Organisation	Summary of Comments	DBC Response
Berkhamsted Town Council (original comments)	The Town Council welcomes the statement at the third paragraph of the CEO introduction: 'The National Planning Policy Framework (NPPF) recognises that good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.	
	We welcome reassertion in the CEO introduction that the strategy is to meet NPPF requirements for the conservation and enjoyment of heritage assets most at risk' and that heritage assets are an irreplaceable resource	
	The strategy contains much on policy and process; but there is no action plan to indicate how the strategy will be delivered, by whom, when, how progress will be monitored or how various initiatives will be resourced. Without some clarity on how the strategy will be delivered, the document has no teeth and can only remain aspirational.	There will be a rolling yearly Action Plan attached to the Strategy – this has been made clearer in revised version. The Action Plan will turn aspirationals into deliverables.
	The draft strategy does not reflect the pro-active approach suggested by the quote from the NPPF. The body of the strategy reads more as a passive statement. It needs to be more specific on actions and resources that will deliver the strategy. Those actions mentioned in the document are referred to as 'ad hoc' which does not give any indication or confidence that the strategy will be delivered in a principled and planned way.	It is not considered that there is a conflict, rather a balance of
	There are potential conflicts between regeneration in its wider sense, and heritage assets. The strategy should recognise those potential conflicts and specify the criteria and process the Borough would use to resolve them.	considerations. This balance is recognised in draft Strategy and has been described further in Dev. M'ment section of revised version.
	Despite the importance which the National Planning Policy Framework (NPPF) puts on design, there is no reference to design at all in the strategy. Design is a key aspect of sustainable development and should be reflected quite specifically throughout the document. The Town Council places a high value on preserving the Conservation Area, Listed Buildings and all heritage assets. We would not want to see a separation of Conservation and Design in the strategy nor a dilution in the good work of the Borough Conservation and Design Officers.	The importance of design is mentioned in the CEO comment. The NPPF states that good design is indivisible from good planning. Therefore all Planning and Conservation officers should as a

How we do it table - Page 6: Any reference to design is omitted from the table. As a minimum, there should be a reference to guidance on design as one of the entries under ADVICE.matter of course put good design at the heart of their considerations.The Town Council welcomes proposals for the database and would want the strategy to have more detail on how and when this would be completed. How the archive would be maintained; and how the public, academics and others might get access to the information it contains. We ask that the database includes all heritage assets in the Borough, not just listed buildings.Specific projects with timetables for delivery would be outlined in the Action Plan.We suggest more specific detail on how the survey will be undertaken than through "the on-going programme". We ask that the survey be extended to include all buildings and structures outside a Conservation Area as a planned and pro-active piece of work, rather than on "an ad hoc basis as they come to light.'The CA Character Appraisals tender process has now been completed. Other requests for action would be dealt with upon receipt dependent on departmental resources.The strategy appears to concentrate on heritage assets in the Conservation Area. We suggest the strategy should seek to provide an up-to-date assessment of all heritage assets, and a database be systematically maintained and updated.It is considered appropriate that this Strategy focuses on Listed Buildings work will depend on future resources.We note that the last "Buildings at Risk" register was reviewed some 15 years ago. The Town Council would welcome more information in the strategy to building we suggest the approach in the strategy be to identify all and potential buildings at risk' and for risks to those buildings to be pro-actively mana		
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when those assets may have already deteriorated quite substantially. This review should encompass assets outside of the Conservation Areas. We note that the Corporate Regeneration Group will play a role in shaping and delivering capital projects, including town centre improvements.	settlements being evaluated under the Conservation Area Character Appraisals. Draft version of Strategy already reflects this work.
You will be aware that all of Berkhamsted town centre is in the Conservation Area and reiterate the point regarding potential conflicts between regeneration and heritage assets. We ask that the strategy should recognise those potential conflicts and specify the criteria and process the Borough would use to resolve	See earlier response regarding 'conflicts'.
them. We would welcome reference to the Town Council's proposed Berkhamsted Streetscape Strategy, to be jointly funded by the Borough and Town Council, which will focus on the High Street and Conservation Area, and on which we will draw on the Borough's substantial experience of Conservation and Heritage issues.	The Berkhamsted Streetscape Strategy has not been finalised. Projects arising from this document could be added to the Action Plan if appropriate and if resources allow.
Rather than only producing specific guidance if it is unavailable elsewhere, we suggest that guidance should be as comprehensive as possible and to be of most value, particularly to potential planning applicants. This might include signposted links to other sources wherever appropriate.	National government guidance is to steer away from local guidance and to use Historic England guidance where available.
We would ask that specific guidance be provided as part of a Conservation and Design remit, to include the issues that are consistently questioned in applications to heritage buildings and those in the Conservation Area, such as shop fronts, advertising/lighting, and the form of rear extensions and dormers.	Specific projects with timetables for delivery would be outlined in the Action Plan.
We would also seek clarification and guidance on what Conditions can and cannot be approved where they have a bearing on the Conservation Area and Listed Buildings.	Conditions are site specific. DM can proactively support Town & Parish Councils in this area if required.
We ask that there should be a more specific details regarding the approaches to enforcement that will be to be taken by the Borough when investigations show, that for example, heritage assets have been neglected, not least to encourage	The Council's procedures for taking planning enforcement action are outlined in the Local Enforcement

	compliance with the strategy and to show that there will be consequences for those that do not.The Town Council welcomes the response to changes in legislation being included in the strategy, but suggests the powers available should become an integral part of the strategy and shows how and where the powers and tools that are available can be used, rather than a distinct and stand-alone section.	Plan. It is considered that the draft Strategy already meets this aim.
Berkhamsted Town Council (further comments)	Following the publication of the Draft Conservation Strategy and the associated consultation, a response has been received from the Berkhamsted Citizens Association, the primary points of which are articulated below;	
	 The BCA would welcome a more proactive approach with a greater commitment to action and associated budgeting with respect to this strategy. The BCA would welcome a more systematic approach to evaluating the historic built environment, with a greater access to records for researchers in this area. 	This will be covered in the rolling Action Plans. A systemic approach is being undertaken in the CA character appraisal work with a consultant now being finalised.
	 The concept of a photographic database of listed buildings is welcomed and it is suggested that this be extended to all heritage assets in the Borough, not just listed buildings. It is acknowledged that the BCA provided a photographic record of Berkhamsted High Street in 2001 in this context. With respect to a Listed Building Survey, it is pointed out that this seems heavily dependent upon Conservation Area Appraisals, although it is 	The dates for the production of the
	 The notion that Buildings at Risk might 'come to light' is considered insufficient and a more proactive approach to seeking out and protecting such assets is recommended. It is noted that Hemel Hempstead has a 'Heritage Improvement Strategy' and suggests the same for Berkhamsted, to include a review of street furniture, lighting and shop fronts. 	outstanding Conservation Area Appraisals is stated in the draft Strategy. The 'Buildings at Risk' register is being reviewed in conjunction with the Listed Building photographic survey. Revised version of Strategy reflects this work. The Strategy is a Borough-wide document.
	 It is recommended that guidance in this context be more widely distributed, perhaps via leaflets and on-line information. 	Specific projects with timetables for delivery would be outlined in the Action Plan.

	 There is a concern around the level of resources being committed to the promotion of heritage within Dacorum. The concept of 'Heritage Partnership Agreements' might represent a way forwards in this context. The main concerns raised revolve around the lack of an 'Action Plan' with which to take the Strategy forwards, together with an associated weakness in funding and the availability of the necessary resources. The full response from the BCA has no doubt been received and considered by the DBC. The Berkhamsted Town Council would like to add its support to this response and, in particular, recommend a properly funded Action Plan with which to proactively pursue the Conservation Strategy. It is acknowledged that our local 'Heritage' is an important factor in the character of both Berkhamsted and the Dacorum Borough. As such, it is instrumental in attracting both tourism and other business related activities to the area. The Town Council is thus supportive of the points raised by the BCA and would recommend further discussion around the Conservation Strategy with a view to ensuring that it is both properly funded, properly represented within the broader Council portfolio and subject to a proactive Action Plan with which to take it forwards. Suggestions in this context from DBC are consequently welcomed. 	HPAs are a tool to simplify the consent procedures for Listed Buildings. They have no connection with the promotion of heritage assets. The role of the Action Plan(s) is specifically stated in revised version of Strategy.
Boxmoor Trust	It seems quite comprehensive. I may have overlooked it but it seems odd that the adopted Heritage Policy Jan 2013 to which the Trust contributed is not acknowledged? It seems quite comprehensive but is perhaps a little light on the opportunities for community engagement/involvement and providing support that would enable more members of the public to more engaged in the various activities. This could be done directly or by a closer working relationship with specialist interest and community groups. There are quite a number of proven templates in other areas of the country.	Opportunities for community work are already written into draft Strategy, with new section regarding archiving added to the revised version.
Berkhamsted Local History and Museum Society	There are many gaps and vague statements, which need to be clarified as to how plans are to be carried out. The emphasis appears to be on Regeneration rather than the active promotion	The role of the Action Plan(s) is specifically stated in revised version of Strategy.

of Heritage. All examples for this are cited from Hemel Hempstead, perhaps because they have not received adequate attention in the past. Anyone reading the document could be forgiven for thinking that Dacorum meant Hemel Hempstead instead of Hemel Hempstead, Berkhamsted, Tring, Kings	It is not agreed that the draft Strategy is Hemel-centric. It is a Borough wide Strategy.
Langley and a number of smaller villages, a very disparate area whose population has very differing responses to Heritage. <u>The Bull public House, a listed building, was identified in the Conservation appraisal for Berkhamsted as being at risk. What mechanism is in place to protect such buildings?</u>	This not the case. The Strategy emphasises the promotion of heritage assets equally to the role heritage plays in regeneration in both the introduction and in their individual
The emphasis appears to be on Regeneration rather than the active promotion of Heritage	sections. It must also be remembered that Regeneration is a key priority for the Council.
Although they have received mention little is actually said of the active work done by Local History Societies such as ours founded in 1950 and by Civic Societies. Members recently assisted the Hertfordshire Buildings Trust and BEAMS in checking on listed buildings and suggesting local listing for buildings with important historical associations. This Society also negotiated with Berkhamsted Town Council and English Heritage to obtain better information for visitors to Berkhamsted Castle, a scheduled Ancient Monument.	
Nothing is said about the role of the local population in supporting heritage and actively saving buildings such as Berkhamsted Town Hall and the Rex Cinema. We are invited to take part in Consultation but are views taken into consideration or acted upon?	Recognition of the role of the local population has been added to the revised version of the Strategy.
Dacorum Look No Further: This tourism promotional body includes Heritage and has a borough –wide perspective. Last summer delegates from the south and east of England had a guided tour of the Borough attractions, including Apsley Paper Trail, Berkhamsted Castle and its historic Town centre and Ashridge House.	
Heritage Open Days: These could be promoted much more widely. The Berkhamsted Local History & Museum Society has arranged them in	The Council wishes to celebrate is highly valued heritage assets. Specific

	Berkhamsted for fourteen years and opened about 12 different sites. They have always been very well attended. Tring has also arranged a few. In Hemel Hempstead there have been one or two. DBC, BTC have had no involvement. nor given financial support in Berkhamsted.	projects are budget dependant and would involve working with Tourism Officer.
Twentieth Century Society	The Society is pleased to see that the Council are committing to a new strategy and are considering pro-active measures to conserve and enhance the historic environment in the Borough. The Society is particularly encouraged by the commitment to identify more locally listed buildings, and the completion of Conservation Area Appraisals.	Positive feedback
	We believe that further measures are called for in respect to the rich Twentieth Century heritage of the Borough which is at present under-represented both by national listings and by Conservation Area designation. We would urge Dacorum Council to add a specific undertaking to consider the designation of a conservation area recognising the value of the Twentieth Century New Town heritage which forms such a significant element in the borough. We would request that should the proposed strategy alter in any material way we would be grateful of notification of the changes, as The Society may wish to re- assess the document and comment further.	20 th century assets are equally being considered at time of CA character appraisals. Additional projects are dependent on departmental resources.
English Heritage	 We welcome the production and update of a conservation strategy for Dacorum, which should help with a number of the Council's planning and conservation activities, including planning policy and proactive interventions. <i>Council's Vision and Priorities</i>: this section provides a useful overview of the strategy's links to the Council's vision and prioritiesThe Research, Advice, Action table is a good summary of the overall strategy. We consider that the conservation strategy clearly sets out areas for action for the conservation of both designated and non-designated 	Positive feedback
	heritage assets. The creation of a photographic database, listed building survey, Building at Risk re-assessment, and Conservation Area Appraisals all aim to	

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build understanding of the historic environment in Dacorum.	
Through actions to gather evidence and understanding about the historic environment, the strategy will be a useful planning and development management tool.	
We welcome the focus on building community capacity and the recognition that heritage provides opportunities for volunteering and focus for community action and engagement.	
Further consideration on actions to build understanding (if not already existing) could include: townscape character assessments to map local character and distinctiveness as well as visual assessments to aid in the protection of the setting of heritage assets, or a Conservation Area Management Plan to bridge the management of all CAs.	This work forms part of the CA character appraisals.
We suggest that the purpose of the strategy could be made more explicit with a clear set of aims and objectives and the overall need for the strategy, as well as information into the precursor documents the strategy links to or progresses from, the higher level documentation it links to such as the Local Plan.	The draft Strategy does link to the Local Plan in the 'Guidance' section.
The introduction and strategy should avoid references to the 'historic built environment', as it suggests that it is only interested in built elements and not those with are archaeological or landscape based. 'Historic environment' is a more inclusive term. The opening sentence of the introduction should also refer to the number of scheduled monuments and registered parks and gardens to emphasise the non-built elements of the historic environment. Non-designated heritage assets (buildings, parks and archaeology) should also be mentioned to give a wider overall picture. The box on page 6 of the strategy could refer to archaeology.	Changes have been made to the draft Strategy to reflect these comments.
We note the timetable for producing conservation area appraisals, and advise that they are kept up to date as regularly as possible. The committee report for the draft strategy details engagement with local groups	Specific projects with timetables for delivery would be outlined in the Action Plan.

	such as the Dacorum Heritage Trust with some mention of engagement also under local listing. As a stated priority for local heritage, we suggest that a clearly stated engagement plan for local stakeholders with an interest in the historic environment would add strength this focus in the strategy document. Engagement through local listing could strategically build community capacity through actively seeking nominations for local assets. English Heritage guidance exists to enable this online at: http://www.englishheritage.org.uk/caring/listing/local/local-designations/local-list/ We support the Council's promotion of Article 4 Directions, although consider that they should not just be issued in "exceptional circumstances" as the first sentence suggests. They should be issued in general circumstances where specific control over development is required, and should form part of the regular review of conservation areas, such as to control certain forms of permitted development to locally listed buildings. <i>Promoting Heritage in Dacorum</i> - This section is well thought out however we suggest further consideration should be given to the inclusion of collaborative working with museums/archives in the promotion of the local historic environment. Such partnership working may support an integrated heritage offer across the Borough as well as open up further options for engagement /building community capacity and funding. The appointment of a Heritage Champion within the Council would also support collaborative working to conserve the historic environment internally and externally (see http://www.helm.org.uk/heritage-champions/).	Government guidance in the Planning Practice Guidance states that, "Conditions restricting the future use of permitted development rights or changes of use will rarely pass the test of necessity and should only be used in exceptional circumstances". 'Collaborative working with museums/archives' added to list of bullet points in 'Promoting Heritage' section.
Markyate Parish Council	Markyate is rich in heritage and this must be protected Having considered this at the 3 March 2015 meeting, the Parish Council agreed they wish to be involved in the Design Strategy as they have concerns about conservation in Markyate.	
	The Parish Council were concerned that the previous appraisal was inaccurate and would wish to ensure that the new appraisal is correct.	These comments will be considered further during work on the Markyate

	The Parish Council is anxious to preserve the last of the archways leading through to the rear of properties, most of which have been lost by permitted development.	Conservation Area Character Appraisal.
Chilterns Conservation Board	No Comment	
Berkhamsted Citizens Association	BCA regret the short consultation window for such an important document. The Association's comments will therefore necessarily be briefer than would otherwise be the case. Supports the formation of a new Conservation Strategy for Dacorum. Looking back over our work since 1974, and submissions made by the BCA over the last 15 years, it is evident that this draft Conservation Strategy and its predecessor have been the subject of much consultation and a modest amount of action.	
	The BCA would welcome a greater commitment to action and budgeting in this Strategy than is currently apparent.	The role of the Action Plan(s) is specifically stated in revised version of Strategy.
	BCA also regrets the 'scattergun approach' prevalent in the text to evaluating the historic built environment; a more systematic approach would be welcomed.	The splitting of conservation work into its respective Action Areas is considered to be appropriate.
	It is significant that the Council puts its Vision before Heritage in the document, and Regeneration heads the list of priorities; an obviously Hemel-centric vision. It would feel more inclusive if DBC made a specific reference to the fact that the older settlements in Dacorum make up the 25 conservation areas (and that includes old Hemel) and that the section headed Building Community Capacity included specific references to town/parish councils and civic & amenity societies such as ours.	The Council's Vision must underscore all strategic documents. This is not a Hemel Hempstead or Berkhamsted Strategy, but a Borough one. Reference made as suggested in revised Strategy.
	No adequate references to Design advice, despite the statement in the CEO's Comment.	See response to similar comment from BTC
	There is no reference in this section to Conservation officers providing informal advice; or going out into the community with whom you aim to 'engage' in the	Conservation Officers are involved in

previous section. Essentially the role of Conservation officers, if it exists at all as a separate entity, appears to be entirely reactive. <u>This is welcomed; however the scope of electronic databases could be widened.</u> <u>The BCA constructed a complete photographic record of Berkhamsted High</u> <u>Street in 2001 and gave a copy to the Planning Department to use as a basis for</u> <u>assessing planning applications, particularly shop fronts. It is this sort of</u> <u>partnership working which could save the Borough Council time and resources.</u> <u>Photographic records could be made, systematically, of all heritage assets in the</u> <u>Borough, not just listed buildings, which are already well-protected.</u>	pre-application discussions and would support community involvement in planning applications. The earlier work of the BCA is recognised and welcomed and the planning department would welcome further collaborative working in this area.
Despite a timetable for carrying out the remaining CACAs, there is no statement concerning how, or by whom, these will be undertaken, and how they will be resourced. What about additional buildings outside conservation areas? It seems they will be considered 'on an ad hoc basis'. This is a prime example of not adopting a	There is a clear commitment in the Strategy to undertake this work during the period of the Strategy. Budgetary constraints realistically limit
thoroughgoing approach. It seems that BARs must 'come to light'; a faintly ridiculous assertion. BARs are generally deliberately and obviously allowed to become 'at risk', for any number of cynical reasons. It is worrying that, despite statements by English Heritage that this is a prerequisite of a competent conservation service, there is no commitment on DBC's part to seek out BARs and enforce action to preserve	the work that can be done in the Strategy period. The revised version of the Strategy has been altered to take into account up front work being done at same time as Listed Building photographic
them. The BCA advocated LLBs and NDHAs in 2001 and before. Now these are a reality, but only systematically within Conservation Areas. Although Appendix II is a useful checklist for 'undesignated' assets, Appendix I seems to have DBC as judge and jury; and consideration piecemeal. Surely a systematic approach would be more cost-effective and fairer? This is a Hemel-weighted list, and looks for matched funding. Hemel Hempstead has a Heritage Improvement Strategy (HIS). How about a HIS for Berkhamsted	survey. The process has a built in appeal stage – giving all parties an opportunity to be heard. However, ultimately the Council will decide whether to locally list a building or not. Specific projects with timetables for

to include a review of street furniture, lighting and shop fronts? And what happened to the small grants budget for householders, to encourage them to keep original features?	delivery would be outlined in the Action Plan.
What is the justification for only producing guidance not available elsewhere? Since 2001 the BCA has advocated circulation of leaflets for specific areas (nowadays they could be available to download) to help residents understand heritage issues, and to promote good design. I cannot see any reference to Design; nor to making available informal Guidance through Conservation officers.	The Council already provides considerable advice on the Conservation & Design section of the web-site and through planning documents, such as Supplementary Planning Guidance.
In view of the continuing issue of planning applications involving rear extensions (including dormers), fenestration and materials in the Conservation Area(s), DBC seems to prefer to fire-fight than educate. The BCA makes annual Environment Awards encompassing all these issues but its reach is limited compared with the Borough Council.	ŭ
Most important is the effect lack of Guidance has on landmark buildings. An unsatisfactory outcome for the Ashlyns Sports Hall in Berkhamsted arose because Design and Conservation Guidance was not sought at an early stage. (or rather, in plain English, 'Supporting Planning Enforcement'). All of the above makes Enforcement easier and cheaper; prevention rather than cure, education rather than a 'big stick'	
The ways in which DBC raises awareness of our rich heritage is a worthy and basic list; but there is no commitment to resources which will make it a reality. The National Planning Policy Framework, adopted in March 2012, gives a stronger framework for protecting heritage. Additionally many of the items on the list are provided by the voluntary sector, such as the local history societies, local action groups, and the BCA. It would also be valuable to see, for instance, a Heritage Partnership Agreement with Ashlyns School, Berkhamsted School or the Parish Churches in all three towns; but the resources would need to be made available for such big undertakings.	Specific projects with timetables for delivery would be outlined in the Action Plan.

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	 <u>Responding to Legislation</u> - Although this section is interesting, its content mostly refers to things DBC will <i>not</i> be doing. However there is no comment upon the issuing of Certificates of Immunity. The BCA would like to see how that particular opportunity would be addressed. 'A greater commitment to the maintenance of DBC's own historic planning records, and affording the opportunity for access for research by students and residents would be welcomed. Our own members have been hindered in their research by a lack of access to data over recent years. 	This is not a list of things <u>DBC</u> will not be doing. Rather it is a list of mechanisms to simplify proposals involving listed buildings, thereby giving <u>homeowners</u> greater clarity. The importance of this is recognised in the revised Strategy with 'Archiving' added as a further action area.
Formerly CARAB	The positive measurable economic impact of good conservation was very interesting to learn about. Whilst re-stating of conservation aims and objectives is welcome and the recording and survey work described is clearly essential, I am afraid that I find it very hard to pin down any indication of practical initiative which will improve the ability of householders, architects, builders and planning committees to appreciate and deliver designs, materials and workmanship which are fitting. Nowhere is it stated that vague imitation and simple preservation are insufficient for a considered approach to conservation and I am afraid that that mistake may lie behind the correct observation of recent building developments as "uninspiring" in the report. Such building developments make use of the character and its economic benefits without contributing to it.	It is considered that there is no need to reproduce guidance already available, e.g. by Historic England; within the NPPF, within Supplementary Planning Guidance documents.