



Report for:	Cabinet
Date of meeting:	16 October 2018
Part:	1
If Part II, reason:	

Title of report:	Dacorum Single Local Plan 2020-2036: Update on current situation
Contact:	<p>Cllr Graham Sutton: Portfolio Holder for Planning & Regeneration</p> <p>Author/Responsible Officers: James Doe: Assistant Director, Planning, Development and Regeneration Andrew Horner: Team Leader, Strategic Planning and Regeneration</p>
Purpose of report:	To update Cabinet on the progress towards preparing Dacorum's Local Plan.
Recommendations	<ol style="list-style-type: none"> 1. That Cabinet note the progress on preparing Dacorum's Local Plan as set out in the report. 2. That Cabinet agree to setting up a Task and Finish group to consider key issues related to the Local Plan. 3. That Cabinet delegates authority to the Corporate Director Housing and Regeneration in consultation with the Portfolio Holder Planning and Infrastructure to submit a bid for financial support from the Ministry of Housing, Communities and Local Government 'Garden

	Cities Prospectus’.
Corporate Objectives:	<p>The Council’s Local Plan helps support all 5 corporate objectives:</p> <ul style="list-style-type: none"> • <i>Safe and clean environment:</i> e.g. contains policies relating to the design and layout of new development that promote security and safe access; • <i>Community Capacity:</i> e.g. provide a framework for local communities to prepare area-specific guidance such as Neighbourhood Plans, Town / Village Plans etc.; • <i>Affordable housing:</i> e.g. sets the Borough’s overall housing target and the proportion of new homes that must be affordable; • <i>Dacorum delivers:</i> e.g. provides a clear framework upon which planning decisions can be made; and • <i>Regeneration:</i> e.g. sets the planning framework for key regeneration projects, such as Hemel Hempstead town centre and the Maylands Business Park.
Implications: ‘Value For Money Implications’	<p><u>Financial</u> Funding to prepare the new Dacorum Local Plan is provided from existing budgets. A budget has been agreed for 2018/19. Preparations to deliver the Plan, can be met by re-phasing existing budgets through the MTFs process, to account for periods of high activity, pre and post examination periods over the next 5 years.</p> <p><u>Value for Money</u> Where possible, evidence base work is undertaken jointly with other authorities to ensure cost is optimised (through economies of scale). Collaborative working with landowner consultants will continue to help extend the resources available to the Council and avoid the duplication of site specific technical information.</p>
Risk Implications	<p>The Local Plan has its own detailed risk assessment.</p> <p>The key risk is that the new Local Plan could be found ‘unsound’ by an Inspector at Public Examination. To ensure against this, the Council must ensure that the Plan’s proposals comply with Government policy, are founded on robust evidence, such as that detailing housing, employment and infrastructure requirements and follow all statutory requirements regarding public consultation, publication, public examination etc.</p> <p>Following adoption of the Local Plan by the Council, the key risk is that the Plan does not deliver as planned. At that stage, continued close working with local communities, developers and infrastructure providers, along with consistent decision making, helps to ensure sustainable development takes place in a timely fashion.</p> <p>The annual Authority Monitoring Report reviews the risks</p>

	<p>inherent in preparing and delivering the Local Plan. Monitoring of development is a source of information which, properly used, can assist risk reduction – i.e. it checks whether progress and control of development has been successful and can indicate where change (in policy or process) may be beneficial. There is a new requirement for an Action Plan where authorities have delivered less than 95% or less of the homes required over the previous three year period. This report should be supported by a detailed evidence base requiring data collection and review at a more detailed site level. Regular monitoring is also able to inform future Local Plan and planning policy document review.</p>
Community Impact Assessment	<p>A full Sustainability Appraisal (SA) must be carried out as part of the Local Plan process. The SA looks at social, environmental and economic impacts in detail and is scrutinised at the Local Plan examination by an independent inspector. The Council will also undertake an Equalities Impact Assessment (EIA) in due course.</p>
Health And Safety Implications	<p>No implications as a result of this report.</p>
Monitoring Officer/ Deputy S.151 Officer Comments	<p>Monitoring Officer:</p> <p>If Cabinet approves the request to set up a Task and Finish Group, the request will be referred to the Programming Panel, which consists of the political group leaders or their representatives, who will appoint the membership of the group and decide upon the terms of reference for the group.</p> <p>Deputy S.151 Officer</p> <p>The submission of a funding application can be produced within the existing local plan approved funding and these funds will be profiled as required to support the delivery of the local plan.</p>
Consultees:	<p>Mark Gaynor, Corporate Director Housing and Regeneration</p> <p>Consultation on the new Local Plan and other policy documents will be carried out in accordance with the council's adopted Statement of Community Involvement (SCI).</p>
Background papers:	<ul style="list-style-type: none"> • Adopted Local Development Scheme (July 2018) • Adopted Core Strategy (September 2013) • Adopted Site Allocations DPD (July 2017) • Dacorum Borough Local Plan 1991 – 2011 (April 2004) • Authority Monitoring Report 2016/17 • National Planning Policy Framework (NPPF) • Housing White Paper 'Fixing our Broken Housing Market (February 2017) • Planning for the Right Homes in the Right Places (Consultation Proposals September 2017) • Planning and Compulsory Purchase Act 2004.

	<ul style="list-style-type: none"> • Planning Act 2008 • Town and Country Planning (Local Planning) (England) Regulations 2012.
Glossary of acronyms and any other abbreviations used in this report:	<p>AMR: Authority Monitoring Report LDS: Local Development Scheme SCI: Statement of Community Involvement SPD: Supplementary Planning Document NPPF: National Planning Policy Framework NPPF2: New National Planning Policy Framework PPG: National Planning Policy Guidance SHMA: Strategic Housing Market Assessment now called the Local Housing Need Assessment ENS: Employment Needs Study IDP: Infrastructure Delivery Plan JSP: Joint Strategic Plan <i>(for SW Herts)</i> LEP: Local Economic Partnership <i>(for Hertfordshire)</i> SoCG: Statement of Common Ground SA: Sustainability Appraisal EIA: Equalities Impact Assessment HRA: Habitat Regulations Assessment SPEOSC: Strategic Planning & Environment Overview & Scrutiny Committee</p>

Background

1. The Council has a statutory duty to prepare a Local Plan; failure to produce and adopt a Local Plan can leave the Council open to direct intervention and loss of control over the plan making process. The new local plan proposed for Dacorum will replace the adopted 2004 Local Plan, 2013 Dacorum Core Strategy, Site Allocation DPD and update a range of existing documents. The timetable for the production of the new Local Plan is set out in the LDS which was approved, in updated form at the meeting of the Cabinet.
2. This report is provided to update Members on the progress with preparing the Local Plan and identify the next stages in progressing the Plan towards adoption. It is intended that this will be the first in a series of update reports with the next update scheduled for the February meeting of the Cabinet.
3. The Local Plan will cover the period to 2036. The latest guidance in the NPPF2, however, makes it clear that Local plans should be kept under review with formal review at least every 5 years to ensure that the plan remains up to date. This requirement does not necessarily require a complete new plan to be produced every five years but the pace of change in Government planning related Policy and other relevant factors suggests that significant updates (if not a full new plan) will be required in response to the reviews.

Key Dates and Milestones

4. As highlighted above the LDS was recently updated and the key milestones and dates in plan preparation are:

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|--|-------------|
| • Pre-Submission (draft version of plan) | Autumn 2019 |
| • Submission of plan to Secretary of State | Spring 2020 |
| • Examination in Public | Summer 2020 |
| • Adoption | Winter 2020 |

5. Within this high level timetable there are many other priorities and deadlines that must be set and met. The following sections of the report give a flavour of the issues to be addressed and the work required but this is not in any way an exhaustive list.
6. There will also be extensive public consultation on the emerging plan in line with the principles set out in the Council's adopted Statement of Community Involvement. The next round of consultation will be at the pre-submission stage scheduled for autumn 2019. It will allow the opportunity for the wider public, land owners, developers, Town and Parish Councils, Ward Councillors and all other with an interest in the emerging Plan to comment and have their views taken into account.

Issues to be addressed in the Plan

7. The formulation of the new plan needs to cover a range of issues including:
 - household projections;
 - the role and function of the Green Belt affecting Dacorum, including long term boundaries and the potential to identify safeguarded land beyond 2031; and more significantly,
 - the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum. This element will include nearby and neighbouring Councils and others lying beyond the Green Belt.
8. Key questions that need to be addressed through this plan review are:
 - What should the roles of the towns and villages be?
 - Should new development be focussed in one place, or distributed more evenly across the Borough?
 - How many new homes and jobs should we provide?
 - How do we ensure new infrastructure is provided alongside new development?
 - What is the future role of the Green Belt in the Borough?

Growth and Infrastructure Strategy

9. As part of the work to support the evolution of the Local Plan, Cabinet agreed in July to the production of a Corporate Growth and Infrastructure Strategy for Dacorum. The production of this new Strategy for Dacorum addresses a fundamental point – that the Council needs a clear and ambitious vision for how it wants the Borough to develop and evolve over the next 20-30 years.
10. This Strategy will be key in articulating how the area can take full advantage of the economic and social opportunities which will arise as a result of the growth and change that is being planned for the area and will underpin the Council's approach towards key issues into the future, such as affordable housing development, economic and business development, health and

wellbeing, regeneration, parks and open spaces, tourism, the role of its town centres and the digital/technology development agenda. It will also set out how the Council will seek to direct and influence the provision of transport and access, utilities and other major infrastructure. The Strategy will also create important opportunities to access new funding across these broader areas of work to help the Council deliver its vision and attract new investment into the Borough.

11. The Strategy will be particularly important for Hemel Hempstead where, as the main urban centre of the Borough, a significant proportion of growth and change is likely to be concentrated. It is similarly important however at other towns and villages, where communities will be looking to the Council to help them optimise the benefits of new development for their local community, such as ensuring the availability of a proportion of new homes for local people in housing need, securing access to jobs and making the most of business opportunities arising from increased disposable income from incoming households and workers.
12. The Strategy will be relatively high level, but detailed action plans and programmes will flow from it, with delivery of the new Local Plan once adopted, placed as one such programme.

Garden Communities Prospectus

13. Members will recall in the report to Cabinet of 31 July 2018, reference was made to the need for the production of a Strategic Sites Supplementary Planning Document in due course, for dealing with the delivery of strategic scale sites emerging from the Local Plan preparation process.
14. The report referred to the proposals by the Crown Estate for a major expansion of Hemel Hempstead initially to its east and then to its north, with the eastern section of around 5000 new homes and an extension to Maylands Business Park, part of the Hertfordshire Enviro-Tech Enterprise Zone featuring in the pre-submission consultation version of the new St Albans Local Plan.
15. The northern section of the development, with capacity for around a further 5000 new homes, local services and open space has been put forward by The Crown Estate as a site for consideration to be included in the new Dacorum Local Plan.
16. The scale of the development is considerable and would be the largest ever, if selected by the Borough Council, to be included in a local plan for the area since the expansion of the new town of Hemel Hempstead by the former new town Development Corporation ended. The scale of the proposal would have the potential, with the proposals contained within the draft St Albans Local Plan and the delivery of development within the Enterprise Zone, to deliver major new infrastructure for the area and to have potentially transformative effects on the town as a whole.
17. The Crown Estate wishes to promote the development of land to the north and east of Hemel Hempstead on garden town or community principles. To help support the delivery of major new garden communities, the Government

has set up a funding programme through its Garden Cities Prospectus to which local authorities and/or developers are invited to bid for resources from.

18. Key thresholds in the funding programme require proposed developments to be of 10,000 new homes or more, and where they are being brought forward as an expansion of an existing settlement (as is the case with the Hemel proposals) they are expected to demonstrate transformational effects and benefits to the established town.
19. A copy of the prospectus is attached as an appendix to this report, and can be found at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/734145/Garden_Communities_Prospectus.pdf
20. The prospectus offers funding to authorities and developers to support the delivery of new garden communities, the prospectus advises that *'We want to see vibrant, mixed-use, communities where people can live, work, and play for generations to come – communities which view themselves as the conservation areas of the future. Each will be holistically planned, self-sustaining, and characterful'*.
21. Though funding levels are not specified, the support on offer is aimed at staffing resources and knowledge that need to be put in place to ensure successful and timely delivery of new garden communities. The fund is not there to overtly provide capital funding, though MHCLG cross-refer to garden community schemes possibly forming part of a Housing Deal with Government.
22. Specifically, the funding could cover:
 - Resource funding – to cover staffing, technical reports and studies. This would be immensely helpful to the HGC project.
 - Delivery advice and support – with reference to Homes England resources being provided to assist. HE is already engaged with the project.
 - Delivery vehicles – such as Joint Venture companies or development corporations. These have not yet been considered as part of the project.
 - Cross-government brokerage
 - Peer learning and networking
 - Bespoke support proposals that bidders might put forward.
23. The deadline for submissions to the Government's programme, being implemented through the Ministry of Housing, Communities and Local Government and Homes England, is 9 November 2018. Given the exceptional scale of the development and its advancement in part at least through both the confirmed and operational Enterprise Zone and the draft St Albans Local Plan, it would be beneficial to submit a bid to MHCLG for there to be a possibility of the support listed above. Officers are working with counterparts at St Albans City and District Council, Hertfordshire County Council and The Crown Estate to prepare a submission by the deadline.

Resources

24. The preparation of the Local Plan is a complex and challenging task for all involved requiring extensive staff input and support from specialist external consultants. The officer team has recently been strengthened through the appointment of a new Team Leader (the role having previously been filled on an interim basis) and filling a Planning Officer vacancy created through the promotion of the previous post holder within the team to the post of Assistant Team Leader. The officer resource available to the team has also recently been boosted through the creation of two Planning Graduate posts for an initial period of two years. These two additional posts, funded from the existing LDF budget, have been filled with the post holders joining the Council in the next few weeks.

Evidence and Evidence Gathering

25. The preparation of the plan will require an extensive and comprehensive evidence base made up of many technical documents that will support the Council's proposals at the Examination in Public. Some pieces of work have been completed, others commissioned and others at an early stage in the tendering process.
26. A key piece of work that is currently completing the tender process is the Site Assessment Study to be carried out by consultants; this will review all potential development sites that have been put forward or identified against a range of criteria. This study will be at a relatively high level but should identify potential development sites that are worthy of more detailed evaluation and rule out sites with no real potential.
27. The retail and Leisure Study is currently underway and is being carried out as a joint study with the other south west Herts authorities which has benefits in ensuring a comprehensive approach and ensuring that costs are shared and thereby minimised. The Gypsy and Traveller Study is close to completion and this will inform the likely requirement to identify new pitches.
28. Another key document being prepared on a South West Hertfordshire wide basis is the Local Housing Need Assessment (previously called the Strategic Housing Market Assessment (SHMA)). This document looks in detail at the form and tenure of housing required, including specialist housing, to meet the needs of South West Hertfordshire in general and Dacorum in particular. The assessment will build detail into the overall quantum of new housing needed in Dacorum.
29. There are many other reports and evidence documents required such as Strategic Flood Risk Assessment, settlement Envelope Boundary Review, Green Infrastructure Study and Social and Community Facilities Study. This is only a sample of the range of documents required but gives an indication of the vast amount of information required to support plan preparation and examination.

Duty to Cooperate

30. The Duty to cooperate is something imposed on all Local Planning Authorities as part of plan preparation. This is not a duty to agree but there is a clear expectation that Council's will work together to resolve issues. The level of

cooperation and efforts made to cooperate are an important issue for consideration at the examination of the Plan. As with all other matters to be examined there must be extensive evidence available to demonstrate the discussions that have taken place and agreements reached and an explanation of situations where agreement was not reached.

31. The Duty to Cooperate is not just limited to other Councils but extend to other organisations including infrastructure providers and Government Bodies such as water supply and health care providers. The Duty covers all aspects of services providing by Councils including County level functions such as education and highways/transport. The current work on the South west Herts Joint Strategic Plan is an example of the operation of the Duty to Cooperate.
32. Duty to cooperate is a significant and important process that involves working closely with partners to identify key issues and find solutions. The outcome of the meetings should produce a more robust solution to issues and deliver joined up thinking and delivery between both councils and infrastructure providers to ensure that development and supporting facilities can be delivered in line with the timescales set out in the Plan once adopted. The steps taken to deliver cooperation will be a key issue for consideration when the plan is Examined; failure to demonstrate a rigorous approach could be a reason for the plan to be declared not to be sound.

Task and Finish Group

33. As part of the formulation of the local plan, its policies and site allocations it is proposed that a Task and Finish group be formed. The purpose of the group would be to review and challenge the proposed overarching strategy, individual policies, site allocations and other key features of the plan prior to a first draft of the document being produced for wider consultation. It is envisaged that the group would highlight strengths and weaknesses of the emerging plan, challenge contentious issues and identify opportunities and solutions. The Task and Finish Group would be set up in accordance with the provisions of the Council's constitution. Details of the programme of meetings will be finalised in consultation with the Portfolio Holder and Programming Panel.

Issues and Options Consultation

34. Members will recall that late last year an extensive Issues and Options consultation was carried out as part of the early stages of the preparation of the new plan. Analysis of the results is being completed by officers; the number and complexity of the questions asked and the responses received (22,688 comments by 2,736 individuals) has made this a challenging task for officers resulting in the process taking much longer than expected. It is anticipated that this work will be complete before the end of the year when a full report will be presented to Cabinet.

All of the comments received can be viewed on the Council's Local Plan Consultations web page by following this link:

<http://consult.dacorum.gov.uk/portal/planning/lp/io/io>

35. Moving forward the scale and form of future consultations will be managed by officers to ensure that the consultation is targeted and focussed to a smaller number of specific questions.

Future Reports and Conclusions

36. It is intended that this will be the first in a series of reports on progress with the Local Plan and it is proposed to bring a further update report to Cabinet in February next year.
37. The Local Plan is a vital statutory document setting the future vision and direction of the Borough. The delivery of the Plan is challenging and requires the gathering and interpretation of extensive evidence and further consultation with the public, Town and Parish Councils and a very wide range of other bodies and organisations.
38. Members are asked to note the content of this report and the progress being made on the preparation of the Local Plan.

Appendix 1

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 cooperate 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-led 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, Bovington).