

Appendix 2

Part A: Overview of key issues raised to the draft (Issues and Options) Local Plan Consultation (Nov/Dec 2017) by local residents.

Consultation Process:

- Complexity and length of the consultation documents.
- Too many questions.
- Lack of understanding of technical issues to be able to respond.
- Problems entering responses onto Objective system.

Duty to Cooperate:

- Need for greater/improved engagement with key stakeholders and neighbouring authorities, particularly in relation to cross-boundary housing numbers and new infrastructure.

Homes:

- Problems with high local house prices and support for increasing the supply of affordable homes.
- Concerns raised over the broadening definition of affordable housing.
- Developers avoiding providing and/or not securing sufficient affordable homes.

Jobs:

- Loss of employment land to housing.
- Settlements becoming solely commuter towns.
- Lack of support for new employment opportunities identified in the plan e.g. at Wayside Farm.

Green Belt:

- Support for the protection of the Green Belt.
- Need to use brownfield sites/look to urban sites before releasing Green Belt land. In some instances, a list of potential sites was provided.
- Green Belts are important to the character and setting of settlements.
- Green Belts protect the open countryside and the wildlife resource and recreational facilities there.
- Loss of Green Belt will result in the merging of settlements.

Housing target:

- General preference for the mid and lower options.
- Concern over the impact and scale of new development on the Borough, individual settlements and the countryside.
- Arguments made in support of lower growth options i.e. below 602dpa.
- The new homes will fail to resolve local housing needs.

Housing distribution:

- General preference for housing to be directed to the larger settlements, particularly Hemel Hempstead.
- Existing settlements have already accommodated sufficient housing.
- Impact and scale of new development on individual settlements and the surrounding countryside.
- Merging of towns and villages.

- Support for brownfield sites within settlements to accommodate the new housing and before greenfield and Green Belt development.
- Urge the need to identify/exhaust urban capacity opportunities.
- Arguments made for alternative growth distributions.

Infrastructure:

- Quality and capacity of existing infrastructure:
 - Lack of school places
 - Lack of community facilities
 - Capacity of highway network to accommodate future growth
 - Capacity of utility provision (electricity, water – both drinking and waste)
 - Capacity of health services, particularly relating to the future of Hemel Hempstead Hospital and GP surgeries
- Timing of new infrastructure:
 - Developers avoiding contributions
 - The need to bring forward infrastructure/contributions earlier.
 - The Council failing to bring forward infrastructure to keep pace with new development.
- The need to plug any funding gaps.

Sites:

- Concerns raised as to whether the sites align to local aspirations for the area or to the overarching plan objectives/place strategies.
- Significant objections made to the sites identified in the Schedule of Site Appraisals:
 - Cumulative impact and scale of sites relative to size of settlement
 - Adverse effects on existing character of settlement
 - Ability of local infrastructure / services / facilities to accommodate the new sites
 - Loss of Green Belt and countryside (Chilterns AONB and agricultural land)
 - Loss of local facilities
 - Settlements have already provided sufficient housing.
- A number of alternative sites suggested.
- Disagree with conclusions made on individual sites in the Sustainability Appraisal.

Part B: Overview of key issues raised to the draft (Issues and Options) Local Plan consultation (Nov/Dec 2017) by Duty-to-Cooperate organisations.

1. SW Herts authorities:

- General support for working collaboratively to meet the needs of the district and those which may affect the wider SW Herts area.
- Potential for Dacorum to help meet the needs of other councils, especially the SW Herts authorities, particularly as it includes the only parts of SW Herts beyond the Green Belt.
- Issues to be addressed on a cross-boundary basis should include retail facilities and transit sites for Gypsies and Travellers.
- The SW Herts authorities should agree housing and job growth targets and how to meet them through joint working and a Statement of Common Ground.
- Further explanation should be provided of the SW Herts strategic sub-regional planning context.
- St Albans have stressed the need to explore potential for housing development / new settlement in the Rural Area beyond the Green Belt.

- Mixed views over the suitability of the approach to employment development. St Albans do not consider there is justification for further greenfield office development at Kings Langley given the potential East Hemel Hempstead employment allocation.

2. Hertfordshire County Council:

Detailed responses received from a number of services:

(a) HCC Highways:

- Dacorum should work with other neighbouring LPAs to understand the cumulative impact of their plans and develop deliverable and effective transport and highways mitigations as the Local Plan develops.
- HCC as Highway Authority has produced 'Requirements for Local Plans - August 2016'. This sets out that transport / highway information and evidence already available and what further evidence is required, a key requirement being a transport strategy that explains how the plan will mitigate the impacts of growth.
- The County-wide COMET transport model can be used to provide an appropriate evidence base and help to inform decisions on site selection and scale of development, as well as transport infrastructure needs.
- Early engagement and consideration of highways mitigation measures in the Local Plan process is essential
- Transport mitigation measures should be integrated into the Local Plan's infrastructure planning processes and ultimately the Infrastructure Delivery Plan.

(b) HCC Minerals and Waste:

- Dacorum should consult HCC as mineral planning authority when identifying areas for non-mineral development in the local plan within HCC's defined Minerals Consultation Areas (MCAs). Draft MCAs are shown in the Draft Minerals Local Plan (2017).

(c) HCC Environment:

- Herts Ecology considers that the environment should be included as a cross boundary issue, given development in Buckinghamshire and the increasing impact on the Special Area of Conservation (SAC) and other environmental resources.
- HCC is consulting on a new Local Transport Plan, and this should be reflected in terms of policies on transport, mobility and connectivity.
- The specific transport issues, implications and infrastructure needs to support the Local Plan will depend on development levels and sites selected in Dacorum and neighbouring local authority areas.
- The Local Plan should include a strategic green infrastructure (GI policy) and should refer to the Hertfordshire GI Strategy, Dacorum GI Strategy and how these translate into local projects.
- Comments submitted on the archaeology, transport/access and ecology implications of the sites in the Schedule of Site Appraisals.

(d) HCC Property (Development Services):

- No changes to facilities proposed and no new fire stations needed to support future housing development.
- The possibility of re-locating fire stations could be examined, particularly at Tring, Markyate and Kings Langley.
- Facilities for young people and children are required, especially for young people.
- New housing developments will necessitate an increase in library service provision, and will need developer contributions.
- Opportunities for co-location of library services will be explored.

- A range of additional Support Accommodation is required for young and older people.
- Guidance has been provided on the possible implications for school place in the towns and large villages in relation to each growth option. Several new primary schools will be required, even with the lowest growth options (Options 1A-1C). There is also the potential need for some new secondary schools.

(e) Waste Disposal Authority:

- Longer term (10-15 years) the Hemel Hempstead Household Waste Recycling Centre (HWRC) is 'unsuitable', and a new HWRC is needed i.e. a one hectare site near the strategic road network.
- The Berkhamsted HWRC is 'not ideal' in the long term as there is insufficient space for additional containers.
- There is a lack of Organic Waste Treatment Facilities in the west of the county, so proposals that come forward should be supported.

(f) Hertfordshire County Council (Public Health Service):

- The Local Plan's policies should promote a positive, healthy environment alongside the provision of healthcare facilities.
- A Health and Wellbeing Policy should be included in the Plan and should be supported by the Plan's vision.
- The Local Plan should encourage new development to be sustainably located, with appropriate densities and provision for walking, cycling and bus services. The health and wellbeing benefits of providing and protecting green infrastructure should be recognised.
- A Health Impact Assessment should be carried out of the growth options as part of the Local Plan preparation.
- In identifying locations for future growth, consideration should be given to locations which will encourage healthy behaviours and lifestyles.
- There should be a policy on air quality and that all development proposals undertake a Health Impact Assessment.

3. Other Neighbouring Authorities:

- Need to consider opportunities for a new settlement.
- Concerns on impact of growth on the A41 and rural roads and the need for traffic modelling evidence to support the Plan's proposals.
- Site Tr-h5 (north of Icknield Way (Waterside Way), Tring) could set a precedent for more housing north of Icknield Way, which could have an adverse landscape and visual impact on Aylesbury Vale.
- Need for joint work on schooling, highways, improved access to Tring Station and other infrastructure requirements.
- The importance of close involvement with adjoining authorities in potential future proposals e.g. at Bovingdon and Markyate.
- Support for mid and higher housing options.
- The Greater London Authority and Chiltern & South Bucks both recommend Dacorum explores whether it can accommodate any needs from housing (and potentially G&T provision).

4. Welwyn and Hatfield BC:

- Part of the SW Herts Housing Market Area (HMA) is also within the Welwyn Hatfield HMA and is an appropriate basis for considering the full OAHN.
- WHBC and the SW Herts authorities should continue to discuss housing land supply and the full OAHN.

- DBC should consider if it can meet some of Welwyn Hatfield's housing shortfall as part of its plan preparation (within the context of the SW Herts HMA).
- The housing target should reflect the updated NPPF and the standard methodology.
- Part of the SW Herts Functional Economic Market Area (FEMA) i.e. St Albans is also within the Welwyn Hatfield FEMA. WHBC and the SW Herts authorities should continue to discuss employment growth and land supply.
- Growth along the A414 corridor should be addressed in the transport strategy and could have implications for the Dacorum Local Plan.
- The need to upgrade Maple Lodge Sewage Treatment Works may affect the location and timing of growth. WHBC should be informed of progress on the Stage 2 study.
- The Dacorum and Watford Gypsy and Traveller Accommodation Assessment (GTAA) should consider the need for transit sites. There should be countywide dialogue on such sites.
- Need to reconsider the option to deliver a small sustainable new settlement (1,000+ dwellings).

5. Dacorum Town and Parish Councils:

- General support for mid to lower housing growth options, with the emphasis on focussing development at Hemel Hempstead.
- A variety of objections raised in each case to sites identified in the Schedule of Site Appraisals, although some sites are supported (see below).
- Concerns raised over impact of growth on the character of settlements and capacity of local infrastructure.
- Markyate PC raised concerns over the impact of growth from Luton and Central Beds. They would support a small development of genuinely affordable housing on the north side of Buckwood Road, to meet local needs only.
- Northchurch PC would consider supporting site Be-h5 (Lockfield, New Road) development if traffic calming/traffic safety measures were introduced onto New Road/canal bridge and Northchurch High Street.
- Tring Rural PC is not opposed to site O-h2 (Grange Road, Wilstone), providing it provides houses/flats for first time buyers or elderly persons and should be affordable and compact in layout. The design should be in keeping with the local architecture.
- Tring Town Council is supportive of site Tr-h5 Dunsley Farm, as it has the scope to deliver a mixed development to meet the wider needs of the town and is well located to the town centre/relatively less constrained.

6. Non-Dacorum Parish Councils:

- Consideration should be given to the wider shared local infrastructure, particularly roads, public transport, education and medical services.
- Concerns over traffic volumes across the district and parish boundaries, including the impact on air quality and public health, and the importance of improving the current road infrastructure.
- Need to coordinate cross-boundary impacts of housing growth on school places in Tring and demand at Tring station.
- Only Redbourn PC raised specific concerns over housing growth options, particularly growth on the north and east of Hemel Hempstead and its impact on the village.

7. Other Duty-to-Cooperate Organisations:

(a) Canal and River Trust:

- Stresses the importance of cross-boundary consistency in the policy approach to the Grand Union Canal and its arms, particularly in the Aylesbury Vale, Three Rivers and Dacorum Local Plans.
- Objects to inclusion of Site O-h2 (north east of Grange Road, Wilstone) in the Schedule of Site Appraisals.

(b) Herts Valleys Clinical Commissioning Group:

- Stresses the shift towards more community based services and care closer to home.
- Consider that there is very limited funding for infrastructure improvements, so developer contributions for health services will be required.
- Housing growth in Dacorum by 2036 will increase pressure on an already pressurised system.
- Many GP surgeries are identified as either constrained or very constrained.

(c) West Hertfordshire Hospitals NHS Trust:

- Watford is currently the preferred option for the main emergency and specialist hospital, with a smaller hospital at St Albans for planned care, specialising in surgery and cancer. A local hospital is proposed in Dacorum, although planning is at an early stage.
- The Trust has not yet decided its requirements, but it has identified a range of the considerations in the next phase of the Local Plan.
- A site is required for the Dacorum local hospital. Hemel Hempstead Hospital is the most likely site, but alternatives could be considered e.g. in the north and east Hemel Hempstead developments.
- Any surplus land at Hemel Hempstead Hospital can be released for development, potentially housing.
- A greenfield site near Kings Langley (site KL-h3) has generally been ruled out as it is Green Belt, close to a congested motorway junction and lacks major utilities/services infrastructure.
- If a greenfield option is retained as an alternative to Watford General Hospital, the Trust will work with the local authorities to identify potential alternatives. A site at east or north Hemel Hempstead is unlikely, due to its proximity to Luton and Dunstable Hospital and displacement of activity into London from the south of the catchment area.

(d) Historic England:

- Need for a positive, integrated and evidence-led strategy for the historic environment in the Plan.
- The conservation and enhancement of the historic environment should be identified as a key cross boundary planning issue and a strategic duty to co-operate priority.
- The Plan's design policies should seek to reflect local character and distinctiveness.
- A more robust approach to the historic environment is required and various ways on how this can be achieved are suggested.
- Growth and development should conserve and enhance the significance of the Borough's many heritage assets.

(e) Sports England:

- The Plan should include a policy to protect and enhance open space and sporting facilities, and contain policy requirements for new sport/leisure provision across a range of sites.
- Outdoor sport should be encouraged in the Green Belt where a need exists.
- Existing playing fields should not be proposed for development or included on the brownfield sites register.

- The level of sports and recreation facilities in new development should be evidenced and take into account national and Sports England advice.
- Site specific comments were made regarding playing fields on sites HH-h1a & b (North of Hemel Hempstead), Be-h2 (Haslam Fields, Shootersway, Berkhamsted), Tr-h5 (Dunsley Farm, Tring), Tr-h6 (north of Icknield Way, Tring) and Bov h3 (rear of Green Lane, Louise Walk, Bovingdon).