfield, New Road, Northchurch
Be-h6	Land adj. to Blegberry Gardens, Shootersway
Be-h7	Land at Bank Mill Lane
Be-h8	Berkhamsted Golf Range, The Brickworks, Spring Garden Lane
TRING	
Tr-h1	Land to the north of Station Road
Tr-h2	Land west of Marshcroft Lane
Tr-h3	Land at Icknield Way / Grove Road (New Mill)
Tr-h4	Land at Cow Lane / Station Road
Tr-h5	Land at Dunsley Farm, London Road
Tr-h6	Land north of Icknield Way (Waterside Way)
BOVINGDON	
Bov-h1	Land at Grange Farm, Green Lane
Bov-h2	Land south east of Homefield
Bov-h3	Land r/o Green Lane / Louise Walk
Bov-h4	Land at Duckhall Farm, Newhouse Road
KINGS LANGLEY	
KL-h1	Land at Hill Farm, Love Lane
KL-h2	Land at Rectory Farm, Hempstead Road
KL-h3	Land to the east of A41 and Wayside Farm, Watford Road
MARKYATE	
My-h1	Land south of Markyate
My-h2	Land at Pickford Road
OTHER SETTLEMENTS	
O-h1	Land at Old Kiln Meadow, Water End Road, Potten End
O-h2	Land to the north east of Grange Road, Wilstone

Location of key sites in draft Schedule of Site Appraisals document



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Question 46

Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?

Yes / No

If yes, please make it clear to which site(s) your comments relate and refer to evidence where available.

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Next steps

- 11.0.1** Thank you for taking the time to be involved in this consultation and we hope you will let us have your views on issues that are important to you.
- 11.0.2** After this consultation closes, we will look carefully at all of the feedback received and summarise this in a consultation report. This consultation report will set out key issues raised, by whom and our response. Our Councillors will then be asked to agree how we will take our Plan forward to the next stage. This is known as the 'Pre-Submission' or 'Publication' stage and will be a full Plan – complete with policies and schedules of sites we wish to include.
- 11.0.3** Everyone who has commented on this current consultation will be added to our consultation list and be told directly by email or letter when this plan is published and how you can comment on it. Precise timings have yet to be decided, but this will be during 2018. Please keep an eye of Dacorum Digest and our website for further information.

Appendices



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12.1 Appendix a) Draft list of policies for Local Plan

12.1.1 *Note: Some policies may be supported by additional information in appendices, SPDs and/or site specific Master Plans/concept frameworks where relevant. The content/coverage of these will be confirmed as the Local Plan is progressed.*

GENERAL

- Supporting Development⁽³⁾

SUSTAINABLE DEVELOPMENT

- Distribution of Development (including support for regeneration schemes in Hemel Hempstead)
- Selection and Management of Development Sites
- Managing Selected Development Sites
- Identified Proposals and Sites
- The Towns and Large Villages
- Green Belt
- Selected Small Villages in the Green Belt
- Major Developed Sites in the Green Belt
- Rural Area
- Sustainable Transport
- Management of Roads
- Highway design and traffic management
- Parking⁽⁴⁾ (to include both on-street and public parking)
- Quality of Settlement and Neighbourhood Design
- Quality of Site Design (to include storage and recycling of waste)
- Quality of the Public Realm
- Change of use of land
- Height of buildings⁽⁵⁾

HOMES AND COMMUNITY FACILITIES

- New Housing
- Mix of Housing
- Affordable Housing
- Local Allocations
- Rural Sites for Affordable Homes
- Optimising the use of land and the retention of housing
- Size of new dwellings
- Extensions to dwellings and replacement dwellings
- Conversions (including to residential, and Homes in Multiple Occupation)
- Accommodation for Travelling Communities
- Social Infrastructure
- Education and Education Zones
- Community care
- Utility and communication infrastructure

ECONOMIC PROSPERITY

- Economic Development
- Employment Areas
- Offices, Research, Industry, Storage and Distribution
- Loss of mixed use and commercial units on non-designated sites
- Shops and Commerce

3 This is an overarching policy that the Planning Inspectorate require us to include

4 To be supported by supplementary planning document setting out the parking standards that apply

5 To be supported by supplementary planning document on tall and taller buildings

- Shopping Areas (Town Centres and Local Centres)
- Tourism
- Hotel, guest houses and bed and breakfast accommodation
- Camping and caravanning
- Agricultural land and farm diversification
- Equestrian activities

LOOKING AFTER THE ENVIRONMENT

- Landscape Character
- The Chilterns Area of Outstanding Natural Beauty
- Green Infrastructure
- Leisure space provision and leisure facilities
- Open land and open space
- Nature Conservation: SSSIs, Nature reserves, Biodiversity Areas and green corridors
- Trees, Hedgerows and Woodlands (preservation, planting and management)
- Public Rights of Way
- Allotments
- Environmental improvements and sustainability offsetting
- Quality of the Historic Environment
- Development affecting the historic environment: archaeological remains, historic park and gardens and/or listed buildings
- Development affecting Conservation Areas
- Carbon Emission Reductions
- Sustainable Design and Construction
- Water environment: lakes, reservoirs, ponds and canals
- Development affecting and management of the Grand Union Canal
- Environmental protection (including lighting, noise, air quality, etc)
- Waste Prevention and Reduction
- Hazardous substances
- Protection of Mineral Resource and uses for historic workings

INFRASTRUCTURE AND DELIVERY

- Infrastructure and Developer Contributions

PLACE STRATEGIES⁽⁶⁾

- Hemel Hempstead
- Hemel Hempstead Town Centre
- Maylands Business Park
- Two Waters and Apsley
- Berkhamsted
- Tring

6 Coverage will be provided for the settlements of Kings Langley, Bovingdon, Markyate and countryside, although specific policies for these settlements are likely to be unnecessary

12.2 Appendix b) Reasons for rejecting alternative growth levels

OPTION	WHY REJECTED
Continuing the current housing target (430 homes / year)	This option has been discounted as it equates to a lower level of housing provision than technical studies show can be accommodated over the plan period. It therefore does not reflect the level of development that is actually expected to come forward in the area. It also falls significantly short of the assessed local housing need for the area and the two figures derived from the Government consultation on 'Planning for the right homes in the right places.'
Urban Capacity option	<p>This option would equate to a level of development of about 476 dwellings / year or 10,940 dwellings over the plan period i.e. the calculated urban capacity of the Borough. It would not require any further land to be released from the Green Belt, but equates to a level of growth that falls significantly short of the assessed local housing need for the area from the SHMA and the two figures derived from the Government consultation on 'Planning for the right homes in the right places.'</p> <p>Provided all other site and density options have been considered, the Council considers that housing need provides the exceptional circumstances required to consider the release of some Green Belt land. This is supported by the fact that the Green Belt studies carried out for the Council show that some land currently designated as Green Belt does not meet the Government's tests for continuing to have this designation.</p>
Above upper Government figure	<p>An option of a level of housing growth above the upper Government figure (calculated using the draft standard formula in the consultation document 'Planning for the right homes in the right places') has been discounted for two main reasons:</p> <ol style="list-style-type: none"> <li data-bbox="355 1003 1527 1171">1. <i>Development constraints</i> – Development options within Dacorum are constrained by a number of designations (Green Belt, Chilterns Area of Outstanding Natural Beauty, Special Areas of Conservation etc) that would be materially affected should development considerably above c1,100 homes/year have to be accommodated. <li data-bbox="355 1182 1527 1350">2. <i>Need</i> - None of the other Councils that make up Dacorum's identified Housing Market Area (HMA) have indicated that they require Dacorum to accommodate any significant level of unmet needs for their areas. However, Welwyn Hatfield Council in an adjoining HMA have recently asked Dacorum to consider taking some of its unmet needs.

12.3 Appendix c) Reasons for rejecting alternative growth distributions

	WHY REJECTED
<p>New settlement: a new town or village</p>	<p>Paragraph 52 of the NPPF states that the <i>"The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development"</i>.</p> <p>The Council has therefore carefully considered the development of a large new settlement. A new settlement has the potential to secure a very high standard of design, access and sustainability and, subject to size, to comprehensively plan for new infrastructure. It can help relieve development pressures on other settlements.</p> <p>However, there are limited opportunities for standalone new settlements as much of Dacorum is affected by sensitive landscapes (e.g. the Chilterns Area of Outstanding Natural Beauty). Those areas that lie outside the AONB suffer from poor communication links e.g. north of Tring. Furthermore, realistic large-scale brownfield opportunities (such as former MOD land) are lacking.</p> <p>In order for a new settlement to successfully function as a place, it would need to be large enough to be self-supporting in terms of services and facilities. For example it would need to have its own completely new transport links, roads, shops, schools, healthcare etc. This means that to support such a level of infrastructure to achieve sustainability, a new settlement needs to realistically contain over 5,000 new homes and is likely in the longer term to contain 10,000 new homes. For comparison, South Woodham Ferrers in Essex, which was built substantially as a new settlement, has around 6,500 homes in its current form and took 20 years to complete.</p> <p>For all new locations the deliverability of sites needs to be considered. This is particularly important for very large proposals as sites can only be built-out at a certain rate. Sites in excess of 3,000 new homes would be difficult to deliver in the Plan period. The Council is required to ensure that it maintains a five-year rolling supply of housing measured against the housing requirement. New large settlements have very long lead-in times and require substantial infrastructure which could significantly impact on this.</p> <p>At present, through the SHLAA and subsequent 'call for sites' process, no suggestions have been put forward for potential sites. A new settlement has therefore been discounted for the following reasons:</p> <ul style="list-style-type: none"> • We do not consider that there are any suitable sites in sustainable locations. • A new settlement could also not deliver the large number of homes required within the timescales required (i.e. by 2036). <p>The option of a new settlement needs to be looked at on a larger scale ideally across the county, but at least on a south west Hertfordshire scale. This work is due to be commissioned shortly and will be used to inform the next Local Plan review.</p>
<p>Rural growth</p>	<p>Focusing growth in rural parts of the Borough would not comply with Government planning guidance, or comply with the suggested Locational Principles. It would result in development being directed to the least sustainable parts of the Borough – many of which are protected by environmental and landscape designations. It would also fail to make use of some development locations on the edge of the three larger settlements, many of which are assessed in the initial assessment process to be suitable potential sites.</p>
<p>Export growth to another Council area</p>	<p>Government guidance sets out a clear expectation that every Council area will try to meet its growth needs within its own boundaries, or seek agreement with neighbouring authorities to ensure they are met across the wider housing market area (HMA). Whilst Dacorum is constrained by the Green Belt, landscape and environmental designations, so are the other authorities within the HMA (and beyond). The only realistic option that could be considered is for some of the homes that will comprise the Gorhambury development at East Hemel Hempstead, in St Albans district, to count towards Dacorum's</p>

WHY REJECTED

	needs. This option is opposed by St Albans Council, and if successful, would still require the allocation of further sites within Dacorum. It is possible that some of Dacorum's future jobs needs could however be met through the Gorhambury development, and this has been agreed in principle between the two Councils. Discussions about housing growth are ongoing with the other Councils in South West Hertfordshire and our approach is being agreed through a Memorandum of Understanding.
Use greenfield before brownfield land	This approach would not comply with Government planning guidance, or with the suggested Locational Principles. It would fail to support urban regeneration and result in development being directed to the least sustainable parts of the Borough – many of which are protected by environmental and landscape designations. Given the high level of local housing need, a combination of greenfield and brownfield sites is likely to be required to meet targets and maintain supply.
Significant expansion of a large village(s)	Focusing growth on one or more of the large villages would not comply with Government planning guidance, or comply with the suggested Locational Principles. It would result in development being directed to less sustainable parts of the Borough – many of which do not have easy access to key services and facilities that can be found at larger settlements. This would also lead to substantial changes to the compact and rural character of these villages.

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