



Report for:	Cabinet
Date of meeting:	20 October 2020
Part:	1
If Part II, reason:	

Title of report:	Dacorum Local Plan (2020 – 2038): Emerging Strategy for Growth (for consultation)
Contact:	<p>Cllr Graham Sutton: Portfolio Holder for Planning & Infrastructure</p> <p>Author/Responsible Officer: James Doe: Assistant Director, Planning, Development and Regeneration Alex Robinson: Strategic Planning Manager</p>
Purpose of report:	To seek Cabinet’s agreement to consult on Dacorum Local Plan (2020 – 2038): Emerging Strategy.
Recommendations	<ol style="list-style-type: none"> 1. That Cabinet recommend to Council that the Emerging Strategy for Growth (Appendix 1) is published for consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). 2. That Cabinet consider the views of Strategic Planning and Environment Overview and Scrutiny Committee and officer response (Appendix 5) and to set out any changes to be made to the consultation document. 3. That Cabinet approve the temporary changes needed to the Statement of Community Involvement (SCI) (Appendix 2) to ensure the consultation can take place in accordance with the approved Local Development Scheme be approved. 4. That Cabinet recommend Council delegate authority to make changes to the Emerging Strategy for Growth , including any necessary to reflect the Cabinet’s and/or Council discussions and decision, to the Assistant Director Planning, Development and Infrastructure in consultation with the Portfolio Holder for Planning and Infrastructure.

Period for post policy/project review	The Local Plan includes provisions that would trigger a review. In addition, national guidance requires that the adopted Local Plan is reviewed every five years to determine whether an update is required.
Corporate objectives:	<p>The Council's Local Plan helps support all 5 corporate objectives:</p> <ul style="list-style-type: none"> • <i>Safe and clean environment:</i> e.g. contains policies relating to the design and layout of new development that promote security and safe access; • <i>Community Capacity:</i> e.g. provide a framework for local communities to prepare area-specific guidance such as Neighbourhood Plans, Town / Village Plans etc.; • <i>Affordable housing:</i> e.g. sets the Borough's overall housing target and the proportion of new homes that must be affordable; • <i>Dacorum delivers:</i> e.g. provides a clear framework upon which planning decisions can be made; and • <i>Regeneration:</i> e.g. sets the planning framework for key regeneration projects, such as Hemel Hempstead Town centre, Two Waters, Hemel Hempstead and the Maylands Business Park.
Implications: 'Value for money' implications	<p><u>Financial</u></p> <p>Funding to prepare the new Dacorum Local Plan is provided from existing base budgets, however in order to allow for peaks in expenditure in the periods of high activity, pre and post examination, expenditure in excess of the base budget will be funded from a drawdown from the Local Development Framework (LDF) reserve. The budget for 2020/21 has been set at required levels, partly funded from a drawdown from the LDF reserve. Any expenditure over the base budget position in 2021/22 will be reviewed and budget approval agreed.</p> <p><u>Value for money</u></p> <p>Where possible, evidence base work is undertaken jointly with other authorities to ensure cost is optimised (through economies of scale). Collaborative working with landowner consultants will continue to help extend the resources available to the Council and avoid the duplication of site specific technical information.</p>
Risk implications	<p>The Local Plan has its own detailed risk assessment and contained in the adopted Local Development Scheme (July 2020). This is regularly monitored in accordance with the Council's programme management procedures.</p> <p>The key risk is that the new Local Plan is found 'unsound' by an Inspector at Public Examination. To avoid this, the Council</p>

	<p>must ensure that the Plan complies with Government policy and is founded on robust evidence, particularly on infrastructure, and follow all statutory and local requirements, including on public consultation.</p> <p>If a plan is submitted prematurely and not fully supported and justified by evidence then the Plan will not be found sound and the Council would have to restart plan making, incurring significant further time and costs to the process.</p> <p>The Local Plan is critical to evidencing there is a five-year supply of housing land which is important to ensure that Council is able to control development appropriately, that planning decisions are plan-led and to assist in meeting the requirements of the Government's Housing Delivery Test.</p> <p>Following adoption of the Local Plan by the Council, the key risk is that the Plan does not deliver as planned. At that stage, continued close working with local communities, developers and infrastructure providers, along with consistent decision making, helps to ensure sustainable development takes place in a timely fashion.</p>
Community Impact Assessment	A full Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) is being carried out on the Local Plan which looks at social, environmental and economic impacts in detail and is scrutinised at the Local Plan examination by an independent inspector. The Council has also undertaken a Community Impact Assessment (CIA) which is appended to this report (Appendix 4).
Health and safety Implications	No implications as a result of this report.
Deputy Monitoring Officer/ S.151 Officer Comments	<p>Deputy Monitoring Officer:</p> <p>The Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012 set out the requirements and statutory procedural arrangements for preparing Local Plans, which include the requirements to consult.</p> <p>The recommendations in this report comply with statutory requirements and procedures under the Councils Constitution.</p> <p>Deputy S.151 Officer</p> <p>There are no direct financial implications as a result of consulting on the proposed Dacorum Plan.</p>
Consultees:	<p>Mark Gaynor, Corporate Director, Housing and Regeneration</p> <p>Consultation on the new Local Plan and other policy documents will be carried out in accordance with the council's</p>

	<p>adopted Statement of Community Involvement (SCI).</p> <p>The consultation document was discussed at SPAEOSC on 23 September 2020 and again on 30 September 2020. The recommendations of SPAEOSC, and officer responses, are summarised in Appendix 5 of this report.</p>
Background papers:	<ul style="list-style-type: none"> • Appendix 1: Dacorum Local Plan (2020 – 2038): Emerging Strategy for Growth (for consultation) • Appendix 2: Temporary changes to the Statement of Community Involvement • Appendix 3: Evidence studies being prepared to support the Dacorum Local Plan (2020 – 2038). • Appendix 4: Community Impact Assessment of the Dacorum Local Plan (2020 – 2038): Emerging Strategy for Growth (for consultation) • Appendix 5: Views of SPAEOSC together with officer response. • Adopted Local Development Scheme (July 2020) • Adopted Site Allocations DPD (July 2017) • Adopted Core Strategy (September 2013) • Dacorum Borough Local Plan 1991 – 2011 (April 2004)
Glossary of acronyms and any other abbreviations used in this report:	<p>DTC: Duty to Cooperate LDS: Local Development Scheme SCI: Statement of Community Involvement NPPF: National Planning Policy Framework PPG: Planning Policy Guidance IDP: Infrastructure Delivery Plan SoCG: Statement of Common Ground SA/SEA: Sustainability Appraisal / Strategic Environmental Assessment AA: Appropriate Assessment under the Conservation of Habitats and Species Regulations 2017 (as amended) CAONB: Chilterns Area of Outstanding Natural Beauty SAC: Special Area of Conservation</p>

1. Introduction to this consultation

1.1. Dacorum Borough Council is preparing a new Local Plan for the period 2020 to 2038. Once adopted, it will replace the Site Allocations Development Plan Document (adopted July 2017), the Core Strategy Development Plan Document (adopted September 2013) and those 'saved' parts of the Dacorum Borough Local Plan (adopted April 2004). The Local Plan is being prepared in accordance with the Council's Local Development Scheme (LDS) (adopted July 2020).

1.2. The document before Cabinet is the Council's emerging growth strategy for the Borough and includes proposals for new housing, employment, retail and other forms of development. This is at Appendix 1. The document is being published under Regulation 18 of the Town and Country Planning

Regulations 2012 (as amended) and falls within the 'plan preparation' stage and therefore does not constitute a draft Local Plan. This comes later under Regulation 19.

- 1.3. The consultation is an opportunity for the local community, other stakeholders and developers to provide feedback on the proposals in the document, the supporting evidence published to date and to advise on changes that should be made prior to the Plan being finalised and published under Regulation 19.

2. Background

- 2.1. Once adopted, the Local Plan will guide new development across the Borough, ensuring it takes place in the areas where the Council wishes it to, and where infrastructure is being planned so that development and infrastructure delivery is coordinated. The Local Plan is also a key tool in delivering our priorities set out in the Council's Corporate Plan (2020 – 2025) and the Dacorum Growth and Infrastructure Strategy (2019).
- 2.2. A new Local Plan is required because the 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 that can be given to the policies in these documents is reducing as time goes by. In addition, the Core Strategy Inspector identified that a wholesale review of the then Core Strategy would be required. The approach is now to provide a new Single Local Plan providing a new strategy for development, new site allocations and policies to deal with development to 2038. Members will note that the Site Allocations Development Plan Document was adopted in 2017, to provide detail on key sites pursuant to the Core Strategy of 2013.
- 2.3. There have been a number of changes to the planning system since these documents were adopted and it is important that we have a Local Plan in place which reflects national policy and guidance, otherwise the Council risks the potential loss over decision making.

3. What has informed the preparation of this consultation document

- 3.1. In November 2017, the Council 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. The report of consultation is available on the Council's website at http://www.dacorum.gov.uk/docs/default-source/strategic-planning/local-plan---issues-and-options---consultation-final--13-november-2017.pdf?sfvrsn=841e329e_21.
- 3.2. Since this time, there have been a number of changes to the planning system, including revised housing figures arising from the standard housing methodology and changes to the National Planning Policy Framework (NPPF) and the supporting Planning Policy Guidance (PPG). In response to these changes, an extended period of plan development has been undertaken. This includes updating the Plan's evidence base to understand better the needs and constraints in the Borough; these have informed the development of the Plan. We have also been through a process of generating and testing options for development as well as seeking the input

with statutory bodies, such as the County Council, adjoining authorities and developers promoting land across the Borough.

3.3. The Local Plan needs to be 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 to be:

- **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 (SoCG); and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

3.4. Dacorum is a very constrained area with significant amounts of the Borough in the Green Belt and/or included as part of the Chilterns Area of Outstanding Natural Beauty (CAONB). Dacorum is also home to parts of the Chilterns Beechwoods Special Area of Conservation (SAC), which has international protection. These are significant constraints, which influence the locations for new development in the Borough.

3.5. 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 have been developed and refined over time as evidence emerged. It was also subject to further testing and targeted engagement to develop the growth strategy contained in the consultation document. The Emerging Strategy for Growth has also been informed by a number of iterations of the Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) 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.

3.6. The Plan is being subjected to an Appropriate Assessment (AA) 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 Special Area of Conservation (SAC) taking into account any further mitigation that may be required in the Plan. This work is ongoing.

3.7. The development of the Local Plan is being informed by various evidence studies, key documents are listed in Appendix 3. Many of the studies have reached an advanced stage but are still in draft form. These will be finalised and published in due course. Finalisation of this background evidence work is not critical at this stage in the process, but will be essential for when the Local Plan is finalised.

- 3.8. The growth strategy has also been supported by separate work on infrastructure delivery. This has helped inform decisions on where growth can, or cannot, be accommodated. Work on the Infrastructure Delivery Plan is ongoing and will continue up to the point at which the Local Plan is submitted to the Secretary of State for Examination.
- 3.9. Officers have been working with the Member Local Plan Task and Finish Group over the last 18 months on the development of the consultation document.

4. Proposed Reforms to the Planning System

- 4.1. The Government has consulted on a range of major reforms to the planning system in its Planning White Paper and related matters. Members should be mindful that if taken forward these will have a fundamental impact on the plan-making process as we move to the new system and potentially the nature and content of the draft Plan over the coming years. While this does introduce uncertainties (including awaited details of transitional arrangements), Officers have, in the interim, incorporated a number of these key expected new approaches in advance of their formal introduction, where considered reasonable. This will ensure the Plan is better placed to respond to these reforms and to avoid later significant adjustments to its content, style and coverage. Cabinet should also note that advice from MHCLG at the current time is that Councils should continue with current work on Local Plans in progress
- 4.2. In particular, Officers have incorporated into the Plan the housing figure derived from the Government's proposed changes to the standard method for assessing housing need. This provides Dacorum with an initial figure of 922 homes per annum. The standard methodology will, in due course, also factor in other land constraints and this may mean that the housing figure in the Plan may be subject to future review. These changes, and the Planning White Paper, are currently subject to consultation.

5. The Main Provisions of the consultation document

- 5.1. The Council has set out to develop a strategy, which, as far as possible, accommodates its objectively assessed development needs. For housing, based on the most up to date information provided by Government, this constitutes 922 dwellings per annum, or 16,596 homes over the Plan period (2020 – 2038). The Council has made provision for 16,865 dwellings to provide a buffer. For employment the emerging growth strategy proposes 116,500 sqm of additional employment space to be provided across the Borough.
- 5.2. Given the scale of growth required and the lack of realistic alternative options, amongst other factors, the Council has concluded that exceptional circumstances exist to require the release of Green Belt land around settlements to meet future development needs.
- 5.3. The strategy set out in the Emerging Strategy for Growth proposes growth in all of the major towns and large villages in the Borough. Hemel Hempstead continues to be the focus of the majority of this growth (c.10,650 dwellings), with Berkhamsted (c.2,230 dwellings) and Tring (c.2,730 dwellings) also

included. Growth at Bovingdon (c.240 dwellings), Kings Langley (c.274) and Markyate (c.215) provide the majority of the remaining development with a further c.500 dwellings coming forward elsewhere in the Borough over the 18 year period of the Plan. A substantial proportion of growth will be provided in the existing built up areas (including on previously developed land) and through existing commitments and other existing allocations. The remaining growth will be within the Green Belt on the edge of existing settlements.

- 5.4. In addition to the growth outlined above, the growth strategy removes further land from the Green Belt around Hemel Hempstead to meet longer term development needs and deliver the Hemel Garden Communities programme. This land could deliver a further 4,000 homes but is not earmarked to come forward until after 2038.
- 5.5. The consultation document sets out the locations for the Green Belt development across the Borough. The Green Belt releases around Hemel Hempstead are to be provided to the north east of the town. Green Belt releases at Berkhamsted are to be located to the south and to the west of the town, with releases at Tring to the east and south east of the town. Smaller scale releases are proposed to the south of Bovingdon, to the east of Kings Langley and to the south of Markyate.
- 5.6. In addition to the proposed housing sites, the consultation document proposes a number of employment sites. These are largely focused in and around Hemel Hempstead but do include extensions to Bourne End Industrial Estate and an allocation as part of the development to the south east of Tring.

6. The Duty to Cooperate

- 6.1. The Council has been working with nearby authorities and other organisations under the requirements of the Duty to Cooperate (DTC). These discussions focus on strategic matters that affect more than one authority and include unmet housing, employment and infrastructure needs across the South West Herts Authorities (Dacorum, St. Albans, Watford, Three Rivers and Hertsmere). Engagement is ongoing but substantial alignment has been reached with many organisations on most issues. As such, the Council has started to prepare Statements of Common Ground / Memoranda of Understanding with these organisations, which have in turn informed the consultation document.
- 6.2. The Council has also contacted nearby authorities outlining the scale of growth that needs to be accommodated and seeking assistance to meet needs. The Council has been advised that other authorities are facing substantial growth challenges of their own, and are unlikely to be able to assist Dacorum, particularly in the case of housing. On employment, there is an acceptance that land to the east of Hemel Hempstead, in St Albans District, can contribute to meeting wider needs of the SWHA area, including Dacorum.
- 6.3. Members will be aware that the DTC is an ongoing process, but the Council will need to demonstrate it has satisfied the legal requirements by the time the Local Plan is submitted for Examination as the Duty cannot be addressed after submission. This point was further illustrated by the Inspectors presiding over the St Albans Local Plan.

6.4. Discussions will continue alongside the preparation of the Local Plan and the conclusions reached will be incorporated into the final Local Plan, where appropriate.

7. Structure of the Consultation Document

7.1. The consultation document is structured as follows:

- **Vision, Strategic Objectives and 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.
- **Guiding Development** – this section contains a number of our planning policies to influence development across the Borough. These are split into relevant sections that 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.
- **Delivery Strategies** – this section focuses on Dacorum's places and how these will change over the Plan period.
- **Proposals and Sites** - this section contains site specific policies for each of the key growth and renewal areas identified in the delivery strategies.

8. The consultation

8.1. Subject to Cabinet approval, the consultation is expected to commence in November and run for 8 weeks. This is two weeks longer than the time period stipulated in the Statement of Community involvement (SCI) and takes into account of the Christmas and New Year period. It also provides additional time for residents to engage in the process given the current COVID-19 restrictions. Officers will be undertaking substantially more online engagement throughout the consultation, including hosting virtual exhibitions instead of large public gatherings.

8.2. The Council adopted its SCI on the 18th September 2019. However, to prevent the spread of COVID-19 a number of commitments made in the SCI are temporarily not possible.

8.3. It is therefore proposed to add an Addendum to the SCI setting out the temporary changes necessary. These include not depositing documents at the Berkhamsted and Tring offices during the consultation as both are expected to remain closed throughout. In addition, we will be amending the protocols on inspecting hard copies of the document to ensure this can be done safely. Each of the changes proposed is explained in Appendix 2. These changes are necessary to allow the Local Plan to progress in line with the adopted Local Development Scheme.

- 8.4. Once the consultation closes we will carefully review all responses received before considering what changes to make to the Plan. These comments, together with our response, will be made public after the consultation has closed.
- 8.5. Officers will continue to develop the evidence base underpinning the Plan and take into account the findings from these. This includes the work underway on the Appropriate Assessment (AA) under the Conservation of Habitats and Species Regulations 2017 (as amended), the outcome of the ongoing development of the IDP and the whole Plan viability assessment.
- 8.6. The Council will consider these issues (and others as appropriate) in finalising the Plan and publishing this under Regulation 19 before being submitted to the Secretary of State for Public Examination. This may include changes to specific policies or sites that are currently included in the Plan.
- 8.7. We will also continue with discussions under the DTC to ensure that we have discharged our obligations appropriately and the conclusions from our engagement are reflected in the Draft Plan at Regulation 19 stage.
- 8.8. Before finalising the Plan, we will need to consider any changes to legislation and/or Government guidance arising from the recently published Planning White Paper consultation and the other changes announced.

9. Next Steps

- 9.1. At its meeting on 18 November 2020, Full Council will consider the Emerging Plan and any changes proposed by Cabinet prior to the consultation. Officers will advise Full Council on whether the changes proposed by Cabinet are such that further work will be needed to be undertaken prior to the consultation taking place.

**Appendix 1: Dacorum Local Plan (2020 – 2038): Emerging Strategy for Growth
(for consultation)**

Attached separately

Appendix 2: Temporary changes to the Statement of Community Involvement

This document establishes a temporary addendum in respect of the Council's standards for involving the community in the planning process, in relation to the Government requirements for preventing the spread of COVID-19 and reflecting the adaptations in service delivery.

This addendum should be read alongside the original adopted Statement of Community Involvement (SCI) which can be found on our website

- https://www.dacorum.gov.uk/docs/default-source/strategic-planning/statement-of-community-involvement---adopted-september-2019.pdf?sfvrsn=3f71099e_4

These proposed amendments are temporary and apply only to the upcoming consultation on the **Dacorum Local Plan 2020-2038 - The Emerging Strategy for Growth** under Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The changes are necessary to ensure the Council can prepare the Local Plan in accordance with its adopted Local Development Scheme. Once this consultation closes the Council will revert back to the original Statement of Community involvement adopted September 2019.

The purpose of the SCI is to outline the Council's standards for community involvement in the planning process and to identify ways these standards will be achieved. The latest version of the SCI was adopted in September 2019.

National Planning Practice Guidance (PPG) has recently been updated due to the COVID-19 Pandemic and recommends 'Where any of the policies in the Statement of Community Involvement cannot be complied with due to current guidance to help combat the spread of coronavirus (COVID-19), the local planning authority is encouraged to undertake an immediate review and update the policies where necessary so that plan-making can continue'¹.

The updated guidance then goes on to state that 'The local planning authority should then make any temporary amendments that are necessary to allow plan-making to progress'².

The Government also introduced temporary changes to regulations through the Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020. The changes included omitting Regulation 35(1)(a) for the period 16/07/2020 to 31/12/2020.

There are a number of ways in which the council is having to adapt the approach to planning decisions and plan making. These changes are necessary to allow plan-making to progress and that we continue to promote effective community engagement by means which are reasonably practicable.

The following table sets out the specific temporary amendments which are required to the SCI and explains the reasons for these:

¹ National Planning Policy Guidance: Delivery of strategic matters (077 Reference ID: 61-077-201200513)

² National Planning Policy Guidance: Delivery of strategic matters (078 Reference ID: 61-078-201200513)

SCI Section	SCI Reference	Change to SCI	Explanation
<p>Section 4 – Table 1 Methods of Communication during consultation</p>	<p>“Making documents available for inspection at specified ‘Deposit Points’ within the Borough is a minimum requirement set by planning regulations. Deposit points are the Borough Council Offices in Hemel Hempstead, Berkhamsted and Tring.”</p>	<p>“Making documents available for inspection at a specified ‘Deposit Point’ within the Borough is a minimum requirement set by planning regulations. This Deposit point is the Borough Council Office in Hemel Hempstead”</p>	<p>Regulation 35 states that a document is taken to be made available when - made available for inspection, at their principal office and at such other places within their area as the local planning authority consider appropriate, during normal office hours.</p> <p>For the purposes of the SCI ‘Deposit Points’ are the Borough Council Offices in Hemel Hempstead, Berkhamsted and Tring.</p> <p>The Forum in Hemel Hempstead is the principal office and will remain open to the public on an appointment only basis. Those wishing to access the document from this office will need to contact the Strategic Planning team in order to book an appointment.</p> <p>The customer service units at Berkhamsted and Tring council offices are closed to the public currently with no plans to re-open during the consultation period. Therefore the council cannot make the document available for inspection at these locations.</p>
<p>Section 4 – Table 1 Methods of Communication during consultation</p>	<p>“Copies of documents are also sent to local libraries within the area and are usually held within the reference section.”</p>	<p>“Copies of documents are also sent to local libraries within the area which are COVID-19 secure and open to the public. These will be available on a loan service as customer browsing hours are</p>	<p>The council has engaged with the County Council in providing hard copy documents in Dacorum Libraries.</p> <p>Therefore, a loan service will be available from Hemel Hempstead, Berkhamsted and Tring libraries.</p>

		limited during the pandemic.”	
Section 4 Table 2 - Methods to overcome consultation challenges	“Documents will be made available in paper form as well as online. The community is able to access online services by using the public computers at either Dacorum’s council offices or within the local libraries.”	“Documents will be made available in paper form as well as online. The community is able to access online services by using the public computers within the local libraries which are open to the public.”	It is possible to book the use of a public computer at The libraries in Hemel Hempstead, Berkhamsted and Tring for a maximum of one hour. There is no use of public computers at the offices at Berkhamsted and Tring as they remain closed to the public.
Section 5 when will we consult – Stage 1 Prepare Plan (Regulation 18) Page 27	“How will Dacorum Borough Council Consult? (6 th bullet point) Make plans available on our website and at deposit points.”	“How will Dacorum Borough Council Consult? (6 th Bullet Point) Make plans available on our website and at the deposit point on an appointment only viewing basis.”	For the purposes of this consultation the deposit point is the principal office at the Forum Hemel Hempstead. This remains open to the public on an appointment only basis. The Council is committed to making a hard copy document available at this deposit point and will make documents available online on the strategic planning website. Arrangements will be made to arrange the purchase of a hard copy document in the post (call 01442 228660 or email strategic.planning@dacorum.gov.uk for more information).

Library opening hours can be found at the Hertfordshire County Council Libraries website: <https://www.hertfordshire.gov.uk/services/Libraries-and-archives/Library-opening-hours/Library-opening-hours-and-locations.aspx> alongside how to book use of a public computer.

In the event of changes by the Government to the requirements for preventing the spread of COVID-19, this addendum will be reviewed and either updated or suspended, as appropriate. If you have any questions on any of the changes outlined in this addendum please contact the planning policy team

- Email: strategic.planning@dacorum.gov.uk
- Phone: 01442 228660

Appendix 3: Evidence studies being prepared to support the Dacorum Local Plan (2020 – 2038) *(Not exhaustive – those studies that are completed will be published alongside the consultation. Other documents will be published when complete).*

Habitats Regulation Assessment: Updated Scoping Report

Habitats Regulation Assessment: Appropriate Assessment

Sustainability Appraisal/Strategic Environmental Assessment

Green Belt Review (Stage 1)

Green Belt Review (Stage 2)

Green Belt Review (Stage 3) and Landscape Assessment

Urban Capacity Study

Gypsy and Travellers Study

Greenfield Site Assessment Study

COMET (traffic) Modelling

Berkhamsted and Tring Sustainable Transport Strategy

Hemel Hempstead Sustainable Transport Study

Infrastructure Delivery Plan

Local Plan Viability Assessment inc. strategic sites viability

SW Herts Strategic Flood Risk Assessment - SFRA 1

Dacorum Strategic Flood Risk Assessment - SFRA 2

Open Space, indoor leisure and playing pitch study

Green Infrastructure Strategy – 1 for Hertfordshire and 1 for Dacorum

SW Herts Economic Study (2016)

SW Herts Economic Study Update (2019)

Employment Land Availability Assessment

SW Herts Retail and Leisure Study

Further Dacorum Retail Study

SW Herts Strategic Housing Market Assessment (2016)

SW Herts Local Housing Needs Assessment (2020)

Custom and Self Build Demand Assessment Framework

Site allocation evidence: site appraisals, specific masterplans / supporting documents where appropriate.

Appendix 4: Community Impact Assessment of the Dacorum Local Plan (2020 – 2038): Emerging Strategy for Growth (for consultation)

Dacorum BC Community Impact Assessment (CIA)	
Policy / service / decision	Dacorum Local Plan 2020-2038 Emerging Strategy for Growth
<p>Description of what is being impact assessed</p> <p><i>What are the aims of the service, proposal, project? What outcomes do you want to achieve? What are the reasons for the proposal or change? Do you need to reference/consider any related projects?</i></p> <p><i>Stakeholders; Who will be affected? Which protected characteristics is it most relevant to? Consider the public, service users, partners, staff, Members, etc</i></p> <p><i>It is advisable to involve at least one colleague in the preparation of the assessment, dependent on likely level of impact</i></p>	
<p>Dacorum Local Plan 2020-2038 Emerging Strategy for Growth.</p> <p>This consultation is being carried out in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012 and the Environmental Assessment of Plans and Programmes Regulations 2004. This CIA focuses on the overarching development principles and the public engagement that is essential to this part of the local plan process</p> <p>The requirement to prepare a Local Plan is set out in Section 13 Planning and Compulsory Purchase Act 2004 as amended by the Neighbourhood Planning Act 2017, Regulation 10A of the Town and Country Planning (Local Planning) Regulations 2012 requires Local Plans to be reviewed every five years. The NPPF states that Councils must regularly update Local Plans.</p> <p>Whilst the report is for information only the Local Plan will affect anyone who lives in, studies in, works in, visits, or has an interest in Dacorum, such as:</p> <ul style="list-style-type: none"> • The community (residents, businesses, voluntary and specialist groups (i.e. residents associations) • Those who engage in planning matters in Dacorum • Parish, Town and County Councils (including those surrounding Dacorum) • Interested developers, landowners and agents • Statutory consultees and various partners • Council staff and elected members <p>The consultation carried out as part of the preparation of the Local plan, in accordance with the council's adopted Statement of Community Involvement (SCI) (as temporarily amended) and Local Development Scheme (LDS) and this will involve the community and other organisations and interested parties at different stages of plan preparation.</p>	

The Local Plan seeks to promote social inclusion and ensure that all people (including vulnerable groups) have access to the services and opportunities that they may need such as housing, employment, public transport and community facilities (e.g. education, health and local shopping). This will work towards meeting the public sector equality duty as the needs of these individuals are being incorporated into the Local Plan.

Evidence

What data/information have you used to assess how this policy/service/decision might impact on protected groups? *(include relevant national/local data, research, monitoring information, service user feedback, complaints, audits, consultations, CIAs from other projects or other local authorities, etc.). You should include such information in a proportionate manner to reflect the level of impact of the policy/service/decision.*

The CIA has been prepared following an iterative process. This involved identifying the likely impacts arising from each draft policy and then considering these impacts as positive, negative or neutral in light of the thrust of the relevant policy. This was set against known facts, information and evidence gathered from the Council's robust evidence base which underpins the Local Plan and which relates specifically to the protected characteristics listed in the Equality Act 2010.

Recommendations on ways by which the negative impacts could be removed or mitigated and the positive impacts strengthened were then sought. The draft policies affected are then reconsidered and re-examined again in the same iterative process until they emerge with no known negative impacts and became more acceptable.

Who have you consulted with to assess possible impact on protected groups? *If you have not consulted other people, please explain why? You should include such information in a proportionate manner to reflect the level of impact of the policy/service/decision.*

This version of the Plan is informed by the previous consultation stages as outlined below and evidence studies. In terms of the consultation on the Issues and Options consultation in 2017 all consultees including organisations and individuals on the Council's consultation database were e mailed directly and notified on the consultation process. The following bodies which represent the interest of the protected groups were emailed directly:

- 45 Clubs and societies
- 15 Community network groups
- 10 Disability groups
- 11 Ethnic minority groups

- 3 Local strategic partnership groups
- 18 Voluntary organisations

Analysis of impact on protected groups (and others)

The Public Sector Equality Duty requires Dacorum BC to eliminate discrimination, advance equality of opportunity and foster good relations with protected groups. Consider how this policy/service/decision will achieve these aims. Using the table below, detail what considerations and potential impacts against each of these using the evidence that you have collated and your own understanding. Based on this information, make an assessment of the likely outcome, **before** you have implemented any mitigation.

- *The PCs of Marriage and Civil Partnership and Pregnancy and Maternity should be added if their inclusion is relevant for impact assessment.*
- *Use “insert below” menu layout option to insert extra rows where relevant (e.g. extra rows for different impairments within Disability).*

Protected group	<p>Summary of impact</p> <p><i>What do you know? What do people tell you? Summary of data and feedback about service users and the wider community/ public. Who uses / will use the service? Who doesn't / can't and why? Feedback/complaints?</i></p>	Negative impact / outcome	Neutral impact / outcome	Positive impact / outcome
Age	<p>Policy DM9 Housing for Older people is specifically positive for those requiring specialist accommodation as their requirements and needs change. This policy identifies the need for different forms of accommodation to ensure the correct care can be provided, and so more people can continue to live independently. In addition policy DM10 accessible and adaptable dwellings will benefit older people who require additional support in order to retain independence.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<p>Policy SP13 delivering high quality design – setting the requirement to comply with the dacorum design guidance, specifies the need to integrate facilities and housing in order to increase opportunities for socialisation and reduce loneliness. The design guide also refers to creating places which encourage people from all ages to be able to be more active.</p> <p>Policy DM42 crime and security will have a positive impact on this group as statistically those who fall under this protected characteristic are more vulnerable to experiencing crime and the fear of crime itself.</p> <p>Policy DM64 community facilities is particularly positive for those with children and those who are more likely to access services. Providing community infrastructure to facilitate services can have a positive impact on addressing poverty and loneliness indicators.</p> <p>Policy DM61 education is beneficial for children as it will enable the delivery of schools. Policy DM63 Open space will also specifically benefit young people and children as it provides them with play space.</p>			
<p>Disability (physical, intellectual, mental)</p> <p><i>Refer to CIA Guidance</i></p>	<p>Policy DM10 Accessible and adaptable housing has positive impacts on those who require specialist accommodation in order to live independently. This will allow for more inclusive development.</p>	<p>□</p>	<p>□</p>	<p>☒</p>

<p>Notes and Mental Illness & Learning Disability Guide</p>	<p>Policy SP13 Delivering high quality design will have a particularly positive impact on those with disabilities as it specifies the use of the Dacorum Strategic Design Guide and encourages that places should be accessible for those with physical disabilities, but they should also be legible and inclusive for those with mental and learning disability.</p> <p>Furthermore policy DM42 crime and security will have a positive impact on this group as statistically those who fall under this protected characteristic are more vulnerable to experiencing crime and the fear of crime itself.</p>			
<p>Gender reassignment</p>	<p>The Draft Local Plan is neutral with regards to gender-reassignment or gender identity.</p>	<p>☐</p>	<p>☒</p>	<p>☐</p>
<p>Race and ethnicity</p>	<p>With the exception of Gypsy & Travellers housing needs, the plan is considered to be neutral in terms of race.</p> <p>Specifically policies DM13 and DM14 consider those from the travelling communities with identified sites for nomadic gypsies and travellers, and a criteria based approach for non-nomadic gypsies and travellers, to meet their needs. These policies are considered to have a positive impact on this specific ethnic group.</p>	<p>☐</p>	<p>☐</p>	<p>☒</p>
<p>Religion or belief</p>	<p>Policy DM64 protects against the loss of community facilities and enables provision for new facilities / enhancement of existing facilities. This policy has potential to have a</p>	<p>☐</p>	<p>☐</p>	<p>☒</p>

	positive impact on this characteristic as places of worship are community facilities defined within the national planning policy framework.			
Sex	The plan is considered to be neutral with regards to biological sex.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sexual orientation	The plan is considered to be neutral with regards to sexual orientation.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Not protected characteristics but consider other factors, e.g. carers, veterans, homeless, low income, loneliness, rurality etc.	<p>The impact is district wide. It will have an impact on everyone who lives, works, plays, visits or travels in the District. This includes businesses, local services, Parish and Town Councils, councillors, land owners and developers.</p> <p>The introduction of Health Impact Assessments in Policy DM60 requires major development to consider specific impacts of their development for all protected and those who fall under other categories at a planning application level.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Negative impacts / outcomes action plan</p> <p>Where you have ascertained that there will potentially be negative impacts / outcomes, you are required to mitigate the impact of these. Please detail below the actions that you intend to take.</p>				
Action taken/to be taken <i>(copy & paste the negative impact / outcome then detail action)</i>	Date	Person responsible	Action complete	
n/a	Select date		<input type="checkbox"/>	

	Select date		<input type="checkbox"/>
	Select date		<input type="checkbox"/>
	Select date		<input type="checkbox"/>
	Select date		<input type="checkbox"/>
	Select date		<input type="checkbox"/>
	Select date		<input type="checkbox"/>
	Select date		<input type="checkbox"/>

If negative impacts / outcomes remain, please provide an explanation below.

n/a

Completed by (all involved in CIA)

Alex Robinson – Strategic Planning Manager

Date

30.09.2020

Signed off by *(AD from different Directorate if being presented to CMT / Cabinet)*

James Doe – Assistant Director

Date

30.09.2020

Entered onto CIA database - date	
To be reviewed by (officer name)	n/a
Review date	n/a

Appendix 5: Views of SPAEOSC together with officer response.

The Committee congratulates Officers for their production of a commendably professional and comprehensive draft plan for growth in Dacorum that goes well beyond the period of 2020-38 which is demanded by the new Local Plan. The document is clearly directed at professionals in planning such as developers and government inspectors and is in many ways constrained by central government policy such as housing targets that we consider to be unwarranted and unjustified and that will not be welcomed by our residents. The Committee therefore recommends that:

1. **A version of the document should be produced especially for the public consultation that concentrates specifically on a new Local Plan and which places all elaboration of growth policy beyond the period of that plan in appendices. This will have the effect of simplifying the description of the plan for the public whilst omitting nothing. But it will not require their consideration of putative developments that are so far in the future that they may not come to pass. After all, we live in a period of flux and policies and even governments may change long before 2038.**

Officer Response:

Officers will be producing a separate document summarising the main provisions of the Local Plan. In addition to this, a video will be prepared explaining the Local Plan. With reference to potential growth beyond 2038, the Local Plan does indicate that further land has been safeguarded at Hemel Hempstead to meet longer term development needs. Whilst not to be developed until after the Plan period its indication now is important to ensure longer term infrastructure planning. Officers will ensure the public consultation material makes clear that growth indicated beyond this Local Plan will only be brought forward by the Council following a further Local Plan process (and all the consultation and oversight therein).

Officer Recommendation: Officers produce a short summary document to accompany the Local Plan consultation.

2. **For the same reason no land should be released from the green belt immediately unless that land is required for development before 2038. The document will state that Council's policy is to safeguard such land for development if required and thus demonstrate that we have the requisite land supply for future growth areas beyond 2038.**

Officer Response:

All allocations made in the Local Plan are to meet (including Green Belt releases) is to meet development needs arising between 2020 and 2038. The justification for identifying 'safeguarded land' to the north of Hemel Hempstead is explained in point 1.

Officer Recommendation: No change recommended to the consultation document.

- 3. To further limit loss of the green belt, in advance of planning applications, master plans should be developed for each major allocated housing site in the new local plan. These master plans should delimit areas for dwellings, infrastructure areas (including buildings roads and paths) and designated open spaces areas (including sports grounds and other leisure facilities).**

Officer Response:

The Council requires Masterplans (to be adopted as SPDs) for the major Green Belt releases at Hemel Hempstead, Berkhamsted and Tring. These will be supported by Development Parcel Design Codes which will inform subsequent planning applications. These will define areas for, amongst other things, dwellings, infrastructure and designated open spaces. The Plan requires that these are prepared in collaboration with key partners and be supported by community and stakeholder engagement.

For Green Belt releases at Bovingdon, Kings Langley and Markyate the Local Plan states that Design Codes will be prepared jointly by the Council and by Parcel developers, with community engagement.

Officer Recommendation: No change recommended to the consultation document.