



# Dacorum Local Plan (2020 - 2038) Emerging Strategy for Growth

September 2020



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## Foreword

This consultation is the next step in creating a new Local Plan that looks ahead to 2038. It 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 and organisations as possible to get involved.

The Local Plan is dealing with many challenges and is being prepared during a period of unprecedented uncertainty. Not only are we meeting the growth challenge set down by Government, working to support recovery from the Covid-19 pandemic but also dealing with potentially radical reforms to the planning system that Government has recently consulted on.

Dacorum will see significant growth and investment over the coming decades, particularly in housing and employment. The Plan outlines the preferred locations for this development and how we can secure the necessary infrastructure to support the growth. The Borough hasn't experienced any similar level of growth since the expansion of Hemel Hempstead during the development of the New Town. This time around our main towns and villages will need to expand if we are to meet such ambitious housing levels.

All of this needs to be done in a way that maintains and enhances the outstanding qualities of Dacorum – its vibrant communities, high quality countryside and being a great place to live, work and enjoy.

This process is exciting. It gives us the chance to grasp opportunities and build for the future, while seeking to tackle some of the many challenges we face in our Borough today. Development will happen – in jobs, homes, retail, and other infrastructure – but if we don't act to shape it, we can't be sure that the best interests of the Borough are being addressed.

Responding to, planning for, and managing opportunity and change requires us to engage with our residents, businesses and with Government and our partner organisations. This allows us to aim to act in the best interests of our residents as the Plan is progressed and be aware of all views and latest opinions. In 2017 we consulted on the issues and options facing the Borough in the future. Wherever possible, we have responded positively to previous representations, whilst recognising this process has not been easy - nor will it be easy, as we will have to make hard and often unpopular decisions.

Over the past three years we have developed evidence, engaged with key stakeholders and partners as well as landowners to develop this document. Using this evidence, alongside responses from the previous consultation we have developed a draft Local Plan for Dacorum.

It is an important time to get involved and tell us what you think. We have set out what we believe to be the best option for growth, but have yet to make a final decision on this matter 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.

Councillor Graham Sutton

Portfolio Holder for Planning and Infrastructure



# INTRODUCTION



# 1 Introduction

## What is this document?

- 1.1** This document is the next stage in the development of the Council's Local Plan - the Emerging Strategy for Growth (2020 - 2038).
- 1.2** This document has been published for consultation under Regulation 18 of the Local Plan Regulations (England) 2004 (As Amended) and is an opportunity for the local community, other stakeholders and developers to provide feedback on the emerging approach to development.
- 1.3** The consultation comes at a time of unprecedented uncertainty. The world continues to change rapidly in response to the Covid-19 pandemic and when the impact of climate change is being seen more across the globe. The UK is also facing potential changes to our international economic relationships which could have wide reaching and long terms implications. Added to this Government has recently published the Planning White Paper setting out a number of potentially significant changes to the planning system. All of which come at a time when the Borough is having to accommodate a significant increase in development, the likes of which have not be seen since the height of the Development Corporation. At no other time has it been more important to have a Local Plan in place to shape our Borough to respond to these challenges.
- 1.4** Sitting alongside this document are several Topic Papers that have been published. These provide a key source of information supporting the proposals contained in the Plan. They set out the evidence base for particular issues, how the responses to previous consultation(s) and other stakeholder feedback has informed the emerging Plan and how we have developed the approach set out in this document.
- 1.5** We have also published the draft Infrastructure Delivery Plan (IDP) which sets out the infrastructure required to support growth, where this is required, when it is required and the costs of this. Whilst this work is ongoing the Council has decided to publish this to enable respondents to have as much information as possible to inform consultation responses.

**The Forum, Hemel Hempstead**



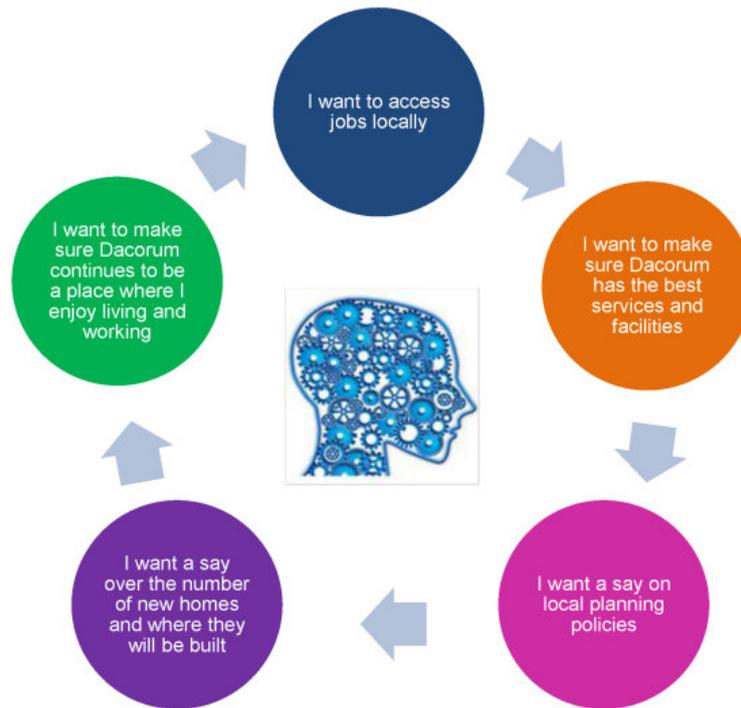
## How does the Planning White Paper consultation affect this Plan?

- 1.6** This consultation comes at a time when Government is considering a number of potentially significant reforms to the planning system. These include both short term changes as well as more fundamental ones.
- 1.7** At the time of writing the reforms are out to consultation and it is unclear which of the proposals will be carried forward, when these will come into force and what transitional arrangements will be put in to place for those authorities that have reached an advanced stage in preparing their current round of Local Plans. What is clear is that if all the proposals are taken forward it would have a significant impact on the Plan we are preparing but until planning legislation or guidance changes we must prepare the Plan against current guidance. However, we are mindful that the changes could mean the look and feel of the Plan we eventually adopt could be quite different to what we have envisaged up to now. Although it is unclear how Government will respond to the consultation we have already taken some steps to reflect some of proposals. These include:
- introducing the simplified zoning categories;
  - reflecting the interim housing requirement calculations but recognising that further adjustments may be made;
  - strengthening our local design policies and guidance; and
  - incorporating reference to First Homes (the Government's new proposals for affordable home ownership).
- 1.8** Other proposed changes could be more fundamental to the Plan. Indeed, the Government is keen to replace many policies in Local Plans with national ones. We will need to take forward all relevant proposals in the final version of the Plan.

## What are we consulting on and why?

- 1.9** Despite the uncertainty arising from the potential changes discussed above, there remain a number of 'constant' factors. We have known for some time that the level of growth we need to plan for will be significantly higher than before (up from 430 in the Core Strategy) and whilst the final figure from Government may be adjusted again we expect this to remain a substantial number. To manage this scale of development we do need an up to date Local Plan in place to ensure that development is provided in the right places and met with the timely delivery of the required infrastructure.
- 1.10** We also know that the scale of growth will require the Council to make some very difficult decisions about the amount of growth to be provided in different locations and will require some of the towns and villages to grow significantly. It is important that the community have an opportunity to shape these decisions before the Plan is finalised.
- 1.11** We are now asking for your views on **the Emerging Strategy for Growth** for Dacorum. This includes our approach to accommodating growth across Dacorum, the sites that have been suggested as well as some of the specific planning policies that will deliver this.
- 1.12** This document is not a final plan with every detail or future policy set out; this will come later in the process. This document also does not contain every item of infrastructure that is required to support development, again this will come later. However, we have published our emerging IDP setting out the broad requirements of future growth (and timings). As the Plan develops we will incorporate more of the infrastructure requirements into the Plan. These will be located in the site specific allocations.

### Why should I get involved?



### Why do we need a Local Plan?

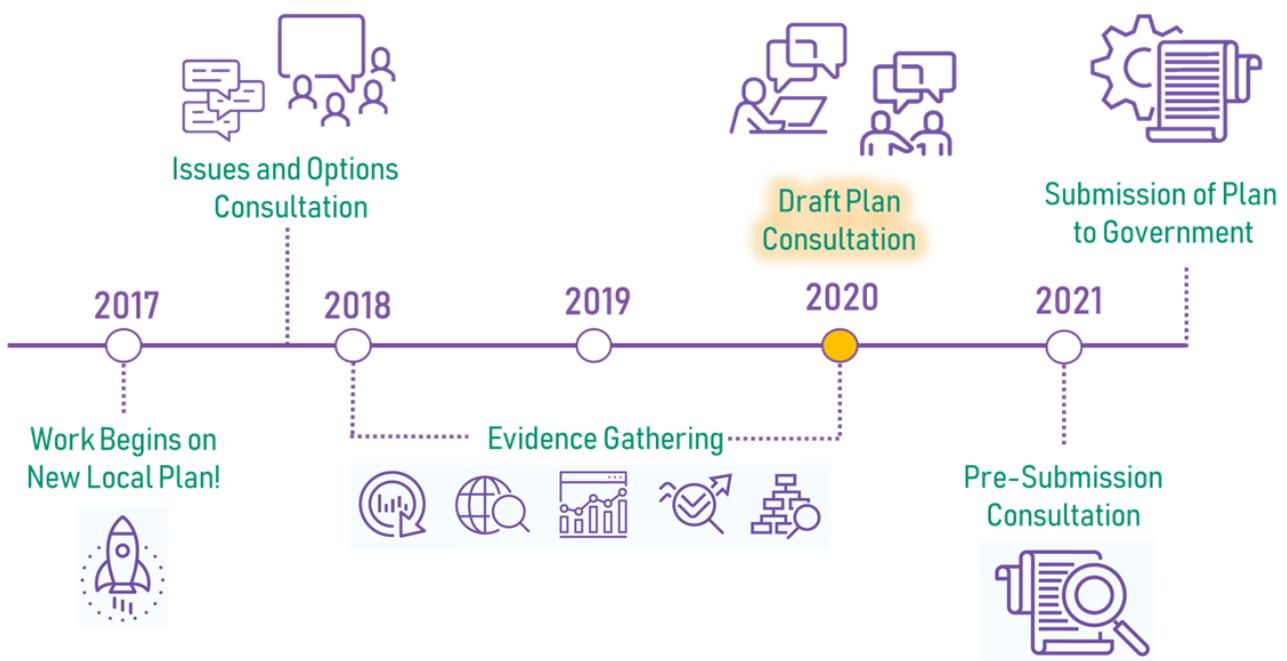
- 1.13** A Local Plan is required to guide new development so that it comes forward in a coordinated manner. It is also a key tool in delivering our priorities set out in other plans and strategies, including the Growth and Infrastructure Strategy and Climate Change emergency.
- 1.14** Our existing Core Strategy (adopted in 2013) and the 'saved' policies from the Dacorum Borough Local Plan (adopted in 2004), are more than five years old and the weight we can give the policies in these documents is reducing as time goes by. The Core Strategy Inspector did identify that a whole scale review of the Plan would be required and although we adopted the Site Allocations Document (2017) this does not provide a comprehensive planning framework for the Borough.
- 1.15** There have been a number of changes to the planning system since these documents were adopted and it is important that we have Local Plans in place which reflect national policy and guidance, otherwise we will lose control of decision making.
- 1.16** When adopted the the Local Plan will be the main planning document guiding development but it will be supported by a number of other important documents. The Council has consulted on the Design Guide (Part 1), referred to as the Strategic Design Guide, and is currently preparing the Design Guide (Part 2), referred to as the detailed design guide.
- 1.17** Once adopted these documents, alongside the Minerals and Waste Local Plans for Hertfordshire and any adopted Neighbourhood Plans (currently Grovehill Neighbourhood Plan (May 2018), will replace the following documents:
  - Site Allocations Development Plan Document (adopted July 2017);
  - Core Strategy Development Plan Document (adopted September 2013);
  - “saved” parts of the Dacorum Borough Local Plan (adopted May 2004); and
- 1.18** The Development Plan is the basis upon which planning applications are determined, unless there are material planning considerations that indicate otherwise.

## What have we done to get here?

- 1.19** In November 2017 we published the Issues and Options (Regulation 18) consultation seeking comments on the key issues facing the Borough. We received more than 22,000 responses to this from over 2,000 individuals and organisations. These comments are publicly available alongside this consultation document.
- 1.20** Since this time there have been a number of changes to the planning system, including revised housing figures and changes to the National Planning Policy Framework (NPPF) and the supporting Planning Policy Guidance (PPG). In response to these changes we have undertaken an extended period of plan development, options generation and testing and have sought input from statutory bodies such as the County Council, adjoining authorities and developers promoting land across the Borough.
- 1.21** We have been updating our evidence base to better understand the needs and constraints in the Borough. This extensive catalogue of assessments has informed our emerging Plan and include the following:
- assessing land availability and suitability in our towns and villages and considering existing and new sites as part of an updated housing land availability assessment;
  - forecasts of housing and employment need / housing and economic development needs assessment;
  - undertaking a review of the Green Belt;
  - preparing evidence to look at future retail needs;
  - Strategic Flood Risk Assessment and Water Cycle Study;
  - Gypsy, Traveller and Travelling Showpeople site assessment;
  - transport modelling and Sustainable Transport Plans
  - an infrastructure delivery plan and viability assessment.
- 1.22** Further evidence will be required to support the final Plan and the Council will continue to keep its website up to date as these assessments are produced.

Figure 1 illustrates the process to date and the key next stages that we will go through. More information can be found in our Local Development Scheme (2020).

**Figure 1**



## Considerations for the Local Plan

- 1.23** The Local Plan has been prepared in accordance with current Government guidance. To be found "sound" the Local Plan needs to comply with the NPPF, specifically paragraph 35, which requires Plans are:
- Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
  - Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
  - Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.
- 1.24** However, we are a very constrained area with significant amounts of our Borough in the Green Belt. We also have a considerable amount of high quality landscape as part of the Chilterns Area of Outstanding Natural Beauty (AONB), which is a national landscape designation shared only by relatively few other authorities across the country. We are also home to parts of the Chilterns Beechwoods Special Area of Conservation (SAC) which is an ecological site of international importance. These are significant constraints which influence the locations for new development in the Borough.
- 1.25** The preparation of the Plan involved the reviewing and testing of a range of growth options and scenarios. Alternative options were developed and presented early in the preparation stage of the Plan and developed and refined over time as evidence emerged. It was also subject to further testing and targeted engagement to develop a preferred strategy. This process has been informed by a number of iterations of the Sustainability Appraisal / Strategic Environmental Assessment to assess emerging proposals against a number of economic, social and environmental objectives and to identify what measures could be included to offset adverse impacts.
- 1.26** In addition, the Plan is being subjected to an Appropriate Assessment under the Conservation of Habitats and Species Regulations 2017 (as amended) which considers (amongst other things) the impact of the Plan on the Chilterns Beechwoods SAC and taking into account any further mitigation that may be required in the Plan.
- 1.27** As already mentioned a significant contributor to the emerging Plan has been the separate, but closely linked, IDP. This has helped inform decisions on where growth can be accommodated or not. In the case of the latter we have sought to identify what infrastructure is required and what solutions are available. The IDP is an iterative assessment and will continue to be updated as we move towards the final draft of the Local Plan.

## Working with others

- 1.28** Dacorum does not exist in isolation and interacts with other nearby local authorities. We are required to develop a strategy that is informed by agreements with other authorities so that 'strategic matters' are appropriately considered and planned for where it is practical to do so and is consistent with achieving sustainable development. This is required by both Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended) and as set out in the National Planning Policy Framework and supporting Planning Practice Guidance.
- 1.29** There are a number of cross boundary matters which we need to have regard to when developing our own Plan and we have been engaging with adjoining authorities (and other stakeholders) throughout the preparation of this Plan.

- 1.30** The engagement has been on strategic matters such as housing and employment requirements and also infrastructure provision needed to support growth. These discussions have been underway for sometime and we have a comprehensive picture of development needs across the South West Hertfordshire authorities area, including the potential unmet needs of Watford. This position has been informed by a number of key evidence studies that have been commissioned jointly across South West Hertfordshire authorities (Dacorum, Hertsmere, St Albans, Three Rivers and Watford). We have also engaged with a variety of other organisations including Hertfordshire County Council, Highways England, Natural England, the Chilterns Conservation Board, Historic England and the Environment Agency.
- 1.31** Some of the Strategic Planning Matters which have been identified through this process are listed below:
- The potential for unmet housing need arising from Watford
  - Looking to our neighbours to deliver some of our own employment needs
  - The delivery of Hemel Garden Community which is a joint growth initiative between Dacorum, St Albans and Hertfordshire County Council and the Local Enterprise Zone Partnership
  - Supporting the Hemel IQ Enterprise Zone at Maylands.
  - Strategic transport movements along 'A' roads and motorways
  - Secondary school capacity and cross county flows, including secondary schooling needs stemming from Dacorum
  - Growth impacts upon the Chiltern Beechwoods SAC
  - Continuing to protect the Chilterns AONB
  - Household waste capacity in west Hertfordshire
  - Acute service provision in west Hertfordshire
- 1.32** Engagement has taken various forms including consultations, meetings and exchange of correspondence and has informed the preparation of this consultation. Dacorum will be preparing Memoranda of Understanding and Statements of Common Ground which set out the identified strategic matters, how options for addressing these have been progressed and what conclusions have been drawn as a result.
- 1.33** More information on the conclusions we have drawn is set out in this consultation and supported by our evidence studies and separately published Topic Papers. We will continue to work closely with other organisations as the Plan develops, particularly across the South West Hertfordshire authorities, to explore strategic matters further - including the issue of unmet needs - and undertake any further work that may be required. What is clear is that Dacorum is uniquely constrained amongst the five South West Hertfordshire authorities in that a large part of the Borough is within the Chilterns AONB as well as containing the Chilterns Beechwoods SAC.
- 1.34** Our evidence is currently telling us that we are unable to meet our full future employment land needs over the Plan period and we require the assistance from neighbouring St. Albans City and District to meet this as well as several items of infrastructure linked to the growth of Hemel Hempstead which cannot be met in the Borough. The assessments we have completed to date also indicate that Dacorum is unlikely to be in a position to provide for unmet housing needs arising from the South West Hertfordshire area in the Plan period whilst still ensuring the Plan is consistent with the provisions of the NPPF and wider sustainable development objectives.
- 1.35** Nonetheless, Dacorum is preparing a positive plan that is seeking to meet as much of our objectively assessed needs as we can. For housing, we are making a bold commitment to significantly increasing the supply of land to 922 per year, more than double the number (430 dwellings per year) in the previous Core Strategy. In addition to this, we are releasing additional land from the Green Belt around Hemel Hempstead (as part of the Hemel Garden Community programme) to meet longer term development needs.

- 1.36** We will continue to work constructively with adjoining authorities as our Plan develops to find solutions to barriers to development that exist in Dacorum as well as in both the 'host' authority (where unmet needs arise) and in those other authorities which may also be suitable locations for delivering unmet needs. We maintain that unmet needs arising should be met as close to the source as possible and all options should be explored before authorities that are more constrained and farther afield are asked to contribute.

## The South West Hertfordshire Joint Strategic Plan



- 1.37** To respond to longer term growth challenges we have joined the other four authorities in South West Hertfordshire (St Albans, Three Rivers, Hertsmere and Watford) in preparing the South West Hertfordshire Joint Strategic Plan. This will consider how best to meet longer term development needs across the area and provides the opportunity to couple growth and infrastructure at a strategic level, enabling more coordinated planning of growth and infrastructure provision.
- 1.38** The South West Herts Joint Strategic Plan will be a 'boundary - off' strategic plan that will set out the vision and map the context for the Local Plans to 2050. It will focus on:
- A Spatial Strategy including any Strategic Areas of Opportunity;
  - Strategic housing need and provision;
  - Strategic employment need and provision;
  - Strategic infrastructure need and provision; and
  - Strategic approach to the Green Belt and the Chilterns AONB.
- 1.39** Joint strategic plans are supported by Government and the five authorities have received funding to prepare this. The Joint Strategic Plan will be prepared over the next couple of years and it is anticipated that it will come into force across all the five authorities by the end of 2023 to address longer term development needs. We will work with the other authorities to accelerate the preparation and adoption of this document to ensure that such development needs are met.

## How this document is structured

- 1.40** This document is split into the following parts:
1. **Vision, Strategic Objectives and overarching sustainable development strategy** – this sets out the overarching aims of the Local Plan including responding to climate change, safeguarding the natural and built environment and reducing carbon emissions alongside the overarching development strategy for housing, employment, retail and infrastructure.
  2. **Guiding Development** – this section contains a number of our planning policies to influence development across the Borough. These are split into relevant sections which deal with housing, economic development, retail, climate change and sustainability, environment and biodiversity, managing development in the countryside, delivering great places, sustainable transport and connectivity, and healthy communities.
  3. **Delivery Strategies** – this section focuses on Dacorum's places and how these will change over the period.

4. **Proposals and sites** - this section contains site specific policies for each of the key growth and renewal areas identified in the delivery strategies.
5. **Appendices** - this contains a list of strategic policies, identified small housing sites and a glossary.

## What happens next?

- 1.41 Once the consultation closes we will carefully consider the responses we receive before considering what changes to make to the Plan. Our current intention is to use these responses to help inform the next stage of Local Plan preparation. We will make these comments public together with our response when the Local Plan is published before being submitted to the Secretary of State for Examination in public.
- 1.42 We will need to continue to develop our evidence further and take into account the findings from these. This includes the work underway on the Appropriate Assessment under the Conservation of Habitats and Species Regulations 2017 (as amended) which considers (amongst other things) the impact of the Plan on the Chilterns Beechwoods SAC and taking into account any further mitigation that may be required in the Plan.
- 1.43 A key further area of work will be the continued development of our IDP. A draft of this has been published but requires refinement as more information becomes available. We will also be using this to develop our work on the whole Plan viability assessment. Viability is the process of assessing whether the Local Plan (and the policies and sites included) are financially deliverable.
- 1.44 If the IDP process and viability assessment demonstrate that certain policies or sites are not deliverable (inc. if solutions to required infrastructure are not identified) then this may lead to changes to certain policies or sites that are currently included in the Plan. We will also continue with discussions under the Duty to Cooperate to ensure that we have discharged our obligations appropriately and the conclusions from our engagement are reflected in the Draft Plan.
- 1.45 **We will also need to consider any changes to legislation and/or Government guidance arising from the Planning White Paper consultation. At present we do not know how any changes could impact on the content of the Plan and this will need to be kept under review.**

# VISION AND STRATEGIC OBJECTIVES



## 2 The Plan Context and Challenges

### Opportunities and Challenges of Growth

- 2.1** The Local Plan needs to respond to a number of significant challenges over the period, including:
- managing a step change in housing supported by the necessary infrastructure;
  - securing employment growth;
  - changes to our international trading relationships;
  - supporting local recovery from Covid-19;
  - adapting to climate change and moving towards a low carbon economy; and
  - delivering the regeneration and transformation of Hemel Hempstead into a 21st century Garden Town.

### Climate Change Emergency

- 2.2** Our climate is changing as a result of human activity and this will have substantial implications for society and our environment if we do not act. The scientific evidence indicates that we will experience hotter and drier summers, milder winters, and more extreme weather events such as drought and flooding. Dacorum's Full Council passed a motion declaring a Climate Emergency in July 2019 and has since prepared a Climate Change Strategy. The Local Plan will play a central role in delivering a number of the aims set out in both. A central thread of the Local Plan is to plan for a low-carbon future in which carbon emissions and other greenhouse gases are reduced and we adapt to the new climatic norms. The planned growth offers real opportunities to deliver significant and meaningful measures to combat the effects of the climate change emergency.

### Housing Growth

- 2.3** One of the major challenges for the Borough is delivering a step change in the level of housing growth as required by Government. This will be far above what has been delivered locally or even in the region in the past and will require us to allow innovation in new ways or approaches. We will need to work in close partnership with the development industry, bring forward publicly owned land and make effective use of its planning powers to ensure the growth can be appropriately delivered.
- 2.4** In addition, the Borough's high average house prices means that market housing is increasingly out of reach for many households. The dream of owning a home is now out of reach for the majority of young people with the average age of house purchase currently being 32 years old. We need to significantly increase the number of affordable homes that are genuinely affordable to local people. This in turn should also aid households to live in adequately sized accommodation where they may have outgrown their current home.
- 2.5** This growth brings with it a significant number of challenges for our local communities, infrastructure, and the natural and built environment. The right type of housing should be provided in the right location, and at the right time to meet the changing housing needs of all members of our communities, particularly the growing elderly population. We will ensure that the new homes are delivered sustainably, that we use land efficiently, and that developments acknowledge local character and context without frustrating innovation or compromising design quality.

### Economic Prosperity and Strengthening the Role of Maylands Business Park

- 2.6** Whilst the future poses a number of significant economic challenges we have big ambitions for our local economy driven by the continuing success of the Maylands Business Park as a key local and sub-regionally important employment centre. Great progress has been made on regeneration, inward investment and expansion since the Buncefield explosion in December 2005, including the creation of the Heart of Maylands (a new local centre to support the role of the business area), the completion of environmental works, and the broadening of its commercial uses.

- 2.7** Regeneration and continued diversification of the Maylands Business Park will continue to form a key part of the strategy, given added impetus by the creation of the Herts Innovation Quarter, a designated Enterprise Zone. Dacorum needs to plan for a significant increase in employment floor space over the Plan period. To meet the needs arising for new employment space the eastward expansion of Maylands is proposed most of which will be into St Albans City and District Council. This will meet a significant portion of the needs arising from Dacorum as well as contributing to meeting the needs from St Albans.
- 2.8** Further investment is needed to resolve congestion and employees, visitors and HGV parking problems in the Maylands Business Park, including the delivery of a multi-modal transport interchange, as part of a wider network of such facilities, providing easy and rapid interchange between different modes of travel.
- 2.9** The strategy will also include safeguarding other existing employment areas that are key to the local economy, including delivering space for start-up businesses and established small and medium enterprises. We will balance the pressure of competing land uses, and look to encourage and support opportunities for inward investment through working in partnership with the Local Enterprise Partnership, the business sector, and other key stakeholders. We will also seek funding from Government and work with other agencies to secure high speed and high capacity digital connectivity for businesses and residents.

## Securing the Vibrancy of our Town Centres

- 2.10** Alongside housing and employment we anticipate continued rapid changes in retailing over the Plan period as our economy evolves and habits change. These changes are likely to have profound implications for our town centres, particularly Hemel Hempstead. This centre has undergone significant regeneration in recent years ranging from environmental improvements to the pedestrianised area of the Marlowes, the creation of a new bus interchange and the award winning restoration of the Jellicoe Water Gardens.
- 2.11** Our high streets are going to be reshaped by a number of factors including continuing changes to retailing patterns brought on by the growth in online shopping and potentially accelerated by the impact of the Covid-19 pandemic. In addition, the changes to the Use Classes Order which came into force in September 2020 could also have implications for the changing face of our town centres. It is important that our town centres remain vibrant, resilient and attractive in the face of a volatile retail environment and changing shopping patterns.
- 2.12** We do not believe this will lead to a significant requirement for new floorspace over the lifetime of the plan. Nonetheless we will take opportunities to support existing retailing and to also encourage a wider variety of uses, promote more leisure and social engagement, and embrace town centre living and the evening economy. We will encourage significant increases in the residential presence in and around our town centres, local and neighbourhood centres to help sustain them over the longer term.

## Transport and Movement

- 2.13** Dacorum currently experiences peak period congestion problems in many of its main urban areas leading to delays and consequential air quality issues in some locations. The strategic road network crossing the Borough (M1/M25/A41/A414) is already heavily used and high car ownership means that parking can be difficult in certain areas. Passenger transport, walking and cycling are not currently as attractive an alternative as they could be. The hilly nature of parts of the Borough can deter walking and particularly cycling. There is also currently limited charging infrastructure capacity available to support electric vehicles.
- 2.14** Our residents have told us of their concerns over the ability of the roads to accommodate high levels of housing growth and to tackle climate change we need to significantly reduce harmful emissions and particulates from transport and at the same time greatly improve local air quality. Therefore, new development will need to be located in places which have excellent access to jobs, shops, services,

can quickly and easily be reached by sustainable public transport and benefit from high quality walking and cycling infrastructure. Even where journeys are made by sustainable methods it is important to minimise journey lengths, reducing demand on transport infrastructure and delivering greater health and wellbeing.

- 2.15** We are developing detailed Sustainable Transport Plans for our main towns to identify the transport interventions that are required and to ensure that new development delivers the transport infrastructure and technology needed to deliver growth that is well connected and less reliant on the car over the long term. Growth will deliver attractive opportunities to travel by bus, foot or on a bike. Future technology will be promoted to deliver and support low-carbon transport. Electric vehicles of all types (including electric bicycles) will feature strongly in this, and necessary infrastructure will be provided to ensure the usability of such vehicles.
- 2.16** We will actively work in partnership with the County Council, bus and train operators and other agencies to deliver investment in, and improvements to, passenger transport. Although it must be recognised the effectiveness and timing of delivering 'modal shift' will be dependent upon the degree of change in 'mindset' towards those local trips generated. The impact some of this has will be dependent upon investment via forums outside of the remit of planning.

## Infrastructure

- 2.17** Providing new infrastructure to support development is essential. This includes the new transport infrastructure, schools, health care and open spaces. Residents have told us that new and upgraded infrastructure must keep pace with the delivery of new homes. New development must contribute its full share of the new infrastructure required to deliver growth. Our IDP shows that major investment is required across the Borough to deliver our growth strategy.
- 2.18** Supporting the significant long term growth at Hemel Garden Community - which as one of few flagship growth schemes supported by the County Council - will require prioritised funding. In addition, our other towns will also be experiencing significant growth and will also require investment in infrastructure. When our IDP is complete we will be confirming the scale of funding required, how much of this can be met by the development industry and how much will require public investment, drawing on our partner organisations and central Government.

## Natural Environment

- 2.19** The combined effects of climate change, population growth and development needs will increase pressure on the natural environment. As already mentioned we have a particularly sensitive environment in Dacorum in the shape of the quality of our protected landscapes (including the Chilterns AONB) and the presence of the Chilterns Beechwoods SAC. The impacts of growth will be reduced through:
- the prudent use of natural resources;
  - encouraging renewable energy production;
  - the effective recycling of waste;
  - the sustainable design of new development;
  - careful land management.
- 2.20** Making effective use of urban land can also help reduce the pressure on the natural environment by limiting the overall scale of greenfield development. New developments can also play their role by: linking to existing green networks, creating new and varied green spaces, and promoting opportunities for biodiversity and nature conservation.

## Managing this Change

- 2.21** The planned levels of housing growth will signal significant changes to the towns and large villages over the lifetime of the Plan. While there are many benefits to growth, including the regeneration of our settlements, providing much needed new homes, new employment land and jobs, improvements to and renewal of infrastructure and help to support existing and new services and facilities, it needs to be managed and planned for carefully.
- 2.22** The following pages set out the strategy in more detail, particularly setting out how our towns and villages will grow in a way that delivers the required level of growth but also does so in a way that balances other priorities, particularly our environmental objectives.
- 2.23** Government policy requires that we make effective use of urban land, and minimise development pressure on the Green Belt. Similarly, many of our residents are telling us that they prefer to see us prioritise the use of urban land for development over greenfield land. However, our evidence demonstrates that we cannot meet all the housing and employment need in urban areas and there will need to be some development of greenfield sites, including sites within the Green Belt.
- 2.24** The main elements of our strategy are to:
- Optimise the use of previously developed land as far as possible by increasing heights and densities in key locations across the Borough.
  - Update our planning and design guidance to allow more contemporary and innovating approaches to development, including supporting offsite construction and other forms of Modern Methods of Construction (MMCs) to increase delivery.
  - Deliver growth in Hemel Hempstead that will support the regeneration of the town and support it as a key employment, shopping and cultural location.
  - Ensuring the important market towns of Berkhamsted and Tring play a much greater role in delivering growth in the Borough and help balance growth and development opportunities in the Borough.
  - Allow the villages to grow to meet more local needs.
  - Protecting the character of the wider countryside and the value of protected / important sites as far as possible (such as important landscapes, heritage and biodiversity and avoidance of areas at high risk of flooding).
- 2.25** To manage this growth we will need to be forward looking and embrace growth and opportunity to draw in the best of the public and private sector resources and skill if we are to succeed. The reward for our communities is clear - significant investment in infrastructure, new schools, improved health care, more open spaces, more affordable housing and and exemplar developments to help fight the impact of climate change.

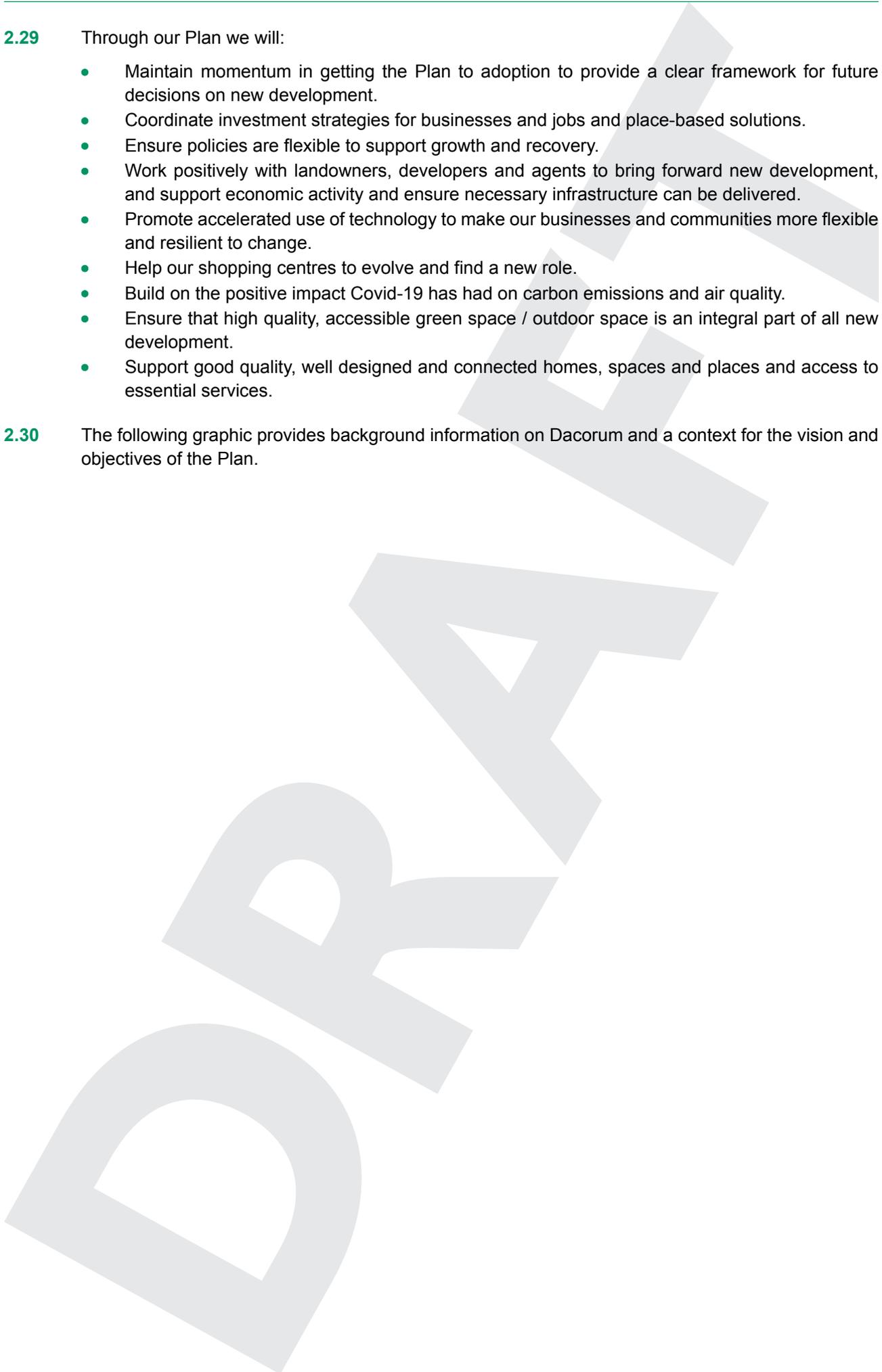
## Covid-19 Recovery

- 2.26** Underpinning these challenges is the need for the Plan to respond to the Covid-19 pandemic. In the short term its impact has been unprecedented in terms of the way we live, work, shop and travel, and how we socialise and use our local places and spaces. It has severely affected our local businesses and damaged our communities in many ways. Unfortunately, it is uncertain as to the medium to long-term consequences and depth of the health and economic emergency will have on our way of life but this will become clearer as a road map to recovery develops.
- 2.27** The Council is committed, with the support of national government and other agencies, to ensuring recovery plans are in place to allow our communities to rebound and thrive and we will continue to support our communities and businesses.
- 2.28** The Plan is an ideal tool to support a sustainable economic recovery across Dacorum. We need to be flexible and responsive to change, and not jump to conclusions over its impact but be evidence-led in our actions.

**2.29** Through our Plan we will:

- Maintain momentum in getting the Plan to adoption to provide a clear framework for future decisions on new development.
- Coordinate investment strategies for businesses and jobs and place-based solutions.
- Ensure policies are flexible to support growth and recovery.
- Work positively with landowners, developers and agents to bring forward new development, and support economic activity and ensure necessary infrastructure can be delivered.
- Promote accelerated use of technology to make our businesses and communities more flexible and resilient to change.
- Help our shopping centres to evolve and find a new role.
- Build on the positive impact Covid-19 has had on carbon emissions and air quality.
- Ensure that high quality, accessible green space / outdoor space is an integral part of all new development.
- Support good quality, well designed and connected homes, spaces and places and access to essential services.

**2.30** The following graphic provides background information on Dacorum and a context for the vision and objectives of the Plan.





### DACORUM'S HOMES

DACORUM HAS **154,280** RESIDENTS | OVER NEXT 20 YEARS 60% INCREASE 65+ YEAR OLD RESIDENTS

**£453,950** AVERAGE HOUSE PRICE IN DACORUM

5,500+ PEOPLE ON HOUSING REGISTER | DACORUM OWN 10,150 COUNCIL HOMES | 18,450 NEW HOMES 2018-2036



### DACORUM'S ECONOMY

**83,400** IN THE WORKING POPULATION | EMPLOYMENT RATE **85%**

**£33,984** AVERAGE INCOME | TOURISM WORTH **£230M**

**8,995** BUSINESSES IN DACORUM | MAYLANDS BUSINESS PARK LARGEST IN THE SOUTH EAST



### DACORUM'S CLIMATE

**54,479** TONNES OF WASTE COLLECTED 2018/2019

DACORUM CO2 EMISSIONS PER PERSON **4.5** TONNES | **52%** RECYCLING RATE

**26** NEIGHBOURHOOD RECYCLING CENTRES | CARBON NET ZERO BY 2050



### DACORUM'S ENVIRONMENT

**3** AIR QUALITY MANAGEMENT AREAS | **85%** OF THE BOROUGH IS RURAL

**230** WILDLIFE SITES | GREEN BELT **60%**

**1/3** CHILTERN'S AREA OF OUTSTANDING NATURAL BEAUTY | **3** CHALK STREAM HABITATS



**DACORUM'S  
BUILT ENVIRONMENT**

**OVER  
30**  
SCHEDULED  
MONUMENTS

1947 HEMEL HEMPSTEAD  
DESIGNATED AS A NEW TOWN

**25**  
CONSERVATION  
AREAS

**2000+**  
LISTED  
BUILDINGS

**4** HISTORIC  
GARDENS



**DACORUM'S  
CONNECTIVITY**

**CAR  
OWNERSHIP  
83%**

**90%** ADULTS IN THE  
UK HAVE ACCESS  
TO INTERNET

**21 MILES**  
OF CYCLE PATHS

**20** MINS  
LUTON

**30** MINS  
HEATHROW

**4** MAINLINE  
STATIONS

**45** MINS  
STANSTEAD



**DACORUM'S  
COMMUNITIES**

**81%** HAVE RECOGNISED  
QUALIFICATIONS

**68%**  
DESCRIBE THEMSELVES  
**AS ACTIVE**

LIFE EXPECTANCY  
**84 FOR WOMEN  
80 FOR MEN**  
ABOVE UK AVERAGE

**96%**  
SAY THEY ARE IN  
**VERY GOOD  
GOOD OR  
FAIR HEALTH**



**DACORUM'S  
INFRASTRUCTURE**

**CIL INCOME**  
**£6,687,065**

**64 CHILDREN'S  
PLAY AREAS**

**9 FAMILY  
CENTRES**

**12 COMMUNITY  
CENTRES**

**7 LIBRARIES**

**19**  
**NHS  
GP  
PRACTICES**

**51 PRIMARY SCHOOLS**

**8 SECONDARY SCHOOLS**

**4 SPECIAL NEEDS SCHOOLS**

**WEST HERTS COLLEGE**

## 3 Borough Vision to 2038

- 3.1 This section of the Local Plan sets out the Vision for Dacorum and strategic outcomes. In developing the vision we have had regard to the issues discussed in the previous section, including the scale of the growth challenge across the South West Hertfordshire Authorities, the infrastructure requirements, environmental constraints, the input from public and stakeholder engagement and new and emerging government policy and guidance.

### Dacorum Growth and Infrastructure Strategy to 2050 "Shaping the future of Dacorum"

- 3.2 The Dacorum Growth and Infrastructure Strategy to 2050<sup>(1)</sup> sets out how we will make the growth that the Local Plan is required to deliver, benefit the existing and new communities in the Borough. This means being clear how we - in partnership with other organisations where appropriate - will ensure that the right type of housing is delivered, infrastructure is provided on time, open space is available and properly maintained, and services are provided for a considerably larger population.
- 3.3 The Strategy has informed the early stages of developing the strategic objectives of the Local Plan. It guides how we can meet the challenges of future growth, and covers six over-arching themes:
- Theme 1: *Building Dacorum's future with homes for everyone.*
  - Theme 2: *Generating a vibrant economy with opportunities for all.*
  - Theme 3: *A happier, healthier and safer Dacorum.*
  - Theme 4: *Creating a clean, green and attractive Dacorum.*
  - Theme 5: *On-track for a better transport network.*
  - Theme 6: *Harnessing the opportunity of technology and digital connectivity.*

### Dacorum Corporate Plan 2020-2025 "Delivering for Dacorum"

- 3.4 This shapes the overall direction of what our priorities will be and what it will deliver over a five year period and provides a focus to the wide range of services and statutory plans that add more detail to enable focus upon and delivery of these priorities.
- 3.5 The vision for Dacorum was adopted in 2020: **"working in partnership to create a borough which enables communities to thrive and prosper"**. The Vision shapes the key corporate priorities and informs all our strategies and plans. The priorities have been set by our Councillors, taking into account the vision and what is most important to the Borough's residents:
- A Clean, safe and enjoyable environment
  - Building strong and vibrant communities
  - Ensuring economic growth and prosperity
  - Providing good quality affordable homes, in particular for those most in need
  - Ensuring efficient, effective and modern service delivery
- 3.6 Alongside the five priorities, the Corporate Plan<sup>(2)</sup> includes the Medium Term Financial Strategy<sup>(3)</sup>, which sets out the key spending plans. The Corporate Plan is underpinned by a Corporate Action Plan, which identifies the different projects that are being delivered and monitors progress and targets against performance indicators.

1 <http://www.dacorum.gov.uk/docs/default-source/strategic-planning/dacorum-growth-and-infratstructure-strategy-to-2050.pdf>

2 <http://www.dacorum.gov.uk/docs/default-source/recruitment/corporate-plan-2020-2025.pdf>

3 <http://www.dacorum.gov.uk/docs/default-source/finance-performance/medium-term-financial-strategy.pdf>

## Overarching Vision for Dacorum's Growth

Dacorum will embrace the next phase of its development by building on its strengths and the opportunities to deliver balanced communities with the homes, jobs and supporting infrastructure needed. As a result of managing the change, Dacorum will remain an attractive and desirable home for residents and for a wide variety of businesses.

New housing will have been provided in sustainable locations to a high standard of design. Affordable housing will be provided and be genuinely affordable having regard to local circumstances and new homes to meet the needs of older people, people with disabilities and those with specialist needs. New housing will deliver our ambitious place-shaping objectives and deliver high quality design and sustainability outcomes. All settlements will have separate and distinctive identities informed by proposals that are shaped by a detailed understanding of place.

Growth will be accompanied by supporting services and infrastructure which are delivered at the right time and benefit new and existing communities, particularly transportation, education and open spaces, to create healthy and sustainable developments.

### Environmental Sustainability

Growth in Dacorum is environmentally sustainable and helping to reduce the Borough's contribution to climate change through the location and design of development, by promoting energy efficiency and renewable energy and sustainable construction, by facilitating a significant increase in sustainable travel modes and supporting reductions in the use of finite resources.

The natural beauty of the Chiltern Hills and the varied character of the countryside will be enhanced, admired and cherished. The countryside will be actively managed and enjoyed and support a healthy local economy and diversity of wildlife. Water quality in the rivers and streams will be good. New woodlands will have been planted for future generations and the Borough will be even greener. Special features, such as the Grand Union Canal, remain an active part of the Borough's heritage. The wider historic environment is valued and protected. The impact of growth on the Chilterns Beechwoods Special Area of Conservation will have been effectively mitigated.

Dacorum will have a network of cycle lanes and secure bike parks, encouraging greater levels of cycling and walking, while also promoting the use of public and greener transport. Sustainable transport is a real option as public transport is more reliable, rapid, flexible, convenient and widely used. Places are better connected, and there are greater opportunities to walk and cycle.

### Economic Growth

Dacorum will have taken full advantage of its strategic M1 - M25 - A41 location. The economy is prosperous and Hertfordshire Innovation Quarter will have delivered a new and dynamic Enviro-Tech business sector which is attracting further growth and innovation. People and businesses are served by excellent community, transport, and digital infrastructure. Dacorum's economy will be more competitive and innovative and will be adapting well to new markets and opportunities. The main town centre in Hemel Hempstead will be enhanced and will continue to be a focus for shopping but will have evolved to become a more diverse place by supporting a range of other activities.

### Health and Wellbeing

Health and well-being has improved across all of the key stages in the life course. The social determinants of preventable ill health are addressed and local health inequalities are reduced. Communities are inclusive, sustainable and embrace diversity. Development is designed to a high quality and health impacts are measured. Places encourage social connections, incorporate green infrastructure, promote active travel and overall create a high quality living environment.

A full range of social, leisure and community facilities and services are delivered in a coordinated way with new development in order to promote healthy behaviours and improve community cohesion. New development will contribute to local and strategic infrastructure requirements. An active lifestyle will be encouraged and supported through the provision of open space, sport and recreation facilities. Opportunities for all people to increase their levels of physical activity will be supported with improved provision of active travel.

## The Vision for Dacorum's Places

**Hemel Hempstead** will have grown significantly and will:

- have a thriving centre, providing new housing, business and enterprise and opportunities for all. Hemel Garden Communities will be delivering new homes, green spaces, green businesses, and community facilities and is a catalyst for transforming Hemel Hempstead and taking forward the legacy of the New Town;
- have seen the redevelopment and renewal of key sites within the town, particularly the key regeneration sites close to the Town Centre and Two Waters Area;
- have delivered a reshaped town centre that provides a focus for retailing but also other leisure, community and service uses that contribute to a vibrant public space, a well-developed evening economy and a significant increase in residential development;
- be recognised as a commercial hub particularly a focus in innovative Enviro-tech clusters;
- be a key hub for public transportation and interchange offering a diverse choice of travel modes with stronger public transport links;
- have had significant transport improvements across the town with new link roads connecting the existing highway network and making provision for alternative routes linking key destinations across the town;
- have transformed the main railway station and adjoining land into an important and attractive transport gateway and interchange; and
- have secured new health care facilities and other community and residential uses on the regenerated hospital site.

**Berkhamsted** will have grown and will:

- be an inclusive market town that meets the needs and aspirations of existing and new residents and visitors;
- have delivered comprehensively planned new neighbourhoods to the south and southwest of the town in a way that takes account of sensitive views and landscape;
- have provided significant new investment into sustainable transport initiatives to increase passenger transport and improvements in walking and cycling connections throughout the town; and
- have delivered a mix of market and affordable housing, new community facilities, including two primary schools and a secondary school, local centre hub, and a hierarchy of open spaces.

**Tring** will have grown and will:

- be an inclusive market town that meets the needs and aspirations of existing and new residents and visitors;
- have delivered comprehensively planned new neighbourhood to the east of the town in a way that takes account of sensitive views, landscape and protected environmental sites;
- have provided significant new investment into sustainable transport initiatives to increase passenger transport and improvements in walking and cycling connections throughout the town;
- have delivered a mix of market and affordable housing, new community facilities, a new business hub, two primary schools and a secondary school;

- have provided significant new open space and sports/leisure facilities to the east of the town; and
- have benefited from further investment in transport infrastructure with active and attractive transport links within the town including new and improved pedestrian and cycle links to the town centre and Tring Station.

**Bovingdon, Kings Langley and Markyate** will have grown and will:

- have provided increased levels of affordable homes;
- have strengthened their role in providing services and facilities to serve residents and the adjacent rural communities; and
- have secured additional and improved local community facilities.

**The Countryside and other small villages** will:

- be protected from development; and
- have diversified further to support changing rural and agricultural practices.

## Delivering our aspirations through our identified Strategic Outcomes

- 3.7** The vision is underpinned by a series of Strategic Outcomes that will guide the direction of the detailed policies within it. These objectives will help focus action, meet the Borough vision and measure progress.



## Delivering Dacorum's future with homes for everyone

- To deliver the identified housing requirement between 2020 and 2038.
- To increase the number of new and truly affordable homes
- To meet the needs of older people and other groups who need specialist housing.



## Generating a vibrant economy with opportunities for all

- To promote Dacorum as a prime location for inward investment
- To strengthen Hemel Hempstead's role as a thriving business centre.
- To maintain commercial enterprise and employment opportunities in the market towns and large villages.
- To ensure town centres continue to evolve and flourish.
- To develop Dacorum as a great tourism destination



## Mitigating and adapting to climate change.

- To mitigate and reduce the causes of climate change.
- To adapt to the impacts of climate change and increase climate resilience.
- To promote the use of renewable resources, reduce carbon emissions, protect natural resources and reduce waste



## Conserving and protecting the natural environment

- To minimise the effects of pollution on people and the environment.
- To reduce the impacts of new development on air quality.
- To protect and enhance Dacorum's distinctive landscape character, open land, biological and geological diversity.
- To protect people and property from flooding.
- To provide a biodiversity net gain.
- To maintain and enhance networks of habitats, green and blue infrastructure
- To conserve and enhance the landscape and scenic beauty of the CAONB.



## Ensuring an attractive and valued Urban Environment

- To ensure the effective use of existing land and previously developed sites
- To promote the distinctiveness of each of Dacorum's towns and villages, reinforcing their role and character whilst not discouraging innovation in approaches
- To create safe and attractive environments through high quality design.
- To protect and enhance Dacorum's distinctive historic environment.



## Promoting and facilitating sustainable transport and connectivity.

- To enable convenient access between jobs, homes and facilities, minimise the impact of traffic and reduce the overall need to travel by car
- To ensure that passenger transport is reliable, integrated and accessible.
- To create environments where active travel is encouraged, safe, and enjoyable.
- To harness the opportunity of technology and Improve digital connectivity



## Supporting community health, wellbeing and cohesion.

- To promote healthy and sustainable communities and a high quality of life
- To provide for a full range of social, leisure and community facilities and services.
- To promote social inclusion and cohesiveness, embrace diversity and reduce inequalities
- To enable and support active lifestyles through the provision of open space, sports and recreation facilities



## Enabling the Delivery of Infrastructure

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

# THE SUSTAINABLE DEVELOPMENT STRATEGY



## 4 Sustainable Development in Dacorum

### Presumption in Favour of Sustainable Development

- 4.1** The principles of sustainable development are central to the planning system, as set out in the NPPF (paragraphs 11-16) All development has to accord with the central presumption in favour of sustainable development.
- 4.2** Sustainable development is about meeting the needs of the present without compromising the ability of future generations to meet their own needs and making economic, environmental and social progress for current and future generations. To achieve this, economic, social and environmental gains should be pursued in an interconnected way. The planning system performs a number of roles in this respect:
- **An economic role** – *contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places to support growth and innovation, including infrastructure provision;*
  - **A social role** – *supporting strong, vibrant and healthy communities by providing housing (including affordable housing), and by creating a high quality built environment with accessible local services; and*
  - **An environmental role** – *contributing to protecting and enhancing the natural, historic and built environment, and as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change.*
- 4.3** Achieving these roles is a central focus of the Dacorum Local Plan to 2038.

#### Policy SP1 - Sustainable Development in Dacorum

1. All development must contribute to the delivery of sustainable development objectives set out in the NPPF. In the local context of Dacorum this means that development proposals and neighbourhood planning documents should:
  - a. Contribute to meeting the vision and strategic outcomes for the Borough set out above, and fit with the 'delivery strategies' and 'guiding development' policies of the Dacorum Local Plan (and policies within Made neighbourhood plans).
  - b. Where there are no policies relevant to the application then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:
    - i. any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole, or
    - ii. specific policies in the NPPF indicate that development should be restricted.
2. Proposals that are in accordance with the development plan will be approved without delay, unless material considerations indicate otherwise. The Council will work proactively with applicants to find solutions so that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

#### Relevant Evidence and Supporting Guidance



## 5 Spatial Strategy for Growth

- 5.1** To establish a framework for growth we have identified a strategy which has been guided by a number of considerations, stemming from well-established principles of sustainable development together with a number of local considerations.
- 5.2** The key principles behind the strategy include:
- Delivering our requirement to significantly boost the housing supply, and in particular, increasing the number of new and genuinely affordable homes in the Borough,
  - Delivering our economic aspirations by providing employment opportunities as well as supporting retail development.
  - Seeking out opportunities to maximise the amount of development on previously developed land within existing urban areas but taking this concept much further in Hemel Hempstead by proactively encouraging substantial increases in heights and densities in the most accessible locations.
  - Providing growth that will contribute to the transformation and regeneration of Hemel Hempstead and renewal of its New Town infrastructure.
  - Ensuring the important market towns of Berkhamsted and Tring play a much greater role in delivering growth in the Borough and complement Hemel Hempstead in providing more balance to the growth focus and help deliver housing, employment and infrastructure in these locations.
  - Providing growth in the villages that reflects their role and character.
  - Minimising and managing the requirement for development on Green Belt land and the impact on the Chilterns AONB and other protected sites.
  - Ensuring that the preferred strategy is of such a form and scale to deliver the appropriate level and type of infrastructure such as schools, health and transport/movement.
  - The delivery of meaningful new infrastructure provision.
- 5.3** The spatial strategy aims to deliver the significant uplift in growth in a sustainable way across the Borough, seeking out opportunities to regenerate Hemel Hempstead and to continue to act as a catalyst for its transformation. Elsewhere, we are looking to accommodate growth that supports the long term function of the towns and villages and that delivers sufficient growth to provide for necessary investment in infrastructure. We know that we cannot accommodate all the growth within the urban area and, despite our approach to increasing densities and heights, we do need to release land in the Green Belt.
- 5.4** The strategy focuses growth in and around the most sustainable settlements in the Borough, principally Hemel Hempstead, Berkhamsted and Tring through utilising urban land as well as through extensions to each settlement. Hemel Hempstead's growth will be focused through much greater urban intensification reflecting the wider availability of development opportunities and the sustainability of the town and access to services, facilities and employment. The expansion of the town will be focused to the north and east as part of the Hemel Garden Communities project (HGC) with further land removed from the Green Belt to meet longer term needs.
- 5.5** Growth in Berkhamsted and Tring will also seek to maximise urban capacity but will not pursue an urban intensification strategy that detracts from the character of these locations. Instead growth will be accommodated through expansions to these settlements in a way that manages landscape and Green Belt impacts but also meets our aspirations for growth to be sustainably located close to passenger transport and other services, facilities and employment opportunities.
- 5.6** While the large villages of Bovingdon, Kings Langley and Markyate provide a reasonable level of services and facilities, they are relatively constrained in terms of local infrastructure. Therefore, the strategy proposes only modest levels of growth in these settlements.

- 5.7** The strategy avoids directing significant development to the smaller villages and wider countryside. We see these areas as being the least sustainable locations, they are more sensitive to substantial change, access and public transport is poorer, and there is a general lack of employment opportunities, supporting service and facilities there.
- 5.8** Not all development needs and infrastructure requirements can be met in the Borough. We will continue to work closely with neighbouring districts on cross-boundary matters. Growth to the north and east of Hemel Hempstead necessitates joint working with St Albans City and District, Hertfordshire County Council, Herts LEP and the landowners to bring forward the Hemel Garden Communities project (see the 'Hemel Hempstead Garden Communities Delivery Strategy'). This will require the co-ordination of planning across local authority boundaries to ensure a consistent approach is taken within emerging plans and strategies, alignment to the overall objectives for the town as a whole, and delivery of key strategic infrastructure for Hemel Hempstead.

## Policy SP2 - Spatial Strategy for Growth

1. Dacorum's Local plan will make provision for the following in the period between 2020 and 2038:
  - a. A minimum of 16,596 homes.
  - b. No net loss of office floorspace from 2025 onwards.
  - c. A net floorspace increase of 116,500 sqm of industrial floorspace.
  - d. Additional retail floorspace to meet the main identified needs in Dacorum's towns focused on Hemel Hempstead and Tring town centres and, on a smaller scale, in new district or local centres on the larger strategic sites.
  - e. Associated infrastructure to support the above.
2. The primary focus of strategic growth and investment will be at Hemel Hempstead, supported by growth at Berkhamsted and Tring and then the large villages of Bovingdon, Kings Langley and Markyate. Elsewhere large-scale development will be restricted outside of the towns and large villages.
3. The majority of new growth and investment will be concentrated in sustainable locations as follows:
  - a. Hemel Hempstead Garden Communities will grow by over 10,600 new homes and will deliver the majority of new employment space. A key feature of the strategy will be the intensification of sites within Hemel Hempstead through increased heights and densities. Key areas for redevelopment include sites across the Town Centre and Two Waters Areas. Smaller scale development within the existing urban area will also be provided to ensure previously developed land is optimised. The town will grow to the north by providing a minimum of 1,500 homes with further land to deliver an additional 4,000 homes released from the Green Belt but safeguarded to meet longer term needs. New urban extensions will be planned and developed drawing on Garden City principles set out in the Hemel Garden Communities Delivery Strategy, with development within and around Hemel Hempstead supporting the transformation of the town. These sites will provide or support delivery of identified strategic infrastructure requirements, and sustainable transport enhancements and improve connectivity across the town.
  - b. Berkhamsted will accommodate growth of at least 2,200 new homes. Development will enhance the town centre and strengthen its function as a key market town in the Borough and will provide significant new investment into sustainable transport initiatives, education, open space and sports facilities.
  - c. Tring will accommodate growth of at least 2,700 new homes. Development will enhance the town centre and strengthen its function as a key market town in the Borough and will provide significant new investment into sustainable transport initiatives, education, open space and sports facilities.
  - d. At the larger villages growth will be apportioned as follows: Bovingdon (240 units), Kings Langley (275 units) and Markyate (215 units).
  - e. At smaller villages, there will be more limited housing growth coming forward through either 'windfall' applications or Neighbourhood Plan allocations rather than allocations in this Plan.

- f. Elsewhere in rural areas, housing development will be strictly limited. This is likely to be small-scale incremental development and should be principally in line with Policies SP11 - Development in the Green Belt and SP12 - Development in the Rural Area and other relevant policies in the Plan.
  - g. An allowance for windfall development of around 2,400 dwelling over the Plan period.
4. Development that does not fit with the scale, distribution or requirements of this policy will not be permitted.
  5. The Council will also support additional growth beyond what is outlined above where this comes forward through Neighbourhood Plans or other local development initiatives where this accords with the objectives and strategies of the Plan.

#### **Relevant Evidence and Supporting Guidance**

- Settlement Hierarchy Study Main Report October 2017
- Settlement Profile Paper October 2017

## 6 The Settlement Hierarchy

- 6.1** In order to ensure that new development takes place in locations that have the best access to a wide range of services, facilities and employment opportunities, and minimises the need to travel, we have developed the settlement hierarchy. This is based on an assessment of population size, settlement connectivity, and the availability of employment and other services and facilities. Growth is to be focused on the main towns and large villages which lie outside of the Green Belt and that have access to a greater level of supporting services, facilities and other local infrastructure.

### Policy SP3 - The Settlement Hierarchy

1. New development will be primarily focused in or adjacent to Hemel Hempstead, the market towns, and large villages. The scale and distribution of development should broadly align with the settlement hierarchy set out below and each settlement's Delivery Strategy policies that arise from it. Development will be controlled in the countryside in order to protect its rural character.

**Table 1 Settlement Hierarchy**

Category	Settlement	Description
<b>Strategic Settlement</b>	Hemel Hempstead	The most sustainable location in the Borough and the focus for the majority of development and strategic and town-wide infrastructure. Hemel Hempstead acts as the primary service centre for the Borough. The town will also expand on its eastern side into St Albans City and District Council area.
<b>Market towns</b>	Berkhamsted	These market towns are sustainable locations and will be the focus for significant development. These settlements act as service centres for other villages around them.
	Tring	
<b>Large Villages</b>	Bovingdon	Growth in the large villages will be at a scale in keeping with their local character and setting. Sites are allocated to enable modest levels of expansion that reflects their role and function as well as other constraints to growth.
	Kings Langley	
	Markyate	
<b>Small Villages within the Green Belt</b>	Chipperfield	These are the least sustainable areas of the Borough, providing much lower level of facilities and where significant environmental constraints often apply. They offer restricted scope for development such as limited infilling within the selected small villages, reuse of buildings, and the redevelopment of previously developed land. Such locations include areas of high landscape quality, such as the Chilterns AONB and the countryside gaps between settlements. This needs to be protected to ensure their rural character is retained and settlements keep their separate identities.
	Flamstead	
	Potten End	
	Wiggington	
<b>Small Villages within the Rural Area</b>	Aldbury	These are the least sustainable areas of the Borough, providing much lower level of facilities and where significant environmental constraints often apply. They offer restricted scope for development such as limited infilling within the selected small villages, reuse of buildings, and the redevelopment of previously developed land. Such locations include areas of high landscape quality, such as the Chilterns AONB and the countryside gaps between settlements. This needs to be protected to ensure their rural character is retained and settlements keep their separate identities.
	Long Marston	
	Wilstone	
<b>Other small villages and the countryside</b>		

**Relevant Evidence and Supporting Guidance**

- Settlement Hierarchy Study Main Report October 2017
- Settlement Profile Paper October 2017

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## 7 The Housing Delivery Strategy

**7.1** The delivery strategy seeks to bring forward a sufficient number, quality and type of housing to meet the needs for general market and affordable homes and other specific housing needs of the community. It delivers a substantial uplift in supply compared to the previous Local Plan. Policy SP4 - The Housing Strategy highlights the different sources of housing supply, their contribution to meeting identified housing need over the Plan period, and seeks to ensure a 5 year supply of housing from adoption of this Plan.

### National Policy

**7.2** In considering the delivery of homes, the NPPF requires that planning authorities:

- make every effort to meet the housing, business and other development needs of an area (paragraph 11).
- demonstrate that they have a five year supply of “deliverable” sites in order to meet housing needs in the first five years of the plan period (paragraph 67).
- identify a supply of specific “developable” sites or broad locations for growth for years 6 to 10 and where possible years 11 to 15 (paragraph 67).
- can make an allowance for windfall sites as part of anticipated supply, where there is compelling evidence that they will provide a reliable source of supply (paragraph 71).
- Make provision for a variety of buffers, as appropriate, to take account of choice and competition in the market for land in the first five year period, any fluctuations in the market during that year, or to reflect persistent under delivery (paragraph 73).

### Evidence base and other studies

**7.3** As part of the evidence base to the Plan, we have undertaken a number of steps to understand the housing supply over the period 2020-38. We have:

- carried out regular monitoring of commitments, completions and existing Plan allocations through our Residential Land Position Statements and Authority Monitoring Reports <sup>(4)</sup>;
- 'Called for Sites' during the earlier stages of preparing the Plan to identify potential greenfield and brownfield sites;
- prepared an Urban Capacity Study to assess what different sources of supply could come forward (incorporating sites from the 2016 Strategic Housing Land Availability Assessment and Brownfield Land Register<sup>(5)</sup>). These identified the suitability of such sites and appraised likely levels of contributions from windfall sites;
- assessed opportunities to increase housing densities on urban sites, particularly in highly accessible locations and transport hubs;
- completed an assessment of potential greenfield sites that could come forward and identified the suitability of such sites;
- engaged with landowner, developers and agents to better understand the timing and delivery of their sites;
- engaged with key stakeholders, as well as relevant infrastructure and service providers over site-specific, settlement or Borough wide constraints, how they might affect bringing forward housing land and, where appropriate, how they might be overcome.

**7.4** The South West Hertfordshire Local Housing Needs Assessment not only identified the overall local housing need for the Borough, but also the needs of different sectors of the community including for affordable housing, housing mix, and specialist accommodation. Therefore, in addition to the overall housing target, this Plan supports new bed-spaces to help meet the accommodation needs of older people needing residential or nursing care. Similarly the, Gypsy and Traveller Accommodation Needs

4 <https://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/monitoring-reports-and-land-position-statements>  
5 <http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/brownfield-land-register>

Assessment explores the need for future pitches and other forms of accommodation over the lifetime of the Plan. Detailed discussion on both matters can be found in the 14 'Housing Delivery' chapter of the Plan.

## Housing Land Supply

**7.5** The Local Housing Needs Assessment has helped us understand what our housing requirement should be. However, the Government is proposing changes to the standard method in its recent consultations on the Planning Reform White Paper and related changes to the planning system. We have therefore progressed the Plan on the basis of this new housing need calculation of 922 homes pa (i.e. 16,596 homes over the period 2020-38). We recognise that there are uncertainties over using this as our housing figure, particularly as there may be a further refinement to the process of calculating housing need and other matters that may need to be factored in. We will keep this issue under review as we progress to the next stage of the Plan and make any necessary adjustments when we know more.

**7.6** Irrespective of the final growth figure, the NPPF requires that we fully explore the potential to make effective use of urban land (paragraphs 118 and 137), especially before considering the exceptional circumstances needed for justifying Green Belt releases for housing purposes. We have thoroughly reviewed the scope for meeting our housing needs from urban land, particularly that from our main towns and larger villages. Such steps include:

- accounting for future commitments based on the most recently available monitoring data (as at 1st April 2020);
- bringing forward earlier and identifying new Plan (strategic and non-strategic) allocations in the existing urban areas;
- identifying development opportunities from sites in the Urban Capacity Study;
- exploring housing opportunities from former employment land;
- fully reviewing opportunities to increase delivery on allocated sites;
- making an allowance across the Plan period of 200 homes pa for windfalls (i.e. small to large sites not currently identified in the Plan but based on an analysis of historic rates); and
- identifying contributions from Neighbourhood Plans.

**7.7** We have planned for 16,899 homes to be built over the Plan period. This will result in a significant uplift in the supply of housing with a strong focus on delivery. It will also help satisfy the broad housing needs of our communities, supports a mix of types and sizes of sites, provide for a modest contingency over the housing requirement, and ensure delivery across the Plan period. The table below summarises the main sources of supply.

**Table 2 Sources of Housing Land Supply**

<b>Housing Land Supply 2020 - 2038 as at April 2020</b>	
Number of homes required to be built	16,596
Total existing commitments	2,708
Urban Growth Areas	5,638
Grovehill Neighbourhood Plan	200
Windfalls	2,408
Strategic greenfield Growth Areas	5,945
<b>Total Housing Supply</b>	<b>16,899</b>
<b>Surplus over housing need figure (16,899 - 16,596)</b>	<b>+303</b>

**7.8** The table indicates that some of the housing supply is already committed through existing planning permissions, and a large proportion is identified as urban Growth and Renewal Areas in the existing settlements. A modest contribution can also be made from the Grovehill Neighbourhood Plan. However, we have not made any specific allowance for further growth coming forward through the emerging Bovington and Kings Langley Neighbourhood Plans, as these already form part of the housing supply.

**7.9** Our analysis indicates that windfall sites will play an important part in the housing programme (at 200 homes pa). They are made up of a wide range of small to large sites from a variety of sources that have been calculated using historic delivery rates and expected future trends. We believe it is justified based on past local evidence and is a reliable source of supply across the Plan period.

**7.10** Our evidence tells us that most of the new homes will come forward from urban sites in our main towns and large villages (chiefly over the short to medium term). Most opportunities will arise in Hemel Hempstead as our largest settlement, particularly in and around the town centre and within the Two Waters area. The policies in the Plan will also encourage a strong urban focus to the housing programme and appropriate levels of intensification/densification.

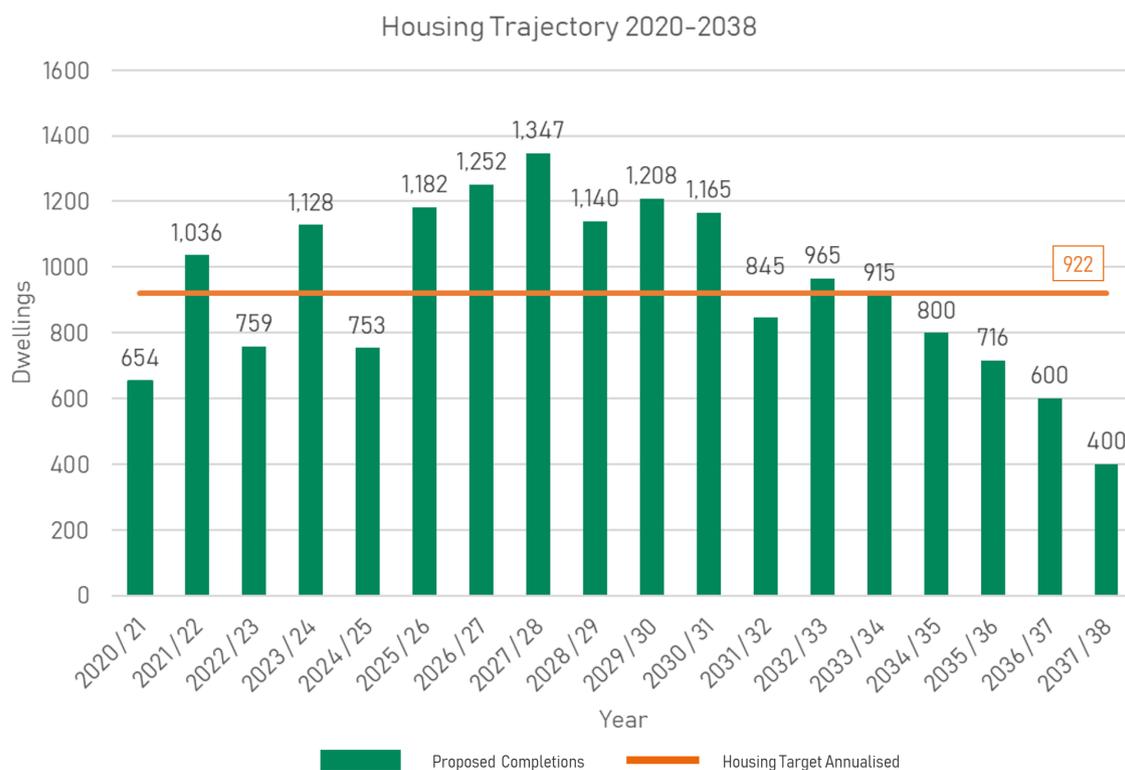
**7.11** However, urban sites cannot contribute a sufficient number of new homes to meet full housing need in order to make the Plan an effective plan. This means that we will have to rely on a range of strategic releases of Green Belt land to meet this need.

### Housing Delivery

**7.12** The graph below outlines the projected housing trajectory (as at a base date of 1 April 2020) in each year of the Plan period to secure delivery of the annual housing need of 922 homes and to ensure a modest additional land supply buffer.

**7.13** While forecast delivery does vary against the annual housing need figure over the Plan period, there is a sufficient housing land supply of deliverable and developable housing sites to satisfy the requirement to 2038 and modestly exceed it by around 280 homes.

**Figure 2 Housing Trajectory 2020 - 2038**



- 7.14** In the short-term the housing programme is more dependent on the supply of existing commitments and previous Plan allocations carried forward into this Plan. Housing supply peaks over the mid-term of the Plan as the new strategic and non-strategic Growth Areas begin to be built-out (alongside a smaller contribution from windfalls). The latter half of the housing programme sees a steady fall in delivery as the Plan becomes more reliant on the larger greenfield Growth Areas .
- 7.15** Further detail on the housing supply and anticipated rates of delivery for sites is provided in the Housing Topic Paper.
- 7.16** The scale of housing necessary in this Plan means that the housing programme will provide for development in a variety of locations and ranges of site sizes, support a variety of house builders and allow for genuine opportunities for self and custom build housing. The larger scale Growth Areas at Hemel Hempstead, Berkhamsted and Tring will provide the greatest opportunities to secure a range of housing types, tenures and other types of specialist accommodation.

## Small Sites

- 7.17** In accordance with National Policy, the plan identifies sufficient sites that are less than one hectare in size which is capable of meeting at least 10% of the overall housing requirement. This is made up through a combination of Growth Area allocations and other sites with planning permission and where construction has yet to commence on the site. These sites are presented in Appendix 2.

## Contingencies/Flexibility

- 7.18** Overall, the Plan sets out an approach to housing that will provide a significant uplift in delivery, particularly in the first half of the Plan period. Sufficient land has been identified so as to meet and modestly exceed the housing need figure of 922 homes pa.
- 7.19** However, the Plan must be sufficiently flexible to allow for uncertainties in the housing supply such as the economic cycle, changing market conditions, physical or planning constraints including the complexities of multiple landownership sites, and infrastructure difficulties leading to the stalling of individual sites. The Covid-19 pandemic has introduced further short term uncertainties into the housing market. Achieving this level of housing delivery will prove challenging, especially as it represents a very significant increase on past housing requirements.
- 7.20** The modest projected over-supply allows for a small degree of flexibility over the non-implementation or long-term stalling of sites.
- 7.21** We have avoided any formal phasing of sites as the sheer scale of housing that we are required to deliver does not warrant this. The larger sites are naturally constrained in terms of lead-in times, the need for site preparation and the timing of infrastructure. Therefore, the Plan does not seek to regulate sites and they are generally free to come forward providing necessary infrastructure can be delivered in a timely manner.
- 7.22** The Plan provides for a range of sites in different locations which means that it is not dependent on delivery or market conditions in any one location. The position on growth to the north of Hemel Hempstead is particularly complicated in terms of housing supply given this is the biggest identified urban extension in the Plan. It can deliver over 5,000 homes during and beyond the Plan period. The scheme also forms part of a large and comprehensive development that extends east of the town into St Albans City and District providing a further 5,000 homes to meet their housing needs.
- 7.23** Development of north Hemel Hempstead offers the opportunity for multiple house builders to deliver a mix of housing products. However, its scale requires it to be infrastructure-led which in turn requires it to be phased. The first phase (North Hemel Growth Area (Phase 1) can deliver around 1,500 homes in the Plan period. A second phase (North Hemel Growth Area (Phase 2) will deliver an additional 3,500 homes from 2038 onwards. The latter will be identified as safeguarded land until released for housing.

- 7.24** The Plan allocates a number of small to medium sized strategic and non-strategic sites for housing development, particularly in the earlier years of the plan period. These will help provide short-term flexibility and contingency reducing the reliance on the larger Growth Areas as part of the major planned new growth.
- 7.25** The housing trajectory is based on discussions with house-builders, infrastructure providers, an assessment of previous delivery rates and other factors. This has helped minimise known risks and provide broad confidence over the timing and delivery of key sites. While the trajectory sets out when sites can reasonably be brought forward it does not prevent earlier or accelerated delivery where opportunities arise.
- 7.26** We will carefully monitor supply as part of our regular monitoring routines to ensure a steady delivery of homes. We will also be assessed annually against the national Housing Delivery Test that looks at housing delivery rates over a rolling three year period. This sets out a number of actions a local authority will have to take if housing supply falls below specified levels.
- 7.27** We can undertake a range of corporate actions, support the actions of other organisations and actively engage with the development industry in order to increase and speed up housing delivery should under-supply become persistent during the Plan period.

### Policy SP4 - The Housing Strategy

1. The Plan will deliver a minimum of 16,596 net additional homes across the Borough over the period 2020-2038. Housing growth will be concentrated on and adjacent to the existing urban areas of Hemel Hempstead, Berkhamsted and Tring and the three larger villages of Bovington, Kings Langley and Markyate. New homes will be delivered in accordance with the delivery strategies through:
  - a. The completion of existing commitments.
  - b. The redevelopment of previously developed land, vacant or underused sites within the urban areas of the Borough.
  - c. An increase in the height and densities of urban sites across all of the main towns and large villages subject to character, with active focus on tall and taller buildings in the Hemel Hempstead Town Centre and the Two Waters areas.
  - d. Bringing forward regeneration opportunities in Hemel Hempstead in and around the Town Centre, Two Waters and the Maylands Growth Areas.
  - e. The development of small to medium sized non-strategic allocations in the urban areas as set out in the relevant settlements delivery strategies.
  - f. Bringing forward windfall allowance for small and large sites not identified in the Plan.
  - g. The development of small-scale sites within the selected small villages in accordance with relevant countryside policies in this Plan.
  - h. The delivery of housing already identified in the Grovehill Neighbourhood Plan, and through small to medium sized allocations in future neighbourhood plans in the rural areas of the Borough.
  - i. Part of Hemel Garden Communities is the strategic urban extension of North Hemel Growth Area (Phase 1): the development of a residential-led strategic allocation on the northern and eastern edge of the town. The scheme will provide up to 1,500 homes within the plan period (5,000 overall homes within Dacorum).
  - j. Supporting a larger comprehensive Hemel Garden Communities scheme extending into land in St Albans City and District which will deliver approximately 11,000 dwellings in total in the Green Belt around Hemel Hempstead.
  - k. The development of a series of strategic urban extensions on land on the south and western edges of Berkhamsted and up to the A41. These will chiefly be made up of a number of small and large developments to the south and south-west which will deliver around 1,750 homes in total, including land for new primary and secondary schools, and other facilities.



## 8 The Employment Strategy

- 8.1 The employment strategy seeks to bring forward a sufficient amount of employment space in the right locations to deliver our wider economic objectives.

### National Policy

- 8.2 The NPPF states that local planning authorities should adopt policies which support economic growth in their area. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

### Evidence base and other studies

- 8.3 Along with the other South West Hertfordshire authorities, we commissioned the South West Hertfordshire Economic Studies (2016 and 2019). These studies looked at employment land and floorspace requirements to 2036. They also reviewed some existing and potential future employment areas. The Dacorum Employment Land Availability Assessment (2017) provided more detailed advice on the quantity, mix and geographical spread of employment land in the Borough

- 8.4 The Council's Enterprise and Investment Action Plan 2017-2020 aims to provide an environment in which businesses can flourish. It seeks to foster a reputation for the Borough being open for business and attracting businesses to the area.

- 8.5 The Hertfordshire Local Enterprise Partnership (LEP) is responsible for a number of important initiatives and reports, including:

- Hertfordshire Strategic Economic Plan (2017)
- Loss of Employment Space in Hertfordshire (2017)
- Hertfordshire Local Industrial Strategy (draft 2019)

- 8.6 An important element of the LEP's strategy is the Hertfordshire Innovation Quarter Enterprise Zone (Herts IQ) Its aim is to attract a wide range of high value sectors linked to environmental technologies, such as off-site construction, 'agritech' and digital industries. The multi-site Enterprise Zone includes part of Maylands Business Park in Hemel Hempstead and the proposed 55 hectare East Hemel Hempstead employment site in St Albans City and District.

- 8.7 Key economic messages for Dacorum to address in the light of the Economic Study Update (2019) are:

- **Supporting the growth of established sectors is key to addressing productivity challenges:** South West Hertfordshire has established strengths in professional services, ICT and film and TV production, with significant growth potential. Science-based industries should also be supported.
- **Supply of employment space is at critically low levels:** there are shortages across South West Hertfordshire, including a shortage of industrial space and space for small firms in Dacorum.
- **High quality transport access is important for new employment development:** high value office occupiers require high quality amenities and good public transport access, particularly to London. However, connections to Maylands Business Park are unlikely to improve sufficiently to produce substantial office growth there. Large and medium sized industrial firms require access to the strategic road network. Maylands Business Park dominates the market, particularly for strategic warehouses. Smaller occupiers are more locationally footloose and need sites with affordable rents and flexible leases.

- 8.8 The South West Hertfordshire Economic Studies identified South West Hertfordshire as a Functional Economic Market Area (FEMA). This reflects evidence of strong commuting and migration relationships and shared leisure, retail and public sector catchment areas.

- 8.9** Given the complex relationship between housing and jobs growth and the uncertainty over total jobs growth, the Economic Study Update advised against setting jobs growth targets in Local Plans. Instead, it recommended planning for appropriate increases in office and industrial floorspace, which are more tangible and easier to monitor.
- 8.10** The study recommended that the South West Hertfordshire authorities should aim to provide additional employment space between 2018 and 2036, as follows:
- Offices: 188,000 sqm
  - Industrial: 481,500 sqm
- 8.11** Indicative district-level floorspace figures for the 2018-2036 period are set out in the study, to inform Local Plan preparation. Dacorum's indicative figures are 45,100 sqm (offices) and 196,500 sqm (industrial). However, the study advised that decisions on floorspace and land requirements in local plans should be informed also by duty to co-operate discussions, which take account of land availability for new development across the FEMA.
- 8.12** Office land supply in South West Hertfordshire exceeds the requirement by 76,000 sqm, but Dacorum has a shortfall of 68,000 sqm against its indicative floorspace figure. There are surpluses in Watford, Three Rivers and St Albans. The latter has an oversupply of 80,000 sqm, due to the capacity for 152,000 sqm of offices on the East Hemel Hempstead site.
- 8.13** With industrial land supply, the Economic Study Update indicated a shortfall of 211,000 sqm shortfall in South West Hertfordshire, including an under supply of 120,000 sqm in Dacorum. However, St Albans City and District has a surplus of 80,000 sqm, because of the potential at East Hemel Hempstead.
- 8.14** St Albans City and District Council's decision to include the permitted Radlett Aerodrome strategic rail freight interchange in its Local Plan means that there is now a surplus of industrial land in South West Hertfordshire against the Economic Study Update's indicative floorspace figure. However, the study stated that, although the rail freight interchange would enable all the strategic demand for industrial space to be met across South West Hertfordshire, there will still be a need for small and medium sized units in other locations to meet more local demand.
- 8.15** Future employment floorspace needs, particularly for offices, may be affected by the current Covid-19 pandemic. It is not possible to make an accurate forecast at present, but we will give the matter further consideration before publishing the next stage of the Local Plan. Our indicative floorspace figures may also be adjusted to reflect the 2020-2038 time horizon of our Local Plan.

## The Proposed Strategy

- 8.16** Our economic strategy is based on the following approach:
1. accommodate Dacorum's indicative floorspace growth figures for office and industrial space as far as possible;
  2. enhance Maylands Business Park as Dacorum's premier business park, including support for green technological uses in Dacorum's part of the Herts IQ Enterprise Zone;
  3. give high priority to medium and small sized businesses in new employment development;
  4. retain existing employment sites unless there are overriding planning reasons to the contrary; and
  5. allocate additional sites to create employment areas that are commercially attractive, with good road and public transport access and high quality amenities such as local shops and cafes.
- 8.17** Accommodating the Borough's indicative floorspace growth figures for office and industrial space is very challenging, given the large shortfalls shown. Indeed, our shortfalls are now larger than stated in the Economic Study Update, as explained in the Economic Development Topic Paper.

- 8.18** Viability issues mean that the scope for new offices in our existing urban areas is very limited and there is no significant urban industrial land supply except at Maylands Gateway fronting the St Albans Road/Breakspear Way. Consequently, major Green Belt releases would be needed in order to meet our indicative floorspace figures.
- 8.19** Given this, we asked the other South West Hertfordshire authorities if they could take our unmet need. Dacorum and St Albans councils are working together to ensure that most of our unmet need will be accommodated on the East Hemel Hempstead site in St Albans City and District. This site is ideally located, as it will act as an extension to Maylands Business Park. It also forms the principal development opportunity in the Herts IQ Enterprise Zone.
- 8.20** We envisage that the East Hemel Hempstead site will accommodate around 84,000 sqm of our unmet office floorspace need and 80,000 sqm of our unmet need for industrial space. After taking this into account, we conclude as follows on employment land supply in Dacorum:
- **Offices:** there is still a small shortfall against the indicative floorspace figure. Indeed, we expect a further net loss of office floorspace up to 2025, due to existing commitments. Beyond 2025, the stock of office floorspace is likely to stay broadly unchanged. Despite this, we do not consider that land should be released from the Green Belt for office development, due to the lack of suitable and viable sites, and the overall floorspace surplus in South West Hertfordshire.
  - **Industrial:** there remains a substantial shortfall against Dacorum's indicative floorspace figure. There is also a severe shortage of land for small and medium sized firms. We consider that these factors constitute exceptional circumstances, justifying the release of some Green Belt land for industrial development.
- 8.21** In the light of the above, we consider that the appropriate indicative floorspace figures in this Plan (excluding any contribution from the East Hemel Hempstead site) are for no net change of office floorspace after 2025 and for an additional 116,500 sqm of industrial space between 2018 and 2036.

## New employment sites

- 8.22** In selecting new sites for employment development (mainly industrial) sufficient to enable the indicative industrial floorspace figure in SP5 - Delivering the Employment Strategy to be met, we have followed the Dacorum Employment Land Availability Assessment's advice that sites along the A41 are good locations for local businesses, as they are less attractive for strategic warehouses which need good motorway access.
- 8.23** The Plan releases land from the Green Belt for employment development next to the A41 junction in Hemel Hempstead (5 hectares) and at Dunsley Farm, Tring (7.4 hectares). It also proposes extensions to the existing employment areas in the Green Belt at Upper Bourne End Lane/Stoney Lane (Bourne End Mills) (1.1 hectares) and Bovingdon Brickworks (0.7 hectares). A total of around 47,000 sqm of industrial development can be accommodated on these sites.

### Policy SP5 - Delivering the Employment Strategy

1. Over the Plan period the Council will seek to grow and develop Dacorum's economy by capitalising on the Borough's position near to the M25 and M1, its proximity to London and the wider Herts IQ Enterprise Zone aspirations.
2. The strategy for supporting economic needs will be delivered by:
  - a. The continued development of Hemel Hempstead as an important economic centre for the Borough.
  - b. Supporting the knowledge-based economy, including the development of green technological businesses at Maylands Gateway close to M1 Junction 8 in the Hertfordshire Innovation Quarter Enterprise Zone.

- c. Attracting new businesses, encouraging business start-ups and assisting businesses to grow, particularly on employment proposal sites, where provision for small and medium sized businesses will be required.
- d. Planning to meet the following indicative floorspace figures:
  - i. Offices: no net loss of space from 2025 onwards.
  - ii. Industrial: net floorspace increase of 116,500 sqm between 2018 and 2036
- e. Supporting the expansion of Maylands Business Park onto the East Hemel Hempstead site in St Albans City and District, to accommodate Dacorum's unmet need for office and industrial floorspace.
- f. Retaining and developing existing employment sites that meet longer term needs for a wide range of office and industrial uses, and releasing sites that do not meet future requirements.
- g. Encouraging offices in town, district and local centres.
- h. Allocating 20 ha of office and industrial development land within use classes E, B2 and B8 at the following Employment Growth Areas:

**Table 3 Employment Growth Areas**

Settlement	Growth Area Allocation
Hemel Hempstead	Breakspear Way/Green Lane/Boundary Way, Maylands Gateway (Growth Area HH20)
	Two Waters Road/A41 Junction (Growth Area HH16)
Tring	Dunsley Farm, London Road (Growth Area Tr01)
The Countryside	Upper Bourne End Lane/Stoney Lane (Bourne End Mills) (Growth Area Cy01)
	Bovingdon Brickworks (Growth Area Cy02)

**Relevant Evidence and Supporting Guidance**

- [South West Herts Economic Study Update September 2019](#)
- [Dacorum Employment Land Availability Assessment - October 2017](#)
- [Hertfordshire LEP Website](#)
- [Enterprise and Investment Team Action Plan - 2017-20](#)
- [LEP Loss of Employment Space in Hertfordshire - february 2019](#)
- [LEP Key Documents](#)
- [Hertfordshire IQ - LEP](#)

## 9 The Retail and Leisure Development Strategy

- 9.1** The retail and leisure development strategy seeks to manage the long term resilience of town centres, making sure they can respond to continued and rapid changes to the way we shop on and offline and use our town centres and continue to thrive and be the heart of our towns.

### National Policy

- 9.2** The NPPF states that planning policies and decisions should support the role that town centres play at the heart of their local communities, by taking a positive approach to their growth, management and adaptation. A hierarchy of town centres should be defined. The NPPF recognises the importance of a diverse range of 'main town centre uses', including retail, leisure, entertainment and more intensive sport and recreation uses (e.g. cinemas, restaurants, pubs, health and fitness centres), offices and the arts. It also recognises that a wide range of complementary uses and evening and night time activities can help support the vitality of town centres. The term 'town centres' in the NPPF also apply to district and local centres.

### Evidence base studies

- 9.3** We, along with the adjoining authorities of Hertsmere, St Albans, Three Rivers and Watford, commissioned the South West Hertfordshire Retail and Leisure Study (2018). This study provided us with an understanding of existing retail and leisure issues across the area, together with an objective assessment of future needs and possible strategic responses.
- 9.4** More recently, we commissioned the Further Dacorum Retail Study (2020) to update the retail aspects of the 2018 study. The Further Study takes account of changed circumstances, including greater clarity on likely future housing development and revised forecasts of future retail expenditure. It also assessed potential sites for retail development in the town centres and advised on its potential distribution.
- 9.5** The evidence defined a retail hierarchy with Hemel Hempstead as a sub-regional centre, Berkhamsted and Tring as town centres, Hemel Hempstead Old Town and potentially Apsley as district centres, and a number of local centres in Hemel Hempstead.
- 9.6** The forecasts in the 2020 study reflected various assumptions, including estimated increases in population, retail expenditure and internet shopping. After taking existing commitments into account, the study identified capacity for 13,200-16,500 sqm net of additional convenience (food) floorspace by 2032. Conversely, no additional comparison (non-food) floorspace was required, assuming existing commitments are implemented. However, there may be scope for some new comparison floorspace, once substantial housing growth has been delivered across Dacorum.
- 9.7** Although there is capacity for a substantial increase in convenience shopping floorspace, the 2020 study is cautious about translating this into provision on the ground, given the structural changes underway to the way we shop. Furthermore, over half the identified convenience capacity is to address 'over-trading' in existing foodstores. The study advises that out of centre retail schemes which are harmful to designated centres should be resisted, irrespective of the capacity identified. However, appropriate retail schemes that would increase the vitality and viability of existing centres should be permitted, even if there is no capacity identified.
- 9.8** Another factor referred to in the 2020 study is the current Covid-19 situation. The study states that this will have consequences which will not be fully understood for some time. Some re-basing of consumer spending patterns is likely, but accurate forecasts are not yet possible. Therefore, the study advises us to closely monitor and regularly update the position on capacity, need and strategy.

- 9.9** The 2018 study assessed the need for a range of leisure uses, namely, indoor sports and health and fitness; cinemas; restaurants; bars, pubs, social clubs and nightclubs; ten pin bowling; bingo; and theatres, galleries and museums. It concluded that existing provision together with commitments is sufficient to meet most of the identified future needs. Therefore, no additional allocations are required for specific major new leisure facilities over the Plan period. Nevertheless, additional facilities should be permitted in sustainable locations. In addition, the loss of existing facilities should be resisted, if it would reduce choice in a sector with long-term demand.

## Scale and location of new retail development

- 9.10** Policy SP6 - Delivering the Retail and Leisure Strategy below sets out our strategy for future retail and leisure development. It defines a hierarchy of centres in Dacorum as recommended in the 2018 Retail and Leisure Study, except in relation to Apsley. The study raised the possibility of elevating Apsley from local to district centre status, by including the adjoining retail parks. We consider this change is justified, as this area plays an important role in meeting Hemel Hempstead's retail needs.
- 9.11** National guidance and our evidence base point to new retail floorspace being located as far as possible in the town, district and local centres, in accordance with the hierarchy. Where it is not met in these centres, any additional retail provision should be directed mainly to the larger strategic sites. Given the uncertainties in retailing mentioned above, we will reconsider retail floorspace needs before the next stage of the Local Plan is published.
- 9.12** In the light of the evidence, we have concluded that rather than set a floorspace target for convenience floorspace, it is better to concentrate on meeting the main identified needs in our towns. Therefore, Policy SP6 facilitates a substantial increase in convenience space, although considerably lower than the floorspace capacity identified in the 2020 retail study.
- 9.13** For comparison floorspace, this Plan does not set a floorspace target given the evidence base findings. However, small scale comparison floorspace will be encouraged in Hemel Hempstead and Tring town centres and on the larger strategic Growth Areas.
- 9.14** There are few realistic opportunities available for retail development in our town centres, but the evidence shows that the most appropriate sites are located at Market Square in Hemel Hempstead and High Street/Brook Street in Tring. Whilst this Plan proposes retail development on these sites, this still needs to be fully tested and it is uncertain whether such development will be delivered. If not, we consider that no alternative provision is needed in Hemel Hempstead, given recent and proposed future supermarket developments elsewhere in the town. However, a new out of centre supermarket in Tring would be justified. We regard the Dunsley Farm Growth Area as the best alternative location.
- 9.15** Housing development on the larger strategic Growth Areas at Hemel Hempstead, Berkhamsted and Tring will take place over an extended period of time and the Plan should not be prescriptive over the size, location or timing of future retail provision. Policy SP06 does, however, indicate the broad nature of retail facilities required, taking account of the evidence.
- 9.16** No new out of centre retail parks are proposed. However, it would be prudent to retain the vacant land at Jarman Park, Hemel Hempstead as a retail proposal site, with potential for convenience and comparison floorspace. This reflects the shortage of potential sites to meet the town's retail needs, although the position should be reviewed through the next Local Plan.

### Policy SP6 - Delivering the Retail and Leisure Strategy

1. The Council will support retailing and leisure by:
  - a. Fostering the retail and leisure base of Hemel Hempstead, Berkhamsted and Tring, by encouraging main town centre uses of an appropriate scale and nature in the town, district and local centres in accordance with the hierarchy below:

Table 4 Retail/Leisure Hierarchy

Type of centre	Centres	Role of centre
<b>Sub-regional centre</b>	Hemel Hempstead	Main destination for comparison and convenience goods shopping, services such as banks, leisure and cultural activities.
<b>Town centres</b>	Berkhamsted	Provision of main convenience and comparison shopping facilities, services and leisure uses for the town and nearby rural area.
	Tring	
<b>District centres</b>	Apsley, Hemel Hempstead	Provision of local convenience and comparison shopping floorspace, services and leisure uses. Furthermore, meet some town-wide needs for retail warehouses (Apsley) and speciality shopping and eating and drinking (Old Town).
	Hemel Hempstead Old Town	
<b>Local centres</b>	Adeyfield, Hemel Hempstead	Contain a limited range of shops (often including a supermarket), services, community uses and food and drink uses for the local community.
	Bennetts End (Bennettsgate), Hemel Hempstead	
	Maylands, Hemel Hempstead	
	Woodhall Farm, Hemel Hempstead	
	Bovingdon	
	Kings Langley	

- b. Focusing new retail floorspace in the town centres and to a lesser extent the larger strategic Growth Areas in accordance with the delivery strategies.
  - c. Accepting further retail development outside of the centres defined above and the larger strategic Growth Areas only if justified under Policy DM21 - Main Town Centre Uses Outside Existing Centres.
  - d. Promoting tourism and other industries in key locations.
  - e. Supporting the evening economies within the town centres.
2. In **Hemel Hempstead** the Council will:
    - a. Promote and support the continued diversification of the town centre to ensure it retains its role as a sub-regional centre.
    - b. Support proposals for retail led mixed use development including a supermarket or local convenience store at the Market Square site (Growth Area HH05).
    - c. Continue to support retail development, including a medium sized supermarket, at Jarman Park (Growth Area HH27).
    - d. Support the delivery of new retail facilities in the Hemel North Growth Area, involving a new district or local centre with a medium or large supermarket and also smaller scale local or neighbourhood centres (Growth Areas HH01 and HH02).
  3. In **Berkhamsted** the Council will:
    1. Reinforce the role of the town centre and support proposals which will maintain its vibrancy.

2. Support the delivery of the permitted supermarket at Gossoms End (Growth Area Bk13) and small scale retail provision in the South Berkhamsted Growth Area (Growth Area Bk01).
4. In **Tring** the Council will:
  - a. Reinforce the role of the town centre and support proposals which will maintain its vibrancy.
  - b. Explore and if appropriate bring forward a mixed use retail led development including a medium sized supermarket at the High Street/Brook Street town centre site (Growth Area Tr06), or encourage a supermarket on the Dunsley Farm Growth Area (Growth Area Tr01) if the town centre site cannot be delivered.
  - c. Seek the delivery of a new neighbourhood centre in the East Tring Growth Area (Growth Area Tr03).

#### **Relevant Evidence and Supporting Guidance**

- South West Hertfordshire Retail and Leisure Study (2018)
- Further Dacorum Retail Study (2020)

## 10 Delivering the Infrastructure to Support Growth

- 10.1** A key requirement of the Dacorum Local Plan is to ensure that there is sufficient and appropriate infrastructure in place to meet the planned growth. This needs to consider both the individual requirements arising from developments and also address the cumulative impact of growth across the Borough. Our consultation on the earlier draft (Issues and Options) Plan has highlighted that this is a fundamental concern of our residents.
- 10.2** In order to identify the infrastructure need we are producing an Infrastructure Delivery Plan (IDP). The IDP will identify the essential infrastructure required to deliver our growth aspirations and requirements, prioritise these according to their importance to delivering the growth strategy and set out when infrastructure is required and how it will be funded.
- 10.3** The term infrastructure covers a wide variety of services and facilities provided by private and public bodies and includes:
- transport infrastructure (rail, roads, cycle routes, buses, footpaths/pedestrian links);
  - utilities and flood management infrastructure – water supply and treatment, flood prevention and drainage, waste disposal and energy;
  - telecommunications infrastructure including high-speed broadband;
  - community infrastructure – schools, sport, cultural and recreation facilities, healthcare, public transport, emergency services, social care facilities, community buildings, places of worship and associated facilities, and community recycling facilities; and
  - green infrastructure – including multi-functional green spaces, ecological enhancements, open green spaces (e.g.parks, allotments, and country parks).
- 10.4** Our IDP will take forward previous work prepared as part of the Hertfordshire Infrastructure Funding Prospectus (HIFP) 2018-2031 which provided a snap-shot in time from September 2018. Across Hertfordshire the infrastructure requirements amounted to at least £5.7 billion. The HIFP also identified key projects for Dacorum, which remain relevant now. These include (but are not limited to):
- capacity improvements to J8 of the M1 and further enhancements to the M1;
  - capacity improvements to J20 of the M25;
  - a new transport corridor to the north of Hemel Hempstead through the North and East Growth Areas;
  - a package of interventions across our towns and villages alongside growth that focus on promoting movements by means other than than car;
  - new primary and secondary schools throughout the Borough; and
  - the provision of new health care facilities across the Borough.
- 10.5** The production of an IDP is an iterative process as infrastructure is continually being delivered through the development management process. A draft IDP has been produced following extensive consultation with stakeholders and infrastructure providers. We will continue to update this right up to the point when we submit the Plan for Examination. By publishing a draft IDP alongside this Plan we will be able to ensure that the required infrastructure is known at an early stage. The IDP is also a key tool in the assessment of development viability, which the Council is continuing to develop to ensure that the required infrastructure can be delivered and development remains viable. As the Plan moves forward the infrastructure requirements will be further refined and will continue to be subject to comprehensive viability testing at the whole plan level but also through the testing of individual sites as required.
- 10.6** The Government expects a viability assessment of likely contributions towards affordable housing and other infrastructure to be undertaken up-front as part of preparing the Local Plan. This is to demonstrate that they do not undermine deliverability of planned development and to avoid the need for further assessments at the later planning application stage. Thus, planning applications are generally assumed to be viable. However, we acknowledge that there may be changes in circumstances that alter the viability position of a development and negatively impact on delivery. The

NPPF and PPG set out a clear and transparent methodology for developers to evidence such change and identify suitable mitigation, although they make clear that it is up to the applicant to demonstrate whether particular circumstances justify the need for a further viability assessment.

- 10.7** Infrastructure should be delivered in a timely manner and be integrated alongside new development, with the specific phasing to be determined in agreement with the local planning authority. Wherever possible and especially on larger developments, infrastructure should be provided on-site as part of the development to contribute towards creating sustainable development, to offset its impact on local infrastructure, and to ensure that new developments are attractive places to live.
- 10.8** The precise mechanism for securing infrastructure is being reviewed and will need to take into consideration the outcome of the White Paper consultation. Subject to this, we intend to produce a supplementary planning document to guide delivery.

### Policy SP7 - Delivering Infrastructure

1. All new development will be required to provide for the necessary on-site and, where appropriate, off-site infrastructure requirements arising from the proposal in order to:
  - a. meet the needs arising from the development so as to avoid placing additional burden on the existing infrastructure;
  - b. avoid or mitigate adverse social, economic and environmental impacts arising from the proposed development; and
  - c. make good the loss or damage of social, economic and environmental assets arising from the proposed development
2. Infrastructure requirements will be delivered directly by the developer and/or through an appropriate financial contribution prior to, or in conjunction with, new development. Where appropriate, developers will be expected to collaborate on the provision of infrastructure which is needed to serve more than one site.
3. The timing of the provision of the infrastructure should be linked directly to the phasing of the development to ensure that infrastructure is provided in a timely and comprehensive manner to support new development. The phasing will be determined in relation to the needs of each development and the overall requirements to mitigate growth in that settlement. In ensuring the timely delivery of infrastructure requirements, development proposals must demonstrate that full regard has been paid to the Infrastructure Delivery Plan, which will be updated over the Plan period to ensure project information remains up to date and relevant to all other policies of this Plan.
4. It will be expected that infrastructure requirements set out in the Infrastructure Delivery Plan will be delivered, however, where it can be demonstrated that the infrastructure requirements could render the development unviable, proposals for major development should be supported by an independent and transparent viability assessment that accords with Planning Practice Guidance. Where viability constraints are demonstrated by evidence, the Council will:
  - a. prioritise developer contributions for critical, essential and required infrastructure based upon the detail of requirements outlines in the Infrastructure Delivery Plan; and/or
  - b. use an appropriate mechanism to defer part of the developer contributions requirement to a later date; or
  - c. as a last resort, refuse planning permission if the development would be unsustainable without the inclusion of the unfunded infrastructure requirements taking into account reasonable contributions from elsewhere including the Community Infrastructure Levy.
5. A Supplementary Planning Document will be produced to provide more detail about its approach to securing developer contributions.

**Relevant Evidence and Supporting Guidance**

- Draft Infrastructure Delivery Plan

## 11 Neighbourhood Planning

- 11.1** Neighbourhood Plans, neighbourhood development orders and community right to build orders have the potential to allow communities to develop a shared vision to shape their neighbourhoods and to work with landowners, developers and service providers to deliver new development and facilities.
- 11.2** A neighbourhood plan provides a mechanism for communities to bring forward development and for the community to have a significant say in its location and specification (providing local detail or distinct approaches), and to plan positively to support local development in meeting the strategic needs of this Plan. Neighbourhood plans must, however, be in general conformity with the strategic policies within this Plan. We set out relevant strategic policies in 'Appendix 1 - List of Strategic Policies'.
- 11.3** This Plan provides a framework, for communities to shape their local neighbourhoods through community-led planning documents. Grovehill has already prepared and 'Made' their Neighbourhood Plan whilst Bovington and Kings Langley have commenced work on preparing neighbourhood plans. There have not, however, been any proposals for neighbourhood development orders and community right to build orders.
- 11.4** Once approved, 'made' neighbourhood plans become part of the statutory development plan and the policies contained within them will be used, together with the Local Plan, in the determination of planning applications.
- 11.5** We have and will continue to take an active role in advising and supporting the community in the neighbourhood planning process, wherever possible, by sharing evidence and information and ensuring the neighbourhood plan fits with our strategic policies as well as national policy.
- 11.6** We are also expected by the NPPF (paragraph 65) to provide a housing requirement figure for the three designated Neighbourhood Areas in the Borough.
- 11.7** In the case of the Grovehill Neighbourhood Area, this is essentially part of the wider Hemel Hempstead urban area. It will contribute to the overall housing supply in the town. However, the two main housing schemes within this neighbourhood area are Marchmont Farm and Henry Wells Square. These together will contribute between 450 and 550 new homes over the Plan period.
- 11.8** With respects to the Bovington and Kings Langley Neighbourhood Areas we have based the indicative housing requirement figures on the relevant Delivery Strategy for each village. They cover the bulk of the Neighbourhood Area, reflect the overall local strategy for the pattern and scale of development in these areas and potential supply of homes there, and provide the most detailed and robust basis for making such allocations.
- 11.9** It should be noted that these homes requirement figures are minimums and count towards the overall housing land supply rather than being additional to it.

### Policy SP8 - Neighbourhood Planning

1. To support neighbourhood plans and clarify their relationship with the Local Plan the Council will expect the following principles to be applied in the development of neighbourhood plans.
2. Neighbourhood plans should:
  - a. show how they are in general conformity with the strategic policies of the Local Plan;

- b. clearly set out how they will promote sustainable development at or above the level of growth planned for through the Local Plan, having regard to information on local need for new homes, jobs and facilities for their plan area; and
- c. where additional growth is planned through new allocations, having regard to any existing or emerging evidence published by Dacorum Borough Council, including in relation to the Green Belt.

**Relevant Evidence and Supporting Guidance**

- Further information on Neighbourhood Planning can be found on the Council's website at: <http://www.dacorum.gov.uk/home/regeneration/neighbourhood-planning>

## 12 Monitoring and Review

- 12.1** Effective monitoring is essential to ensuring that the policies in the Plan remain relevant, up to date and are achieving their aims. As with previous Plans, we will prepare a yearly monitoring report which will measure and report on their effectiveness and establish a monitoring framework against which policy performance will be measured. Actions will be identified where policies are not achieving their aims and we will consider whether policies need adjusting or replacing either because they are not working as intended, or they need changing to reflect changes in national policy, guidance, emerging best practice or local circumstances.
- 12.2** As required by the duty to co-operate, we will give consideration (including through a review of the Plan where appropriate) to helping to meet the needs (such as housing, employment or infrastructure) of other local planning authorities where clearly established through the Plan evidence gathering process that those needs can only be met through provision in Dacorum. At the very least we will within five years of adoption decide whether we need to update the Plan, taking account of the outcome of the South West Herts Joint Strategic Plan.

### Policy SP9 - Monitoring and Review

1. The policies in the Plan will be monitored at least annually to assess if they are fulfilling their aims.
2. The Plan will be subject to partial or complete review, or proposals for alternative sustainable sites considered favourably (subject to compliance with other policies in the Plan), in any of the following circumstances:
  - a. site allocations are not delivering new homes at the rate anticipated in the housing trajectory, leading to net housing development not being delivered at the rate set out in the Plan;
  - b. evidence established through another local planning authority's Local Plan process shows that its unmet need can only be accommodated in Dacorum;
  - c. significant changes in national planning policy and guidance that mean one or more of the policies in the Plan are out of date and in major conflict with National Guidance; and
  - d. evidence in the monitoring report shows that one or more of the policies in the Plan is frustrating the delivery of the Plan's objectives or is working contrary to effective planning in the Borough.